

COMMONWEALTH OF KENTUCKY
PUBLIC SERVICE COMMISSION

BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

In the Matter of)
)
Application of BellSouth) Case No. 2001-105
Telecommunications, Inc. to Provide)
In-Region InterLATA Services Pursuant)
To Section 271 of the)
Telecommunications Act of 1996)

**AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.'S
AND TCG OHIO, INC.'S FIRST DATA REQUEST TO BELLSOUTH
TELECOMMUNICATIONS, INC.**

AT&T Communications of the Southern States, Inc. and TCG Ohio, Inc. (collectively "AT&T") serve upon BellSouth Telecommunications, Inc. ("BellSouth") the following written interrogatories to be answered under oath by an officer or agent of BellSouth on or before August 5, 2001.

INSTRUCTIONS FOR USE AND DEFINITIONS

1. All information is to be divulged which is in the possession of BellSouth, its attorneys, investigators, agents, employees, or other representatives of BellSouth and/or its attorneys.
2. Where an Interrogatory calls for an answer which involves more than one part, each part of the answer should be clearly set out so it is understandable.
3. In the event the space provided on the form of Interrogatories is not sufficient for your answer to any of the Interrogatories, please attach a labeled, separate sheet of paper with the additional information.

4. These Interrogatories are intended as continuing Interrogatories, requiring you to supplement your answer, setting forth any information within the scope of the Interrogatories that may be acquired by you, your agents, your attorneys, or representatives at any time following the date of your original answer.

5. To the extent BellSouth has previously provided a response to any Interrogatory or has provided documents responsive to any of the following data requests in Kentucky or any other state in any other proceeding in which both BellSouth and AT&T are parties, BellSouth need not respond to such Interrogatory or document request again, but rather may respond to such Interrogatory or document request by identifying the prior response to such Interrogatory or document request by state, proceeding, and specifying the Interrogatory, by identifying.

6. To the extent BellSouth previously has provided documents in Kentucky or any other state in any proceeding which are responsive to any of the following requests for production, BellSouth need not produce such documents again, but rather may satisfy such request by identifying the prior production of such documents by state, proceeding, and specific request for production; provided however, that BellSouth indicate in its response that the prior production remains accurate, current and complete.

7. "State all facts" or "state the factual basis" means to set forth in writing and in detail every fact, opinion, assumption, belief, hypothesis, and theory, concerning or relating to the matter inquired about in the Interrogatory, whether these are matters of your own observation and actual knowledge, or are matters which you have become aware of through some other means or through some other person. It furthermore means to set forth in writing in detail how and when you came to observe or have actual knowledge of the matter and how and

when you became aware of the matter through some other means or person. It also means to identify all such persons through whom you became aware of the matters.

8. When used with reference to natural persons, the word “identify” or “identity” or the phrase “give the identity of” means to state his or her full name, present or last-known address, present or last-known employer, present or last-known telephone number, occupation or profession, and the capacity in which he or she has ever been affiliated with BellSouth.

9. When used with reference to a document, the word “identify” or “identity” or the phrase “give the identity of” means to state the type of document to which the Interrogatory is addressed (i.e., correspondence, memoranda, notes, etc.); its title or other means of identification; its author’s identity; its date; the identity of all recipients of the document (whether the document is addressed to such recipient or merely copied to such recipient); all dates and places of recording or filing with any court, commission, or public agency; the book and page number, or cause number, and all other information reflecting recordation or filing; the present location and identity of the custodian of the original document; the present location and identity of all the persons having a copy of such document; and whether such original or copy of the document is presently in your possession or control, and, if it is not, what disposition was made of it. In the alternative, the document(s) in question may be attached to the answer to that particular Interrogatory.

10. “Documents” is to be construed in the broadest possible sense and means any tangible thing, recording and reproduction, whether visual, auditory or digital in BellSouth’s possession, control, or custody, including without limiting the generality of its meaning, correspondence, pleadings, reports, depositions, personal memoranda, memoranda to files, inter-office memoranda, intra-office memoranda, drawings, prints, graphs, charts,

photographs, phonographs, notes, studies, valuations, analyses, reports (whether expert or otherwise), reviews, working papers, books, notes, telegrams, pamphlets, video or audio tapes, voice recordings, computer tapes, printouts or cards, microfilms, microfiches, and any papers or items on which words have been written, printed, typed, or otherwise affixed, and shall mean a copy when the original is not in the possession, control, or custody of BellSouth, and shall mean every copy of every document when such a copy is not an identical copy of an original.

11. "Person" shall mean and is defined as any natural person, proprietorship, association, partnership, corporation or any business entity, to include in the singular as well as the plural.
12. "You" or "yours" means BellSouth and any agents or employees thereof.
13. The "Georgia OSS Test" refers to the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia, ordered by the Georgia Public Service Commission ("GPSC") in Docket No. 8354-U and summarized in the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia Master Test Plan and Supplemental Test Plan Final Report Version 1.0 submitted by KPMG Consulting, Inc. ("KCI") on March 20, 2001.
14. The "Florida OSS Test" refers to the BellSouth Telecommunications, Inc. OSS Evaluation – Florida, ordered by the Florida Public Service Commission ("FPSC") in Docket Nos. 981834-TP and 960786-TL.
15. "Status Report" refers to any KCI Interim Status Reports.
16. Some of these requests seek documents relating to Operational Support Systems ("OSS") testing in Georgia and Florida. Requests regarding the Georgia OSS Test seek documents created after May 20, 1999, the date of the Georgia Public Service Commission Order instituting the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia.

Requests regarding the Florida OSS Test seek documents created after August 9, 1999, the date of the Florida Public Service Commission Order instituting the BellSouth Telecommunications, Inc. OSS Evaluation – Florida.

17. An objection of attorney-client privilege or work-product in response to an Interrogatory or Document Request is not an excuse for a complete failure to respond. If you have such an objection, you are instructed to state fully the grounds for such objections, specifying, in the case of attorney-client privilege: (1) what type of communication is involved (letter, oral communication, memorandum, etc.), (2) the identities of all persons who are or were ever privy to the contents of such communications, (3) the general subject matter of the communication, (4) the date of and place where the communication was made, and (5) the general nature of the subject matter of the legal advice that was being sought or rendered, during the course of which such communication took place; and in the case of work-product privilege: (1) the identity of the attorney or person acting at the request or counsel who developed the work-product, (2) what the form of the work product is (letter, memorandum, etc.), (3) the identity of all persons who ever have been privy to the contents of such work-product, (4) the date it was prepared, (5) what litigation it was prepared in anticipation of, and (6) the basis for your contention that it was “prepared in anticipation of litigation.” Where such a privilege is asserted as to any document, you are instructed to prepare and submit to this defendant a list of all such documents together with the information supporting the claim of privilege and the identity of all such documents should be included as a part of your response to the requests for production of documents.

INTERROGATORIES

INTERROGATORY No. 1: Please identify all persons who provided any information for purposes of answering these interrogatories and for each person identify the Interrogatory with which that person assisted.

ANSWER:

INTERROGATORY No. 2: Identify the name, title, and business address of one or more subject matter experts, officers, directors, managing agents, or other person(s) most knowledgeable about and responsible for implementing the change control processes used to manage changes made to interfaces and processes provided to Competitive Local Exchange Carriers (“CLECs”).

ANSWER:

INTERROGATORY No. 3: Identify the name, title, and business address of one or more subject matter experts, officers, directors, managing agents, or other person(s) most knowledgeable about and responsible for implementing the OSS functionality provided to BellSouth’s retail operation in comparison to that which is provided to CLECs, including certain issues pending in the change control process, such as:

- a) the provision of parsed customer service records for pre-ordering;
- b) the provision of the ability to submit orders electronically for all services and elements; and
- c) the provision of electronic processing after electronic ordering, without subsequent manual processing by BellSouth personnel.

ANSWER:

INTERROGATORY No. 4: Identify the name, title, and business address of one or more subject matter experts, officers, directors, managing agents, or other person(s) most knowledgeable about the responsible for implementing the change control processes used to manage changes made to interfaces and processes used in BellSouth's retail operations.

ANSWER:

INTERROGATORY No. 5: Identify the name, title, and business address of one or more subject matter experts, officers, directors, managing agents, or other person(s) most knowledgeable about BellSouth's ability to provide a full function, machine-to-machine, maintenance and repair interface that is capable of integration by CLECs.

ANSWER:

INTERROGATORY No. 6: Please identify all individuals involved in the tasks listed below, and describe the nature and time period of each individual's involvement in that task. Please provide the information organized in response to the following subparts and indicate which individual is best able to provide information on the details of the topic referenced in the subpart.

- (a) Negotiations surrounding the initial engagement of KCI for third-party testing of OSS in Georgia and any subsequent engagement between BellSouth and KCI;
- (b) the drafting or revision of any and all fee arrangements or contracts for hire that reflect an agreement for Georgia OSS Test work performed by KCI, by version;
- (c) the development, review and/or revision of the Georgia and Florida OSS Tests Master Test Plans including any supplemental test plans, by version, including decisions regarding the scope of the Georgia and Florida OSS Tests;
- (d) the implementation of the Georgia and Florida OSS Test Master Test Plans including all supplemental test plans;
- (e) the collection or reporting of data or supporting information under the Georgia and Florida OSS Test Master Test Plans, including all supplemental test plans;
- (f) for each test domain, the identification of exceptions under the Georgia and Florida OSS Test Master Test Plans, including all supplemental test plans;
- (g) for each exception report, the resolution or closure of exceptions under the Georgia and Florida OSS Test Master Test Plans, including all supplemental test plans;
- (h) the drafting and revision of the Georgia OSS Test Master Test Plan Final Report and the Supplemental Test Plan Final Report.

(i) the existence and extent of competition for local service in Kentucky

ANSWER:

INTERROGATORY No. 7: Please identify each meeting and telephone call among or between BellSouth, KCI, and/or representatives of the GPSC, whether or not the meeting and telephone call was attended by others, and for each meeting and telephone call, identify both the invited persons and the attendees, and describe the purpose of the meeting and telephone call. Please indicate which of the meetings and telephone calls were regularly scheduled meetings and telephone calls set by a published schedule. Please identify all documents referred to and all persons consulted to develop the response to this Interrogatory.

ANSWER:

INTERROGATORY No. 8: Please identify the participants in each of the weekly conference calls referenced in the Georgia Status Reports.

ANSWER:

INTERROGATORY No. 9: Please identify all individuals who drafted or revised all plans or reports submitted to the GPSC during the course of the Georgia OSS Test and for each, identify the report drafted or revised.

ANSWER:

INTERROGATORY No. 10: Please identify all individuals who drafted or revised all documents, plans or reports submitted to the FPSC during the course of the Florida OSS Test (beginning with the creation of the Master Test Plan and all periods thereafter) and for each, identify the report drafted or revised.

ANSWER:

INTERROGATORY No. 11: Please describe the policies and procedures KCI employed in the Georgia and Florida OSS Tests, identify any input by BellSouth as to the policies and procedures and specify the ways in which these policies and procedures differ, if any, from Generally Accepted Auditing Principles and/or standards promulgated by the American Institute of Certified Public Accountants.

