STATE OF GEORGIA

COUNTY OF FULTON

BEFORE, ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared W. Keith Milner, who being by me first duly sworn, deposed and said that:

He is appearing as a witness before the Kentucky Public Service Commission in "Investigation Concerning the Propriety of InterLATA Services by BellSouth Telecommunications, Inc. Pursuant to the Telecommunications Act of 1996," KY PSC Case No. 2001-105, and if present before the Commission and duly sworn, his direct testimony would be set forth in the annexed transcript consisting of 116 pages and 9 exhibit(s).

W. Keith Milner

SWORN TO AND SUBSCRIBED BEFORE ME this
15th day of May, 2001.

NOTARY PUBLIC

MICHEALE F. HOLCOMB
Notary Public, Douglas County, Georgia
My Commission Expires November 3, 2001

BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF W. KEITH MILNER

BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

CASE NO. 2001-105

MAY 18, 2001

Q. STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH").

A. My name is W. Keith Milner. My business address is 675 West Peachtree Street, Atlanta, Georgia 30375. I am Senior Director - Interconnection Services for BellSouth. I have served in my present position since February 1996.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. My business career spans over 30 years and includes responsibilities in the areas of network planning, engineering, training, administration, and operations. I have held positions of responsibility with a local exchange telephone company, a long distance company, and a research and development company. I have extensive experience in all phases of telecommunications network planning, deployment, and operations in both the domestic and international arenas.

I graduated from Fayetteville Technical Institute in Fayetteville, North Carolina, in 1970, with an Associate of Applied Science in Business Administration degree. I graduated from Georgia State University in 1992 with a Master of Business Administration degree.

Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY STATE PUBLIC SERVICE COMMISSION?

A. I have previously testified before the state Public Service Commissions in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, and South Carolina, the Tennessee Regulatory Authority, and the North Carolina Utilities Commission on the issues of technical capabilities of the switching and facilities network, the introduction of new service offerings, expanded calling areas, unbundling, and network interconnection.

Q. HOW IS YOUR TESTIMONY ARRANGED?

A. My testimony is divided into the following sections:

Part A: Executive Summary: Pages 2 to 14.

The Executive Summary Section contains an overview of the network-related offerings BellSouth makes available to Competitive Local Exchange Carriers ("CLECs") through BellSouth's approved interconnection agreements and Statement of Generally Available Terms and Conditions ("SGAT").

Part B: Comprehensive Discussion of the Availability of Network-Related Offerings to CLECs: Pages 14 to 116.

Part B contains an extensive discussion of the availability of required offerings in Commission-approved interconnection agreements.

PART A: EXECUTIVE SUMMARY

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY TODAY?

A. The purpose of my testimony is to document the means by which BellSouth satisfies the network requirements of the Competitive Checklist set forth in Section 271(c)(2)(B) of the Telecommunications Act of 1996 ("Act"). In doing so, I will describe the network-related offerings that BellSouth makes available to CLECs in Kentucky through BellSouth's approved interconnection agreements and SGAT.

Q. HOW IS YOUR TESTIMONY ORGANIZED?

A. I discuss each checklist item in order. Within my discussion of various checklist items, I introduce affidavits from a number of BellSouth subject matter experts on the topics of (A) collocation; (B) access to poles, ducts, conduits and rights-of-way; (C) operator services and directory assistance ("OS/DA"); (D) white pages listings; (E) Local Number Portability ("LNP"); and (F) 911 and E911.

Q. WHAT WILL YOUR TESTIMONY DEMONSTRATE?

A. My testimony will demonstrate that BellSouth currently is in compliance with all the network requirements of the competitive checklist. Moreover, I will show that BellSouth has a legal obligation to provide required offerings in Commission-approved interconnection agreements. In addition to the interconnection agreements cited herein, Exhibit CKC-3 to the testimony of Cynthia Cox sets forth the citations to various interconnection agreements that evidence BellSouth's legally binding obligations to provide the network requirements of the competitive checklist. BellSouth refers the Commission to CKC-3 as evidence of BellSouth's checklist compliance. The Kentucky Public Service commission issued an Advisory Opinion in Case No. 96-608 on July 8,

1999, in which the Commission found that BellSouth satisfied seven of the fourteen checklist items. I will reference this decision as appropriate when I discuss each item.

Q. WHERE CAN THE COMMISSION FIND ADDITIONAL TECHNICAL INFORMATION ON THE OFFERINGS DISCUSSED HEREIN?

A. BellSouth provides detailed administrative information, technical information, and procedures for ordering facilities and services in a number of guides, technical service descriptions, and manuals, all of which are available on BellSouth's Internet website at (http://www.interconnection.bellsouth.com/guides/guides.html) and (http://www.interconnection.bellsouth.com/products/tech_ref.html). This website is available to the Commission should the Commission desire additional detail on any of the offerings discussed herein.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 1: INTERCONNECTION?

A. As of March 31, 2001, BellSouth had provisioned 8,820 trunks interconnecting its network with the networks of CLECs in Kentucky (that is, trunks from CLECs' switches to BellSouth's switches). In its nine-state region, BellSouth had installed 421,220 trunks from CLECs' switches to BellSouth's switches as of that same date. As of March 31, 2001, BellSouth had provided 203,850 two-way trunks (including transit trunks) to a total of 92 CLECs across BellSouth's nine-state region. In Kentucky, BellSouth has provided 3,783 two-way trunks (including transit trunks) to 16 CLECs who also have ordered and been provided trunk groups to BellSouth's local tandem switches.

In Kentucky, as of March 31, 2001, BellSouth had completed 198 physical collocation arrangements, with two (2) in progress, for over 20 different CLECs, of which 141are cageless physical collocation arrangements. Physical collocation arrangements were established in 30 different central offices out of a total of 178 central offices in Kentucky as of March 31, 2001. As of March 31, 2001, there were 5,303 physical collocation arrangements in place for CLECs throughout BellSouth's nine-state region. Of these, 3,353 were cageless physical collocation arrangements. An additional 161 physical collocation arrangements were in progress for over 43 different CLECs as of March 31, 2001.

In Kentucky, as of March 31, 2001, there were two (2) virtual collocation arrangements in progress, however there were two (2) virtual collocation arrangements in service located in one (1) BellSouth central office. Across BellSouth's nine-state region, over 40 different CLECs have requested and BellSouth had provided 361 virtual collocation arrangements with construction of an additional 26 arrangements underway as of March 31, 2001.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 2: NONDISCRIMINATORY ACCESS TO NETWORK ELEMENTS?

A. As of March 31, 2001, BellSouth had 14,635 loop and port combinations in place for CLECs in Kentucky and 303,257 such combinations in place for CLECs across BellSouth's nine-state region. In addition, BellSouth had 23 loop and transport combinations in place for CLECs in Kentucky.

BellSouth has also provided over 80 access terminals to CLECs in its nine-state region for the purpose of gaining access to sub-loop elements.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 3: ACCESS TO POLES, DUCTS, CONDUITS, AND RIGHTS-OF-WAY?

A. As of May 4, 2001, CLECs in Kentucky had executed with BellSouth 43 license agreements and 102 license agreements region-wide, (both state-specific and multi-state) that allow them to attach their facilities to BellSouth's poles and to place their facilities in BellSouth's ducts and conduits. Since July 1997, BellSouth has received 49 requests in Kentucky for access to poles, ducts, conduits, and rights-of-way from seven (7) CLECs with no requests being denied. Similarly, CLECs have leased approximately 195,000 feet of conduit space in BellSouth's nine-state region as a result of CLEC requests, of which 3,500 feet are in Kentucky. The Kentucky Commission has previously ruled that BellSouth satisfies this checklist requirement (Advisory Opinion, page 5).

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 4: LOCAL LOOP?

A. As of March 31, 2001, in Kentucky, BellSouth had provisioned 364 two-wire Asymmetrical Digital Subscriber Line ("ADSL") loops; and one (1) two-wire High Bit Rate Digital Subscriber Line ("HDSL") loop to over ten (10) different CLECs in Kentucky. As of the same date, BellSouth had provisioned within its region 14,102 two-

wire ADSL loops, 451 two-wire HDSL loops, and 46 four-wire HDSL loops to over 90 different CLECs.

While CLECs in Kentucky have not purchased unbundled sub-loop elements, BellSouth has provided over 500 unbundled sub-loop elements across its nine-state region.

BellSouth has no dark fiber arrangements in place in Kentucky; however, BellSouth has ten (10) dark fiber arrangements in place in two (2) other states within BellSouth's nine-state region.

As of April 1, 2001, BellSouth had provisioned 2,542 line sharing arrangements across BellSouth's nine-state region and 166 line sharing arrangements in Kentucky.

In February 2001, CLECs made 4,283 mechanized Loop Makeup ("LMU") inquiries region-wide. In Kentucky, CLECs made 116 mechanized LMU inquiries. From November 2000 through February 2001, CLECs made 549 manual LMU inquiries region-wide, with none in Kentucky.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 5: LOCAL TRANSPORT?

A. As of March 31, 2001, BellSouth had provided 228 dedicated local transport trunks to CLECs in Kentucky. BellSouth has provided 10,907 dedicated trunks providing interoffice transport to CLECs in its nine-state region as of that same date.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 6: LOCAL SWITCHING?

A. As of March 31, 2001, BellSouth had two (2) unbundled switch ports in service in Kentucky. Region-wide, BellSouth had 388 unbundled switch ports in service as of that same date. Additionally, in connection with its combined loop/port combination offering, BellSouth had 14,365 switch ports in service in Kentucky and 303,257 in service regionally.

BellSouth offers two methods of customized routing to CLECs: Advanced Intelligent Network ("AIN") and Line Class Codes ("LCCs"). BellSouth has tested both methods and both currently are available.

To date, no CLEC has requested BellSouth's AIN method of customized routing. BellSouth stands ready to provide the AIN method upon request. BellSouth has provided the LCC method of customized routing to one CLEC in Georgia. No CLEC in Kentucky has requested this method of customized routing; BellSouth, however, stands ready to provide it.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 7: 911/E911, DIRECTORY ASSISTANCE AND OPERATOR CALL COMPLETION?

A. As of March 31, 2001, CLECs had requested and BellSouth had provided 96 E911 trunks for CLECs in Kentucky. In its nine-state region, BellSouth had 4,400 trunks in

service connecting CLECs' switches with BellSouth's E911 arrangements as of that same date. In Kentucky, 13 CLECs were sending mechanized updates to BellSouth for inclusion in the 911 database as of March 31, 2001; and in BellSouth's nine-state region, 66 CLECs were doing so as of that same date.

As of March 31, 2001, CLECs in Kentucky had 65 directory assistance trunks in place between those CLECs' switches and BellSouth's Directory Assistance ("DA") platform. In BellSouth's nine-state region, there were 2,929 such directory assistance trunks in place serving CLECs. In BellSouth's nine-state region, 30 CLECs were purchasing Directory Assistance Access Service ("DAAS") and 41 CLECs were purchasing Directory Assistance Call Completion ("DACC") from BellSouth as of March 31, 2001.

As of March 31, 2001, five (5) service providers were using BellSouth's Kentucky subscriber listings, via Directory Assistance Database Service ("DADS"), to provide DA service and third party listing data to end users. Nine (9) service providers were using DADS across BellSouth's nine-state region as of that same date. As of March 1, 2001, two (2) service providers in the region were using Direct Access to Directory Assistance Service ("DADAS") to provide the service to CLECs.

As of March 31, 2001, BellSouth had provided CLECs in Kentucky with 59 operator services trunks. Across its nine-state region, BellSouth had provided CLECs with 2,903 operator services trunks as of that same date. In Kentucky, BellSouth had provided CLECs with two (2) verification trunks as of March 31, 2001. Across its nine-state region, BellSouth had provided CLECs with 503 verification trunks as of that same date.

BellSouth offers four service levels of branding to CLECs when CLECs order Directory Assistance and/or Operator Call Processing. The options are: BellSouth branding, unbranded, custom branding, and self-branding. Unbranded, custom branding, and self-branding are all provided via customized routing. BellSouth will complete its deployment of Originating Line Number Screening ("OLNS") in Kentucky by July 13, 2001.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 8: WHITE PAGES LISTINGS?

A. BellSouth has long made its white pages listing capabilities available to independent LECs and other service providers. Because methods and procedures have been in place to allow other carriers access to BellSouth's white pages listing capabilities for many years, the necessary methods and procedures pursuant to which CLECs may obtain such listings are business as usual for BellSouth. The Kentucky Commission has previously ruled that BellSouth satisfies this checklist requirement (Advisory Opinion, page 6).

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 9: NUMBER ADMINISTRATION?

A. The Kentucky Commission has previously ruled that BellSouth satisfies this checklist requirement (Advisory Opinion, p 7). At this time, Bellsouth was performing the central office code assignment function. At this time, BellSouth no longer performs this function. NeuStar assumed all North American Numbering Plan Administrator ("NANPA") responsibilities on November 17, 1999 when the Federal Commissions

Commission ("FCC") approved the transfer of Lockheed-Martin's Communication Industry Service division to NeuStar.

As to its responsibilities, BellSouth has responded to CLEC concerns about accurate and timely activation of NXX codes by establishing, effective May 15, 1998, its NXX activation Single Point of Contact ("SPOC") to provide assistance to CLECs and Independent LECs. The NXX SPOC processes requests for NXX activity coordination, and provides information concerning BellSouth's architecture arrangements, assistance in trouble resolution for code activation, and assistance in preparing the Code Request. If a CLEC or independent LEC intends to interconnect directly with BellSouth, or if interconnection arrangements with BellSouth are already in place, the CLEC or independent LEC should send to BellSouth a courtesy copy of its Central Office Code Request in conjunction with the submission of its CO Code Request to the NANPA (NeuStar). If the CLEC gives BellSouth a copy of its Central Office Code Request, BellSouth is better able to activate the Central Office Code in BellSouth's network.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 10: ACCESS TO DATABASES AND ASSOCIATED SIGNALING?

A. BellSouth's signaling service is available as evidenced by the fact that, as of May 7, 2001, ten (10) CLECs had directly connected to BellSouth's signaling network in Kentucky.

BellSouth's region-wide Line Information Database ("LIDB") processed more than 1.5 billion queries from CLECs and others during the period from January 1997 through February 2001.

As of April 1, 2001, BellSouth has over 70 Calling Name ("CNAM") database customers, consisting of both CLEC and independent LECs, across BellSouth's nine-state region.

BellSouth has offered independent LECs and other service providers, access to its Toll Free Number database for years. The necessary methods and procedures for obtaining such access by CLECs are business as usual for BellSouth. Moreover, the availability of these services is evidenced by the fact that, from January 1997 through March 31, 2001, CLECs and other service providers across BellSouth's nine-state region completed approximately 8.2 billion queries to BellSouth's Toll Free Number database. The Kentucky Commission has previously ruled that BellSouth satisfies this checklist requirement (Advisory Opinion, page 7).

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 11: SERVICE PROVIDER NUMBER PORTABILITY?

A. The Kentucky Commission has previously ruled that BellSouth satisfies this checklist requirement (Advisory Opinion, page 8). At the time, BellSouth was utilizing interim Number Portability. BellSouth ported 2,456 lines in Kentucky using Interim Number Portability ("INP"). However, as of May 2, 2001, BellSouth had converted 1,236 (50%)

of those lines to Local Number Portability ("LNP"). In its region, BellSouth ported 117,010 numbers, of which 107,773 (92%) have been converted to LNP as of that same date.

BellSouth continued to offer INP in each central office in Kentucky until LNP was implemented, which began in December 1998. As of March 31, 2001, BellSouth had ported 26,613 business directory numbers and 110 residence directory numbers in Kentucky using LNP. In its nine-state region, BellSouth has ported 1,113,649 business and 133,703 residence directory numbers as of March 31, 2001, which confirms the availability of LNP.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 12: LOCAL DIALING PARITY?

A. BellSouth's interconnection arrangements do not require any CLEC to use access codes or additional digits to complete local calls to BellSouth customers. Neither are BellSouth customers required to dial any access codes or additional digits to complete local calls to the customers of any CLEC.

While BellSouth is unable to determine the full extent of CLEC dialing policies, BellSouth is not aware of any complaints from CLEC customers that they are required to dial any access codes or additional digits to complete local calls. The Kentucky Commission has previously ruled that BellSouth satisfies this checklist requirement (Advisory Opinion, pages 8-9).

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 13: RECIPROCAL COMPENSATION?

A. Reciprocal compensation arrangements are provided for in BellSouth's interconnection agreements as well as through its SGAT. The Kentucky Commission has previously ruled that BellSouth satisfies this checklist requirement (Advisory Opinion, page 10). However, reciprocal compensation is discussed further in the testimony of Cynthia Cox.

Q. WHAT EVIDENCE DOES BELLSOUTH HAVE THAT INDICATES IT IS IN COMPLIANCE WITH CHECKLIST ITEM 14 RESALE OF THE INCUMBENT LEC'S RETAIL TELECOMMUNICATIONS SERVICES AT A DISCOUNT?

A. As of March 31, 2001, there were 121,031 units being resold by CLECs in Kentucky while 3,002,701 were being resold throughout BellSouth's region.

PART B: COMPREHENSIVE DISCUSSION OF THE AVAILABILITY OF NETWORK-RELATED OFFERINGS TO CLECS.

CHECKLIST ITEM 1: INTERCONNECTION

Q. GENERALLY DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 1.

A. According to the FCC, interconnection refers "to the physical linking of two networks for the mutual exchange of traffic." *Local Competition Order*, ¶ 176. Checklist Item 1

obligates BellSouth to provide CLECs access to points of interconnection that are equal in quality (as defined by 47 C.F.R. § 51.331) to what BellSouth provides itself, and that meet the same technical criteria and standards used in BellSouth's network for a comparable arrangement, except where a CLEC requests otherwise. 47 U.S.C. § 251(c)(2)(C) and (D) and 47 C.F.R. § 51.305(a)(3), (4).[1] As detailed below, BellSouth's interconnection agreements and its Kentucky SGAT fully satisfy this mandate.

Checklist item 1 has three requirements. First, BellSouth must provide interconnection at any technically feasible point in the carrier's network. Second, BellSouth must provide CLECs with interconnection that is at least equal in quality to that provided by BellSouth to itself. Third, BellSouth must provide interconnection on rates, terms and conditions that are just, reasonable and nondiscriminatory.

POINTS OF INTERCONNECTION

Q. DOES BELLSOUTH PROVIDE INTERCONNECTION AT ANY TECHNICALLY FEASIBLE POINT?

A. Yes. Local interconnection is available at any technically feasible point in BellSouth's network, including meet point interconnection arrangements, on terms and conditions that are just, reasonable and nondiscriminatory. 47 U.S.C. § 251(c)(2); 47 C.F.R. § 51.305(a)(2); s*ee* Interconnection Agreement between BellSouth and e.spire

[1] *See also,* Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket Nos. 96-98 & 95-185, 11 FCC Rcd 15499, 15614 (1996) ("Local Competition Order"), modified on recon., 11 FCC Rcd 13042 (1996), vacated in part on other grounds sub nom. Iowa Utils. Bd. V. FCC, 120 F. 3d 753 (8th Cir. 1997), cert. granted sub nom. AT&T Corp. v. FCC, 118 S. Ct. 879 (1998).