ANSWER:

INTERROGATORY No. 12: Please identify all of the differences between the procedures, testing, monitoring and reporting KCI has used and is using in the Georgia OSS Test and the procedures used in a review or test of BellSouth's Operational Support Systems in other states, including, but not limited to Florida. Please explain how these differences relate to data reporting and test results.

ANSWER:

INTERROGATORY No. 13: Please identify all electronic, telephonic or other communication received from any third party, including CLECs, regarding exceptions, conduct, scope, assumptions, problems, deficiencies, concerns, or any other issues related to the Georgia and Florida OSS Tests. For each communication, please describe how the third party communication was processed, to whom the information was disseminated, and any resulting action.

ANSWER:

INTERROGATORY No. 14: Please describe the process by which the Georgia OSS Test Master Test Plan was developed. Please identify and describe each revision to the Master Test Plan and for each describe the date of the revision, the basis for the revision, and the impact of the revision on the Georgia OSS Test.

ANSWER:

INTERROGATORY No. 15: Please identify and describe the standard, if any, for military testing used in designing the Georgia and Florida OSS Tests, including, but not limited to, any differences between the two tests.

ANSWER:

INTERROGATORY No. 16: The Georgia Master Test Report states at Page II-6 that “[i]n a military style test, a mindset of ‘test until you pass’ was generally adopted.” Please identify all of the tests in the Georgia OSS Test in which KCI deviated from military testing and, for each test, explain the basis for the deviation.

ANSWER:

INTERROGATORY No. 17: Please describe the methodology used to select sample sizes in the Georgia and Florida OSS Tests for each test by individual test or, if appropriate, by

groups of tests, and identify the individuals responsible for developing and implementing that methodology.

ANSWER:

INTERROGATORY No. 18: For the Georgia OSS Test, please identify each test for which sample size or methodology was changed during any retest and describe the basis for each change. For each change, please identify the individuals involved in determining that the change should be made, their qualifications for making that determination, the standard and/or methodology they applied, and the factors that informed their decision.

ANSWER:

INTERROGATORY No. 19: For the Georgia and Florida OSS Tests, please identify all exceptions for which further testing was conducted after issuance of the closure report and describe the nature and results of that testing.

ANSWER:

INTERROGATORY No. 20: For the Georgia and Florida OSS Tests, please identify all exceptions that were closed based upon proposed fixes. For each exception, please identify the individuals involved in determining the exception should be closed, their qualifications for

making that determination, the standards they applied, the criteria established for retest, and the basis upon which they accepted a proposed fix rather than requiring the fix to be implemented and tested.

ANSWER:

INTERROGATORY No. 21: Please identify all tests which were considered for inclusion in the Georgia and Florida OSS Tests. For each test in each state, please identify the basis upon which the decision to include or exclude the test was made. Please also identify all individuals involved in making the decision for each test and describe the standards they applied.

ANSWER:

INTERROGATORY No. 22: Please provide the definition and meaning of the phrase “no adverse impact on competition” as it is used in the Georgia OSS Test and explain how it relates to test results, as well as identify the individuals involved in making that determination, their qualifications for making that determination, the standard and/or methodology they applied, and the factors that informed their decision.

ANSWER:

INTERROGATORY No. 23: Please describe all parameters of each test bed account in the Georgia and Florida OSS Tests.

ANSWER:

INTERROGATORY No. 24: Please explain whether any test results, including but not limited to results from work done prior to September 9, 1999, were excluded from the Georgia OSS Test Final Report. If so, identify and describe the excluded data and for each item describe why it was excluded.

ANSWER:

INTERROGATORY No. 25: For each “draft exception” report that was withdrawn in the Georgia OSS Test, please identify the individuals involved in making the withdrawal determination, their qualifications for making that determination, the standard they applied, and the factors that informed their decision.

ANSWER:

INTERROGATORY No. 26: For the Georgia and Florida OSS Tests, please identify each test in which KCI acted as if it were a CLEC. For each of these tests, please specify whether KCI was identifiable to BellSouth.

ANSWER:

INTERROGATORY No. 27: Please describe the process by which volume testing for capacity management testing was conducted in the Georgia and Florida OSS Tests.

ANSWER:

INTERROGATORY No. 28: Please identify all order types that are designed to fall out of the mechanized order process in the Georgia and Florida OSS Tests. For each order type, describe the basis for the design choice.

ANSWER:

INTERROGATORY No. 29: In connection with the Georgia and Florida OSS Tests, please describe the standard against which KCI evaluated BellSouth's change management process and the basis for the choice of that standard.

ANSWER:

INTERROGATORY No. 30: Please describe any CLEC interviews conducted as part of the Georgia OSS Test, including but not limited to an identification of the CLECs interviewed, a description of the subjects discussed, and the use made of the information gathered during those interviews.

ANSWER:

INTERROGATORY No. 31: Please describe any CLEC interviews conducted as part of the Florida OSS Test, including, but not limited to, an identification of the CLECs interviewed, a description of the subjects discussed, and the use made of the information gathered during those interviews.

ANSWER:

INTERROGATORY No. 32: Please describe the information available to Hewlett Packard (“HP”) for purposes of constructing the TAG and EDI interfaces for the Georgia OSS Test. Did HP rely solely on this information or did it receive assistance? If HP received assistance, please identify the source and extent of the assistance.

ANSWER:

INTERROGATORY No. 33: Please describe all communications between BellSouth and HP in connection with the Georgia OSS Test.

ANSWER:

INTERROGATORY No. 34: Please describe the information available to KCI for purposes of constructing the TAG and EDI interfaces for the Florida OSS Test. Did KCI rely solely on this information or did it receive assistance? If KCI received assistance, please identify the source and extent of the assistance.

ANSWER:

INTERROGATORY No. 35: For the Georgia and Florida OSS Tests, please identify the types of directory listings tested for: (a) unbundled network element loop orders; and (b) loop/port orders.

ANSWER:

INTERROGATORY No. 36: Please provide the definition and meaning of the term “parity” as it is used in the Georgia and Florida OSS Tests and explain how it relates to data reporting and results.

ANSWER:

INTERROGATORY No. 37: Please identify by test activity all BellSouth retail operations used for purposes of assessing parity in the Georgia and Florida OSS Tests.

ANSWER:

INTERROGATORY No. 38: Please provide the definition and meaning of the phrase “retail analog” as it is used in the Georgia and Florida OSS Tests and explain how it relates to data reporting and results.

ANSWER:

INTERROGATORY No. 39: Please identify all CLEC operations in Georgia and Florida for which BellSouth contends there is no retail analog for purposes of assessing parity and describe the basis for the contention.

ANSWER:

INTERROGATORY No. 40: In connection with the Georgia OSS Test, please provide the definition and meaning of the phrase “original source” as it is used on page 22 of the Flow-Through Evaluation Report.

ANSWER:

INTERROGATORY No. 41: In connection with the Georgia and Florida OSS Tests, was any data regarding CLECs’ use of BellSouth’s OSS analyzed and compared with any test results with actual CLEC results? If so, please describe such analysis and comparison, the individuals performing the analysis and comparison, and their conclusions. If not, please explain and provide the basis for the decision not to make reference to actual CLEC data and identify the individuals involved in making that decision.

ANSWER:

INTERROGATORY No. 42: Did BellSouth ever provide KCI data or information from the AT&T Georgia 1000 Test of BellSouth provision of unbundled network element platform (“UNE-P”)? If so, describe any use KCI made of that data or information.

ANSWER:

INTERROGATORY No. 43: Please explain why the Georgia OSS Test was terminated and identify the individuals involved in requesting, considering, and approving the termination of the Test.

ANSWER:

INTERROGATORY No. 44: For the Georgia OSS Test, please identify the “five active issues” contained in KCI’s Documentation Issues Log as reported in the Interim Status Report of January 26, 2001.

ANSWER:

INTERROGATORY No. 45: Please identify and describe all exceptions, exception amendments, exception responses, and exception closures issued since the submission of the Georgia Final Report on March 20, 2001.

ANSWER:

INTERROGATORY No. 46: For the Georgia and Florida OSS Tests, please identify and describe all pending exceptions, exception amendments, exception responses, and exception closures still outstanding as of the date of your answer.

ANSWER:

INTERROGATORY No. 47: Please provide intervals for:

- a) BellSouth PMAP help desk to provide answers to CLEC questions;
- b) Account Team members to provide an explanation to CLEC inquiries regarding their performance measures reports and/or raw data; and
- c) Performance measurement personnel to provide an explanation to CLEC inquiries regarding their performance measure reports and/or raw data.

ANSWER:

INTERROGATORY No. 48: For each and every BellSouth SQM measure, please provide a list of:

- a) all data included in the Legacy systems but excluded from the ICAS or BARNEY data warehouse;
- b) all data included in the Legacy systems but excluded from the “Snapshot” database; and
- c) all data included in the ICAIS and “Snapshot” database, but excluded from the PMAP “raw data files” posted on BellSouth’s PMAP web-site.

ANSWER:

INTERROGATORY No. 49: Please describe all types of data included in the denominator of the Percent Rejected Service Requests-- total mechanized measure and all data included “Total Mech. LSRs” section in the Flow-Through Report and any differences between these data sets.

ANSWER:

INTERROGATORY No. 50: Please describe all types of data included in the LSRs in the fully mechanized Reject Interval measure and all data included in the LSRS in the auto-clarification section of the Flow-Through Report and explain any differences between these data sets.

ANSWER:

INTERROGATORY No. 51: Please describe all types of data included in the partially mechanized Reject Interval Measure and all the data included in the “CLEC Caused Fallout” section of the Flow-Through Report and explain any differences between these data sets.

ANSWER:

INTERROGATORY No. 52: Please describe all types of data included in the fully mechanized Firm Order Confirmation Measure and all data included in the “Issued Service Orders” section of the Flow-Through Report and explain any differences between these data sets.

ANSWER:

INTERROGATORY No. 53: Please describe all types of data included in the completed orders used in the calculation of the missed appointment measure for Kentucky and all types

of data included in the completed orders used in the calculation of the completion notice measure for Kentucky and explain any differences between these data sets.

ANSWER:

INTERROGATORY No. 54: Please describe all types of data included in the completed orders used in the calculation of the Missed Appointments –LNP measure for Kentucky and all types of data included in the completed orders used in LNP Disconnect Timeliness Measure for Kentucky and explain any differences between these data sets.

ANSWER:

INTERROGATORY No. 55: For each SQM measure, please describe the source of the data used to calculate the performance measurement results, e.g. LESOG, SOCs, and others.

ANSWER:

INTERROGATORY No. 56: For each measure for which data is available in the Legacy system, describe the data that is stored or otherwise placed in BARNEY. If data for a measure is not stored or otherwise placed in BARNEY, please identify the database or system where such information is stored or otherwise placed.

ANSWER:

INTERROGATORY No. 57: For each of the following, please state the date by which BellSouth will provide CLECs in Kentucky with the following:

- a) raw data for LNP measures;
- b) raw data for billing measures; and
- c) PON specific raw data for the Coordinated Customer Conversions-Hot Cut Timeliness % within Interval measure.

ANSWER:

INTERROGATORY No. 58: Identify the name, title, and business address of one or more subject matter experts, officers, directors, managing agents, or other person(s) most knowledgeable about and responsible for managing and implementing the electronic and manual interfaces available to CLECs for accessing BellSouth's OSS.

ANSWER:

INTERROGATORY No. 59: Describe in detail the methodology utilized by BellSouth to calculate the “Percent Flow-through Service Requests Report” and “LNP Percent Flow-through Service Requests Report” for service requests submitted on or after January 1, 2000, including a description of any changes to that methodology that have been implemented since that date. Include descriptions for all sub-sections of each report (Summary, Detail, Residence Detail, Business Detail, UNE Detail, Flow-through Error Analysis, LNP Summary, and LNP Aggregate Detail).

ANSWER:

INTERROGATORY No. 60: Describe in detail the errors that resulted in BellSouth re-issuing the entire January 2000 Flow-Through Report, including a description of the errors, how they were caused, how they were corrected and what steps were taken to insure that the same errors will not be made in future reports.

ANSWER:

INTERROGATORY No. 61: Describe in detail the errors that resulted in BellSouth re-issuing the February 2000 Local Number Portability Flow-Through Report, including a description of the errors, how they were caused, how they were corrected and what steps were taken to insure that the same errors will not be made in future reports.

ANSWER:

INTERROGATORY No. 62: Describe in detail any errors in the BellSouth October 2000 Flow-Through Report provided to KMPG for validation in the Georgia and Florida Third-Party Tests that caused that report to be different from the official reports filed with the Georgia and Alabama Public Service Commissions.

ANSWER:

INTERROGATORY No. 63: Please describe in detail the methodology utilized by BellSouth to calculate the "Percent Flow-through Service Requests" for BellSouth's retail operations. Provide the methodology for requests placed using the Regional Negotiation System (RNS) and using the Regional Ordering System (ROS).

ANSWER:

INTERROGATORY No. 64: Identify and describe all products or services contained in

BellSouth Flow-Through Reports under the following categories:

- a) LNP;
- b) UNE;
- c) Business;
- d) Residence; and

Using the table below, for each month beginning January 1999 through the most current report, across all nine BellSouth states and specifically for Kentucky identify:

- a) the volume of CLEC local service requests (“LSRs”) received manually and via electronic interface, and the volume of service orders (“SOs”) subsequently issued.

Month / Year
Local Service Request* and Service Order Volume#

Product Group	LNP		UNE		Business		Residence		Total	
	LSR	SO	LSR	SO	LSR	SO	LSR	SO	LSR	SO
Interface										
TAG										
EDI										
LENS										
Manual										
Total										

- Counted and reported at the individual LSR “version” level as is the practice in the BellSouth Flow-through Report.
- # The Service Order information being requested here and in “b” and “c” is for the total number of service orders issued, and is not limited to “flow-through” service orders. This information is not provided by BellSouth in any existing report, including the monthly flow-through report. Providing the flow-through reports, or referring AT&T to those reports will not be responsive to this request.

- b) the volume of LSRs submitted electronically that fall-out to manual handling and the volume of service orders (“SOs”) that result.

Month / Year
Local Service Requests Routed for Manual Handling ("M" Orders)

Product Group	LNP		UNE		Business		Residence		Total	
	M	SO	M	SO	M	SO	M	SO	M	SO
Interface										
TAG										
EDI										
LENS										
Total										

c) the volume of LSRs that fall out due to BellSouth errors ("BST Caused Fallout") and the volume of service orders (SOs) that result.

Month / Year
Local Service Requests Encountering BST Caused Fallout (BST Error)

Product Group	LNP		UNE		Business		Residence		Total	
	BST Error	SO	BST Error	SO	BST Error	SO	BST Error	SO	BST Error	SO
Interface										
TAG										
EDI										
LENS										
Total										

ANSWER:

INTERROGATORY No. 65: For each month beginning January 1999 through the most current month, across all nine BellSouth states and specifically for Kentucky, identify the volume of BellSouth service requests for retail local exchange services and the volume of service orders (SOs) subsequently issued.

Month / Year
Service Requests for Local Exchange Service and Service Order Volume

Product Group	Business		Residence		Total	
	Requests	SO	Requests	SO	Requests	SO
Interface						
RNS						
DOE						
SONGS						
ROS						
Total						

ANSWER:

INTERROGATORY No. 66: For each month beginning January 1999 through the most current month, across all nine BellSouth states and specifically for Kentucky, identify the volume of BellSouth employee input errors (“IE”) and BellSouth System Caused Fallout (“BST Errors”) occurring in each month.

Month / Year
Service Requests for Local Exchange Service and Service Order Volume

Product Group	Business		Residence		Total	
	IE	BST Error	IE	BST Error	IE	BST Error
Interface						
RNS						
DOE						
SONGS						
ROS						
Total						

ANSWER:

INTERROGATORY No. 67: For each month beginning January 2000 through the latest reported month, across all nine BellSouth states and specifically for Kentucky, identify the volume of BellSouth employee input service requests that failed to be accepted by SOCS as valid service orders and thus did not reach assignable order (“AO”) status.

Month / Year
Service Requests for Local Exchange Service Failing to Reach AO Status

Product Group	Business	Residence	Total
Interface			
RNS			
DOE			
SONGS			
ROS			
Total			

ANSWER:

INTERROGATORY No. 68: For each type of resale service, UNE, requisition, activity, or circumstance (e.g., more than 25 lines, populated project or RPON fields, expedites, etc.) that falls out for manual processing by design, please identify the monthly volume of each type for the latest 3 months, and reason why BellSouth designed such LSRs to fall out to manual processing. Provided below is a sample format.

Designed Manual Fallout Distribution

Type	March	April	May	Reason for Fall Out
LNP with Complex Listing				e.g., complexity
Basic Rate ISDN				e.g., low volumes
LSRs Expedited by CLEC				

ANSWER:

INTERROGATORY No. 69: Please describe in detail the modifications that were required or made to the Direct Order Entry (“DOE”) and Service Order Negotiation System (“SONGS”) marketing and sales ordering systems to allow them to be used by BellSouth personnel in the LCSC to order unbundled network elements.

ANSWER:

INTERROGATORY No. 70: Please describe whether electronic mechanization is affecting LCSC volumes and staffing and:

- a. List each of the order types processed by the LCSC;
- b. Provide the "standard work times" associated with each order type;
- c. Provide the definition, including the duration (in minutes or seconds) of a “Standard Work Unit”.

ANSWER:

INTERROGATORY No. 71: Describe in detail the capabilities of the new Regional Ordering System (“ROS”) that BellSouth developed for its internal use to replace DOE and SONGS.

ANSWER:

INTERROGATORY No. 72: Compare and contrast ROS capabilities with the capabilities of the existing Regional Negotiation System (“RNS”), the DOE system, and the SONGS system.

ANSWER:

INTERROGATORY No. 73: Provide the following information related to the transition from DOE and SONGS to ROS that was completed in the fourth quarter 1999.

- (a) For each month of the transition, provide the number and percentage and cumulative number and percentage of BellSouth Retail Business Unit service representatives transitioned to the new ROS system.
- (b) For each month of the transition, provide the number and percentage of eligible BellSouth Retail Business Unit transactions performed using the new ROS system.

ANSWER:

INTERROGATORY No. 74: Describe in detail how BellSouth employees input information into the RNS, the DOE/SONGS and the new ROS, and describe any additional manual activities required of such employees to transmit this information from RNS, DOE/SONGS or ROS to the Service Order Control System (“SOCS”).

ANSWER:

INTERROGATORY No. 75: Describe in detail all edit checks provided by the software utilized in RNS, DOE/SONGS and the new ROS.

- a) For each edit check by each system, state whether the BellSouth employee using the system can “release” (forward or submit) a service request being prepared on these systems to SOCS without satisfying the edit.
- b) If the answer to (a) is affirmative, please explain how this is done.

ANSWER:

INTERROGATORY No. 76: Does the RNS, the DOE/SONGS or the new ROS convert a typed service request input into a format that can be accepted by SOCS? If so, explain how the conversion occurs.

ANSWER:

INTERROGATORY No. 77: Must CLEC service requests satisfy the same SOCS Service Order Edit Routine (“SOER”) edits as would a BellSouth service request? If not, explain in detail the differences.

ANSWER:

INTERROGATORY No. 78: Are BellSouth employees utilizing the RNS, DOE/SONGS or the new ROS required to re-type Customer Service Record (“CSR”) information for

existing customers whose records are found in the Customer Records Information System (“CRIS”) or Business Office Customer Records Information System (“BOCRIS”) when preparing service requests for changes to existing BellSouth accounts? If so, identify the information that must be retyped.

ANSWER:

INTERROGATORY No. 79: Identify, with specificity, the particular unbundled network elements (“UNEs”), and the particular combinations of UNEs, for which maintenance and repair services can be ordered using the following interfaces:

- a) Trouble Analysis and Facilitation Interface (TAFI); and
- b) Electronic Communications Trouble Analysis (ECTA).

ANSWER:

INTERROGATORY No. 80: For each of the OSS listed below, state whether or not a BellSouth employee using TAFI to resolve customer reported troubles is able to communicate with that system to handle the customer’s complaint successfully.

- a) LMOS (“Loop Maintenance Operations System”)
- b) MLT (“Mechanized Loop Testing”)
- c) BOCRIS (“Business Office Customer Records System”)
- d) BOSIP (“BellSouth Open System Interconnect Platform”)
- e) COSMOS (“Computer System for Mainframe Operations”)
- f) JMOS (“Job Management Operations System”)
- g) LFACS (“Loop Facility Assignment and Control System”)
- h) SOCS (“Service Order Control System”)
- i) NIW (“Network Information Warehouse”)

- j) OSPCM (“Outside Plant Capacity Management System”)
- k) HAL (“Hands-Off” Assignment Logic System”)
- l) SNECS (“Secured Network Element Contract Server”)
- m) Predictor (“System used to query central office switch translations”)
- n) MARCH (“System that implements central office translation changes”)
- o) WFA (“Work Force Administration System”)
- p) Inside Dispatch (“Central Office Technician”)
- q) Outside Dispatch (“Field Technician”)
- r) MA (“Maintenance Administrator”) Screening Pool

ANSWER:

INTERROGATORY No. 81: Identify all downstream systems, databases and communications links that a BellSouth employee/user must access manually to use TAFI to correct the trouble reported.

ANSWER:

INTERROGATORY No. 82: Identify any CLEC that has developed the electronic capability to transmit data in TAFI relating to trouble reporting/resolution transactions to their internal databases.

ANSWER:

INTERROGATORY No. 83: Is the Electronic Communications Trouble Analysis (“ECTA”) interface, as implemented by BellSouth based upon the ANSI standards T1.227,

T1.228, and T1.262, limited to entering a trouble report, modifying an existing trouble report, canceling an existing trouble report, obtaining status about existing trouble reports, and initiating a mechanized loop test and receiving the test results? If any part of your response is negative, identify the other activities for which ECTA is used.

ANSWER:

INTERROGATORY No. 84: Does the ECTA route all trouble reports submitted by a CLEC to a BellSouth maintenance administrator for manual screening and handling? If any part of your response is negative, describe the other routings for CLEC trouble reports.