Communications, Inc. ("e.spire Agmnt"), GTC-A, § 7.0; ATT.1. Consistent with FCC rules, BellSouth makes interconnection available at the following points: line-side of the local end office switch; trunk-side of the local end office switch; trunk interconnection points for local end office and tandem switches; central office cross-connect points; out-of-band signal transfer points; and the points of access to unbundled elements. *See* Interconnection Agreement Between BellSouth and NewSouth Communications, Corp. ("NewSouth Agmnt"), Att. 3, § 1.2. CLECs have the option to interconnect at only one technically feasible point in each LATA. *See* NewSouth Agmnt. Att.3, § 1.2. In cases in which dual entrance points are available in a given central office building, and space is available, BellSouth will make dual entry facilities available to CLECs. *See* NewSouth Agmnt., Att. 4, § 5.2.1. Moreover, a CLEC may request, via the Bona Fide Request ("BFR") process, to utilize another interconnection point when it is determined to be technically feasible.[2] *See* NewSouth Agmnt., Att. 3, § 1**.** BellSouth will provide ordering and provisioning of interconnection services that is equal to the ordering and provisioning services BellSouth provides to itself. *See* NewSouth Agmnt., Att. 6.

MEANS OF INTERCONNECTION

Q. WHAT MEANS OF INTERCONNECTION DOES BELLSOUTH OFFER?

A. BellSouth offers the following means of interconnection: (1) physical collocation; (2) virtual collocation; (3) assembly point arrangements; (4) fiber optic meet arrangements; and (5) interconnection via purchase of facilities from the other party. *See* e.spire

[2] The BFR process, and the intervals associated with it, are addressed in the testimony of Cynthia Cox.

Agmnt., Att. 3, §§ 1.1; 1.11; 1.8; Att. 4; SGAT, § I.C. BellSouth provides equal-in-quality interconnection on terms and conditions that are just, reasonable, and nondiscriminatory in accordance with the requirements of Sections 251(c)(2) and 252(d)(1). Moreover, a CLEC may request, via the BFR process, to utilize another means of interconnection when it is determined to be technically feasible. *See* e.spire Agmnt., Att. 3, § 1.1.

Q. DESCRIBE MULTIPLE TANDEM ACCESS (MTA).

A. BellSouth MTA provides for LATA-wide BellSouth transport and termination of CLEC-originated local and BellSouth transported intraLATA traffic by establishing a Point of Interconnection at a BellSouth access tandem with routing through multiple BellSouth access tandems as required. The terms and conditions for such offering are set forth in interconnection agreements. *See* NewSouth Agmnt., Att. 3, § 1.9.

INTERCONNECTION TRUNKS

Q. DESCRIBE THE TRUNKING ARRANGEMENTS AVAILABLE TO CLECS FOR ROUTING TRAFFIC.

A. BellSouth provisions, maintains, and repairs interconnection trunks for CLECs in a manner that is equal in quality to the way in which BellSouth provisions trunks for its own services. 47 C.F.R. § 51.305(a)(3); *see also* NewSouth Agmnt., Att. 3. BellSouth designs its interconnection facilities to meet the same technical criteria and service standards that are used within its own network. *See* e.spire Agmnt., Att. 3, §§ 3.2 – 3.3.

BellSouth offers CLECs various options to route local/intraLATA toll traffic and transit traffic over separate trunk groups or over a single trunk group. *See* e.spire Agmnt., Att. 3; NewSouth Agmnt., Att. 3.

First, BellSouth provisions local/intraLATA toll trunks for traffic between CLEC end users and BellSouth end users or Wireless Service Providers and vice versa. Local traffic or local/intraLATA toll traffic may be delivered at the BellSouth local tandem, the BellSouth access tandem, or the BellSouth end office. Local/intraLATA toll trunks may use multi-frequency ("MF") or Signaling System 7 ("SS7") signaling and may be one-way or two-way. *See* e.spire Agmnt., Att. 3, § 2; NewSouth Agmnt., Att. 3, § 2.6. In addition, BellSouth provides transit trunks for traffic between a CLEC and a third party such as an Independent Company, Interexchange Carrier, or another CLEC (i.e., where a BellSouth end user is not involved). Transit trunk groups are generally two-way trunks, but may be built as one-way trunks. They may use MF or SS7 signaling. Transit intraLATA toll traffic from the CLEC must be delivered to the BellSouth access tandem. Transit local traffic may be delivered to the BellSouth access tandem or to the BellSouth local tandem. *See* e.spire Agmnt., Att. 3.

If the CLEC chooses, additional trunk groups may be established for operator services, directory assistance, emergency services and intercept. *See* e.spire Agmnt., Att. 3.

Q. ARE CLECS PURCHASING INTERCONNECTION TRUNKS?

A. Yes. As of March 31, BellSouth had provisioned 8,820 trunks interconnecting its network with the networks of CLECs in Kentucky (that is, trunks from CLECs' switches

to BellSouth's switches). In its nine-state region, BellSouth had installed 421,220 trunks from CLECs' switches to BellSouth's switches as of that same date. As of March 31, 2001, BellSouth had provided 203,850 two-way trunks (including transit trunks) to a total of 92 CLECs across BellSouth's nine-state region. In Kentucky, BellSouth has provided 3,783 two-way trunks (including transit trunks) to 16 CLECs who also have ordered and been provided trunk groups to BellSouth's local tandem switches.

Q. HOW DO CLECS REQUEST INTERCONNECTION TRUNKS?

A. CLECs request interconnection trunks by submitting an Access Service Request ("ASR") to BellSouth's Interconnection Purchasing Center ("IPC"). BellSouth established the IPC during the second quarter of 1998 to facilitate BellSouth's handling of ASRs submitted by the CLECs and payment of CLECs' reciprocal compensation charges. The IPC receives ASRs from the CLECs, captures information required for Carrier Access Billing System ("CABS") billing purposes, screens the ASR for accuracy, and routes the ASR via the Telcordia (formerly Bell Communications Research, Inc. or "Bellcore") Exchange Access Control and Tracking ("EXACT") System to BellSouth's Circuit Capacity Management ("CCM") center. The BellSouth CCM Center establishes the trunk group identification for new trunk groups or increases the trunk quantities in BellSouth's mechanized systems in the case of trunk augmentations. The ASR is then forwarded via EXACT to BellSouth's Circuit Provisioning Group ("CPG"). The CPG is responsible for issuing required trunk and facilities orders to BellSouth's Network Infrastructure Support Center ("NISC"), which prepares required switch translations, and BellSouth's Local Interconnection Switching Center ("LISC"), which coordinates the testing and turn-up of the trunks. The LISC forwards the orders to BellSouth's Work Management Center

("WMC") and BellSouth's Field Work Groups ("FWGs") for testing and turn-up of the trunks. *See* BellSouth's Local Interconnection and Facility Based Ordering Guide.

From July 1999 through March 2001, BellSouth's IPC processed 152 orders from CLECs for interconnection trunks in Kentucky and processed 6,920 orders from CLECs across BellSouth's nine-state region.

Q. HOW DOES BELLSOUTH PROCESS ITS OWN TRUNK AUGMENTATIONS TO BELLSOUTH'S POINT OF INTERCONNECTION WITH CLECS?

A. For trunks originating on BellSouth's network and terminating on the CLEC's network, the process for establishing and augmenting trunks is the same as the CLEC process to establish interconnection trunks with BellSouth, except for the billing. The CCM issues an "external" ASR to the CLEC and an "internal" ASR to the IPC. The IPC screens the "internal" ASR for accuracy, and routes the ASR via the EXACT System to the CCM Center. The CCM Center establishes the trunk group identification for new trunk groups or increases the trunk quantities in BellSouth's mechanized systems in the case of trunk augmentations. The ASR is then forwarded via EXACT to the CPG. The CPG is responsible for issuing required trunk and facilities orders to the NISC, which prepares required switch translations, and BellSouth's LISC, which coordinates the testing and turn-up of the trunks. The LISC forwards the orders to BellSouth's Work Management Center and BellSouth's Field Work Groups for testing and turn-up of the trunks.

Q. DISCUSS BELLSOUTH'S PROCESS FOR FORECASTING THE NUMBER OF TRUNKS REQUIRED TO PROVIDE INTERCONNECTION SERVICES.

A. All trunk forecasting and servicing for CLEC local and intraLATA toll trunk groups is based upon the same industry standard objectives that BellSouth uses for its own trunk groups. BellSouth uses the standard objective of two (2) percent overall call blocking during the time-consistent average busy hour in the busy season which consists of one (1) percent blocking from the end office to the local tandem and one (1) percent blocking from the local tandem to the end office. When an access tandem serves as the intermediary switch, the standard objective is one and one-half (1.5) percent overall blocking during the time-consistent average busy hour in the busy season. This consists of one-half (.5) percent blocking on the common transport trunk group from the end office to the access tandem and one (1) percent blocking from the access tandem to the end office.

BellSouth's forecasting process is designed to determine the amount of traffic that will be handled by each central office, and the number of trunks that will be required to carry that traffic during the forecast period (normally 5 years). BellSouth's General Trunk Forecast (the "GTF") is maintained daily and includes forecasts both for BellSouth traffic and CLEC traffic.

Twice a year, the BellSouth LISC initiates written requests for forecasts from all CLECs who have a presence in any of the nine BellSouth states. The forecasting periods cover January - June and July - December. The LISC provides the CLECs' forecasts to the BellSouth CCM Centers in each state. The CLEC forecasts are necessary in order to incorporate the CLEC's requirements into BellSouth's GTF.

To prepare the GTF, BellSouth begins with the number of trunks currently in service. BellSouth then calculates a growth factor (that is, the percentage of growth expected over the next forecast period as well as anticipated growth in traffic that may be generated by new services.) This data is measured using "busy hour" information, measured and gathered using a BellSouth system, the Network Information Warehouse, that conforms with national industry standards. BellSouth also adjusts for planned network rearrangements, such as switch replacements, relocations, or additions. The growth factor is then applied to the trunks currently in service.

As CLECs interconnect to BellSouth's network, the transitioning of traffic from BellSouth to the CLEC often requires more trunks than would normally carry the traffic in question when BellSouth was the sole provider of service. The purpose of the CLEC forecast is to identify locations and estimated quantities to be used in developing factors to account for these transitional effects in the network. After BellSouth's growth factor is applied to the trunks in service, BellSouth applies these transitional factors. After these adjustments for growth and transitional factors are taken into account, BellSouth's forecast is reflected in the GTF.

Q. DISCUSS THE FORECASTING RESPONSIBILITIES OF BELLSOUTH AND THE CLECS.

A. BellSouth and the CLECs are jointly responsible for forecasting, monitoring, and servicing all two-way trunk groups between the two networks. *See* NewSouth Agmnt., Att. 3, § 3.6. BellSouth is responsible for forecasting, monitoring, and servicing the one-way trunk groups terminating to CLECs. CLECs are responsible for forecasting,

monitoring and servicing the one-way trunk groups to BellSouth, including terminating, transit, operator services, directory assistance, and E911 trunks. *See* e.spire Agmnt., Att. 3, § 3.6. Standard trunk traffic engineering methods are used as described in Bellcore document SR-TAP-000191, Trunk Traffic Engineering Concepts and Applications or as otherwise mutually agreed to by the parties.

BellSouth will use its best efforts in conjunction with the CLEC to create the most effective and reliable interconnected telecommunications network. *See* e.spire Agmnt., Att. 3, § 3.1. BellSouth and the CLEC will meet periodically for the purpose of exchanging non-binding forecasts of their traffic and volume requirements for interconnection. *See* NewSouth Agmnt., Att. 3, § 3.6. Forecast meetings may be face-to-face, or by video or audio conference. *See* SGAT, §XVII.B; XVII.C.

In addition to, and not in lieu of, the required non-binding forecasts, BellSouth and the CLEC may negotiate a binding forecast that commits the forecast provider to purchase, and the forecast recipient to provide, a specified volume to be utilized as set forth in the binding forecast. The terms of such a binding forecast will be negotiated and may contain provisions regarding price, quantity, and liability for failure to perform. *See* ICG Agmnt., Att. 3; SGAT, § XVII.D.

Q. DISCUSS BELLSOUTH'S PROCESS FOR FORECASTING SWITCH CAPACITY NEEDS.

A. BellSouth forecasts its switch capacity needs based on two inputs – the GTF and the access line forecast. As described above, the GTF is created using CLEC inputs. Thus,

CLEC plans are taken into account both in BellSouth's trunk forecasting and in its switch planning and forecasting processes. For most switches, the capacity managers generally schedule additions of trunk terminations to be completed and available for service by the time the currently installed trunk capacity reaches 97 percent utilization.

Some specific switches have been identified as candidates for trunk relief when the installed trunk capacity reaches 90 percent utilization. Candidate offices are those offices that meet the following criteria:

- End office digital switches
- Switches with 100 trunking DS1s currently installed (a DS1 contains 24 voice channels)
- Switches with growth of at least 75 trunking DS1s per year

Those offices that are candidates for relief at 90 percent are larger offices typically serving business customers, and likely to also have high usage between CLEC's switches and BellSouth's switches.

For tandem switches, the capacity managers schedule additions of trunk terminations to be completed and available for service by the time the currently installed trunk capacity reaches 85 percent utilization.

An addition of trunk terminations is scheduled to complete when the switch has reached its targeted trunk utilization percentage. In other words, BellSouth does not wait until that utilization percentage has been reached before triggering the addition. Once the capacity manager has determined the anticipated target exhaust date for a switch, the capacity manager subtracts an appropriate amount of time from that exhaust date to allow for the equipment addition to be engineered, manufactured, shipped, and installed in the

switch. Thus, BellSouth initiates the addition of trunk terminations well in advance of the targeted exhaust date. As discussed earlier, CLECs inform BellSouth of their anticipated traffic growth through the routine exchange of traffic forecasts.

Q. DOES BELLSOUTH MAKE INTERCONNECTION TRUNKS AVAILABLE ON A NONDISCRIMINATORY MANNER?

A. Yes. BellSouth's performance data for interconnection trunks will be discussed in the performance data testimony of Alphonso Varner.

FIBER-MEET

Q. DESCRIBE THE FIBER-MEET ARRANGEMENT.

A. "Fiber-Meet" is an interconnection arrangement whereby the parties physically interconnect their networks via an optical fiber interface (as opposed to an electrical interface) at which one party's facilities, provisioning, and maintenance responsibility begins and the other party's responsibility ends (i.e., at a Point of Interface). If a CLEC elects to interconnect with BellSouth pursuant to a fiber-meet arrangement, the CLEC and BellSouth shall jointly engineer and operate such. See e.spire Agmnt., Att. 3, § 1.11; NewSouth Agmnt., Att. 3, § 1.11.

COLLOCATION

Q. DOES BELLSOUTH MAKE SPACE AVAILABLE IN ITS PHYSICAL STRUCTURES TO FACILITATE THE INTERCONNECTION OF ITS NETWORK FACILITIES WITH THOSE OF CLECS?

A. Yes. Collocation is a process pursuant to which BellSouth permits CLECs to contract for space in BellSouth's premises so that CLECs may interconnect their network facilities with BellSouth's network facilities. BellSouth premises include land owned, leased, or controlled by BellSouth as well as any BellSouth network structure on such land housing network facilities. *See* e.spire Agmnt., Att. 4, § 1.2. BellSouth offers a variety of collocation arrangements as described below. Where technically feasible, BellSouth will make physical collocation available in any BellSouth structure that houses network facilities and has space available for collocation.

Q. DESCRIBE BELLSOUTH'S PHYSICAL COLLOCATION OFFERINGS.

A. BellSouth will provide to a CLEC at the CLEC's request, on a first-come, first-served basis, physical collocation under the same terms and conditions available to similarly situated carriers and on terms and conditions that are just, reasonable and non-discriminatory. 47 C.F.R. § 52.323 (f); SGAT, § II.A.7. Where sufficient space exists, CLECs can physically collocate in BellSouth premises to terminate CLEC cables on their own equipment. Physical Collocation is available at Central Offices, Serving Wire Centers, and at Remote Sites and may be offered in the following types: Caged, Shared (including shared cages), Cageless, or Adjacent. *See* e.spire Agmnt., Att. 4; NewSouth Agmnt., Att. 4.

With physical collocation, equipment ownership, operation, maintenance and insurance are the responsibility of the collocator or its approved agent. BellSouth permits the collocation of any type of equipment that is directly related to and thus necessary, required, or indispensable for interconnection to BellSouth's network or for access to unbundled network elements in the provision of telecommunications services. *See* NewSouth Agmnt., Att. 4, § 1.3. In addition, BellSouth permits the physical collocation of microwave facilities when technically feasible for interconnection to BellSouth's network or for access to UNEs in the provision of telecommunications services. *See* SGAT, Attach. I. With physical collocation, BellSouth provides an interconnection point or points, physically accessible by both BellSouth and the requesting CLEC, at which the fiber optic cables carrying the CLEC's circuits enter BellSouth's premises. 47 C.F.R. § 51.323 (d)(1); NewSouth Agmnt., Att. 4, § 1.3. BellSouth will provide at least two interconnection points at each premise where there are at least two such interconnection points available and where capacity exists. *See* e.spire Agmnt., Att. 4, § 5.2.1. For purposes of collocation, the interconnection point is the point at which the CLEC enters BellSouth's premises, namely the manhole or the cable vault. *See* e.spire Agmnt., Att. 4, § 5.2.

Physical Collocation is a negotiated contract arrangement in all BellSouth states for the placement of collocator-owned facilities and equipment in BellSouth central premises. The terms and conditions pursuant to which BellSouth offers physical collocation are set forth in detail in the Affidavit of Wayne Gray, Attachment A; *see* also, NewSouth Agmnt., Att. 4.

Q. IS BELLSOUTH PROVIDING PHYSICAL COLLOCATION IN KENTUCKY?

A. Yes. In Kentucky, as of March 31, 2001, BellSouth had completed 198 physical collocation arrangements, with two (2) in progress, for over 20 different CLECs, of which 141 are cageless physical collocation arrangements. Physical collocation arrangements were established in 30 different central offices out of a total of 178 central offices in Kentucky as of March 31, 2001. As of March 31, 2001, there were 5,303 physical collocation arrangements in place for CLECs throughout BellSouth's nine-state region. Of these, 3,353 were cageless physical collocation arrangements. An additional 161 physical collocation arrangements were in progress for over 43 different CLECs as of March 31, 2001. Exhibit WKM-1 is a summary of physical and virtual collocation arrangements currently in place or in progress in Kentucky and in BellSouth's nine-state region.

Q. DOES BELLSOUTH HAVE PROVISIONING INTERVALS FOR PHYSICAL COLLOCATION?

A. Yes. On August 10, 2000, the FCC issued its Collocation Reconsideration Order setting forth default intervals for physical collocation where state regulatory authorities had not established such intervals. On December 1, 2000, BellSouth filed with the FCC a Petition for Conditional Waiver. On February 20, 2001, the FCC held that the intervals in the New York Section 271 decision would be the default intervals applicable to BellSouth. Consequently, BellSouth will comply with the FCC's default intervals until such time as the Commission establishes permanent intervals. BellSouth has filed an updated tariff with the Kentucky Public Service Commission to reflect the collocation intervals ordered by the FCC in its recent Memorandum Opinion and Order, CC Docket No. 98-147, released February 20, 2001. BellSouth will provision physical collocation in

76 business days under ordinary conditions and 91 business days under extraordinary conditions. These intervals are contingent on the CLEC's provision of a collocation forecast.