ANSWER:

INTERROGATORY No. 85: List the telephone number-based or telephone number-associated services for which TAFI is designed to provide:

- a) Complete trouble reporting and resolution;
- b) Trouble reporting only; and
- c) Neither trouble reporting or resolution.

ANSWER:

INTERROGATORY No. 86: Identify, provide and describe all portions of ANSI standards T1.227, T1.228, and T1.262 that BellSouth claims prevent BellSouth from

providing TAFI functionality via the Electronic Communications Trouble Analysis Interface (ECTA).

ANSWER:

INTERROGATORY No. 87: From January 2001 until the latest reported month, across all nine BellSouth states and specifically for Kentucky, provide the total number of CLEC trouble reports received by BellSouth by interface/process.

CLEC Trouble Volumes – Nine States

Month	TAFI	ECTA	WFA	LMOS	Total

CLEC Trouble Volumes – Kentucky

Month	TAFI	ECTA	WFA	LMOS	Total

ANSWER:

INTERROGATORY No. 88: For each month beginning January 2001 through the latest reported month, across all nine BellSouth states and specifically for Kentucky, provide the total number of BellSouth retail trouble reports received by BellSouth by interface/process.

BellSouth Trouble Volumes – Nine States

Month	TAFI	WFA	LMOS	Total

BellSouth Trouble Volumes – Kentucky

Month	TAFI	WFA	LMOS	Total

ANSWER:

INTERROGATORY No. 89: For each of the last six months, provide the clearing times, number of tickets cleared per hour by employee, and trouble report queuing times while waiting for a technician to become available/assigned, for TAFI, the Loop Maintenance Operations Support (LMOS) system and the Work Force Administration (WFA) system.

ANSWER:

INTERROGATORY No. 90: For each of the last six months, provide the average clearing time for retail troubles reported to BellSouth and handled/resolved using the LMOS/WFA system.

ANSWER:

INTERROGATORY No. 91: For each of the last six months, provide the average "pickup" time from the time a repair service attendant or other BellSouth employee directs a customer's trouble report to the LMOS/WFA system for distribution to a Maintenance Administrator until the time the report is actually viewed by the MA.

ANSWER:

INTERROGATORY No. 92: For each of the last six months, provide the average clearing time for retail troubles reported to BellSouth and handled/resolved using the TAFI system closed in TAFI using the front end close out process ("FECO") and closed in LMOS.

ANSWER:

INTERROGATORY No. 93: For each of the last six months, provide the average clearing time for retail troubles reported to BellSouth and handled and resolved using the LMOS/WFA system.

ANSWER:

INTERROGATORY No. 94: For each of the last six months, provide the average “pickup” time from the time a repair service attendant or other BellSouth employee directs a customer’s trouble report to the LMOS/WFA system for distribution to a Maintenance Administrator until the time the report is actually viewed by the MA.

ANSWER:

INTERROGATORY No. 95: For each of the last 12 months, provide the number of BellSouth employees in the following “work centers” dedicated to the handling of CLEC transactions across all nine BellSouth states and for Kentucky specifically.

BellSouth Employees Dedicated to Handling CLEC Transactions			
Month / Year			
Local Carrier Service Center (LCSC)	Atlanta	Birmingham	Jacksonville
• Resale Group			
• Complex Group			
• UNE Group			
• Project Group			
• Total LCSC			
Unbundled Network Element Center (UNEC)			
• Provisioning			
• Maintenance			
• Total UNCE			
BellSouth Resale Maintenance Center			
Local Interconnection Trunking Center			

ANSWER:

INTERROGATORY No. 96: For each of the last 12 months, provide, by work center, the number of BellSouth employees in each of the BellSouth “work centers” analogous to the CLEC centers, dedicated to handling BellSouth transactions across all nine BellSouth states and for Kentucky specifically.

ANSWER:

INTERROGATORY No. 97: For each state in the BellSouth region, please provide the number of customized routing arrangements using AIN Hubbing, if any, that BellSouth provides to CLECs, and the number of such arrangements that provided routing to a non-BellSouth OS/DA platform.

ANSWER:

INTERROGATORY No. 98: For each state in the BellSouth region, please provide the number of customized routing arrangements using Line Class Code technology, if any, that BellSouth provides to CLECs, and the number of such arrangements that provided routing to a non-BellSouth OS/DA platform.

ANSWER:

INTERROGATORY No. 99: List all BellSouth-initiated software changes to electronic interfaces used by CLECs, which were implemented from May 1998 to the present, and indicate which changes were formally submitted by BellSouth to the Electronic Interface Change Control Process (“EICCP”) or Interim Change Control Process (“I-CCP”). Provide the Change Control Request Number and date of submission for each such change formally submitted to EICCP or I-CCP.

ANSWER:

INTERROGATORY No. 100: With respect to any testing (whether external or internal testing) conducted by BellSouth of changes to the interfaces that it provides or has provided to CLECs from May 1998, to the present, describe for each such interface and each such test:

- a) the date(s) on which the test was conducted;
- b) the type of test performed;
- c) the specific objectives of the test;
- d) the results that BellSouth intended to achieve;
- e) the methodology used to perform the test;
- f) the types of service orders that were used in the test;
- g) the types of services and products that were the subject of the test;
- h) the results of the test (including a description of what the test results measured and how the measurements were defined); and
- i) any changes that were made in the interface following the test, as a result of the test.

ANSWER:

INTERROGATORY No. 101: For the most recent six month period, please provide BellSouth's monthly wholesale revenues (or billings) for each of the following areas: residential resale, business resale, unbundled network elements, and interconnection.

ANSWER:

INTERROGATORY No. 102: Has BellSouth conducted any cost/benefit analysis related to increasing the level of mechanized ordering capability for any resale service, UNE, requisition, activity, or circumstance service, that currently can only be ordered by CLECs on a manual or partially mechanized basis. If so, please provided such cost/benefit analyses.

ANSWER:

INTERROGATORY No. 103: Describe the engineering standard to which BellSouth engineers its interconnection trunk(s) and trunk groups, separately identifying the process steps for engineering tandem and end office switch interconnection trunks.

ANSWER:

INTERROGATORY No. 104: Describe the analysis, including methods and procedures, BellSouth uses for determining when it will augment interconnection trunk(s) or trunk groups to prevent call blocking in its tandem switches.

ANSWER:

INTERROGATORY No. 105: Describe the analysis, including methods and procedures, BellSouth uses for determining when it will augment interconnection trunk(s) or trunk groups to prevent call blocking in its end office switches.

ANSWER:

INTERROGATORY No. 106: Describe any differences in the analysis, methods, and procedures described in Interrogatory 106, 107 and 108 from the analysis, methods, and procedures BellSouth uses to augment access tandem trunk(s) or trunk groups.

ANSWER:

INTERROGATORY No. 107: What is the ratio of tandem to end office trunks (tandem completing field) that BellSouth expects to add when CLEC interconnection trunks are added from the CLEC switch to a BellSouth Tandem.

ANSWER:

INTERROGATORY No. 108: Describe in detail BellSouth's process for determining why and when it disconnects interconnection trunks.

ANSWER:

INTERROGATORY No. 109: From the time period November 1, 2000 to the present, please describe:

- 1) how many separate times BellSouth disconnected interconnection trunks in Kentucky. This includes reducing the size of existing trunk groups by disconnecting members of the trunk group;
- 2) in what specific locations did BellSouth disconnect interconnection trunks in Kentucky;
- 3) in the above instances, how many days prior to the disconnect did BellSouth notify AT&T that the disconnect would occur; and

- 4) in how many of these instances did BellSouth await a response from AT&T that the disconnect was appropriate?

ANSWER:

INTERROGATORY No. 110: Describe the methods, procedures, and processes BellSouth uses with CLECs for preventing a customer from being without local telephone service during and just after BellSouth "ports" that customer's telephone number.

ANSWER:

INTERROGATORY No. 111: Describe the root cause of loss of inbound service, and/or partial loss of inbound service, on calls from BST customers to AT&T customers. Specifically, this problem involves the loss of the ability for some BST customers to place calls to some AT&T business and residence customers after the AT&T customer has been ported from BST. Please describe all root causes for both residential and business customers.

ANSWER:

INTERROGATORY No. 112: Describe the solutions that BST is pursuing to eliminate the problems described in Interrogatory 113 above.

ANSWER:

INTERROGATORY No. 113: How many CLEC customers lost the ability to receive calls from some or all BellSouth customers during all months in 2001.

ANSWER:

INTERROGATORY No. 114: Describe the analysis, methods, procedures, and processes BellSouth uses to reassign telephone numbers.

ANSWER:

INTERROGATORY No. 115: Describe the analysis, methods, procedures, and processes BellSouth uses when a customer who has DID service behind a PBX ports its number from BellSouth to a CLEC.

ANSWER:

INTERROGATORY No. 116: Describe the analysis, methods, procedures, and processes BellSouth uses when it is porting only a portion of a customer's telephone numbers to a CLEC.

ANSWER:

INTERROGATORY No. 117: Describe the analysis, methods, procedures, and processes BellSouth uses to prevent duplicate billing of customers who have moved or transferred their local telephone service to a CLEC and describe the process BellSouth follows to correct this type of duplicate billing.

ANSWER:

INTERROGATORY No. 118: Describe the problems BellSouth has experienced in providing accurate calling party information when it ports a number.

ANSWER:

INTERROGATORY No. 119: Identify the nature of the “fix” BellSouth proposes to address this calling party information problem and identify the dates by which this “fix” will be tested and ready for use in each of the states in BellSouth’s region.

ANSWER:

INTERROGATORY No. 120: Describe in detail, with examples, how BellSouth is calculating the information used to populate the Trunk Group Performance - Aggregate report that is produced each month. This should include a description of the types of trunks used in the calculation, the method of calculating the blocking on each trunk, and the mathematical calculations used to aggregate trunk blocking amongst trunks for a particular hour.

ANSWER:

INTERROGATORY No. 121: Describe in detail how the SEEM Analog/Benchmarks for the Trunk Group Performance measure is calculated. Include in this description the types of trunk groups evaluated, the way in which each trunk group is evaluated, and the mathematical method of aggregating trunk group results.

ANSWER:

INTERROGATORY No. 122: Describe BellSouth's rationale for proposing that the SEEM measure for trunk group performance should be based on a .5% difference in blockage in any two hour period in 24 hours.

ANSWER:

INTERROGATORY No. 126: Identify the number of service center employees who handle help requests related to Local Number Portability problems and state the hours during which such employees are present at the facility.

ANSWER:

INTERROGATORY No. 127: What process or mechanism does BellSouth's system use to identify UNE-Loop related orders?

ANSWER:

INTERROGATORY No. 128: What process does BellSouth use to ensure that the loop facility, porting, facility disconnect, personnel dispatch and other internal components of an order are updated with subsequent and supplemental information pertaining to related orders?

ANSWER:

INTERROGATORY No. 129: Please state all methods and procedures related to calls answered by BellSouth's Local Carrier Services Center ("LCSC") as well as methods and procedures related to calls answered by BellSouth's Retail Service Centers ("RSCs") and calls answered by BellSouth's Business Service Centers ("BSCs").

ANSWER:

INTERROGATORY No. 130: Please state BellSouth's methods and procedures as well as provide any and all information used to determine the start time used in BellSouth's Hot Cut Timeliness performance and to capture and verify that start time date.

ANSWER:

INTERROGATORY No. 131: How does BellSouth treat its own orders for maintenance relating to erroneously disconnected end users of BellSouth? (i.e. does BellSouth repair erroneously disconnected BellSouth end-users through a BellSouth maintenance request or is BellSouth retail required to send in a new order to fix or repair BellSouth's erroneously disconnected BellSouth end-user?)

ANSWER:

INTERROGATORY No. 132: How does BellSouth treat a CLEC's order for maintenance relating to erroneously disconnected end users of the CLEC? (i.e. does BellSouth repair erroneously disconnected CLEC end-users through a maintenance request that takes 24 hours or does BellSouth require a CLEC to send in an entirely new order to fix or repair the CLEC's erroneously disconnected CLEC end-user?)

ANSWER:

INTERROGATORY No. 133: Please state and provide the data results for all orders classified as partially mechanized orders during the Georgia third-party test's second retest of O&P Test 1-2-3 and O&P

Test 1-3-3.

ANSWER:

INTERROGATORY No. 134: What is the minimum required amount of amperage a CLEC collocator must order for a physical collocation cage?

ANSWER:

INTERROGATORY No. 135: Is the minimum amount of amperage different depending on whether the CLEC is powering individual equipment bays versus powering the CLEC's BDFB?

ANSWER:

INTERROGATORY No. 136: When a CLEC power request causes BellSouth to augment its physical power plant, what percentage or total cost does BellSouth allocate to CLECs on a non-recurring and recurring basis?

ANSWER:

INTERROGATORY No. 137: Are the non-recurring charges associated with the augment charged to the CLEC that caused the augment or are they allocated to all prospective collocators. What is the basis for any allocation used?

ANSWER:

INTERROGATORY No. 138: Please identify charges assessed made by BellSouth to AT&T for cable under USOC PEIPM (cable) at the following Kentucky collocation site: LSVLKYAP. Please identify what this recurring charge is for. If it is for power cable, please

identify for each location, if the cable is feeding power from a BellSouth BDFB or directly from the power equipment.

ANSWER:

INTERROGATORY No. 139: When BellSouth requires a collocator to physically provision a collocation cage, how much additional recurring or non-recurring cost does BellSouth charge the CLEC for cross-connects when the CLEC collocator has provisioned his own physical cross-connects? Why does BellSouth charge for these cross-connects that are initially provisioned and provided for by the CLEC collocator?

ANSWER:

INTERROGATORY No. 140: Does BellSouth have electronic OSS for line splitting? If not, describe the steps for manual order for line splitting, including time frames for acknowledgement, FOC and provisioning from FOC for line splitting; and when does BellSouth expect to have electronic OSS for line splitting?

ANSWER:

INTERROGATORY No. 141: If a CLEC is providing voice service to a customer using UNE-P and the CLEC wants to engage in line splitting, will BellSouth allow the CLEC to use

the same loop and port that was providing voice service only to provide line splitting? If your answer is no, please explain the reasons why a CLEC can not use the same loop and port that was providing the voice service only to provide line splitting.

ANSWER:

INTERROGATORY No. 142: What is the percentage of NGDLC in BellSouth's network?

ANSWER:

INTERROGATORY No. 143: What is the percentage of NGDLC in BellSouth's network in Kentucky?

ANSWER:

INTERROGATORY No. 144: Will BellSouth continue to provide xDSL service to a customer who was receiving voice and data services from BellSouth and now wants to receive voice service from a CLEC but retain BellSouth as their data provider?

ANSWER:

INTERROGATORY No. 145: Will BellSouth provide the splitter for a CLEC to serve a new customer through line splitting? If not, why not?

ANSWER:

INTERROGATORY No. 146: Does BellSouth provide the splitter for CLECs to engage in line sharing with BellSouth?

ANSWER:

INTERROGATORY No. 147: When and under what circumstances did BellSouth first determine that a CLEC UNE-P customer lost dial tone upon conversion from BellSouth service to CLEC UNE-P service due to BellSouth's working a "D" (disconnect or termination) order but not working the related "N" (conversion) order?

ANSWER:

INTERROGATORY No. 148: On what date did BellSouth undertake to form a task team to address the loss of dial tone incidents described in Interrogatory No. 147 by developing or generating a new single C- order” (change order) process for UNE-P conversions? Identify the members of the team and the team leader.

ANSWER:

INTERROGATORY No. 149: Describe the action plan or steps and the timeline for the development or generation of a new “single C order” process as described in Interrogatory 148. Identify any documents comprising, relating or referring to the action plan or steps described in the preceding sentence.

ANSWER:

INTERROGATORY No. 150: Is it BellSouth’s practice to send out a completion notice on a conversion from BellSouth service to CLEC UNE-P service before all orders involved in the conversion are completed by BellSouth? If not, describe BellSouth’s policy and practice in this regard.

ANSWER:

INTERROGATORY No. 151: Explain why BellSouth does not treat loss of dial tone incidents as described in Interrogatory 147 as a maintenance issue to be handled by a BellSouth maintenance center personnel.

ANSWER:

INTERROGATORY No. 152: Does BellSouth intend to recognize loss of dial tone as a maintenance issue? If so, when?

ANSWER:

INTERROGATORY No. 153: When converting a customer from BellSouth to a CLEC using UNE-P, is BellSouth using the same facilities or does BellSouth move the customer's service from one facility to another? If moved, why does BellSouth change the facility used?

ANSWER:

INTERROGATORY No. 154: When a CLEC reports a loss of dial tone incident on a UNE-P order to BellSouth, BellSouth dispatches a service technician to resolve the problem. For what reason is the service technician dispatched and what tasks does the technician perform?

ANSWER:

INTERROGATORY No. 155: Are UNE-P customers who were on IDLC facilities prior to their conversion to a CLEC UNE-P left on the existing facilities or are they changed to universal or copper facilities before or at the time of the conversion?

ANSWER:

INTERROGATORY No. 156: Please explain what the phrase “non-leveragable legacy system” means (as that phrase is used in the Rebuttal Testimony of Ken Ainsworth filed in Alabama Docket No. 25835 on June 19, 2001), and identify all of BellSouth’s OSS that are “non-leveragable systems”.

ANSWER:

INTERROGATORY No. 157: Please explain what the phrase “sunset list” means (as that phrase is used in the Rebuttal Testimony of Ken Ainsworth filed in Alabama Docket No. 25835 on June 19, 2001), and identify all of BellSouth’s OSS that are on the “sunset list”.

ANSWER:

INTERROGATORY No. 158: For each system that is on BellSouth’s “sunset list,” describe BellSouth’s plans to replace such systems, including but not limited to the anticipated technology to be used, functionality, and implementation schedule.

ANSWER:

INTERROGATORY No. 159: Please describe BellSouth’s “strategic direction and goals” as that phrase is used in Mr. Ainsworth’s Rebuttal Testimony filed on June 19, Docket No. 25835, and how “ROS” fails to meet such direction and goals.

ANSWER:

INTERROGATORY No. 160: Please provide any data available on call defects per million that would include all lost calls, for reasons of blocking, outages, etc. Provide this information segmented by call defects per million for CLEC calls and defects per million for

calls within the BellSouth network. Provide this data in the most disaggregate form available, by month.

ANSWER:

INTERROGATORY No. 161: Please provide trunk by trunk blocking data for all CLEC trunks that had call blocking over 2% during the months of January, February, March, April and May 2001. For the protection of proprietary information, the names of individual CLECs should be redacted.

ANSWER:

INTERROGATORY No. 162: Please identify all of the access tandems in Kentucky and in each state in the BellSouth region by CLLI codes and English identifiers. Give the tandem completing fields for each switch, listing all trunk groups to each end office, the size of the trunk group and the types of traffic on each.

ANSWER:

INTERROGATORY No. 163: Please identify all of the local tandems in Kentucky and in each state in BellSouth region by CLLI codes and English identifiers. Give the tandem completing fields for each switch, listing all trunk groups to each end office, the size of the trunk group and the types of traffic on each.

ANSWER:

INTERROGATORY No. 164: Please identify all tandems in Kentucky and in each state in the BellSouth region that are both access and local tandems by CLLI codes and English identifiers. Specify whether these tandems are segmented into different logical switches which have different tandem completing fields. Give the tandem completing fields for each switch, listing all end offices connected to each, all trunk groups to each end office, the size of the trunk group and the types of traffic on each.

ANSWER:

INTERROGATORY No. 165: For Kentucky and each of the BellSouth states, please provide the average cabling distance that exists between BellSouth's BDFBs and the collocation areas that they serve.

ANSWER:

INTERROGATORY No. 166: For Kentucky and each of the BellSouth states, please indicate whether any interconnection arrangements in Kentucky between BellSouth interconnection frames and collocation arrangements require repeaters. If so, please indicate the central office and the transmission rate for which the repeaters are required (DS1 or DS3).

ANSWER:

INTERROGATORY No. 167: Please provide any standard collocation interconnection agreement terms and conditions that BellSouth uses for its interconnection agreements with competing local exchange carriers in Kentucky.

ANSWER:

INTERROGATORY No. 168: Identify all BellSouth employees or agents involved in investigating and resolving or who have knowledge of the local service and network problems reported to BellSouth by AT&T Broadband in Trouble Ticket Nos. KI015929 and KI016185 during the period March 16 to April 4, 2001 ("dead air problems") and describe identified individuals involvement with these issues.

ANSWER:

INTERROGATORY No. 169: Describe the manner in which Louisville Armory Place switching facilities currently carry BellSouth and CLEC telecommunications traffic, including, but not limited to, the manner in which such traffic is split or allocated at the Louisville Armory Place switching facilities to provide service to customers.

ANSWER:

INTERROGATORY No. 170: Identify and describe all facilities and network changes to the Louisville Armory Place switching facilities with respect to BellSouth and CLEC telecommunications traffic during the period January 1, 1999 to the present.

ANSWER:

INTERROGATORY No. 171: For any facilities and network changes to the Louisville Armory Place switching facilities identified in Interrogatory No. 171, describe the actions taken by BellSouth, if any, to ensure any changes made to the LAP switching facilities did not adversely effect CLEC telecommunications traffic.

ANSWER:

INTERROGATORY No. 172: Identify and describe BellSouth's process for ensuring that facility and network changes on its network will not adversely effect CLEC

telecommunications traffic, including, but not limited to, any testing, inspection or CLEC notification procedures.

ANSWER:

INTERROGATORY No. 173: Describe the actions taken by BellSouth to investigate and resolve the dead air problems experienced by AT&T customers during the period of March 16 to April 4, 2001.

ANSWER:

INTERROGATORY No. 174: Describe why BellSouth “closed” or ceased further action to investigate and remediate the dead air problems stated in Trouble Ticket No. KI015929.

ANSWER:

INTERROGATORY No. 175: Identify and describe the circumstances which BellSouth determined that the dead air problems experienced by AT&T customers during the period of March 16 to April 4, 2001 was caused by a faulty T1 card at the Louisville Armory Place switching facility.