Q. DESCRIBE BELLSOUTH'S VIRTUAL COLLOCATION OFFERING.

A. Upon request of the CLEC, or when space is not available for physical collocation, BellSouth offers virtual collocation in accordance with the existing BellSouth FCC Tariff Number 1, Section 20, "Virtual Expanded Interconnection Service", as contemplated by Paragraph 826 of the *Local Competition Order*, 11 FCC Rcd at 15912. Virtual collocation provides for the placement of collocator-owned transmission equipment and other facilities in BellSouth central offices for interconnection to the BellSouth network. Such equipment must be necessary for the provision of telecommunications services and may include, but not be limited to, optical terminating equipment and multiplexers, digital subscriber line access multiplexers ("DSLAMs"), routers, asynchronous transfer mode ("ATM") multiplexers, and remote switching modules. Virtual collocation arrangements may interconnect to designated BellSouth tariffed services, local interconnection trunks and/or unbundled network elements. BellSouth will provide virtual collocation in a manner that permits CLECs to combine UNEs. With virtual collocation, BellSouth provides an interconnection point or points, physically accessible by both BellSouth and the requesting CLEC, at which the fiber optic cables carrying the CLEC's circuits enter BellSouth's premises. 47 C.F.R. § 51.323(d)(1). BellSouth will perform all maintenance and repair on virtual collocation equipment once the collocator requests such work. BellSouth will install, maintain and repair collocated equipment in the same manner as BellSouth provides for its own equipment. The terms and conditions

pursuant to which BellSouth provides virtual collocation are set forth in detail in the Affidavit of Wayne Gray, Attachment A.

Q. IS BELLSOUTH PROVIDING VIRTUAL COLLOCATION IN KENTUCKY?

A. Yes. In Kentucky, as of March 31, 2001, there were two (2) virtual collocation arrangements in progress, however there were two (2) virtual collocation arrangements in service located in one (1) BellSouth central office. Across BellSouth's nine-state region, over 40 different CLECs have requested and BellSouth had provided 361 virtual collocation with construction of an additional 26 arrangements underway as of March 31, 2001. Exhibit WKM-1 is a summary of physical and virtual collocation arrangements currently in place or in progress in Kentucky and in BellSouth's nine-state region.

Q. DOES BELLSOUTH HAVE INTERVALS FOR VIRTUAL COLLOCATION?

A. Yes. Neither the FCC nor the Commission has established provisioning intervals for virtual collocation. Notwithstanding that fact, BellSouth will provide virtual collocation in 50 calendar days from receipt of a Bona Fide Firm Order ("BFFO") under ordinary circumstances and 75 calendar days from receipt of a BFFO under extraordinary circumstances.

OTHER INTERCONNECTION METHODS

Q. DOES BELLSOUTH OFFER MEANS OTHER THAN COLLOCATION FOR INTERCONNECTION?

A. Yes. BellSouth also offers assembly point arrangements. Assembly point arrangements allow a CLEC to combine UNEs without physical or virtual collocation. *See* SGAT, § II.D.1. The assembly point is a cross connection device to which BellSouth will deliver UNEs requested by CLECs using the arrangement. In this arrangement, BellSouth will supply all of the equipment required by the CLEC to access UNEs.

BellSouth makes physical collocation available in compliance with its SGAT and applicable interconnection agreements. Moreover, BellSouth is providing interconnection at the local tandem. *See* e.spire Agmnt., Att. 3, § 1.10. A CLEC may select either basic or enhanced local tandem interconnection. Basic local tandem interconnection allows CLECs to terminate traffic to BellSouth's end office switches and wireless service provider switches within the area served by the tandem. Enhanced local tandem interconnection adds the ability to terminate traffic to other CLEC and independent company switches in the area served by the tandem. *See* NewSouth Agmnt., Att. 3, §§ 1.5; 1.10; SGAT, § I.A.5. As of March 31, 2001, BellSouth has provided 120 local tandem interconnection trunks to one (1) CLEC in Kentucky.

CHECKLIST ITEM 2: NONDISCRIMINATORY ACCESS TO NETWORK ELEMENTS

Q. GENERALLY DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 2.

A. BellSouth meets the requirements of Checklist Item 2 if it offers access and interconnection that includes "[n]ondiscriminatory access to network elements in accordance with the requirements of Section 251(c)(3) and 252(d)(1)." 47 U.S.C. §

271(c). Section 251(c)(3) requires BellSouth to provide CLECs with nondiscriminatory access to UNEs at any technically feasible point on rates, terms and conditions that are just, reasonable, and nondiscriminatory. This section also requires BellSouth to provide UNEs in a manner that allows CLECs to combine such elements in order to provide a telecommunications service. As detailed below, BellSouth's interconnection agreements and its Kentucky SGAT satisfy these obligations. BellSouth's provision of access to Operations Support Systems ("OSS") functions is described in the testimony of Ron Pate, filed concurrently herewith.

As required by 47 C.F.R. § 51.307, BellSouth provides to a requesting CLEC (for the provision of telecommunications service) nondiscriminatory access to network elements on an unbundled basis at any technically feasible point which is at least equal in quality to the access BellSouth provides to itself. *See* NewSouth Agmnt., GTC-A, § 4.0. These network features provide the CLEC access to all features, functions and capabilities of the network elements in a manner that allows the CLEC to provide any telecommunications service that the network element is capable of providing. Each network element BellSouth provides to CLECs is at a level of quality and performance that is at least equal to that which BellSouth provides to itself. *See* e.spire Agmnt., GTC-A, § 4.0.

BellSouth shall provide ordering and provisioning of UNEs to CLECs that are equal in quality to the ordering and provisioning services BellSouth provides to itself or any other CLEC. *See* NewSouth Agmnt., Att. 6, § 1.1. As required by the FCC, and as set forth in its interconnection agreements and its SGAT, BellSouth makes available

nondiscriminatory access to the following unbundled elements at Total Element Long Run Incremental Cost ("TELRIC") rates approved by the Commission:

- Local loop, including sub-loops and the high frequency portion of the loop
- Loop concentration in BellSouth central offices
- Simple Loop + Port Combinations
- Loop + Transport Combinations
- Network Interface Device ("NID")
- Local switching capability
- Tandem switching capability
- Interoffice transmission facilities
- Digital cross connection capability
- Signaling networks and call-related databases
- Operations support systems functions
- Local channel
- Channelization
- Dark fiber
- Loop conditioning

See NewSouth Agmnt., Att. 2. BellSouth also provides access to the facilities or functionality of network elements separately from access to other network elements and for a separate charge. 47 C.F.R. § 51.307(d). BellSouth will utilize its best efforts to obtain coextensive third party intellectual property rights for CLECs using UNEs.

Requesting CLECs are entitled to exclusive use of an unbundled network element, and to the use of its features, functions, or capabilities, for a set period of time. 47 C.F.R. § 51.309(c). BellSouth, however, retains ownership of the facility and remains obligated to maintain, repair or replace the network element as necessary.

CLECs may provide telecommunications services wholly through BellSouth's UNEs, without using any facilities of its own. The terms and conditions pursuant to which BellSouth provides access to UNEs are offered equally to all requesting CLECs. 47 C.F.R. § 51.313(a). Moreover, as discussed more fully in the testimony of Cynthia Cox, filed concurrently herewith, the "Most Favored Nation" clause in BellSouth's interconnection agreements and the provisions of 47 U.S.C. § 252(i) allow a CLEC to adopt terms, conditions and prices of another CLEC's contract in accordance with the FCC's rules. *See* NewSouth Agmnt., GTC-A, § 16.0.

With the exception of the NID, the minimum set of network elements is required separately by the checklist and therefore will be discussed in later sections of my testimony. The NID, however, will be discussed in this section, as will UNE combinations.

Q. DESCRIBE THE NID OFFERING.

A. The NID is a cross-connect device used to connect BellSouth's loop facilities to a customer's inside wiring. The NID contains connection points to which the service provider and the end user customer each make their connections. *See* NewSouth Agmnt., Att. 2, § 4.0. When the CLEC provides its own facilities, the CLEC will provide its own

NID and thereby interface to the customer's inside wire through the customer chamber of the BellSouth NID. 47 C.F.R. § 51.319(2). This method of access has been referred to as the "NID-to-NID" method, in that the CLEC connects its NID to the BellSouth NID and thereby gains connectivity between the CLEC's loop and the customer's inside wire. As a second method, a CLEC may connect its loop directly to any available spare terminal in the BellSouth NID and thereby gain access to the customer's inside wire. 47 C.F.R. § 51.319(2); *see also* NewSouth Agmnt., Att. 2, § 4.0. Any upgrades or rearrangements to the NID required by the CLEC are performed by BellSouth based on time and materials charges. In situations in which no spare terminals are available in the BellSouth NID, the CLEC may remove BellSouth's loop from BellSouth's NID in order to terminate the CLEC's loop to BellSouth's NID. *See* e.spire Agmnt., Att. 2, § 4.0. As of March 31, 2001, no CLEC had requested an unbundled NID in Kentucky or anywhere in BellSouth's nine-state region.

Where a CLEC obtains local loops as a UNE from BellSouth, BellSouth also provides the NID. BellSouth connects the drop wire, where present, between the loop distribution facilities and the NID at no additional charge to the CLEC. *See* NewSouth Agmnt., Att. 2, § 2.2.1.

At multiple dwelling units or multiple-unit business premises, BellSouth will provide, where technically feasible, a Single Point of Interconnection ("SPOI") that is suitable for use by multiple carriers. *See* SGAT, § II.

Q. HAS BELLSOUTH PROVIDED ACCESS TERMINALS TO CLECS IN KENTUCKY AND IN ITS NINE-STATE REGION FOR THE PURPOSE OF GAINING ACCESS TO SUB-LOOP ELEMENTS?

A. No. BellSouth has not provisioned any such access terminals to CLECs in Kentucky because none have been requested; however, BellSouth has provisioned over 80 access terminals across its nine-state region. Access terminals are available to CLECs via the SGAT, § IV.

Q. MAY A CLEC TEST THE UNES IT IS OBTAINING FROM BELLSOUTH PRIOR TO TURNING UP A CUSTOMER'S SERVICE?

A. Yes. Each CLEC may perform testing of its UNEs using whatever methods it deems appropriate in light of its network configuration. BellSouth will provide UNEs to each CLEC's collocation arrangement at the specified level of quality. BellSouth has tested and confirmed its ability to provide UNEs to requesting CLECs.

Q. DESCRIBE BELLSOUTH'S CROSS-CONNECT OFFERING.

A. Cross connections are the facility by which BellSouth extends its network to the point of access selected by a CLEC, as described above. The FCC's *Local Competition Order* required incumbent LECs to provide such facilities and stated that the LEC could recover the costs associated with providing cross connections. Cross connections are wires or fibers or equipment that connect one piece of equipment to another on a semi-permanent basis. For instance, some cross connections are made by a simple pair of copper wires

called a jumper. Different loop options require different types of cross connections. In fact, several cross connections may be required for many of the options. BellSouth offers the following types of loop cross connects:

- Cross connect to Digital Cross-connect System ("DCS")
- Cross connect to Multiplexer/Interoffice transport
- Cross connect to collocation arrangement
- Cross connect to switch port

In addition, BellSouth offers the choice of three types of cross connects with subloop elements. The applicable cross connects are as follows:

- Two wire
- Four wire
- Dark fiber

Cross connections must also be used with Unbundled Dedicated Transport ("UDT"). The dedicated transport cross connects are the equipment needed to connect the interoffice dedicated transport transmission facilities to the point of access.

The following cross connects are available with UDT:

- Voice grade 2-Wire
- Voice grade 4-Wire
- Digital 56/64 Kilobits per second (Kbps)
- DS1
- DS3
- OC3
- OC12
- OC48 (Only between BellSouth offices)
- Dark fiber

Q. DESCRIBE BELLSOUTH'S DIGITAL CROSS CONNECT OFFERING.

A. A DCS is an electronic device that provides the capability of rearranging circuits on high-speed facilities without the need to de-multiplex the signals. Without DCS, signals cannot be exchanged between high-speed circuits without returning all of the circuits to analog electrical signals. BellSouth offers DCS in conjunction with the unbundled dedicated transport element with the same functionality that is offered to interexchange carriers or with additional functionality as provided in a BellSouth/CLEC interconnection agreement. 47 C.F.R 51.319 (d)(2)(iv); *See* e.spire Agmnt., Att. 2, § 8.1.1(4).

BellSouth provides CLECs three types of port DCS configurations as follows:

- DS0 channel port termination.
- DS1 channel port termination.
- DS3 channel port termination.

A CLEC may utilize BellSouth's Management Terminal Interface ("MTI") through the use of a computer terminal on the CLEC's premises to access a database maintained by BellSouth to reconfigure the CLEC's Dedicated Transport facilities. A CLEC may use the MTI to directly access and control the CLEC's 45 Megabits per second (Mbps) facilities or 1.544 Mbps facilities or 64 Kbps facilities or unbundled dedicated transport, subtending channels, and internodal facilities (i.e., the facilities that connect a DCS in one central office with a DCS in another central office).

CLECs remotely access the database by using a computer terminal on the CLEC's premises in conjunction with the CLEC's facilities or BellSouth Unbundled Loops or

Dedicated Transport elements (Entrance Facility and/or Interoffice Transport), or in conjunction with a local telephone line with a seven-digit or ten-digit telephone number. CLECs may use DCS to perform the following functions:

- Routing/Rerouting - The routing feature allows a CLEC to select the routes that will be used to connect circuits between DCSs. The CLEC may control the route selection process by various parameters according to the CLEC's needs. A CLEC may also reroute circuits from a failed internodal facility to a working one.
- Renaming-A CLEC may rename its circuits and facilities.
- Scheduled Command Definition – A CLEC may specify circuit reconfiguration on special days, e.g., payday, holidays.
- Transaction Log – A CLEC is provided a database log that contains every transaction. These transactions include reconfiguration, scheduling, macro development, alarm surveillance, and attempted transactions.
- Scheduled Command Summary Screen – A CLEC may view the status of its reconfiguration reservations.
- Macro Command/Network Modeling – A CLEC may initiate, with one command, multiple two-point cross connections. The CLEC can build separate network macros, such as daytime macros, nighttime macros, and disaster recovery macros and invoke their activation or switch from one to the other.
- Perform real-time configuration management and alarm surveillance.
- Electronically cross-connect and route traffic in order to:
    - Alleviate congestion
    - Isolate faults
    - Change routing logic
    - Monitor network performance

- Pre-arrange and automatically switch to backup facilities for disaster recovery

BellSouth provides the cross connects necessary to extend Dedicated Transport facilities to points of access designated by the CLEC. 47 C.F.R. § 51.319(d)(2)(iii). In addition to the standard arrangements, the CLEC may request new or additional unbundled transport elements via the BFR process.

COMBINATIONS OF UNES

Q. GENERALLY DESCRIBE BELLSOUTH'S COMBINATION OFFERINGS.

A. BellSouth provides access to UNEs in a manner that allows requesting carriers to access preexisting combinations of network elements as well as to combine UNEs for themselves. *See* NewSouth Agmnt., Att. 2. BellSouth provides CLECs a variety of means by which CLECs may combine network elements, including caged, cageless, and shared collocation, *see* NewSouth Agmnt., Att. 4, and an Assembly Point arrangement. *See* SGAT, § II.D.1. BellSouth also offers other technically feasible methods of combining UNEs via the BFR process. *See* NewSouth Agmnt., GTC-A, § 6.0. Each of these options is described more fully in my testimony on checklist item 1, and collocation is described more fully in the Affidavit of Wayne Gray, attached hereto as Attachment A.

Q. DOES BELLSOUTH OFFER PREEXISTING COMBINATIONS OF UNES TO CLECS?

A. Yes. Except upon request, BellSouth will not separate requested network elements where such elements are, in fact, currently combined in BellSouth's network to the location the CLEC wants to serve. *See* SGAT, § II.D (3).

The rates for these UNE combinations are addressed in the testimony of Cynthia Cox. Ms. Cox also addresses the conditions pursuant to which BellSouth offers the Enhanced Extended Link ("EEL").

The ordering mechanism for preexisting combinations is discussed in the testimony of Ron Pate.

Q. MAY CLECS COMBINE UNES THEMSELVES?

A. Yes. BellSouth provides access to UNEs in a manner that allows requesting carriers to combine those elements. CLECs may use either physical collocation (including caged, shared cage, cageless, and adjacent, where space is not available), virtual collocation arrangements, *see* NewSouth Agmnt., Att. 4, or assembly point arrangements, SGAT, § II.D.1, to combine UNEs. In addition, CLECs may request other technically feasible methods of combining UNEs through the BFR process. *See* NewSouth Agmnt., GTC-A, § 6.0.

The UNE combination is effectuated as follows: BellSouth will wire each UNE to the tie cable and pair running between BellSouth's distributing frame and the CLEC's collocation arrangement as designated by the CLEC on its UNE order. For example, both the loop and the switch port are terminated on the Main Distribution Frame ("MDF")

within the BellSouth central office. Upon request of the CLEC, BellSouth will wire the loop to the tie cable and pair facility designated on the unbundled loop order. Likewise, BellSouth will wire the unbundled switch port to the tie cable and pair designated on the unbundled switch port order. In the case of physical collocation, BellSouth's wiring of the UNEs to the tie cable and pair interconnection facilities designated by the CLEC correlates to the pre-designated positions on the interconnection point (that is, BellSouth's distributing frame) serving the collocation arrangement. The CLEC may complete the combination via connections within its collocation arrangement either manually or electronically, at the election of the CLEC. These connections within the CLEC's collocation arrangement may be pre-wired or established on an as-needed basis at the election of the CLEC. To facilitate UNE combinations using virtual collocation, the CLEC may employ any of several options that include, but are not limited to: pre-wired terminations on the CLEC's transmission equipment; use of the CLEC's electronic digital cross-connection facilities or other means of performing cross-connections remotely; or connections on a per request basis.

An example of using pre-wired terminations might include the CLEC's arranging the pre-wiring of connector block "position 100" to "position 200", "position 101" to "position 201" and so forth. Should the CLEC wish to combine two elements, such as the combining of an unbundled loop with an unbundled switch port, the CLEC would specify the BellSouth cable and pair assignment correlating to "position 100" on the unbundled loop order and would specify the BellSouth cable and pair assignment correlating to "position 200" on the unbundled switch port order. With "position 100" and "position 200" having been pre-connected, the UNEs would thus be combined once

BellSouth completes its connection of each of the UNEs ordered to the designated interconnection facility cable and pair assignments.

Q. IT APPEARS THAT THE DISTRIBUTION FRAME IS AN ESSENTIAL COMPONENT OF A CLEC'S ABILITY TO COMBINE UNES. CAN BELLSOUTH ACCOMMODATE THE CLECS' DEMAND FOR DISTRIBUTING FRAME CONNECTOR BLOCKS?

A. Yes. BellSouth can fully accommodate demand for new distributing frame connector blocks for CLECs. While space on distributing frames is a finite resource, this is not a consequence of local competition. Because of increasing retail demand, BellSouth has for many years been faced with the possible exhaustion of space on distributing frames within its central offices. This increasing demand is evidenced by the fact that in 1992, there were over 970,000 access lines in Kentucky; through December 2000, there were over 1.25 million access lines in Kentucky, a more than 25 percent increase in eight (8) years. BellSouth has always effectively met the challenges of increased demand -- a fact no party contests. For example, in the years 1999-2000, BellSouth completed 43 additions to its conventional main distribution frames and COSMIC main distribution frames in Kentucky. Also, BellSouth has never denied any CLEC's request for a UNE because of a lack of main distribution frame connector blocks. BellSouth likewise will continue to make needed additions to its distributing frames on a nondiscriminatory basis, as with other facilities such as switches and loop facilities, to accommodate CLECs' needs.

Q. HAS BELLSOUTH PROVIDED CLECS WITH PREEXISTING UNE COMBINATIONS?

A. Yes. As of March 31, 2001, BellSouth had 11,239 loop and port combinations in place for CLECs in Kentucky and 303,257 such combinations in place for CLECs across BellSouth's nine-state region. In addition, BellSouth had 23 loop and transport combinations in place for CLECs in Kentucky.