ANSWER:

INTERROGATORY No. 176: Identify the duration of the problems with the faulty T1 card as described in Interrogatory 175 and the dead air problem at the Louisville Armory Place switching facilities and why such problems were not discovered by BellSouth until April 2001.

ANSWER:

INTERROGATORY No. 177: Explain how and to what extent the faulty T1 card as described in Interrogatory 175 and the dead air problem at the Louisville Armory Place switching facilities affected service to BellSouth and CLEC customers.

ANSWER:

INTERROGATORY No. 178: Describe why T1 card identified in Interrogatory 175 was faulty.

ANSWER:

INTERROGATORY No. 179: Describe and explain the actions taken by BellSouth regarding the repair of the faulty T1 card at the Louisville Armory Place switching facilities and the resolution of the dead air problems, including, but not limited to, the date and time the faulty T1 card was discovered, BellSouth's activities in physically repairing or replacing the faulty T1 card and the interval time between BellSouth's discovery of the faulty T1 card and its repair or replacement.

ANSWER:

INTERROGATORY No. 180: Describe the actions, if any, taken by BellSouth to improve its troubleshooting, inspection, testing processes, and processes for timely resolution to mitigate any future reoccurrences of customer-affecting facilities or network troubles such as the faulty T1 card identified in Interrogatory 175 and dead air problems.

ANSWER:

INTERROGATORY No. 181: Describe any actions taken by BellSouth to address the concerns raised by AT&T Broadband as set forth in the May 2, 2001 letter from Dennis C. Berger to Jan Burris.

ANSWER:

INTERROGATORY No. 182: Identify and describe the actions taken by BellSouth, if any, to investigate and address number portability issues raised in an AT&T letter from Denise C. Berger to Jan Burris dated May 25, 2001.

ANSWER:

INTERROGATORY No. 183: Identify and describe the circumstances in which BellSouth has rescheduled customer service transitions from BellSouth service to AT&T Broadband service.

ANSWER:

INTERROGATORY No. 184: For any rescheduled customer service transitions identified in Interrogatory No. 184, explain the cause for the schedule change, the notice provided to AT&T of the change and the dates and times that the rescheduled customer transitions were originally scheduled and accomplished.

ANSWER:

INTERROGATORY No. 185: Identify and explain the circumstances in which BellSouth refused to accomplish customer service transitions from BellSouth service to AT&T Broadband service scheduled for Saturday, June 9, 2001.

ANSWER:

INTERROGATORY No. 186: Identify and describe any notice provided to AT&T Broadband regarding BellSouth's refusal to accomplish the scheduled June 9, 2001 customer service transitions.

ANSWER:

INTERROGATORY No. 187: Identify and explain whether BellSouth provided a revised date for the accomplishment of the scheduled June 9, 2001 customer service transitions.

ANSWER:

INTERROGATORY No. 188: How many orders does BellSouth require for a CLEC to convert UNE-P which is being used only for voice service to line splitting.

ANSWER:

INTERROGATORY No. 189: Does BellSouth have business rules that provide information on line splitting? If so, when did BellSouth create the business rules and when were they first available to CLECs?

ANSWER:

INTERROGATORY No. 190: Are Universal Service Order Codes (“USOCs”) required to order line splitting? If so, what is the USOC and when did BellSouth create the USOC for line splitting?

ANSWER:

INTERROGATORY No. 191: Does BellSouth or an entity affiliated with BellSouth provide stand-alone DSL transport to end user residential customers at retail. If so, provide the name of the affiliate or company that provides this service.

ANSWER:

INTERROGATORY No. 192: Does BellSouth or any entity affiliated with BellSouth provide stand-alone DSL transport to end-user business customers at retail. If so, provide the name of the affiliate or company that provides this service.

ANSWER:

INTERROGATORY No. 193: Provide the total number of BellSouth lines for Kentucky, including switched and special access lines.

ANSWER:

INTERROGATORY No. 194: Provide the total number of CLEC lines for Kentucky.

ANSWER:

INTERROGATORY No. 195: Please state the date that BellSouth will begin to provide CLECs with raw data for each of the following reports:

Ordering

- a) LNP_PCT_Reject_Interval_Service_Requests_Total_Mech.txt
- b) LNP_PCT_Reject_Interval_Service_Requests_Partial_Mech.txt
- c) LNP_PCT_Reject_Interval_Service_Requests_Fully_Mech.txt
- d) LNP_Reject_Interval_Service_Requests_Total_Mech.txt
- e) LNP_Reject_Interval_Service_Requests_Partial_Mech.txt
- f) LNP_Reject_Interval_Service_Requests_Fully_Mech.txt
- g) LNP_Firm_Order_Confirmation_Total_Mech.txt
- h) LNP_Firm_Order_Confirmation_Partial_Mech.txt
- i) LNP_Firm_Order_Confirmation_Fully_Mech.txt
- j) Note that no LNP Non-Mechanized data is reported in the Ordering reports or raw data files

Provisioning

- a) LNP_Total_Order_Cycle_Time_Mechanized.txt
- b) LNP_Total_Order_Cycle_Time_Mechanized_with_Appointment_codes.txt
- c) LNP_Percent_Missed_Installation_Appointments.txt
- d) LNP_Disconnects.txt
- e) Note again that no LNP Non-Mechanized data is reported in the Provisioning reports or raw data files

Billing

- a) Invoice Accuracy CLEC (Region)
- b) Mean Time to Deliver Invoices CLEC (Region)
- c) Usage Data Delivery Accuracy CLEC
- d) Usage Timeliness & Completeness CLEC

ANSWER:

INTERROGATORY No. 196: Identify, on an individual measure basis, any and all studies or other documents, that BellSouth has caused to be prepared or possesses that justify and/or explain the differences between its SQM measures and its SEEM measures, including, but not limited to, differences in disaggregation.

ANSWER:

INTERROGATORY No. 197: Describe the method(s) and/or procedure(s) BellSouth uses to ensure the accuracy of the error assignment for the flow-through report.

ANSWER:

INTERROGATORY No. 198: For each of the following SEEM sub-measures, list any and all CLEC products and/or services offered by BellSouth that will be aggregated together for comparison with BellSouth's retail data:

- a) Percent Missed Installation Appointments – UNE Loops
- b) Average Completion Interval (OCI) – UNE Loops
- c) % Provisioning Troubles Within 30 Days – UNE Loops
- d) Missed Repair Appointments – UNE Loops
- e) Customer Trouble Report Rate – UNE Loops
- f) Maintenance Average Duration – UNE Loops
- g) Percent Repeat Troubles Within 30 Days – UNE Loops

ANSWER:

INTERROGATORY No. 199: Please provide the standard order interval offered by BellSouth for each of the products/services listed in response to Interrogatory No. 199, sub-measures (a) through (g).

ANSWER:

INTERROGATORY No. 200: List each and every BellSouth product and/or service that is included in each of the following SEEM retail analogs:

- a) Retail Residence and Business

- b) Retail Residence and Business Dispatch
- c) Retail Design

ANSWER:

INTERROGATORY No. 201: Please specify the standard offered order interval for each of the BellSouth products and/or services identified in response to Interrogatory No. 201.

ANSWER:

INTERROGATORY No. 202: For the months of December 2000, January and February 2001, please state, expressed in percentages and by BellSouth retail analog category, the number of each BellSouth product and/or service sold.

ANSWER:

INTERROGATORY No. 203: Please describe in detail BellSouth's procedure(s) for ensuring that its raw data includes all BellSouth and CLEC transactions, and is otherwise accurate.

ANSWER:

INTERROGATORY No. 204: Explain with specificity how the product disaggregation for provisioning and maintenance sub-measures specified in BellSouth's SEEM proposal, supports BellSouth's claim that SEEM incorporates "like-to-like" comparisons with BellSouth's retail results.

ANSWER:

INTERROGATORY No. 205: Describe BellSouth's process, including raw data collection, systems accessed for data, and report creation, used for assembling the performance measure billing reports. In your description, state what aspects of the process are manual or electronic, and to the extent to which it is manual, whether it is a totally or partially manual process.

ANSWER:

INTERROGATORY No. 206: For each and every measure for which BellSouth provides raw data, please state what data, if any, is excluded from the PMAP raw data files.

ANSWER:

INTERROGATORY No. 207: For all sub-measures for which BellSouth is currently providing performance --results, please state the following: BellSouth and CLEC means, BellSouth and CLEC standard deviations, and BellSouth and CLEC sample sizes.

ANSWER:

INTERROGATORY No. 208: For the months of December 2000 through June 2001, what are the average CLEC and BellSouth sample sizes for each SQM sub-measure.

ANSWER:

INTERROGATORY No. 209: In BellSouth's SEEM, within which disaggregation category are LNP standalone performance results reported for the following measures?

- a) Average Completion Interval
- b) Percent Troubles Within 30 Days
- c) Missed Repair Appointment
- d) Customer Trouble Report Rate
- e) Maintenance Average Duration
- f) Repeat Troubles Within 30 Days
- g) FOC Interval
- h) Rejection Interval

ANSWER:

INTERROGATORY No. 210: In BellSouth's SEEM, within which disaggregation category are LNP with UNE loop performance results reported for the following measures?

- a) Average Completion Interval
- b) Percent Troubles Within 30 Days
- c) Missed Repair Appointment
- d) Customer Trouble Report Rate
- e) Maintenance Average Duration
- f) Repeat Troubles Within 30 Days

- g) FOC Interval
- h) Rejection Interval

ANSWER:

INTERROGATORY No. 211: In BellSouth's SEEM, within which disaggregation category are Switch Ports performance results reported for the following measures?

- a) Average Completion Interval
- b) Percent Troubles Within 30 Days
- c) Missed Repair Appointment
- d) Customer Trouble Report Rate
- e) Maintenance Average Duration
- f) Repeat Troubles Within 30 Days
- g) Percent Missed Appointments
- h) FOC Interval
- i) Rejection Interval

ANSWER:

INTERROGATORY No. 212: In BellSouth's SEEM, within which disaggregation category are Transport performance results reported for the following measures?

- a) Average Completion Interval

- b) Percent Troubles Within 30 Days
- c) Missed Repair Appointment
- d) Customer Trouble Report Rate
- e) Maintenance Average Duration
- f) Repeat Troubles Within 30 Days
- g) Percent Missed Appointments

ANSWER:

INTERROGATORY No. 213: In BellSouth's SEEM, within which disaggregation category are EEL performance results reported for the following measures?

- a) Average Completion Interval
- b) Percent Troubles Within 30 Days
- c) Missed Repair Appointment
- d) Customer Trouble Report Rate
- e) Maintenance Average Duration
- f) Repeat Troubles Within 30 Days
- g) Percent Missed Appointments
- h) FOC Interval
- i) Rejection Interval

ANSWER:

INTERROGATORY No. 214: Please provide all information on test responsiveness results used by BellSouth in the development of its benchmark for the Loop Make Inquiry – Electronic measure.

ANSWER:

INTERROGATORY No. 215: Describe each and every step of the process by which data flows from the CLEC to receipt of a response by the CLEC for the OSS Response Interval Measure and identify what portion of the data flow process is included in the time captured for this measure by BellSouth.