Q. DESCRIBE THE MEANS BY WHICH CLECS MAY COMBINE INDIVIDUAL UNES OBTAINED FROM BELLSOUTH WITH THE CLEC'S OWN FACILITIES.

A. A CLEC may also use its physical collocation arrangement to combine UNES that the CLEC acquires from BellSouth with the CLEC's own equipment or facilities. BellSouth will extend UNEs to a CLEC's physical collocation arrangement and will terminate those UNEs in such a way as to allow the CLEC to provide any cross connections or other required wiring within the collocation arrangement in order to effect the combination. In such an arrangement, the CLEC is responsible for making any necessary cross connections within the physical collocation arrangement, for example, by making cross connections at a frame or cross connection block within the physical collocation arrangement. As noted above, the CLEC may choose to "pre-wire" these connections in anticipation of BellSouth's providing the UNEs, thereby eliminating the need to establish these connections during the customer cutover process.

For example, BellSouth will deliver both unbundled loops and unbundled dedicated transport facilities to the CLEC's collocation arrangement. The CLEC is then free to

cross-connect the loop and transport facilities in any manner it chooses. Similarly, BellSouth will deliver unbundled loops and unbundled switch ports to any CLEC's collocation arrangement and, again, the CLEC may cross-connect the unbundled loop and unbundled switch port in any manner the CLEC desires.

In order to combine network elements in their collocation arrangements, CLECs will use the same types of cross-connections that BellSouth regularly uses thousands of times every day in its retail operations. When BellSouth connects a new customer to its network, it uses cross-connections to combine facilities, just as CLECs may do. In its retail operations, BellSouth regularly uses multiple cross-connections between loops and switch ports, as well as on Intermediate Distribution Frames ("IDF"), and provides high quality transmission performance on the resulting service. CLECs' use of cross-connections to combine network elements into an operational network is a routine part of local telephone operations and precisely analogous to the manner in which BellSouth establishes service to a customer premises not previously served by its own network.

CHECKLIST ITEM 3: ACCESS TO POLES, DUCTS, CONDUITS, AND RIGHTS-OF-WAY

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 3.

A. Section 271(c)(2)(B)(iii) of the Act requires BellSouth to provide nondiscriminatory access to poles, ducts and conduits and rights-of-way to CLECs when requested. The FCC found that BellSouth had met all requirements for Checklist Item 3 in the *Second Louisiana Order*. In its 1999 Advisory Opinion in Case No. 96-608, the Commission

found BellSouth in compliance with this checklist item. In Section III of the SGAT, and in various negotiated and arbitrated agreements, *see* NewSouth Agmnt., Att. 8, BellSouth continues to offer nondiscriminatory access to poles, ducts, conduits and rights-of-way in a timely fashion as discussed in the Affidavit of Linda Kinsey, Attachment B**.**

Q. ARE CLECS USING BELLSOUTH'S POLES, DUCTS, CONDUITS, AND RIGHTS-OF-WAY?

A. Yes. As of May 4, 2001, CLECs in Kentucky had executed with BellSouth 43 license agreements and 102 license agreements region-wide, (both state-specific and multi-state) that allow them to attach their facilities to BellSouth's poles and to place their facilities in BellSouth's ducts and conduits. Since July 1997, BellSouth has received 49 requests in Kentucky for access to poles, ducts, conduits, and rights-of-way from seven (7) CLECs with no requests being denied. Similarly, CLECs have leased approximately 195,000 feet of conduit space in BellSouth's nine-state region as a result of CLEC requests of which 3,500 feet are in Kentucky.

CHECKLIST ITEM 4: LOCAL LOOP

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 4.

A. Checklist Item 4 requires that BellSouth provide local loop transmission from the central office to the customer's premises, unbundled from local switching or other services. 47 U.S.C. § 271(c)(2)(B)(iv**).** BellSouth provides nondiscriminatory access to local loop

transmission on an unbundled basis and has procedures in place for the ordering, provisioning, and maintenance of unbundled loops.

Q. DESCRIBE THE UNBUNDLED LOOPS BELLSOUTH MAKES AVAILABLE TO CLECS.

A. The local loop network element is defined as a dedicated transmission facility between a distributing frame (or its equivalent) in a BellSouth central office and the loop demarcation point at an end user customer's premises. The local loop network element includes all features, functions and capabilities of the transmission facility, including dark fiber and attached electronics (except those electronics used for the provision of advanced services, such as DSLAMs), and loop conditioning. 47 C.F.R. § 51.319(a). BellSouth allows CLECs to access unbundled loops at any technically feasible point. BellSouth provides CLECs access to unbundled local loops in a manner that allows an efficient competitor a meaningful opportunity to compete.

BellSouth makes the following loop types available to CLECs and has provided the following quantities in Kentucky as of March 31, 2001:

- SL1 voice grade loops (1)
- SL2 voice grade loops (3,621)
- 2-wire ISDN digital grade loops (534)
- 2-wire ADSL loops (364)
- 2-wire HDSL loops (1)
- 4-wire HDSL loops (0)
- 4-wire DS-1 digital grade loops (575)

- 56 or 64 Kbps digital grade loops (0)
- UCL (Long and Short) loops (234)
- DS3 Loops (0)
- UCL-ND (0)

CLECs may purchase additional loop types through the BFR process. BellSouth provides access to loops at any technically feasible point with access to all features, functions, and capabilities unbundled from other UNEs; without any restrictions that impair use by CLECs; for a CLEC's exclusive use; and in a manner that enables CLECs to combine loops with other UNEs. *See* NewSouth Agmnt., Att. 2. Moreover, BellSouth offers local loop transmission of the same quality and same equipment and technical specifications used by BellSouth to service its own customers.

Q. ARE CLECS PURCHASING UNBUNDLED LOOPS FROM BELLSOUTH?

A. Yes. As of March 31, 2001, BellSouth had provisioned 5,330 unbundled loops to over ten (10) CLECs in Kentucky. In BellSouth's nine-state region, BellSouth had provisioned 353,992 unbundled loops as of that same date.

Q. DOES BELLSOUTH OFFER UNBUNDLED LOOPS SERVED BY INTEGRATED DIGITAL LOOP CARRIER (IDLC) TECHNOLOGY?

A. Yes. Integrated Digital Loop Carrier ("IDLC") is a special version of DLC that does not require the host terminal in the central office (sometimes referred to as the Central Office Terminal or "COT"), but instead terminates the digital transmission facilities directly into

the central office switch. The design of IDLC technology means that it is impossible to separate the loop from the switch because the switch performs the control and functions normally performed by the host terminal. In the Texas decision, the FCC found that "the BOC must provide competitors with access to unbundled loops regardless of whether the BOC uses integrated digital loop carrier (IDLC) technology or similar remote concentration devices for the particular loops sought by the competitor." *SWBT*, ¶ 248. BellSouth provides access to such IDLC loops via the following methods:

Alternative 1: If sufficient physical copper pairs are available, BellSouth will reassign the loop from the IDLC system to a physical copper pair.

Alternative 2: Where the loops are served by Next Generation Digital Loop Carrier ("NGDLC") systems, BellSouth will "groom" the integrated loops to form a virtual Remote Terminal ("RT") set-up for universal service (that is, a terminal which can accommodate both switched and private line circuits). "Grooming" is the process of arranging certain loops (in the input stage of the NGDLC) in such a way that discrete groups of multiplexed loops may be assigned to transmission facilities (in the output stage of the NGDLC). Both of the NGDLC systems currently approved for use in BellSouth's network have "grooming" capabilities.

Alternative 3: BellSouth will remove the loop distribution pair from the IDLC and re-terminate the pair to either a spare metallic loop feeder pair (copper pair) or to spare universal digital loop carrier equipment in the loop feeder route or Carrier Serving Area ("CSA"). For two-wire ISDN loops, the universal digital loop carrier facilities will be made available through the use of Conklin BRITEmux or Fitel-PMX 8uMux equipment.

Alternative 4: BellSouth will remove the loop distribution pair from the IDLC and re-terminate the pair to utilize spare capacity of existing Integrated Network Access ("INA") systems or other existing IDLC that terminates on DCS equipment. BellSouth will thereby route the requested unbundled loop channel to a channel bank where it can be de-multiplexed for delivery to the requesting CLEC or for termination in a DLC channel bank in the central office for concentration and subsequent delivery to the requesting CLEC.

Alternative 5: When IDLC terminates at a peripheral capable of serving "side-door/hairpin" capabilities, BellSouth will utilize this switch functionality. The loop will remain terminated directly into the switch while the "side-door/hairpin" capabilities allow the loop to be provided individually to the requesting CLEC.
Alternative 6: If a given IDLC system is not served by a switch peripheral that is capable of side-door/hairpin functionality, BellSouth will move the IDLC system to switch peripheral equipment that is side-door capable.

Alternative 7: BellSouth will install and activate new Universal DLC ("UDLC") facilities or NGDLC facilities and then move the requested loop from the IDLC to these new facilities. In the case of UDLC, if growth will trigger activation of additional capacity within two years, BellSouth will activate new UDLC capacity to the distribution area. In the case of NGDLC, if channel banks are available for growth in the CSA, BellSouth will activate NGDLC unless the DLC enclosure is a cabinet already wired for older vintage DLC systems.

Alternative 8: When it is expected that growth will not create the need for additional capacity within the next two years, BellSouth will convert some existing IDLC capacity to UDLC.

See e.g. NewSouth Agmnt., Att. 2.

Because certain circuits cannot be supported via an IDLC system in those instances where NGDLC is installed, BellSouth normally reserves some NGDLC capacity to support those special service circuits (both its own and those of CLECs) through a universal DLC arrangement based on site-specific forecasts. BellSouth does not reserve loops served by NGDLC for its own purposes, and does not restrict CLEC access to BellSouth loops. BellSouth will construct the facilities necessary to provide unbundled loops to requesting CLECs in the small number of cases in which none of these methods is viable through the special construction process. *See* NewSouth Agmnt., Att. 2, § 2.2.1.

Q. DESCRIBE BELLSOUTH'S UNIVERSAL DIGITAL CARRIER LOOP OFFERING.

A. BellSouth provides CLECs the Universal Digital Carrier ("UDC") capable loop. This loop gives CLECs the ability to arrange the individual channels of an ISDN line such that it appears to the end user to be a single channel of 144 Kbps. Some CLECs have referred to such an arrangement as ISDN Digital Subscriber Line ("IDSL") service.

Q. DOES BELLSOUTH OFFER LOOP CONDITIONING?

A. Yes. BellSouth offers loop conditioning in accordance with applicable FCC rules and orders. Loop conditioning is defined as the removal from the loop of any devices that may diminish the capacity of the loop to deliver high-speed switched wireline telecommunications capability, including xDSL service. BellSouth provides loop conditioning for unbundled loops, whether or not BellSouth offers advanced services to the end-user on that loop. *See* SGAT, § IV.F. BellSouth's loop conditioning offer is described fully in the testimony of Wiley (Jerry) G. Latham.

Q. ARE CLECS PURCHASING LOOP CONDITIONING?

A. Yes. Through March 2001, no CLECs in Kentucky made requests for loop conditioning; however, across BellSouth's region as of that same date there were a total of 59 requests.

Q. DOES BELLSOUTH OFFER SUB-LOOP ELEMENTS IN COMPLIANCE WITH CHECKLIST ITEM 4?

A. Yes. In addition to the unbundled loops themselves, BellSouth offers CLECs nondiscriminatory access to sub-loop elements. See NewSouth Agmnt., Att. 2, § 6.0. A sub-loop unbundled network element is an existing portion of the loop that can be accessed at accessible points on the loop. An accessible point on the loop is where technicians can access the copper wire or fiber within the cable without removing a splice case to reach the wire or fiber within. This includes any technically feasible point near the customer premises (such as the pole or pedestal, the NID, or minimum point of entry ("MPOE") to the customer's premises), the feeder distribution interface ("FDI"), the MDF, remote terminals, and various other terminals. BellSouth offers loop

concentration/multiplexing as a sub-loop element. BellSouth also provides unbundled access to the sub-loop elements loop feeder, loop distribution, intrabuilding network cable, and network terminating wire. Details about how these sub-loop elements are provided may be found at BellSouth's Interconnection website:

http://www.interconnection.bellsouth.com/products/unes.html

Q. ARE CLECS PURCHASING SUB-LOOP ELEMENTS?

A. Yes. While CLECs in Kentucky have not purchased unbundled sub-loop elements, BellSouth has provided over 500 unbundled sub-loop elements across its nine-state region.

Q. DOES BELLSOUTH PROVIDE ACCESS TO DARK FIBER?

A. Yes. BellSouth also provides access to unused transmission media, which in some cases is referred to as "dark fiber". *See* e.spire Agmnt., Att. 2, § 14. BellSouth provides dark fiber in the subscriber loop segment of the network and in the dedicated interoffice transport segment of the network as a UNE when the CLEC has collocation space in a central office housing a BellSouth tandem or end office switch. BellSouth uses standardized forms to allow a CLEC to determine dark fiber availability via a service inquiry and to order dark fiber via a local service request. BellSouth will use its best efforts to confirm the availability of dark fiber within ten (10) business days of receipt of a service inquiry. BellSouth will use its best efforts to provide dark fiber to the CLEC within thirty (30) business days from the receipt of a complete, accurate and error-free local service request. BellSouth will either grant the request, and issue an appropriate

lease, or deny the request. Availability is limited by fibers in use by BellSouth or its customers, maintenance spares, number of defective fibers present, and the number of fibers for which BellSouth has specific documented plans within a two-year period. BellSouth has, where appropriate, executed non-disclosure agreements and agreed to share documents with CLECs in order to demonstrate BellSouth's specific documented plans. To exercise its right of revocation, BellSouth must demonstrate that the subject dark fiber is needed to meet BellSouth's bandwidth requirements or the bandwidth requirements of another local service provider. BellSouth's dark fiber interoffice service terminates on a standard Light Guide Cross-connect ("LGX") termination at both ends. The dark fiber subscriber loop service terminates on a standard LGX in the subscriber's Serving Wire Center. A collocation cross-connect is used to provide connectivity between the dark fiber and the CLEC's collocation space. *See*, e.spire Agmnt., Att. 2, § 14.

Q. ARE CLECS PURCHASING DARK FIBER?

A. Yes. BellSouth has no dark fiber arrangements in place in Kentucky. BellSouth has ten (10) dark fiber arrangements in place in two (2) other states within BellSouth's nine-state region.

Q. DOES BELLSOUTH OFFER CLECS LINE SHARING?

A. Yes. BellSouth provides CLECs with access to the high frequency portion of the local loop as a UNE in compliance with the FCC's *Line Sharing Order*. The high frequency of the loop is defined as the frequency range above the voice band on a copper loop facility

carrying analog circuit-switched voice band transmissions where the incumbent LEC is the voice provider. *See* SGAT, § IV. BellSouth will provide requesting carriers access to the high-frequency portion of the loop at the remote terminal location as well as at the central office. Line Sharing is discussed in the testimony of Tommy G. Williams.

Q. ARE CLECS PURCHASING LINE SHARING?

A. Yes. As of April 1, 2001, BellSouth had provisioned 2,542 line sharing arrangements across BellSouth's nine-state region and 166 line sharing arrangements in Kentucky.

Q. DOES BELLSOUTH PROVIDE ACCESS TO LOOP MAKEUP (LMU) INFORMATION?

A. Yes. BellSouth provides CLECs access to information regarding a given loop's characteristics, including loop length, wire gauge, loop medium (copper of fiber), and information regarding any bridged tap, load coil, or repeaters present on the loop. Manual access to LMU information is described in the testimony of Wiley (Jerry) G. Latham. *See* also SGAT, § IV. BellSouth's electronic pre-ordering and ordering interfaces have been enhanced to provide electronic access to loop makeup information and electronic ordering of ADSL-capable loops, HDSL-capable loops, and UCLs. Electronic access to LMU information is described in the testimony of Ron Pate.

Q. ARE CLECS ACCESSING LOOP MAKEUP INFORMATION?

A. Yes. In February 2001, CLECs made 4,283 mechanized LMU inquiries region-wide. In Kentucky, CLECs made 116 mechanized LMU inquiries. From November 2000 through February 2001, CLECs made 549 manual LMU inquiries region-wide, none of which were in Kentucky.

Q. DOES BELLSOUTH PROVIDE XDSL LOOPS TO CLECS?

A. Yes. As discussed earlier, BellSouth provides CLECs with various types of xDSL loops including the 2-wire ADSL, the 2-wire and 4-wire HDSL, 2-wire ISDN and Unbundled Copper Loops. *See* NewSouth Agmnt., Att. 2, § 2.0. Finally, BellSouth offers nondiscriminatory access to loop makeup information so that CLECs can determine whether or not existing loop facilities can support the desired xDSL service. BellSouth's xDSL loops, line conditioning and loop qualification offerings are discussed in detail in the testimony of Wiley (Jerry) G. Latham.

Q. ARE CLECS ORDERING XDSL LOOPS?

A. Yes. As of March 31, 2001, in Kentucky, BellSouth had provisioned 364 two-wire ADSL loops and one (1) two-wire HDSL loop to over ten (10) different CLECs in Kentucky. As of the same date, BellSouth had provisioned within its region 14,102 two-wire ADSL loops, 451 two-wire HDSL loops, and 46 four-wire HDSL loops to over 90 different CLECs.

Q. DOES BELLSOUTH FACILITATE LINE SPLITTING?

A. Yes. BellSouth will work cooperatively with CLECs to develop rates, methods and procedures to operationalize a process whereby two CLECs, one being a provider of voice services and the other being a provider of data services may provide service over the same loop. *See* SGAT, § II.B.9. Line Splitting is discussed in detail in the testimony of Tommy Williams.

Q. ARE CLECS ORDERING LINE SPLITTING?

A. No, not at this time. As stated above, however, BellSouth will facilitate line splitting for any CLEC that requests it.

HOT CUTS

Q. GENERALLY DESCRIBE THE PROCESS KNOWN AS A "HOT CUT."

A. Hot cuts involve the conversion of an existing BellSouth customer to the network of a competitor by transferring the customer's in-service loop over to the CLEC's network. BellSouth has established hot cut procedures that ensure accurate, reliable, and timely cutovers.

Q. DESCRIBE THE LOOP CUTOVER PROCEDURES ESTABLISHED BY BELLSOUTH TO ENSURE ACCURATE AND TIMELY CUTOVERS.

A. BellSouth has implemented three hot cut processes, two involving coordination at the time of the hot cut between BellSouth and the requesting CLEC and one process that

does not involve such coordination. The two processes for coordinated loop cutovers are a time-specific cutover, and a non-time-specific cutover. With a time-specific cutover, a CLEC can set a specific date and time for a loop conversion by ordering and paying for time specific order coordination. Under this option, BellSouth commits to use best efforts to complete the conversion as specified by the CLEC at the ordered date and time. *See* NewSouth Agmnt., Att. 2, § 2.2.2. If unforeseen circumstances occur during the provisioning process which may cause the date or time of the conversion to be in jeopardy, BellSouth notifies CLEC as soon as the jeopardy is identified to allow the CLEC to respond to its customer as appropriate.

Under the second option, the CLEC may request non-time specific coordination from BellSouth. Under this option, BellSouth and a CLEC mutually establish a date for the conversion but do not pick a specific conversion time at the time BellSouth receives the CLEC's local service request. Then, 24 to 48 hours in advance of the date of the conversion, BellSouth and the CLEC mutually set a time for the conversion. Like time-specific coordination, if unforeseen circumstances occur that may jeopardize BellSouth's ability to perform the conversion, BellSouth notifies the CLEC as soon as the jeopardy is identified.

As a third option, the CLEC may prefer no coordination of any kind between BellSouth and the CLEC at the time of the hot cut. The CLEC merely specifies the date upon which it wishes BellSouth to perform its cutover activities and BellSouth notifies the CLEC once the hot cut is complete.

Q. DESCRIBE IN MORE DETAIL THE PROCESS FOR COORDINATED CUTOVERS.

A. Coordinated loop cutovers involve a number of steps. Exhibit WKM-2 shows, pictorially and with a brief narrative, the various work steps involved in a typical coordinated loop cutover. These photographs were taken in BellSouth's Norcross, Georgia, central office; however, the work steps are identical in all nine states in BellSouth's region. Briefly, the work steps involved are as follows:

- The BellSouth central office technician receives a call from the Customer Wholesale Interconnection Network Services (CWINS) Center to begin cutover and asks for the cable pair number of the loop to be cutover. This is shown on page 1 of Exhibit WKM-2.
- The technician types the cable pair number into a database to find the loop cutover work order number. This is shown on page 2 of Exhibit WKM-2.
- The technician retrieves a copy of the work order for the unbundled loop. This is shown on page 3 of Exhibit WKM-2.
- The technician in the BellSouth central office responds to the BellSouth UNE Center's request to initiate coordination of the overall cutover of service from BellSouth to the CLEC. This is shown on page 4 of Exhibit WKM-2.
- The technician then verifies that the correct loop has been identified for cutover. This is done using a capability referred to as Automatic Number Announcement Circuit ("ANAC"). The technician plugs a test set onto the loop and dials a special code. The telephone number associated with that loop is played audibly. This is shown on page 5 of Exhibit WKM-2.
- Next, the technician locates the existing jumper on the BellSouth MDF running between the loop and the BellSouth switch port. This is shown on pages 6-7 of Exhibit WKM-2.
- The technician locates and removes the end of the jumper connected to the

BellSouth cable pair. This is shown on page 8 of Exhibit WKM-2.

- The technician then locates and removes the end of the jumper connected to the BellSouth switching equipment. This is shown on page 9 of Exhibit WKM-2.
- The technician then connects the one end of a new jumper between the loop and a connector block on a cable rack with tie cables to the CLEC's collocation arrangement. This is shown on page 10 of Exhibit WKM-2.
- The technician then weaves the new jumper wire through the cable rack to reach the tie cables to the CLEC's collocation arrangement. This is shown on page 11 of Exhibit WKM-2.
- The technician connects the second end of the new jumper to the connector block and thus the tie cable to the CLEC's collocation equipment. This is shown on page 12 of Exhibit WKM-2.
- The technician next verifies that the loop is connected to the expected switch port and telephone number in the CLEC's switch, again using ANAC capabilities. This is shown on page 13 of Exhibit WKM-2.
- Upon successful completion of the loop cutover, the technician verifies with the CLEC that the order was correctly worked, closes the work order, and notifies the UNE Center. This is shown on page 14 of Exhibit WKM-2.
- Once the cutover is complete, the CLEC sends appropriate messages to effect number porting.

Q. DOES BELLSOUTH DO ANY TESTING IN ADVANCE OF THE CUTOVER DATE?

A. Yes, BellSouth does advance testing for all designed circuits which come with test points. For such circuits, BellSouth will check the circuit 24 to 48 hours prior to the due date.

For non-designed circuits, BellSouth performs continuity tests within the central office from the collocation space to the BellSouth switch. For both designed and non-designed circuits, BellSouth tests on the cutover due date for CLEC dialtone.

On the due date, BellSouth tests for CLEC dialtone for all circuits, whether designed or nondesigned. BellSouth also monitors the line for use. If during the test, BellSouth does not receive CLEC dialtone, the cutover will not take place unless the CLEC corrects the problem within 15 minutes or pays for standby time. Otherwise, the CLEC must elect to reschedule the conversion.

Q. DOES BELLSOUTH PERFORM LOOP CUTOVERS SIMULTANEOUSLY WITH NUMBER PORTING?

A. No. BellSouth does not perform loop cutovers simultaneously with number porting for the very important reason that to do so leaves the end user customer at risk of the number porting being completed early and calls bound for the end user customer being misdirected to the CLEC's switch. The loop cutover is much more complicated in terms of the work steps involved (on the part of both BellSouth and the CLEC) than the number porting. BellSouth performs all "up front" work in anticipation of the loop cutover being successfully completed. BellSouth's provisioning process is discussed in the testimony of Ken Ainsworth. BellSouth's LNP implementation is discussed further in the Affidavit of Dennis L. Davis, Attachment E.

The cutover process can be even more unobtrusive to the end user customer if one of several processes is followed. The CLEC might, for example, schedule the cutover late

at night or on a weekend or any other time when the end user customer will not be using the service. Other procedures such as pre-wiring cross connections in anticipation of BellSouth's providing the unbundled network elements likewise minimize or eliminate any inconvenience to the end user customer.

Q. DOES BELLSOUTH DOCUMENT ITS CUTOVER PROCESS SUCH THAT THE CLECS CAN REVIEW IT?

A. Yes. BellSouth has developed a detailed flow chart depicting the entire process. This process flow is attached to this testimony as Exhibit WKM-3.

Q. DOES BELLSOUTH HAVE METHODS AND PROCEDURES THAT DOCUMENT THIS PROCESS FLOW?

A. Yes. BellSouth has developed methods and procedures ("M&Ps") for its process flow. BellSouth's M&Ps are attached to this testimony as Exhibit WKM-4 and address the following:

- BellSouth's processes when a CLEC orders a coordinated conversion and whether the CLEC wants to set the conversion time for an offered day or whether the CLEC elects to have the time mutually agreed to prior to conversion.
- BellSouth's requirements to contact the CLEC at any point in the provisioning process where a jeopardy condition might result in a conversion delay.
- BellSouth's commitment to contact the CLEC 24 to 48 hours in advance of the cut depending on the interval for the service ordered, to negotiate a non time specific conversion and/or to verify the CLEC's readiness to convert the

customer's service as ordered.

- BellSouth's pre-testing responsibilities prior to conversion as well as on the conversion date to ensure the conversion is completed successfully.
- BellSouth's willingness to notify and cooperatively work with CLECs to correct any wiring defects which BellSouth identifies while performing pre-testing activities whether the fault appears to be in BellSouth's or a CLEC's equipment.
- A CLEC's ability to accept or reject the completion of a conversion prior to BellSouth completing the service request and BellSouth's obligation to timely notification to the CLEC for the porting of telephone numbers.

In addition, BellSouth has developed training materials with which to instruct its technicians about the loop cutover process. These are Work Instruction UTDIC001, Issue 2f, and Work Instruction UTNIC001, Issue 2g., and are attached to this testimony as Exhibit WKM-5.

Q. IS BELLSOUTH'S CIRCUIT FACILITY ASSIGNMENT (CFA) DATABASE AVAILABLE TO CLECS IN CONNECTION WITH LOOP CUTOVERS?

A. Yes. BellSouth makes available its CFA database to CLECs via the Internet. BellSouth provides CLECs with the circuit facility assignments (that is, cable and pair assignments for the cable between the CLEC's collocation arrangement and BellSouth's equipment such as distributing frames or cross-connect bays) assigned to the CLEC at the time the CLEC's collocation arrangement is made available. Each CLEC is required to maintain its own circuit facility assignment records and assign each pair that the CLEC wants BellSouth to use in order to connect BellSouth facilities to the CLEC's facilities.

CHECKLIST ITEM 5: LOCAL TRANSPORT

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 5.

A. Checklist Item 5 requires BellSouth to offer access to the local transport network element on the trunk side of a wireline local exchange carrier switch unbundled from switching or other services. 47 U.S.C. § 271(c)(2)(B)(v). Local transport consists of BellSouth interoffice transmission facilities dedicated to a particular customer or carrier, or shared by more than one customer or carrier, that provide telecommunications between wire centers owned by BellSouth or a CLEC or third parties acting on behalf of a CLEC, or between switches owned by BellSouth or a CLEC or third parties acting on behalf of a CLEC. BellSouth provides both types of local transport, namely dedicated and common (also called "shared.") *See* NewSouth Agmnt., Att. 2, § 8.0. BellSouth complies with the obligations of this checklist item, both through its interconnection agreements and through its SGAT.

Dedicated transport consists of BellSouth transmission facilities dedicated to a particular customer or carrier that provide telecommunications between wire centers owned by BellSouth or CLECs, or between switches owned by BellSouth or CLECs. *See* e.spire Agmnt., Att. 2, § 8.3.

Common transport is interoffice transmission facilities, shared between BellSouth and one or more CLECs, that connect end office switches, end office switches and tandem switches, or tandem switches, in BellSouth's network. This definition of common

transport assumes the interconnection point between the two carriers' networks is at BellSouth's switch. *See* e.spire Agmnt., Att. 2, § 8.2.

With respect to dedicated transport, BellSouth does the following: (1) provides unbundled access to dedicated transmission facilities between BellSouth's central offices or between such central offices and serving wire centers ("SWCs"); between SWCs and IXC's points of presence ("POPs"); between tandem switches and SWCs, end offices, or tandems of BellSouth and the wire centers of BellSouth and requesting carriers; (2) provides all technically feasible transmission capabilities such as DS1, DS3, and Optical Carrier (OCn) levels that the competing carrier could use to provide telecommunications, including the necessary electronics; (3) does not limit the facilities to which dedicated interoffice transport facilities are connected, provided such interconnections are technically feasible, or restrict the use of unbundled transport facilities; and (d) to the extent technically feasible, provides requesting carriers with access to digital cross-connect functionality in the same manner that the BellSouth offers such capabilities to IXCs that purchase transport services. *See* e.spire Agmnt., Att. 2, §. 8.0.

In addition, CLECs can use dedicated transport to provide any transmission-specific service to the extent technically feasible.

With respect to common transport, BellSouth does the following: (1) provides common transport in a way that enables the traffic of requesting carriers to be carried on the same transport facilities that BellSouth uses for its own traffic; (2) provides common transport transmission facilities between end office switches, between BellSouth's end office and tandem switches; and between tandem switches in BellSouth's network; (3) permits

requesting carriers that purchase unbundled common transport and unbundled switching to use the same routing table that is resident in BellSouth's switch; and (4) permits requesting carriers to use common (or dedicated) transport as an unbundled element to carry originating traffic from, and terminating traffic to, customers to whom the requesting carrier is also providing local exchange service. *See* e.spire Agmnt., Att. 2, § 8.0.

In the *Second Louisiana Order*, the FCC found that BellSouth complies with the requirements of this checklist item by making available dedicated and common transport between end offices, between tandems, and between tandems and end offices.[3] BellSouth continues to make both dedicated and shared transport available to CLECs on a nondiscriminatory basis and has procedures in place for the ordering, provisioning, and maintenance of both dedicated and shared interoffice transport.

In addition to the types of local transport currently offered by BellSouth, a CLEC may request new or additional unbundled transport elements using the BFR process. *See* NewSouth Agmnt., GTC-A, § 6.0.

Q. ARE CLECS ORDERING LOCAL TRANSPORT?

[3] Despite its favorable conclusion on BellSouth's provision of local transport, the FCC declined to approve this checklist item on the grounds that BellSouth had failed to make a prima facie showing that it provides nondiscriminatory access to OSS for the ordering and provisioning of dedicated and shared transport facilities. These issues are discussed in the testimony of Ron Pate.

A. Yes. As of March 31, 2001, BellSouth had provided 228 dedicated local transport trunks to CLECs in Kentucky. BellSouth has provided 10,907 dedicated trunks providing interoffice transport to CLECs in its nine-state region as of that same date.

For common transport, specific counts of trunks providing service to CLECs cannot be determined. This is because, as the name (common transport) implies, all trunks in a given trunk group are available for carrying service for any carrier which uses that group, including BellSouth and in some cases multiple CLECs. However, BellSouth can state that as of from July 1999 to March 31, 2001, there were 16 CLECs in Kentucky and 92 in BellSouth's nine-state region using common transport to some degree.

CHECKLIST ITEM 6: LOCAL SWITCHING

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 6.

A. The Act requires BellSouth to offer access to "[l]ocal switching unbundled from transport, local loop transmission, or other services." 47 U.S.C. § 271(c)(2)(B)(vi). Local switching is the network element that provides the functionality required to connect the appropriate originating lines or trunks wired to the MDF or to the digital cross connect panel to a desired terminating line or trunk. Local switching encompasses line-side and trunk-side facilities, plus the features, functions and capabilities of the switch. *See* NewSouth Agmnt., Att. 2, § 7.0.

BellSouth has procedures in place for the ordering, provisioning, and maintenance of its switching services on a nondiscriminatory basis. *See* e.spire Agmnt., Att. 2, § 7.1.1. The

line-side facilities include the connection between a loop termination at, for example, a main distributing frame, and a switch line card. 47 C.F.R. § 51.319(c)(1)(i)(A). The trunk-side facilities include the connection between, for example, trunk termination at a trunk-side cross connect panel and a trunk card. 47 C.F.R. § 51.319 (c)(1)(i)(B). The functionality of BellSouth's local circuit switching offerings includes all of the features, functions and capabilities provided for the particular port type, including features inherent to the switch and the switch software. Local circuit switching also provides access to additional capabilities such as common and dedicated transport, out of band signaling, 911, operator services, directory services, repair service, as well as AIN and similar capabilities.

Because BellSouth obligates itself to provide common transport, it, by definition, provides CLECs with shared trunk ports, and the routing table that instructs the call to follow a specified path. *See Second Louisiana Order*, ¶ 228 ("BellSouth is obligated to provide shared trunk ports and the routing tables necessary to get to the shared trunk port as a consequence of its legal obligation to provide shared transport.")

In addition, if CLECs want unbundled switching in conjunction with dedicated transport, CLECs likewise have access to BellSouth's routing tables.

Q. DOES BELLSOUTH PROVIDE ACCESS TO VERTICAL SERVICES AND FEATURES?

A. Yes. BellSouth's local circuit switching offerings include access to the vertical services and features the switch is capable of providing. All vertical features loaded in a circuit

switch are available to CLECs, whether or not BellSouth offers such features to its retail customers. Features loaded but not activated and features not loaded in the circuit switch may be requested through the BFR process. *See* e.spire Agmnt., Att. 2, § 7.1.2; *Second Louisiana Order*, ¶ 220 ("we find that a BOC can require a requesting carrier to submit a request for such a vertical feature through a predetermined process that give the BOC an opportunity to ensure that it is technically feasible and otherwise develop the necessary procedures for ordering those features.")

Q. DOES BELLSOUTH ACTIVATE CLEC NXX CODES IN BELLSOUTH'S SWITCHES?

A. Yes. For successful call completion, each switch must recognize all active NXX codes in order to determine where the call is to be routed. When a CLEC, or any other LEC, obtains a new NXX code, BellSouth activates the code in its switches in accordance with the FCC's *Third Order on Reconsideration*, 12 FCC Rcd 12,460, ¶ 82. BellSouth performs this function at no charge to the CLEC.

BellSouth provides an NXX activation Single Point of Contact ("SPOC") to address CLEC inquiries about NXX codes. Among other functions, the NXX SPOC coordinates the activation of CLEC NXX codes within BellSouth's network and provides a trouble-reporting center for CLEC code activation.

Since its establishment, the NXX SPOC has successfully facilitated the NXX activation process. The NXX SPOC provides CLECs with a positive report on the activation of all of the CLEC's NXXs that are activated in BellSouth's network. If requested by a CLEC,

a written response is provided to the CLEC when BellSouth's Complex Translations Group has provisioned the NPA/NXX in the appropriate BellSouth switches and BellSouth has completed mechanized Automatic Message Accounting ("AMA") testing and validation. Since it began operation, the NXX SPOC has tracked the provisioning and testing of approximately 4,300 NXXs codes for facility-based CLECs and Independent Telephone Companies and has been involved in the resolution of over 400 customer related routing troubles.

Q. DOES BELLSOUTH PROVIDE FEATURE GROUP D SIGNALING IN CONJUNCTION WITH THE PROVISIONING OF UNBUNDLED LOCAL SWITCHING?

A. Yes. BellSouth will provide a CLEC with its choice of signaling format, including Feature Group D signaling, to the extent technically feasible.

Q. DOES BELLSOUTH PROVIDE ACCESS TO PACKET SWITCHING?

A. Pursuant to Rule 51.319, BellSouth will provide CLECs packet switching as a UNE in situations in which each of the following conditions is satisfied:

(1) BellSouth has deployed digital loop carrier systems, including but not limited to, integrated digital loop carrier or universal digital loop carrier systems; or has deployed any other system in which fiber optic facilities replace copper facilities in the distribution section (*e.g.*, end office to remote terminal, pedestal or environmentally controlled vault);

(2) There are no spare copper loops capable of supporting xDSL services the CLEC seeks to offer;

(3) BellSouth has not permitted a CLEC to deploy a Digital Subscriber Line Access Multiplexer in the remote terminal, pedestal or environmentally controlled vault or other interconnection point, nor has the requesting carrier obtained a virtual collocation arrangement at these subloop interconnection points as defined in 47 C.F.R. § 319(b); and

(4) BellSouth has deployed packet switching for its own use.

See SGAT, § VI.D.

Q. DOES BELLSOUTH PROVIDE ACCESS TO TANDEM SWITCHING?

A. Yes. BellSouth's unbundled tandem switching element meets all the requirements of the FCC's Rules. Tandem switching is defined as trunk-to-trunk connection facilities, including but not limited to the connection between trunk terminations at a cross connect panel and a switch trunk card; the basic switching function of connecting trunks to trunks; and all technically feasible functions that are centralized in tandem switches (as distinguished from separate end office switches), including but not limited to call recording, the routing of calls to operator services, and signaling conversion features. 47 C.F.R. § 51.319(c)(2); S*ee* e.spire Agmnt., Att. 2, § 7.1.1.1. Tandem switching provides trunk to trunk connections for local calls between two end office switches, including two end office switches belonging to different CLECs. To the extent that all signaling is SS7, tandem switching preserves Custom Local Area Switched Services (CLASS) features and Caller ID information as calls are processed. BellSouth performs testing through the tandem switching element for CLECs in the same manner and frequency that it performs

such testing for itself. To the extent that BellSouth manages traffic congestion for tandem switching for itself, it also manages it for CLECs using unbundled tandem switching, including congestion points such as those caused by radio station call-ins, and network routing abnormalities, using capabilities such as Automatic Call Gapping, Automatic Code Gapping, Automatic Congestion Control, and Network Routing Overflow.

Q. ARE CLECS ORDERING UNBUNDLED LOCAL SWITCHING?

A. Yes. As of March 31, 2001, BellSouth had two (2) unbundled switch ports in service in Kentucky. Region-wide, BellSouth had 388 unbundled switch ports in service as of that same date. Additionally, in connection with its combined loop/port combination offering, BellSouth had 14,635 switch ports in service in Kentucky and 303,257 in service regionally.

Q. DOES BELLSOUTH OFFER CUSTOMIZED ROUTING IN COMPLIANCE WITH THE FCC'S REQUIREMENTS?

A. Yes. Customized routing (which is also referred to as selective routing) permits requesting carriers to designate the particular outgoing trunks that will carry certain classes of traffic originating from competitors' customers. *See Second Louisiana Order*, ¶ 221. One specific use of customized routing is to allow calls from a CLEC's customers served by a BellSouth switch to reach the CLEC's choice of operator service or directory assistance service platforms which may be BellSouth's operator service and directory assistance service platforms or the CLEC's platforms or the platforms of a third party

provider. Customized routing can be provided when a CLEC acquires unbundled local switching from BellSouth or resells BellSouth's local exchange services.