ANSWER:

INTERROGATORY No. 216: Describe each and every step of the process by which data flows from the CLEC to receipt of a response by the CLEC for the FOC Timeliness Measure and identify what portion of the data flow process is included in the time captured for this measure by BellSouth.

ANSWER:

INTERROGATORY No. 217: Describe each and every step of the process by which data flows from the CLEC to receipt of a response by the CLEC for the Reject Interval Measure and identify what portion of that flow is included in the time captured for this measure by BellSouth.

ANSWER:

INTERROGATORY No. 218: Describe each and every step of the process by which data flows from the CLEC to the receipt of a response by the CLEC for the Completion Notice Interval Measure and identify what portion of that flow is included in the time captured for this measure by BellSouth.

ANSWER:

INTERROGATORY No. 219: With respect to the Pre-Order Order Interface Availability measure, please state whether BellSouth considers it an outage if the CLEC interface, i.e. LENS, EDI, TAG is down, but the legacy systems are functionally available?

ANSWER:

INTERROGATORY No. 220: Describe the actions taken by BellSouth to disconnect telephone numbers in the central office switch following the receipt of an activate message indicating the porting of a number by a CLEC.

ANSWER:

INTERROGATORY No. 221: For the database update interval measure, indicate whether the “date and time stamp when a service order is completed” noted in the business rules is for a “CP” completion or a “CPX” completion.

ANSWER:

INTERROGATORY No. 222: Describe in detail BellSouth’s process for obtaining a statistically valid sample of CLEC orders for the Percent (%) Database Update Accuracy measure.

ANSWER:

INTERROGATORY No. 223: Identify and describe the methods by which BellSouth captures, tracks, and reports problems with NPA/NXX activation and their resolution.

ANSWER:

INTERROGATORY No. 224: Identify the BellSouth SQM measure(s) that include the time interval for completion of xDSL loop conditioning and describe in detail the start and stop times of the interval, and any information or request types excluded from the interval.

ANSWER:

INTERROGATORY No. 225: Please identify each of BellSouth's LCSC locations that are included in the Speed of Answer in Ordering Center Measure.

ANSWER:

INTERROGATORY No. 226: Please describe any differences in the data included in the LSR's in the denominator of the Percent LSRs total mechanized measure, and the LSRs included in the "LSRs submitted" in the flow-through report.

ANSWER:

INTERROGATORY No. 227: Please describe any differences in the data included in the LSRs in the fully mechanized rejections measure and the LSRs in the auto-clarifications of the flow-through report.

ANSWER:

INTERROGATORY No. 228: Please describe any differences in the data included in the LSRs in the partially mechanized rejections measure and the LSRs included in the “CLEC caused fallout” of the flow-through report.

ANSWER:

INTERROGATORY No. 229: Please describe any differences in the data included in the LSRs in the fully mechanized FOCs measure and the LSRs included in the “Issued Service Orders” of the flow-through report.

ANSWER:

INTERROGATORY No. 230: Please describe any differences in the completed orders used in the calculation of the missed appointment metric and the completed orders used in the calculation of the completion notice measure.

ANSWER:

INTERROGATORY No. 231: Please describe any differences in the completed orders used in the calculation of the Missed appointments – LNP measure and the completed orders in the calculation of the LNP Disconnect Timeliness measure.

ANSWER:

INTERROGATORY No. 232: Please describe any differences in the completed orders used in the calculation of the Missed Appointments UNE with LNP metric and the completed orders used in the calculation of the Hot Cut Timeliness measure.

ANSWER:

INTERROGATORY No. 233: Describe in detail the process BellSouth uses to track and report performance results for coordinated customer conversions (loops with and without number portability).

ANSWER:

INTERROGATORY No. 234: Identify all supporting documentation that references or discusses the process BellSouth uses to track and report performance results for coordinated customer conversions (loops with and without number portability).

ANSWER:

INTERROGATORY No. 235: With respect to the Coordinated Hot Cut Timeliness % Within Interval Measure, please provide all performance data, studies, or other information that support the benchmark of 95% within 4 hours window for IDLC loops.

ANSWER:

INTERROGATORY No. 236: For the months of January 2001 through June 2001, please state, by month, the percentage of coordinated cutovers in Kentucky that involved IDLC.

ANSWER:

INTERROGATORY No. 237: For the months of January 2001 through June 2001, please state the number and percentage of coordinated customer conversion service orders in Kentucky involving IDLC for which BellSouth failed to meet the Coordinated Hot Cut Timeliness % Within Interval Measure.

ANSWER:

INTERROGATORY No. 238: Describe in detail the carrier notifications that are included in BellSouth's change control measures and the carrier notifications that are excluded from BellSouth's change control measures.

ANSWER:

INTERROGATORY No. 239: Describe in detail the documentation releases that are included in BellSouth's change control measures and the documentation releases that are excluded from BellSouth's change control measures.

ANSWER:

INTERROGATORY No. 240: Please state the average interval by which BellSouth initiates local service for a new retail customer through the "win-back" process via loop cut-overs performed in the central office.

ANSWER:

INTERROGATORY No. 241: Beginning with January 1, 2001, provide the service order accuracy rate for CLEC orders and the service order accuracy rate for BellSouth's retail operation for Kentucky. For purposes of this interrogatory, "service order accuracy rate" with respect to CLEC orders is defined as the percentage of service orders for CLECs that were processed by BellSouth exactly as they were ordered or prepared by the CLECs.

ANSWER:

INTERROGATORY No. 242: Please describe in detail BellSouth's rationale for the 85% met benchmarks for the Percent Flow through Service Requests measure.

ANSWER:

INTERROGATORY No. 243: Explain why "D" orders associated with LNP Standalone Orders are not excluded from the Average Order Completion Interval measure.

ANSWER:

INTERROGATORY No. 244: For each SQM measure, describe the source of the data used to calculate the performance measurement results, e.g. LESOG, SOCs, etc.

ANSWER:

INTERROGATORY No. 245: Please describe BellSouth's rationale for excluding from its Held Order Interval Measure those orders that were held during the month, but were completed by the end of the month.

ANSWER:

INTERROGATORY No. 246: For each measure, describe the data that is stored or otherwise placed in BARNEY. If data for a measure is not stored or otherwise placed in BARNEY, please identify the database or system where such information is stored or otherwise placed.

ANSWER:

INTERROGATORY No. 247: Please identify all systems that feed information and/or data into PARIS.

ANSWER:

INTERROGATORY No. 248: Please describe the type information that is feed into and/or retained in PARIS.

ANSWER:

INTERROGATORY No. 249: Please describe in detail how data used to support BellSouth's SQM and SEEM plan is collected and stored.

ANSWER:

INTERROGATORY No. 250: For each measure in BellSouth's SQM, describe whether the data specified as excluded in BellSouth's SQM is also excluded from the raw data provided to CLECs.

ANSWER:

INTERROGATORY No. 251: Describe in detail BellSouth's procedure(s) for ensuring that its raw data includes all BellSouth and CLEC transactions, and is otherwise accurate.

ANSWER:

INTERROGATORY No. 252: Provide a SEEM report for AT&T data for February 2001 results, including payment amounts that would be due, if any, including all back-up detail. If results are not available for all measures, please provide a report on those measures for which data is available.

ANSWER:

INTERROGATORY No. 253: Provide BellSouth's basis for excluding appointments missed subsequent to the original committed due date from its Percent Missed Appointments measure.

ANSWER:

INTERROGATORY No. 254: For the months of January 2001 through June 2001, please provide the following information for each SEEM measure described below:

Measure	For CLEC Service Orders	For CLEC Service Orders	For BST Retail Analog Service Orders	For BST Retail Analog Service Orders
	% Field Dispatch	% Central Office Dispatch	% Field Dispatch	% Central Office Dispatch
Average Completion Interval/UNE Loops				
% Missed Installation Appointments/UNE loops				
Maintenance Avg. Duration/UNE Loops				
% Provisioning Troubles within 30 Days/UNE Loops				

ANSWER:

INTERROGATORY No. 255: Please provide the January 2001 through June 2001 monthly performance results for the “ADSL provided to retail” analog included in BellSouth’s proposed SQM.

- a. Average Completion Notice Interval
- b. Average Jeopardy Notice Interval
- c. % Missed Installation Appointments
- d. Missed Repair Appointments
- e. Maintenance Average Duration
- f. % Troubles within 30 Days

ANSWER:

INTERROGATORY No. 256: Describe and identify any and all analysis BellSouth has conducted on the pay-outs that would have been required of BellSouth for the months of January 2001 and February 2001 based on the remedy plan proposed by BellSouth.

ANSWER:

INTERROGATORY No. 257: Describe and identify any and all correlation studies and/or documents that BellSouth possesses or has caused to be prepared to justify its exclusion of measures from its remedies plan.

ANSWER:

INTERROGATORY No. 258: Provide all formulas required to compute the balancing critical value for proportion measures and please provide in an Excel spreadsheet, a numerical example illustrating the necessary computations.

ANSWER:

INTERROGATORY No. 259: Please provide the BellSouth mean and standard deviation for installation intervals of residential lines requiring dispatch.

ANSWER:

REQUESTS FOR DOCUMENTS

1. Please produce all documents that reflect the negotiations surrounding BellSouth's engagement of KCI for the Georgia OSS Test.
2. Please produce all documents that relate to, reflect or represent all compensation received by KCI for the testing done on BellSouth's OSS in Georgia.

3. Please produce any and all internal audits, change orders or work orders under the contract between KCI and BellSouth for Georgia Test.
4. Please produce all drafts, revisions and edits of the Georgia Master Test Plan and all subparts respectively revised and agreed upon by KCI and BellSouth to include but not limited to revisions filed with the GPSC on 10/16/99, 12/15/99 and 3/21/2000.
5. Please produce all drafts, revisions, and edits of the Georgia Final and Supplemental Test Reports, including, but not limited to, related electronic mail, notes, memoranda and other correspondence.
6. Please produce all data provided by BellSouth to KCI or Hewlett Packard ("HP") related to the Georgia and Florida OSS Tests, to include all revisions, changes, work papers, and drafts.
7. Please produce all correspondence and documents referring or relating to the Georgia and Florida OSS Tests, including, but not limited to, analysis or evaluation of information whether in letter, facsimile (fax), or electronic or other form, between or among any of the following entities: KCI, BellSouth, the GPSC, FPSC, HP and Competing Local Exchange Carriers ("CLECs").
8. Please produce all documents related to exception reports filed by KCI, including, but not limited to revisions, drafts, working papers and communications between BellSouth and KCI relating to any proposed exception report, in connection with the Georgia or Florida OSS Tests.
9. Please produce all withdrawn "draft exception" reports and related documents, to include but not limited to all comments sent or received from BellSouth and any subsequent communications, and all communications from BellSouth to KCI for the Georgia and Florida OSS Tests.
10. Please produce all documents, including but not limited to correspondence, electronic mail, and notes of telephone calls referring to, relating to, or constituting comments from the GPSC and FPSC on the exception or closure reports in the Georgia and Florida OSS Tests.