BellSouth offers two methods of customized routing to CLECs: AIN and LCCs. *See* SGAT, § X.A.3(f); NewSouth Agmnt., Att. 2, § 7.2.1.14.6.4. BellSouth has tested both methods and both currently are available.

BellSouth posted its CLEC Information Package for the BellSouth AIN Selective Carrier Routing (AIN-SCR) service and its Market Service Description ("MSD") for the SCR via LCCs (SCR-LCC) service to the BellSouth Interconnection Services website on April 30, 2001.

Q. DESCRIBE THE AIN METHOD OF CUSTOMIZED ROUTING BELLSOUTH OFFERS.

A. BellSouth's AIN method uses a database of the CLEC's routing choices queried during call set up. The AIN method of customized routing allows the use of the AIN "hub" concept, which yields several advantages. The AIN hubbing arrangement:

- Allows the use of appropriate AIN "triggers" for all call types rather than only a limited set of call types.
- Allows even those end office switches that are not AIN-capable to use the AIN customized routing solution.
- Optimizes the use of trunk groups by allowing the carriage of customized routing traffic over common trunk groups between the end office and the AIN hub.

Thus, the AIN hubbing arrangement allows the use of the AIN method in all switches, even those that are not AIN capable. Also, the AIN hubbing arrangement allows the sharing of trunk groups that some CLECs have stated they prefer.

Q. DID BELLSOUTH RECENTLY COMPLETE AN ENHANCEMENT TO THE AIN METHOD?

A. Yes. BellSouth completed an enhancement to its AIN method that further automates the means by which CLECs' routing information may be updated. End-to-End call-through testing was successfully completed on June 14, 2000. BellSouth then completed all methods and procedures for the service offering during the third quarter 2000, and posted a MSD to its interconnection website on October 23, 2000.

Q. ARE CLECS USING THE AIN METHOD OF CUSTOMIZED ROUTING?

A. To date, no CLEC has requested BellSouth's AIN method of customized routing. BellSouth stands ready to provide the AIN method upon request.

Q. DESCRIBE THE LCC METHOD OF CUSTOMIZED ROUTING.

A. In the LCC method, which is the method by which BellSouth routes its own end users' calls, end user calls are routed via the use of a LCC in the switch. For example, a CLEC's end users served by a BellSouth switch are configured such that when the end user dials 0-, a Line Attributes Table points to another table, a Position Table for 0- calls. This table in turn identifies a trunk group to the appropriate operator services platform.

For calls requiring a number pretranslation such as 411 or 611, the Line Attributes Table points the call to the appropriate pretranslator table, and this table then points the call to the appropriate destination. A separate line class code is not needed for each end user for each function, but rather the same line class code can be used for multiple subscribers. The same LCC connects each of them to the same destination for the same type of call. *See* e.g., NewSouth Agmnt., Att. 2, § 10.4.

Availability of customized routing capability using LCCs is offered on a first-come, first-served basis. This method permits the passage of intraLATA toll and interLATA operator services traffic to interexchange carriers over Feature Group D trunks at the CLEC's option. While there are finite limits on the number of line class codes in particular central office switches, BellSouth has not denied any request for customized routing based on lack of LCC capacity. Moreover, the AIN method of customized routing eliminates any potential exhaust concerns about the LCC method of customized routing.

Q. ARE CLECS USING THE LCC METHOD OF CUSTOMIZED ROUTING?

A. Yes. BellSouth has provided the LCC method of customized routing to one CLEC in Georgia. No CLEC in Kentucky has requested this method of customized routing; BellSouth, however, stands ready to provide it.

Q. HOW IS THE AIN METHOD OF CUSTOMIZED ROUTING DIFFERENT THAN THE LCC METHOD?

A. The AIN method allows the use of shared trunk groups (for those CLECs using the AIN method) between the end office switch and the AIN hub switch to accomplish customized routing for customers served by different end offices subtending a particular AIN hub. In contrast, the LCC solution, discussed below, requires a separate trunk group for each end office due to the inherent technical limitations of the switches. This separate trunk group may be shared, however, by those CLECs requesting the same branding or unbranding of their respective end users' OS/DA traffic. BellSouth uses separate trunk groups between its end office switches and BellSouth's operator services and directory assistance platforms for calls from BellSouth's end users.

Q. DO BELLSOUTH'S CUSTOMIZED ROUTING SOLUTIONS MEET THE FCC'S REQUIREMENTS?

A. Yes. In the *Second Louisiana Order*, the FCC discussed the CLECs' ability to route its customers' calls. Specifically, the FCC held that "BellSouth should not require the competitive LEC to provide the actual line class codes, which may differ from switch to switch, if BellSouth is capable of accepting a single code region-wide." *Second Louisiana Order*, ¶ 224. In compliance with this obligation, BellSouth will implement one routing pattern per region for a CLEC's customers. In addition, although it is not required to do so, BellSouth voluntarily will provide a single routing pattern on a state-wide basis. This single routing pattern (whether region-wide or state-wide) can include routing to a BellSouth platform (branded or unbranded), a CLEC platform, or a third-party platform.

To avail itself of the single routing pattern, the CLEC need not put any LCC on its local service requests ("LSRs"). Such orders will be handled electronically (assuming, of course, that they would not otherwise fall out for manual handling) and therefore will need no manual intervention.

This line class code routing arrangement is identical to that provided to the BellSouth retail units. On its retail side, BellSouth has a single region-wide routing pattern for its customers' calls that is effectuated without the service representative having to populate the LCC on the service order. Likewise, BellSouth will provide a single routing pattern for CLECs that is effectuated without the CLEC service representative having to populate the LCC on the order.

If, on the other hand, the CLEC chooses to have different routing options available for different customers served out of the same switch, BellSouth will handle such requests on a manual basis. In this scenario, the CLEC will provide information on the LSR designating the appropriate LCCs to direct the call for those of the CLEC's end users for which the single routing plan will not be used. Although submitted electronically, such an order will fall out for manual handling and BellSouth will process it manually. The FCC specifically recognized that CLECs who wish to have multiple routing patterns in the same switch should bear the obligation to populate the requisite LCCs on the LSR. Specifically, the FCC held as follows:

> We agree with BellSouth that a competitive LEC must tell BellSouth how to route its customers' calls. If a competitive LEC wants all of its customers' calls routed in the same way, it should be able to inform BellSouth, and BellSouth should be

> able to build the corresponding routing instructions into its systems just as BellSouth has done for itself. If, however, a competitive LEC has more than one set of routing instructions for its customers, it seems reasonable and necessary for BellSouth to require the competitive LEC to include in its order an indicator that will inform BellSouth which selective routing pattern to use.

Second Louisiana Order, ¶ 224. As described above, BellSouth is in full compliance with these obligations.

For those LSRs on which the CLECs populate the LCCs for specific routing patterns, BellSouth will process them in a timely manner. Such orders will be counted in the "partially mechanized" category of performance data and addressed fully in the performance data filing of Alphonso Varner.

CHECKLIST ITEM 7: 911/E911, DIRECTORY ASSISTANCE AND OPERATOR CALL COMPLETION

Q. PLEASE DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 7.

A. BellSouth provides to CLECs access to 911/E911 services, directory assistance services, and operator call completion services at a level of quality and performance that is at least equal to that which BellSouth provides to itself.

911/E911

Q. DOES BELLSOUTH PROVIDE NONDISCRIMINATORY ACCESS TO 911 AND E911 SERVICES?

A. Yes. Section 271(c)(2)(B)(vii) of the Act requires a Bell Operating Company such as BellSouth to provide "[n]ondiscriminatory access to --- (I) 911 and E911 services. In the *Ameritech Michigan Order*, the FCC held that a BOC "must maintain the 911 database entries for competing LECs with the same accuracy and reliability that it maintains the database entries for its own customers" and that for facilities-based carriers, BellSouth must provide "unbundled access to [its] 911 database and 911 interconnection, including the provision of dedicated trunks from the requesting carrier's switching facilities to the 911 control office at parity with what [BellSouth] provides to itself." *Ameritech Michigan Order*, ¶ 256.

Q. DESCRIBE THE MEANS BY WHICH BELLSOUTH OFFERS CLECS ACCESS TO BELLSOUTH'S E911 DATABASE.

A. The BellSouth E911 database contains end user subscriber information that is useful to emergency service agencies in locating a customer dialing 911 for dispatching appropriate emergency services. The database contains information such as customer name, service address, class and type of service. BellSouth has had procedures in place since early 1996 by which CLECs can connect their switches to BellSouth's E911 tandems. Because methods and procedures have long been in place to allow other carriers, including independent LECs, access to BellSouth's E911 and 911 updating

capabilities, the necessary methods and procedures for obtaining such updating by CLECs have been business as usual for BellSouth. *See* NewSouth Agmnt., Att. 2, § 16.0, e.spire Agmnt., Att. 2, § 16.0.

BellSouth's provision of nondiscriminatory access to the E911 database as well as procedures for updating and maintaining the E911 database both for CLEC and BellSouth end users are described in the Affidavit of Ms. Val Sapp, Attachment F.

In the *Second Louisiana Order*, the FCC found that BellSouth satisfied the requirements of Checklist Item (7)(I). There has been no material change in BellSouth's provision of 911/E911 since that decision and thus the Commission should find BellSouth in compliance.

Q. ARE CLECS ACCESSING BELLSOUTH'S E911 DATABASE?

A. Yes. As of March 31, 2001, CLECs had requested and BellSouth had provided 96 such trunks for CLECs in Kentucky. In its nine-state region, BellSouth had 4,400 trunks in service connecting CLECs' switches with BellSouth's E911 arrangements as of that same date. In Kentucky, 13 CLECs were sending mechanized updates to BellSouth for inclusion in the 911 database as of March 31, 2001; and in BellSouth's nine-state region, 66 CLECs were doing so as of that same date. These mechanized updates include information about both end user customers to whom CLECs provide service via the resale provisions of the Act as well as those end user customers to whom CLECs provide service from the CLECs' own switches.

DIRECTORY ASSISTANCE/OPERATOR SERVICES

Q. WHAT ARE BELLSOUTH'S OBLIGATIONS WITH RESPECT TO DIRECTORY ASSISTANCE AND OPERATOR SERVICES?

A. Section 271(c)(2)(B)(vii)(II) and (III) of the Act requires BellSouth to provide nondiscriminatory access to "directory assistance services to allow the other carrier's customers to obtain telephone numbers" and "operator call completion services," respectively. Section 251(b)(3) obligates BellSouth to permit CLECs to have nondiscriminatory access to operator services, directory assistance and directory listing with no unreasonable dialing delays. BellSouth, however, is no longer obligated to provide operator and directory assistance services as a UNE because BellSouth provides customized routing as discussed earlier.

Q. DOES BELLSOUTH PROVIDE DIRECTORY ASSISTANCE SERVICE IN A NONDISCRIMINATORY MANNER?

A. Yes. BellSouth provides directory assistance access service to CLECs in the same manner as it does for its own retail subscribers. *See* NewSouth Agmnt., Att. 2, § 10.3. Specifically, BellSouth provides CLECs with DAAS. DAAS allows CLECs' end users to obtain telephone listing information from BellSouth. CLECs also have access to BellSouth's DACC service, which gives the CLEC's end user the option to have a call to BellSouth's DA service completed automatically. Facilities-based CLECs obtain access to these services through trunks connecting the CLEC's point of interface to BellSouth's DA platform.

Q. ARE CLECS USING DAAS AND DACC?

A. Yes. As of March 31, 2001, CLECs in Kentucky had 65 directory assistance trunks in place between those CLECs' switches and BellSouth's DA platform. In BellSouth's nine-state region, there were 2,929 such directory assistance trunks in place serving CLECs. In BellSouth's nine-state region, 30 CLECs were purchasing DAAS and 41 CLECs were purchasing DACC from BellSouth as of March 31, 2001.

Because methods and procedures have long been in place to allow other carriers, such as independent LECs, access to BellSouth's DAAS and DAAC services, the necessary methods and procedures for obtaining such access by CLECs are business as usual for BellSouth.

Q. DOES BELLSOUTH PROVIDE CLECS WITH ACCESS TO BELLSOUTH'S SUBSCRIBER LISTING INFORMATION FOR CLECS TO ESTABLISH THEIR OWN DIRECTORY ASSISTANCE SERVICES?

A. Yes. BellSouth provides CLECs and other service providers with access to BellSouth's DADS, which allows CLECs to use BellSouth's subscriber listing information to set up their own directory assistance services. *See* NewSouth Agmnt., Att. 2 § 10.5. BellSouth also provides CLECs and other service providers with DADAS, which gives CLECs direct access to BellSouth's DA database so that CLECs may provide directory assistance services. *See* NewSouth Agmnt., Att. 2, § 10.6. BellSouth currently provides both DADS and DADAS to CLECs themselves and to various third-party service providers which, in turn, furnish the service to CLECs. Database information is available to

CLECs in magnetic tape format, cartridge tape format, and where the CLEC has electronic connectivity, in network data mover (NDM) format.

All information contained in BellSouth's listing database for its own end users, CLECs' end users, and independent LECs' end users is available to competitive carriers in the same manner as it is available to BellSouth itself. BellSouth is fully compliant with Section 51.217(c)(3)(i) of the FCC's rules.

Q. ARE CLECS ACCESSING BELLSOUTH'S DIRECTORY DATABASES?

A. Yes. As of March 31, 2001, five (5) service providers were using BellSouth's Kentucky subscriber listings, via DADS, to provide DA service and third party listing data to end users. Nine (9) service providers were using DADS across BellSouth's nine-state region as of that same date. As of March 1, 2001, two (2) service providers in the region were using DADAS to provide the service to CLECs.

Q. DESCRIBE BELLSOUTH'S INTERCEPT SERVICE OFFERING.

A. CLECs also have access to BellSouth's intercept service, which refers calls from a disconnected or non-working number to an appropriate announcement. Facilities-based CLECs obtain access to BellSouth's intercept service through a dedicated trunk facility. As of March 31, 2001, BellSouth had provided CLECs in Kentucky with six (6) intercept trunks. In BellSouth's nine-state region, BellSouth had provided 172 intercept trunks to CLECs as of that same date. Because methods and procedures have long been in place to allow other carriers, such as independent LECs, access to BellSouth's intercept service,

the necessary methods and procedures for obtaining such access by CLECs are business as usual for BellSouth.

Q. DESCRIBE BELLSOUTH'S OPERATOR CALL PROCESSING SERVICES OFFERING.

A. Operator call processing, which allows CLECs to obtain both live operator and mechanized functionality, is available from BellSouth. *See* NewSouth Agmnt., Att. 2, § 10. BellSouth call processing includes: Call Assistance and Call Completion services; Alternate Billing Services such as third number billing, calling card billing, and collect call handling; verification and interruption of a busy line; and operator transfer service. Facilities-based CLECs can obtain access to BellSouth's operator call processing by connecting their point of interface via a trunk group to BellSouth's operator services system.

Q. ARE CLECS ACCESSING BELLSOUTH'S OPERATOR SERVICES?

A. Yes. As of March 31, 2001, BellSouth had provided CLECs in Kentucky with 59 operator services trunks. Across its nine-state region, BellSouth had provided CLECs with 2,903 operator services trunks as of that same date. In Kentucky, BellSouth had provided CLECs with two (2) verification trunks as of March 31, 2001. Across its nine-state region, BellSouth had provided CLECs with 503 verification trunks as of that same date. Because methods and procedures have long been in place to allow other carriers, such as independent LECs, access to BellSouth's operator call processing, such access by CLECs is considered business as usual for BellSouth.

Q. CAN INFORMATION CONCERNING CLECS' END USER CUSTOMERS BE ENTERED INTO OR CORRECTED IN BELLSOUTH'S DIRECTORY ASSISTANCE AND OPERATOR SERVICES DATABASES?

A. Yes. BellSouth will update CLEC end user listings equal to the service it provides to itself and its end users. *See* NewSouth Agmnt., Att. 2, § 10.3.2.2. BellSouth's procedures for updating and maintaining the DA and OS databases for BellSouth's end user subscribers are described in the Affidavit of Doug Coutee, Attachment C. As described by Mr. Coutee, procedures for both CLEC subscribers and BellSouth subscribers are performed in a similar and nondiscriminatory manner.

DISAGGREGATION OF PERFORMANCE DATA FOR DIRECTORY ASSISTANCE/OPERATOR SERVICES

Q. DO BELLSOUTH'S PERFORMANCE MEASUREMENTS FOR DIRECTORY ASSISTANCE/OPERATOR SERVICES SUFFICIENTLY DEMONSTRATE NONDISCRIMINATION?

A. Yes. In the *Second Louisiana Order*, the FCC stated that in future applications, BellSouth needed either to disaggregate its performance data for directory assistance and operator services between wholesale and retail, or explain why such disaggregation is unnecessary to show nondiscrimination. *Second Louisiana Order*, ¶ 245. Because BellSouth's provision of directory assistance and operator services to CLECs is parity by design, disaggregation of performance measurements for these services is unnecessary.

To demonstrate this fact, I directed the preparation of exhibits that describe the routing and handling of operator services and directory assistance calls. Exhibit WKM-7 describes the processing of such calls by the Traffic Operating Position System ("TOPS") and its associated Queuing Management System ("QMS"). This exhibit was prepared by BellSouth subject matter experts responsible for staff support for BellSouth departmental operations in these two areas. I also obtained an affidavit from one of BellSouth's major suppliers of hardware and associated software systems for these two areas, Nortel, Inc. This affidavit, which is attached to my testimony as Exhibit WKM-8 validates the accuracy of the exhibit as well as my overview of it contained herein.

Q. EXPLAIN WHY DISAGGREGATION OF PERFORMANCE DATA IS UNNECESSARY.

A. Exhibit WKM-6 documents the flow of service orders from various sources (BellSouth Retail Units, CLEC resale, CLEC UNE, and CLEC UNE and resale with customized call routing). As this Exhibit demonstrates, the flow of the service order is precisely the same regardless of the source of the service order. Universal Service Order Codes ("USOCs") on the service orders are used to establish switch translations that provide dial tone and various service features listed on each service request. The exact same list of USOCs, with the exception of four unique provisioning USOCs used for UNEs, is used on both BellSouth and CLEC orders to describe various features and functions. If the service order being processed is for a CLEC, it contains a special four-digit Field Identifier Code ("FID") that ultimately identifies the CLEC to the billing system. However, the FID is <u>not</u> input to the switch. Thus, the switch is "blind" as to whether a given end user customer is BellSouth's customer or a CLEC's customer. The service orders enter a

system called the Line Class Code Assignment Module ("LCCAM"). The LCCAM associates the USOCs assigned on service orders with an appropriate LCC that identifies the routing and screening characteristics of the line to the switch. Nothing in the LCC distinguishes a BellSouth customer from a CLEC customer. The LCC information flows into a computer system named MARCH. MARCH is a memory administration system that translates line-related service order data into switch provisioning messages and automatically transmits the messages to targeted stored program control switches. Routing, screening, and trunking of calls by the switch are identical for lines associated with identical LCCs. Therefore, it is not necessary to perform measurements beyond this point in the process to demonstrate parity in the handling of operator services and directory assistance calls. The diagrams attached to Exhibit WKM-6 clearly show that the LCCAM to MARCH handoff merges traffic from all sources into a single flow determined solely by LCCs.

BRANDING

Q. WHAT BRANDING OPTIONS DOES BELLSOUTH PROVIDE TO CLECS?

A. BellSouth offers four service levels of branding to CLECs when CLECs order Directory Assistance and/or Operator Call Processing. The options are: BellSouth branding, unbranded, custom branding, and self-branding. *See* NewSouth Agmnt., Att. 2, § 10.4. Unbranded, custom branding and self-branding are all provided via customized routing. Unbranded and custom branding can also be provided via OLNS. BellSouth will complete its deployment of OLNS in Kentucky by July 13, 2001.

Q. HOW DOES BELLSOUTH ROUTE OPERATOR SERVICES AND DIRECTORY ASSISTANCE TRAFFIC FOR ITS OWN END USER CUSTOMERS?

A. BellSouth routes its operator services or directory assistance traffic directly to a BellSouth TOPS platform rather than via a tandem switch. The operator services or directory assistance end office functions offered by BellSouth, as part of its retail services, require dedicated trunk groups from BellSouth end offices to the TOPS platform.

Q. PLEASE DESCRIBE THE OPERATION OF TOPS.

A. Exhibit WKM-7 provides a complete description of TOPS call flow via the QMS. Calls are initially queued based on call origination type. For example, a determination is made whether the call originated from a public telephone or arrived at TOPS via a directory assistance trunk group. Next, calls are ordered based on whether or not they have previously received some form of automated treatment or operator handling. Then the calls are processed through six refinement tables to enable them to be handled by operator groups best equipped to handle specific types of calls. For example, this process routes directory assistance calls to directory assistance equipped TOPS positions while calls requiring fluency in a particular language are routed to operators with skills in that language. Finally, the calls are routed to queues based on such factors as the age of the call, equipment availability, and force management considerations.

Q. HOW DOES TOPS TREAT CALLS FROM CLEC END USER CUSTOMERS?

A. CLECs' customers' calls to BellSouth's TOPS platform are handled in a nondiscriminatory manner at parity with the treatment of calls from BellSouth's retail customers. TOPS does not distinguish between calls made by BellSouth end users and calls made by CLEC end users. Thus, the system represents parity by design. Exhibit WKM-8 contains affidavits prepared by Mr. Robert Summers, Jr., Mr. William Greytock, and Mr. David C. Thompson, all of Nortel, pertaining to operation of the TOPS and QMS systems. Nortel is the supplier of BellSouth's TOPS platform. Their affidavits confirm that BellSouth's processes for the handling of calls to operator services are nondiscriminatory.

Q. DOES BELLSOUTH PERMIT A CLEC TO ROUTE ITS OPERATOR SERVICES OR DIRECTORY ASSISTANCE TRAFFIC TO ITS OWN OPERATOR SERVICES OR DIRECTORY ASSISTANCE PLATFORMS?

A. Yes. The CLEC may wish to route calls to its own operator or directory assistance platform for branding purposes. As discussed in Exhibit WKM-6, customized routing is ordered by use of a FID that is then converted by LCCAM, as discussed above, into an LCC for use by the switch. Once this conversion occurs, the switch's processor routes the call based on the assigned LCC rather than on the basis of whether the LCC is a "BellSouth LCC" or a "CLEC LCC". If the LCC denotes that the call is to be routed to an operator services platform other than BellSouth's operator services platform, then the provisioning of the trunk group to the CLEC's choice of operator services platform is the responsibility of the CLEC. Under this scenario, the CLEC will have the option of treating the calls in any fashion it wants because the calls will be directed to the CLEC's

(or third party provider's) platform. The diagram for example 3 of the attachments to Exhibit WKM-6 depicts the call processing flow of calls using customized routing.

Q. DOES BELLSOUTH PROVIDE CLECS WITH THE ABILITY TO APPLY UNIQUE BRANDING IN COMPLIANCE WITH THE FCC'S REBRANDING REQUIREMENTS?

A. Yes. In the *Second Louisiana Order*, the FCC stated that BellSouth must demonstrate that its method of providing branding results in nondiscriminatory access. *Second Louisiana Order*, at ¶ 247. BellSouth provides CLECs the ability to apply unique branding via the customized routing methods discussed in my testimony under Checklist Item 6 and the OLNS method described below.

Under the LCC method of customized routing, calls are directed at the end office switch to the requested OS/DA platform over dedicated trunks. Dedicated trunks are required because of the technical limitations of the switches. To the extent that CLECs choose the same OS/DA platform and the same branding (or unbranding) of calls, CLECs may share transport between the end office switch and the platform. A CLEC's use of line class codes to reach an OS/DA platform is the same as BellSouth's use of line class codes to reach its TOPS platform, and thus BellSouth's provision of customized routing is nondiscriminatory.

Under the AIN method of customized routing, calls are sent to an AIN hub that performs the database query. AIN uses centralized databases to determine routing instructions rather than have the same determination made at the end office switch level. In this

arrangement, CLECs may share transport between BellSouth's end office switch to the AIN hub. Moreover, CLECs who opt for the same branding (or unbranding) of their traffic and whose traffic is sent to the same OS/DA platform can likewise share trunk groups between the AIN hub and that OS/DA platform.

Q. DESCRIBE BELLSOUTH'S OFFERING OF ORIGINATING LINE NUMBER SCREENING (OLNS).

A. OLNS is method of providing customized branding in addition to the LCC and AIN methods described earlier in this testimony. OLNS provides a means of making information available to the OS/DA platform about the end user originating a telephone call. This information may be used to determine things such as an end user's local service provider and that local service provider's branding preferences. OLNS functionality makes originating line information available to the OS/DA platform via centralized databases. In other words, OLNS allows end users' calls to proceed from the end office switches to BellSouth's OS/DA platform over common trunk groups (that is, a single trunk group between an end office switch and the OS/DA platform carrying multiple service providers' traffic including calls from BellSouth's retail customers). Once the call arrives at the OS/DA platform, OLNS is used to "look up" the telephone number of the calling party in its database to determine whether and how to brand a call from that particular end user.

BellSouth completed its deployment of OLNS in Georgia on December 31, 2000. BellSouth had earlier informed CLECs of this deployment in a carrier notification letter on BellSouth's interconnection website dated December 22, 2000. The current

deployment schedule calls for OLNS availability to CLECs in Kentucky by July 13, 2001 and in the rest of BellSouth's region by that same date.

CHECKLIST ITEM 8: WHITE PAGES LISTINGS

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 8.

A. Checklist Item 8 requires that BellSouth's interconnection offerings include directory listings in BellSouth's white pages directory for customers served by a CLEC. BellSouth has long made its white pages listing capabilities available to independent LECs and other service providers. Because methods and procedures have been in place to allow other carriers access to BellSouth's white pages listing capabilities for many years, the necessary methods and procedures pursuant to which CLECs may obtain such listings are business as usual for BellSouth. The white pages listings will include the subscriber's name, address and telephone number. The FCC in the *Second Louisiana Order* found BellSouth in compliance with this checklist item. In addition, in its 1999 Advisory Opinion in Case No. 96-608, the Commission found BellSouth in compliance with this checklist item.

The Affidavit of Rook Barretto, attached hereto as Attachment D, describes the flow of orders received for the production of white pages directories and how this process is accomplished for both BellSouth's listings and CLECs' listings.

CHECKLIST ITEM 9: NUMBER ADMINISTRATION

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 9.

A. During February 1998, Lockheed-Martin assumed the NANPA functions previously provided by Bell Communications Research, Inc. (Bellcore), now Telcordia Technologies, Inc. This did not include the central office code assignment and Numbering Plan Administration (NPA) relief planning functions that continued to be performed by the dominant ILEC serving the particular geographic territory until a transition plan could be finalized to transfer these functions to Lockheed-Martin. The central office code assignment function was transferred to Lockheed-Martin region-by-region through an industry-accepted transition plan. In BellSouth's region, that transition began July 6, 1998, and concluded August 14, 1998. At this time, BellSouth no longer performs the central office code assignment function. NeuStar assumed all NANPA responsibilities on November 17, 1999 when the FCC approved the transfer of Lockheed-Martin's Communication Industry Service Division to NeuStar. In its 1999 Advisory Opinion in Case No. 96-608, the Commission found BellSouth in compliance with this checklist item.

Q. DOES BELLSOUTH HAVE ANY RESPONSIBILITY FOR NPA RELIEF PLANNING NOW?

A. No. NeuStar also assumed responsibility for NPA relief planning. When BellSouth was responsible for NPA relief planning and as an NPA was found to be in jeopardy of exhausting before a NPA relief plan could be implemented, the BellSouth Central Office Code Administration Center implemented code conservation measures complying with

consensus decisions of the local industry as reached in one or more Industry Jeopardy Meetings. NANPA now has the responsibility for jeopardy declaration in a NPA.

Q. PLEASE DESCRIBE BELLSOUTH'S ACTIONS PRIOR TO THE TIME NPA RELIEF PLANNING WAS TRANSFERRED TO NEUSTAR.

A. While serving as the Central Office Code Administrator for its territory, BellSouth maintained neutrality in performing the code administration functions and ensured that CLECs had nondiscriminatory access to telephone numbers for assignment to their customers. BellSouth adhered to the code administration guidelines published by the Industry Numbering Council ("INC"), a national industry body under the Carrier Liaison Committee ("CLC"), sanctioned by the Alliance for Telecommunications Industry Solutions ("ATIS"). INC documents, including final documents, completed guidelines, and issue resolutions in final closure, are readily accessible via the Internet, at ATIS's website (http://www.atis.org). These guidelines provide instructions to all service providers, including CLECs, on how to request and have NPA/NXX codes assigned. BellSouth established procedures to provide nondiscriminatory NXX code assignments to CLECs that conform to the INC standards. Pursuant to these procedures, as of August 19, 1998, BellSouth had assigned 2,141 NPA/NXX codes for CLECs in its nine-state region. Other than when faced with imminent NPA exhaustion, BellSouth did not refuse any CLEC requests for NPA/NXX code assignments, either in Kentucky or in BellSouth's nine-state region.

Q. DOES BELLSOUTH HAVE ANY RESPONSIBILITY FOR THE ASSIGNMENT OF NPA/NXX CODES NOW?

A. No. Since NeuStar assumed the Central Office Code Administration function, BellSouth no longer has any responsibility for the administration or assignment of central office codes (NXXs) to CLECs or any other telecommunications service provider. BellSouth follows the Central Office Code (NXX) Assignment Guidelines developed by the INC in submitting NXX code requests to NANPA, entering code information into the appropriate national databases, activating NXX codes assigned to any service provider in BellSouth's territory, making available BellSouth NXX codes that are no longer in use, and all other areas covered by these and other appropriate industry guidelines. It is now NANPA's responsibility to supply competitively neutral number administration services and to ensure that all service providers have equal and non-discriminatory access to telephone numbers.

Q. WHAT RESPONSIBILITIES DOES BELLSOUTH NOW HAVE WITH REGARD TO THE ACTIVATION OF NNX CODES WITHIN ITS NETWORK?

A. BellSouth responded to CLEC concerns about accurate and timely activation of NXX codes by establishing, effective May 15, 1998, its NXX activation Single Point of Contact ("SPOC") to provide assistance to CLECs and Independent LECs. The NXX SPOC processes requests for NXX activity coordination, and provides information concerning BellSouth's architecture arrangements, assistance in trouble resolution for code activation, and assistance in preparing the Code Request. If a CLEC or independent LEC intends to interconnect directly with BellSouth, or if interconnection arrangements with BellSouth are already in place, the CLEC or independent LEC should send to BellSouth a courtesy copy of its Central Office Code Request in conjunction with the submission of its CO Code Request to the NANPA (NeuStar). If the CLEC gives

BellSouth a copy of its Central Office Code Request, BellSouth is better able to activate the Central Office Code in BellSouth's network.

Among other functions, the NXX SPOC coordinates the activation of CLEC NXX codes and provides a trouble-reporting center for CLEC code activation. Since its establishment in mid-1998, the NXX SPOC has operated successfully in keeping NXX activation problems to a minimum. The NXX SPOC provides CLECs with a positive report on the activation of all of the CLECs' NXX codes that are activated in BellSouth's network. If requested by the CLEC, a written response is provided to the CLEC when BellSouth's Complex Translations Group has provisioned the NPA/NXX in the appropriate BellSouth switches and BellSouth has completed mechanized AMA testing and validation. Since it began operation, BellSouth's NXX SPOC has tracked the provisioning and testing of approximately 4,300 NXXs for facility-based CLECs and Independent Telephone Companies. BellSouth has never charged CLECs or LECs for NPA/NXX codes.

Q. WHAT INFORMATION DOES BELLSOUTH FURNISH TO NEUSTAR WITH RESPECT TO NUMBER RESOURCES?

A. BellSouth furnishes certain data to NeuStar with respect to number resources. For example, BellSouth provides the following: (1) Number Resource Utilization Forecast (NRUF) Report – BellSouth prepares a NRUF Report and forwards it to NeuStar pursuant to FCC directives. NeuStar uses the NRUF Reports from all carriers to estimate when all NPAs will exhaust; (2) Part 1 CO Code Request Form and Months-To-Exhaust Worksheet – when BellSouth requests a new CO code assignment for growth from

NeuStar CO Code Administration, BellSouth submits a Part 1 CO Code Request Form and Months-To-Exhaust Worksheet that shows when the existing supply of telephone numbers in the CO will exhaust; (3) Part 4 – New CO codes must be put to work within six months of being or assigned or must be returned to NeuStar. BellSouth notifies NeuStar that an NXX code has been put to work by furnishing NeuStar with a Part 4.

CHECKLIST ITEM 10: ACCESS TO DATABASES AND ASSOCIATED SIGNALING

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 10.

A. This checklist item obligates BellSouth to provide:

- Nondiscriminatory access to databases and associated signaling necessary for call routing and completion. 47 U.S.C. § 271(c)(2)(B)(x).
- Nondiscriminatory access to signaling networks and call-related databases. 47 C.F.R. § 51.319(e).

The FCC, in its *Second Louisiana Order*, found that BellSouth was in compliance with this checklist item. In addition, in its 1999 Advisory Opinion in Case No. 96-608, the Commission found BellSouth in compliance with this checklist item.

Q. GENERALLY DESCRIBE THE ACCESS BELLSOUTH PROVIDES TO ITS DATABASES AND SIGNALING NETWORKS.

A. BellSouth employs the same relevant systems, processes, and procedures in Kentucky as in Louisiana, which the FCC held were providing nondiscriminatory access to signaling

and call-related databases. BellSouth provides nondiscriminatory access to its signaling networks, including Signal Transfer Points ("STPs"), Signaling Links, Service Control Points ("SCPs"), LIDB, Toll Free Number Database, AIN Toolkit, and the AIN method for Customized Routing. In addition, BellSouth also provides access to the LNP database and the CNAM database.

BellSouth provides nondiscriminatory access to its call-related databases and associated signaling as evidenced by the millions of queries that BellSouth's call-related databases have successfully handled for CLECs, IXCs, and other ILECs. BellSouth provides CLECs access to BellSouth's signaling network either directly, or through third party service providers, whichever the CLEC elects. BellSouth's provision of the AIN method for customized routing is described earlier in my testimony.

SIGNALING NETWORKS

Q. DESCRIBE THE ACCESS BELLSOUTH PROVIDES TO ITS SIGNALING LINKS AND SIGNAL TRANSFER POINTS.

A. BellSouth provides nondiscriminatory access to its signaling network, including Signaling Links and STPs on an unbundled basis. 47 C.F.R. § 51.319(e)(1)(i); *See* NewSouth Agmnt., Att. 2, § 11.0. Signaling networks enable CLECs to send signals between its switches (including unbundled switching elements), between its switches and BellSouth's switches, and between its switches and those third party networks with which BellSouth's signaling network is connected. BellSouth provides Signaling System 7 ("SS7") network service to CLECs for their use in furnishing SS7-based services to their

own end users or to the end users of another CLEC that has subtended its STP to the signaling network of the interconnecting CLEC. *See* SGAT, § X. This arrangement permits CLECs to use BellSouth's SS7 signaling network for signaling between the CLECs' switches, between the CLECs' switches and BellSouth's switches, and between the CLECs' switches and the networks of other parties connected to BellSouth's SS7 network. Because all unbundled switching elements are provided on switches that BellSouth uses to provide service to its own customers, all signaling functions are identical. 47 C.F.R. § 51.319(e)(l)(iii); See NewSouth Agmnt., Att. 2, § 11.0.

The Signaling Link between the CLEC's switch and BellSouth's STP is an unbundled network element that CLECs can order by contacting their assigned account team representative at BellSouth. The representative then arranges the set-up for the CLEC. When a CLEC purchases unbundled switching from BellSouth, BellSouth will provide access to its signaling network in the same manner as it provides such access for itself.

BellSouth's SS7 network provides dedicated two-way signaling links that interconnect BellSouth's STP locations and CLEC's Signaling Points at Signaling-Point-of-Interface (SPOI) locations. SGAT, § X.A. The SS7 network consists of STP Port Termination(s) for CLEC signaling and STP Interconnection Facilities (also called Signaling Links). The port terminations consist of port connections operating at 56 Kilobits per second (56 Kbps) transmission facilities on BellSouth's STP. The STP Interconnection Facility is the transmission facility which lies between the multiplexing hub, which demultiplexes the CLEC's 56 Kbps transmission from DS1 transmission facilities, and the STP port. 47 C.F.R. § 51.319(e)(1)(ii); See NewSouth Agmnt., Att. 2, § 11.0.

STPs are signaling message switches that interconnect Signaling Links to route signaling messages between switches and databases. CLECs may use BellSouth's SS7 signaling network for signaling between their switches, between their switches and BellSouth's switches, and between their switches and the networks of other parties connected to the BellSouth SS7 network. STPs also provide access to other network elements connected to the BellSouth SS7 network including: 1) BellSouth-provided local end office switching or tandem switching; 2) BellSouth-provided SCPs or databases; 3) third-party provided local end office switching or tandem switching; and 4) third-party provided SCPs or databases. *See* NewSouth Agmnt., Att. 2, § 11.0.

Q. DOES BELLSOUTH PROVIDE SS7 NETWORK INTERCONNECTION?

A. Yes. SS7 Network Interconnection is the interconnection of the CLEC's local STPs and CLEC's local end office or tandem switching systems with BellSouth's STPs. This interconnection provides connectivity that enables the exchange of SS7 messages among BellSouth's switching systems and databases, CLEC's local or tandem switching systems, and other third-party switching systems directly connected to the BellSouth SS7 network. SS7 network interconnection provides CLECs with connectivity to all components of the BellSouth SS7 network.

Q. IS ACCESS TO BELLSOUTH'S SIGNALING NETWORK AVAILABLE?

A. Yes. BellSouth's signaling service is available as evidenced by the fact that, as of May 7, 2001, ten (10) CLECs had directly connected to BellSouth's signaling network in Kentucky. Additional facilities-based CLECs may obtain access to BellSouth's signaling

network as described above and in BellSouth's tariff (FCC No. 1). Because neither BellSouth's switch nor STP distinguish between BellSouth's end users and the end users of resellers, BellSouth does not know how many queries have been made to BellSouth's databases from the end users of resellers.

CALL-RELATED DATABASES

Q. DESCRIBE THE CALL-RELATED DATABASES BELLSOUTH OFFERS ON AN UNBUNDLED BASIS.

A. Section 51.319(e)(2)(ii) of the FCC Rules set forth certain call-related databases to which BellSouth must offer access on an unbundled basis. Consistent with that rule, BellSouth provides access to its LIDB, Toll Free Number Database, LNP database, CNAM database, AIN Services Feature database, as well as the 911 and E911 databases. *See* SGAT § X.A.3.d.