11. Please produce all documents, including but not limited to correspondence, electronic mail, and notes of telephone calls referring to, relating to, or constituting comments from HP on the exception or closure reports in the Georgia and Florida OSS Tests.
12. Please produce all notes taken by any participant in the weekly Georgia OSS and Florida OSS conference calls referenced in various Status Reports.
13. Please produce all documents detailing or related to any process for reviewing CLEC communications relating to the Georgia and Florida OSS Tests, including, but not limited to, documents demonstrating who at KCI or BellSouth received the communications, to whom they were disseminated, the process for evaluating the communicated information, and the plan and process for responding.
14. Please produce a log, including date, time, participants, agenda, and topics discussed, of all calls and meetings between KCI and BellSouth or between BellSouth and the GPSC and between BellSouth and the FPSC or among KCI, BellSouth and the GPSC or FPSC. Please provide copies of all notes taken by any participant in the calls identified.
15. Please produce all documents that refer or relate to KCI's evaluation of the accuracy of BellSouth's reports of flow through rates for BellSouth's own business and residential orders in the Georgia and Florida OSS Tests.
16. Please produce all documents that refer or relate to consideration of whether to evaluate the degree of parity between flow through rates for individual CLEC and BellSouth in the Georgia and Florida OSS Tests.
17. Please produce all documents that refer or relate to evaluations of the adequacy of BellSouth's change management process in the Georgia and Florida OSS Tests.
18. Please produce all documents that refer or relate to retesting of BellSouth's proposed modifications to remedy Exception Nos. 9, 24 and 91 and any other exceptions closed on the basis of proposed fixes in the Georgia OSS Test.
19. Please produce all documents that refer or relate to the basis for determining the number of calls used during retests of billing exceptions in the Georgia OSS Test.

20. Please produce all documents related to any retesting or reconsideration of any exception after the issuance of the closure report on the exception in the Georgia and Florida OSS Tests.
21. Please produce all system outage logs for BellSouth systems necessary for the Georgia and Florida OSS Tests.
22. Please produce any documents provided by BellSouth to KCI that were relied upon in building the interfaces to place orders with BellSouth for the Georgia and Florida OSS Tests.
23. Please produce all documents related to the construction of the TAG and EDI interfaces in the Georgia and Florida OSS Tests.
24. Please produce all job aids, methods and procedures, and maintenance methods and procedures used to evaluate the DSL portion of the Supplemental Test Plan in the Georgia OSS Test.
25. Please produce all documents related to the determination of the P-value calculations in the Georgia OSS Test.
26. Please produce all documents referring or relating to recommendations for modification of the Georgia and Florida OSS Tests received from any entity.
27. Please produce all documents referring or relating to the scope of the Georgia and Florida OSS Tests as defined by the GPSC and the FPSC.
28. Please produce all BellSouth analysis and evaluation related to the AT&T Georgia 1000 Test of BellSouth provision of UNE-P.
29. Please produce all documents related to KCI's determination that any exception was satisfied, not satisfied, or no determination was made in the Georgia OSS Test.
30. Please produce all documents that refer or relate to the standards or methodologies used to make the following determinations during the Georgia OSS Test: "satisfied,"

“not satisfied,” “material adverse impact on competition,” “no material adverse impact on competition,” “statistically significant,” and “not statistically significant.”

31. Please produce all documents related to the decision to terminate the Georgia OSS Test.
32. Please produce retest transactions, analysis and evaluations on any open exceptions in the Georgia and Florida OSS Tests.
33. Please produce all documents relating to the design consideration and implementation of re-testing in the Georgia OSS Test, including, but not limited to, the volume to be tested and the product mix for retesting for every transaction-based test.
34. Please produce all documents relating to the design and implementation of each test bed account in the Georgia and Florida OSS Tests.
35. Please produce all documents related to the design, methodology and implementation of data integrity testing of performance measures in the Georgia and Florida OSS Tests.
36. Please produce copies of any and all Test Cycle Logs included as part of the cycle report in the Master Test Plan in Georgia and Florida OSS Tests.
37. Please produce any reports, data, analysis, or other documentation that describe BellSouth's procedures for augmenting interconnection trunk groups, including engineering standards used for making the determination to augment.
38. Please provide Trunk Group Service Detail for all CLEC trunks that had blocking in excess of 3% during the months of Nov. 2000 through April 2001 in Kentucky. Please provide this information in electronic form on an Excel spreadsheet or equivalent.
39. Please provide the detailed WAPA logs for interconnection trunks provisioned to AT&T during the past 6 months. Include both BellSouth Managed and CLEC Managed trunks. Please provide this information in electronic form, such as an Excel spreadsheet, if possible.

40. Please provide LCSC's standard work unit volume graphs for the latest 12 months.
41. Please produce all documents relating to the group or department that reviews work performed by the LCSC representatives to ensure the accuracy of the issued order based on the information submitted by the CLEC in the LSR. Include documents relating to its methods, procedures and work papers.
42. Please produce a copy of BellSouth's Performance Measurements Quality Assurance Plan ("PMQAP").
43. Please produce copies of all Service Center Call Data, including Call Management System Reports, timeliness information, call abandonment rates, hold time range/median/mode and raw data.
44. Please produce all documents related to or used for "method one" and "method two" as described on pages 6 and 9 of the Affidavit of Victor K. Wakeling, attached as Exhibit CKC-4 to the Direct Testimony of Cynthia Cox (May 18, 2001) ("*Wakeling Aff.*").
45. Please produce all correspondence, including electronic mail, between Pricewaterhouse Coopers LLC. ("PwC") and BellSouth regarding or related to the Attestation Report filed as Exhibit OSS-74.
46. Please produce all information provided to PwC by BellSouth for the evaluation performed by PwC filed as Exhibit OSS-74.
47. Please produce all drafts and comments on any drafts on the Attestation Report prepared by PwC.
48. Please produce all work papers prepared by PwC as part of the examination of BellSouth OSS.
49. Please produce all documents by state relating or referring to loss of dial tone incidents in the year 2001 involving CLEC UNE-P customers.

50. Please produce all documents by state relating or referring to UNE-P User Group Meetings in which loss of dial tone incidents were discussed.
51. Please produce all documents relating or referring to the action plan or steps and the timeline for the development or generation of a new "single C-order" (change order) process for the UNE-P conversions.
52. Please produce all documents that relate to BellSouth's attempts to increase the capacity of its OSS production systems.
53. Please produce all documents that relate to attempts by BellSouth to solicit or consider input from CLECs regarding the design or PMAP, SEEM or SQM.
54. Please produce all documents that relate to the decision by BellSouth to include or exclude from SEEM or any particular performance measures.
55. Please produce all documents that relate to the determination by BellSouth of where and how to set the penalty levels in SEEM.
56. Please produce all documents that refute or support the statement contained in Victor Wakeling's affidavit that "The data demonstrate that competition in Kentucky's local exchange market is economically viable, rapidly expanding, irreversible, and serving the public interest." (*Wakeling Aff.* at 2-3.)
57. Please produce all correspondence referring or relating to the Georgia OSS Test, including electronic mail, between or among any of the following entities: KPMG, BellSouth, the GPSC, HP, and PwC.
58. Please provide any and all correspondence between BellSouth and PwC regarding the Attestation Report filed as Exhibit OSS-74.
59. Please provide floor plans for at least three central offices in Louisville, Kentucky that contain collocation. Please ensure that the floor plans show the entire central office including the BellSouth telecommunications area and the collocation areas. Further, please ensure that the frame placements in the central office are labeled with the type of equipment that is located in those areas.

60. Please provide the document or documents specifying the engineering guidelines used by BellSouth in planning and utilizing the telecommunication space within its central offices in Kentucky and each of the BellSouth states. Please ensure that this document or documents contains the information outlining how various pieces of telecommunications equipment including interconnection frames, power, transport, and switching equipment are related to one another within the central office from a space planning standpoint.
61. Please provide a tour of any three central offices within the Louisville, Kentucky area that contain collocation arrangements. The tour should permit escorted access to the collocation arrangements, interconnection frames, power equipment used for collocation, and the cable vault.
62. Please provide all documents relating to the dead air problems identified in Trouble Ticket Nos. KI015929 and KI016185.
63. Please provide all documents relating to any BellSouth facility or network changes effecting telecommunications traffic at the Louisville Armory Place switching facility during the period of January 1, 2000 to present.
64. Please provide all documents relating to any testing, inspections, troubleshooting or verification of functionality of the facilities or network at the Louisville Armory Place switching facility relating to telecommunication traffic.
65. Please provide all documents relating to the identification and repair of the faulty T1 card located at the Louisville Armory Place switching facilities during the period of January 1, 2001 to the present.
66. Please provide all documents relating to BellSouth's internal troubleshooting or investigation of its network and facilities upon notification that AT&T Broadband customers were experiencing the dead air problems identified in Trouble Ticket Nos. KI015929 and KI016185, during the period of March 16, 2001 to the present.
67. Please provide all documents relating to BellSouth's actions in response to the issues raised in AT&T Broadband's letter dated May 2, 2001 from Denise Berger to Jann Burris, attached as Exhibit JBC-2 to AT&T witness Coleman's Testimony filed July 9, 2001.

68. Please provide documents related to any problems conveyed to BellSouth regarding the "double billing" by BellSouth of AT&T Broadband customers for service after the porting of such customers from BellSouth service to AT&T Broadband service.
69. Please provide documents related to any problems conveyed to BellSouth regarding the inability of AT&T customers to receive local calls from BellSouth customers.
70. Please provide documents relating to any problems conveyed to BellSouth regarding the reassignment of the AT&T Broadband customer telephone numbers by BellSouth after porting from BellSouth service to AT&T service.
71. Please provide documents relating to the issues raised in AT&T Broadband letter dated May 25, 2001 from Denise C. Berger to Jan Burris attached as Exhibit JBC-4 to AT&T witness Coleman's Testimony filed July 9, 2001.
72. Please provide documents relating to the rescheduling of customer service transitioning scheduled on June 9, 2001 for AT&T Broadband service.
73. Please provide documents relating to BellSouth's justification or cause for rescheduling customer service transitions from BellSouth service to CLEC service during the period of January 1, 2001 to the present.
74. Please produce all contracts, work orders, or other documents between BellSouth and PwC outlining the scope of PwC's work in preparing the Attestation Report filed as Exhibit OSS-74.
75. Please produce all correspondence, including electronic mail, between PwC and BellSouth regarding or related to the Attestation Report filed as Exhibit OSS-74.
76. Please produce all documents and information provided to PwC by BellSouth for the evaluation performed by PwC filed as Exhibit OSS-74.
77. Please produce all drafts and comments on any drafts regarding the Attestation Report prepared by PwC filed as Exhibit OSS-74.

78. Please produce all work papers or notes prepared by PwC as part of the examination of BellSouth's OSS.
79. Please produce all internal BellSouth documents that describe how BellSouth handles disconnect orders associated with a CLEC UNE-P order and that describe how BellSouth coordinates its disconnect orders with a CLEC UNE-P order.
80. Please provide any and all documents related to and relied upon in responding to AT&T's Interrogatories to BellSouth.
81. Please provide all responses and documents to any data request filed in Case No. 2001-105.