Q. DOES BELLSOUTH PROVIDE ACCESS TO ITS SERVICE CONTROL POINTS?

A. Yes. A SCP is a specific type of network element where call related databases can reside. SCPs deployed in a SS7 network execute service application logic in response to SS7 queries sent to them by a switching system also connected to the SS7 network. SCPs also provide operational interfaces to allow for provisioning, administration and maintenance of subscriber data and service application data. CLECs may use either Feature Group D or SS7 signaling for interconnecting with BellSouth's network. *See* NewSouth Agmnt., Att. 2, § 13.0.

Q. DESCRIBE THE ACCESS BELLSOUTH PROVIDES TO ITS LIDB DATABASE.

A. The LIDB is a transaction-oriented database accessible through Common Channel Signaling (CCS) networks such as BellSouth's SS7 network. It contains records associated with end user line numbers and Special Billing Numbers. BellSouth's region-wide LIDB processed more than 1.5 billion queries from CLECs and others during the period from January 1997 through February 2001. Access to the LIDB is at present through a third party "signaling hub" provider or IXC directly connected to BellSouth's signaling network. LIDB queries are billed to the third party "signaling hub" provider or IXC, not the CLEC. CLECs can access the LIDB database once the CLEC puts required signaling links in place. *See* NewSouth Agmnt., Att. 2, § 13.4. Carriers may update customer information contained in BellSouth's LIDB in substantially the same time and manner as BellSouth's retail operations.

Q. DESCRIBE THE ACCESS BELLSOUTH PROVIDES TO ITS CNAM SERVICE.

A. CNAM service enables the called end user to identify the calling party by a displayed name before the call is answered (often referred to as a "caller ID" service). BellSouth will provide all requesting CLECs nondiscriminatory access to its CNAM Service Database. *See* NewSouth Agmnt., Att. 2, § 13.8. When a CLEC purchases unbundled local switching from BellSouth, access to the CNAM database will be identical to that used by BellSouth in the same switch. 47 C.F.R. § 51.319(e)(2)(iii).

The calling party's name, date, and time of the call are retrieved from the SCP database and delivered to the end user's premises between the first and second ring for display on

compatible customer premise equipment. CNAM Service Query is BellSouth's service that allows a CLEC to query BellSouth's Calling Name database.

When a CLEC operates its own switching center, access to the CNAM database is obtained through the SS7 network. The CLEC accesses the SCP through the BellSouth STP or by connecting the CLEC's STP to the BellSouth STP and then to the BellSouth SCP. CLECs that deploy their own switching facilities are able to access BellSouth's SS7 network for each of their switches through a signaling link between their switches and BellSouth's STP in the same manner as BellSouth connects its own switches to the STP. The same features, functions, and capabilities are available to the CLEC as are available to BellSouth. 47 C.F.R. §51.319(e)(2)(iv).

Q. IS CNAM AVAILABLE TO CLECS?

A. Yes. As of April 1, 2001, BellSouth has over 70 CNAM database customers, consisting of both CLECs and independent LECs, across BellSouth's nine-state region.

Q. DESCRIBE THE ACCESS BELLSOUTH PROVIDES TO ITS TOLL FREE NUMBER AND NUMBER PORTABILITY DATABASE.

A. The SGAT and BellSouth's Commission approved agreements provide the terms and conditions for nondiscriminatory access to BellSouth's Toll Free Number and Number Portability Database. *See* NewSouth Agmnt., Att. 2, § 13.5. Access to the Toll Free Number and Number Portability databases allows a CLEC to access BellSouth's Toll Free Number and Number Portability databases for the purpose of switch query and

database response. The Toll Free Number database provides the CLEC information required to determine the appropriate routing to a toll free number such as an 800 or 888 number.

The Number Portability database comes in two forms. The Routing service, which is a default porting service (if a company does not sign up for a query service, it will automatically use the Routing service to port calls) is available to any company and no registration is necessary. The Query service is available to any company as well, but a three-page form must be completed and returned to BellSouth. The differences between the two services is that the query service is about one-fourth of the cost of the routing service. No contracts are necessary for either service. Additional information on both LNP database services is available at: http://www.interconnection.bellsouth.com/products/vertical/LNP__Query.html; and http://www.interconnection.bellsouth.com/products/vertical/LNP__Call__Routing.html. When a CLEC purchases unbundled local switching from BellSouth, it has exactly the same access as BellSouth to BellSouth's Toll Free Number and Number Portability database. *See* NewSouth Agmnt., Att. 2, § 13.5.

BellSouth offers three different types of access to the BellSouth call related databases. The first type of access allows a CLEC whose switches are SS7 capable to attach those switches to BellSouth's STPs and then to the BellSouth call related databases. See SGAT, § X.A.

The second option is for a CLEC whose switches are SS7 capable to attach those switches to a third party's STPs. These STPs would be attached to BellSouth's STPs and

then to BellSouth's call related databases. See SGAT, § X.A. A CLEC can use Feature Group D for calls using information retrieved from BellSouth's databases.

The third option allows access by a CLEC whose switches are not capable of supporting SS7 protocols. I am not aware of any requests from CLECs for such access, no doubt because the SS7 protocol has been used so extensively for many years that most, if not all, modern switching systems are SS7-capable. However, should a CLEC make such a request, BellSouth would respond using the BFR process.

All of the above features are available to a CLEC and its customers in the same manner as provided by BellSouth to its own customers. When a CLEC operates its own switching system, access to the databases will be obtained by using the SS7 network. 47 C.F.R. § 51.319(e)(2)(iv).

When a CLEC purchases unbundled local switching from BellSouth, the access to the call related databases will be identical to that used by BellSouth in the same switch. 47 C.F.R. § 51.319(e)(2)(iii).

Q. IS BELLSOUTH SUCCESSFULLY PROVIDING ACCESS TO ITS TOLL FREE NUMBER DATABASE?

A. Yes. BellSouth has offered independent LECs and other service providers access to its Toll Free Number database for years. The necessary methods and procedures for obtaining such access by CLECs are business as usual for BellSouth. Moreover, the availability of these services is evidenced by the fact that, from January 1997 through

March 31, 2001, CLECs and other service providers across BellSouth's nine-state region completed approximately 8.2 billion queries to BellSouth's Toll Free Number database. Additional facilities-based CLECs may obtain access to the database as described in BellSouth's tariff (FCC No. 1). Assuming the appropriate signaling links are in place, direct access to the database can be provided as determined through negotiations.

Q. DESCRIBE THE ACCESS BELLSOUTH PROVIDES TO THE AUTOMATIC LOCATION IDENTIFICATION/DATA MANAGEMENT SYSTEM (ALI/DMS).

A. The ALI/DMS database contains end user information (including name, address, telephone information, and sometimes special information from the local service provider or end user) used to determine to which Public Safety Answering Point the call should be sent. BellSouth offers CLECs a data link to the ALI/DMS database or permits CLECs to provide their own datalinks to the database. *See* NewSouth Agmnt., Att. 2, § 13.6.

Q. DESCRIBE BELLSOUTH'S AIN NETWORK ARCHITECTURE.

A. AIN is a vendor-independent network architecture deployed by BellSouth that provides capabilities for creation of custom telecommunications services that are invoked by SS7 messages (called "triggers") from a switch through the STP to a SCP database. AIN uses distributed intelligence in databases to control call processing and manage network information, rather than performing those functions at every switch. When a CLEC purchases unbundled local switching from BellSouth, it has exactly the same access as BellSouth to BellSouth's AIN.

AIN access provides CLECs the ability to create service applications utilizing BellSouth's AIN and deploy those applications via the BellSouth Service Management System ("SMS") in conjunction with BellSouth's SCPs. BellSouth provides access to its AIN SCP, or databases, through its AIN Toolkit and AIN SMS Access services. These services permit the CLEC to create and deploy AIN services on a BellSouth SCP using a set of service creation tools provided by BellSouth. BellSouth uses these same tools to create and deploy AIN services in exactly the same manner as is available to CLECs. As set forth in BellSouth's SGAT, SMS access allows CLECs to provide AIN services from either BellSouth switches or the CLEC's own switch. It also allows CLECs to create service applications using BellSouth's AIN service creation tools and to deploy those services using BellSouth's service management tools. CLECs will have the same access to SMS as does BellSouth. *See* SGAT, § X.3.d.

Using BellSouth's AIN Toolkit, end user customers of the CLEC may also access BellSouth-created AIN applications and/or CLEC-created AIN applications residing in BellSouth's SCP via 1) unbundled local switching purchased from BellSouth, or 2) a CLEC's own switch that is connected to BellSouth's SS7 network via the SS7 network element. 47 C.F.R. § 51.319(e)(2)(iii), (iv) and § 51.319(e)(3)(C).

BellSouth has tested its AIN Toolkit, which provides a CLEC with the ability to create and offer AIN-service applications to the CLEC's end users, as well as its AIN SMS Access, which provides a CLEC with access to the BellSouth-provided service creation environment. The completion of test calls and the generation of billing records were part of the testing process that completed March 31,1997. The testing confirmed that service

orders flowed through BellSouth's systems properly and that accurate bills were rendered.

BellSouth has made presentations to several CLECs interested in using AIN Toolkit to develop AIN applications that would run via BellSouth's AIN, and thus on BellSouth's switches. A CLEC that wishes to access BellSouth's AIN service creation tools (that is, AIN Toolkit) for the first time could, however, do so in a matter of seven days provided that the CLEC has an ISDN line and a personal computer.

BellSouth provides access to the SMS associated with each of the databases described above in accordance with 47 C.F.R. §51.319(e)(3). This gives CLECs the same access as BellSouth to develop and deploy AIN services using BellSouth's SMS. Requesting CLECs receive the information necessary to format data and enter the data correctly into the various databases using the associated SMS.

Q. DOES BELLSOUTH MAINTAIN ITS DATABASES IN ACCORDANCE WITH SECTION 222 OBLIGATIONS?

A. Yes. All data in the above databases are maintained in accordance with §222 of the Act. 47 C.F.R. § 51.319(e)(2)(vi).

Q. WILL BELLSOUTH CONSIDER OTHER MEANS OF ACCESS TO ITS CALL-RELATED DATABASES?

A. BellSouth will respond to requests for additional arrangements for access to call-related databases and associated signaling facilities through the BFR process.

Q. PLEASE SUMMARIZE YOUR TESTIMONY ON CALL-RELATED DATABASES.

A. In summary, as required by 47 C.F.R. § 51.319(e), BellSouth provides unbundled, nondiscriminatory access to its signaling networks, to its call-related databases used in signaling networks for billing and collection or the transmission, routing or other provision of telecommunications services, and to the associated SMS for each database. Each database is accessed through BellSouth's STPs by a requesting CLEC in the same manner and via the same signaling links to the database that are used by BellSouth itself.

Q. DESCRIBE BELLSOUTH'S PROVISION OF NONDISCRIMINATORY ACCESS TO SERVICE MANAGEMENT SYSTEMS.

A. SMS is defined as a computer database or system not part of the public switched network that, among other things: (1) interconnects to the SCP and sends to that SCP the information and call processing instructions needed for a network switch to process and complete a telephone call; (2) provides telecommunications carriers with the capability of entering and storing data regarding the processing and completing of a telephone call. BellSouth provides access to the SMS associated with each of the databases described above in accordance with 47 C.F.R. § 51.319(e)(3). Requesting carriers are provided with the information necessary to format data and enter it into the various databases using the associated SMS. Carriers have the same access as BellSouth to develop AIN services

using SMS. All data in the databases described above is maintained in accordance with § 222 of the Act.

CHECKLIST ITEM 11: SERVICE PROVIDER NUMBER PORTABILITY

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 11.

A. Section 271(2)(B)(xi) requires that BellSouth generally offer "until the date by which the Commission issues regulations pursuant to section 251 to require number portability, interim telecommunications number portability through remote call forwarding, direct inward dialing trunks, or other comparable arrangements, with as little impairment of functioning, quality, reliability, and convenience as possible. After that date, full compliance with such regulations." BellSouth provides interim number portability in accordance with these requirements. In its 1999 Advisory Opinion in Case No. 96-608, the Commission found BellSouth in compliance with this checklist item. BellSouth continued to offer INP in each central office in Kentucky until LNP was implemented, which began in December 1998. By March 31, 2000, over 97% of the access lines served by BellSouth were LNP capable. As of that same date, all of the central offices in Kentucky were LNP capable and 100% of the access lines in Kentucky were LNP capable. Therefore, BellSouth continues to be in compliance with this checklist item.

Q. DESCRIBE BELLSOUTH'S INTERIM NUMBER PORTABILITY OFFER.

A. BellSouth offered interim number portability under the four methods which the FCC has found to be technically feasible: (1) Remote Call Forwarding (RCF) and Direct Inward

Dialing (DID); (2) Route Index-Portability Hub (RI-PH); (3) Directory Number-Route Index (DN-RI); and (4) Local Exchange Routing Guide (LERG) Reassignment. BellSouth provides Route Index-Portability Hub (RI-PH) as a comparable arrangement in provisioning interim number portability.

BellSouth ported 2,456 lines in Kentucky using INP. However, as of May 2, 2001, BellSouth had converted 1,236 (50%) of those lines to LNP. In its region, BellSouth ported 117,010 numbers, of which 107,773 (92%) have been converted to LNP as of that same date.

Q. DESCRIBE BELLSOUTH'S PERMANENT NUMBER PORTABILITY OFFER.

A. BellSouth has implemented permanent number portability in Kentucky in accordance with FCC rules and as discussed further in the Affidavit of Dennis Davis, Attachment E. As of March 31, 2000, BellSouth had equipped all of its switches in Kentucky with LNP capability. As of March 31, 2001, BellSouth has equipped in its nine-state region switches accounting for over 97% of its access lines with LNP capability. This total includes all major marketing areas. The remaining approximately less than 3% of network access lines in BellSouth's nine-state region generally are located in rural areas not yet subject to competition. These access lines will be equipped for LNP if requested by a CLEC via the BFR process. For the less than 3% of access lines for which LNP is not available, INP will remain available.

Once long term number portability is implemented in a particular end office, BellSouth and CLECs will withdraw interim number portability offers. The transition from interim

arrangements to permanent arrangements should be accomplished within 120 days. BellSouth will not charge the CLEC for the conversion from interim to permanent number portability.

As of March 31, 2001, BellSouth had ported 26,613 business directory numbers and 110 residence directory numbers in Kentucky using LNP. In its nine-state region, BellSouth has ported 1,113,649 business and 133,703 residence directory numbers as of March 31, 2001, which confirms the availability of LNP.

Q. DESCRIBE THE MEANS BY WHICH CLECS' END USER CUSTOMERS MAY OBTAIN VERIFICATION OR INTERRUPTION OF A TELEPHONE NUMBER THAT HAS BEEN PORTED TO A CLEC SWITCH.

A. BellSouth has developed methods and procedures to be followed when customers want verification or interruption of a conversation involving a telephone number that has been ported to a CLEC's switch. There are two arrangements that a CLEC may elect: 1) BellSouth provides operator call processing on behalf of the CLEC; and 2) the CLEC provides its own operator call processing. When BellSouth handles the CLEC's operator call processing, a verification trunk will be provisioned between the BellSouth operator services platform and the CLEC's network. This will allow BellSouth's operator to verify such a line in a CLEC switch at the request of either a BellSouth or CLEC end user. When the CLEC handles its own operator call processing, a two-way inward operator trunk (an operator to operator connection) will be jointly provisioned. This will allow the BellSouth operator to contact the CLEC operator. The CLEC operator will verify and/or interrupt the line, and report the condition to the BellSouth operator who

will, in turn, report the condition of the line to the end user. This arrangement will likewise allow the CLEC operator to contact the BellSouth operator. The BellSouth operator will verify and/or interrupt the line and report the condition to the CLEC operator who will report the condition of the line to the CLEC's end user.

CHECKLIST ITEM 12: LOCAL DIALING PARITY

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 12.

A. Checklist Item 12 obligates BellSouth to provide nondiscriminatory access to such services or information as are necessary to allow the requesting carrier to implement local dialing parity in accordance with the requirements of Section 251(b)(3). Rule 51.207 states that a LEC shall permit telephone exchange service customers within a local calling area to dial the same number of digits to make a local call notwithstanding the identity of the customer's or the called party's telecommunications service provider. The FCC, in the *Second Louisiana Order,* found BellSouth in compliance with this Checklist Item. In addition, in its 1999 Advisory Opinion in Case No. 96-608, the Commission found BellSouth in compliance with this checklist item.

The FCC's *Second Report and Order*, ¶ 71 stated that local dialing parity also is achieved through the implementation of the interconnection, number portability and nondiscriminatory access to telephone number requirements of Section 251 of the Act. As described earlier, BellSouth has implemented each of these items in accordance with the Act.

BellSouth's interconnection arrangements do not require any CLEC to use access codes or additional digits to complete local calls to BellSouth customers. Neither are BellSouth customers required to dial any access codes or additional digits to complete local calls to the customers of any CLEC. Further, end user customers of CLECs that have provisioned those customers utilizing the UNE Platform (UNE-P) will have available to them local dialing plans in the same manner as BellSouth's retail customers. In addition, BellSouth will not cause CLECs' local service customers to experience inferior quality regarding post-dial delay, call completion rate and transmission quality as compared to BellSouth's local service customers. *See* NewSouth Agmnt., Att. 3, § 5.0. The interconnection of the BellSouth network and the network of the CLEC will be seamless from a customer perspective, unless the CLEC chooses otherwise. While BellSouth is unable to determine the full extent of CLEC dialing policies, BellSouth is not aware of any complaints from CLEC customers that they are required to dial any access codes or additional digits to complete local calls.

CHECKLIST ITEM 13: RECIPROCAL COMPENSATION

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 13.

A. Reciprocal compensation arrangements are provided for in BellSouth's interconnection agreements as well as through its SGAT. In its 1999 Advisory Opinion in Case No. 96-608, the Commission found BellSouth in compliance with this checklist item. Reciprocal compensation is discussed further in the testimony of Cynthia Cox.

CHECKLIST ITEM 14: RESALE OF THE INCUMBENT LEC'S RETAIL TELECOMMUNICATIONS SERVICES AT A DISCOUNT

Q. DESCRIBE BELLSOUTH'S COMPLIANCE WITH CHECKLIST ITEM 14.

A. Checklist Item 14 obligates BellSouth to make telecommunications services available for resale in accordance with the requirements of sections 251(c)(4) and 252(d)(3). Specifically, BellSouth is required to offer for resale at wholesale rates without unreasonable or discriminatory conditions or limitations any telecommunications service that the carrier provides at retail to subscribers who are not telecommunications carriers. In the *Second Louisiana Order*, the FCC found that but for perceived deficiencies in BellSouth's OSS systems, BellSouth makes telecommunications services available for resale in accordance with sections 251(c)(4) and 252(d)(3). With respect to the offering of services for resale, BellSouth continues to meet the requirements of this Checklist Item.

Q. ARE CLECS PURCHASING RESOLD SERVICES?

A. Yes. As of March 31, 2001, there were 121,031 units being resold by CLECs in Kentucky while 3,002,701 were being resold throughout BellSouth's region. The table shown in Exhibit WKM-9, which is attached to my testimony, identifies the service and the number of units being resold in Kentucky and across the BellSouth region.

Other retail telecommunications services are likewise available for resale. Further discussion of Checklist Item 14 is found in the testimony of Cynthia Cox. Ms. Cox also addresses pricing of resold services in Kentucky in her testimony.

Q. DOES THIS CO NCLUDE YOUR TESTIMONY?

A. Yes.