



BellSouth Interconnection Services
1880 West Exchange Place
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AT&T Regional Account Team
770-492-7550
Fax 770-492-9412

May 24, 2001

Ms. Denise Berger
AT&T Local Services
Room 12256
1200 Peachtree St., NE
Atlanta, Georgia 30309

RE: Louisville Armory Place Tandem

Dear Denise:

This is in response to your letter dated May 2, 2001, requesting a written explanation regarding the alleged process gaps and service quality at the Louisville, Kentucky Armory Place Tandem. You stated that the problem was created when BellSouth moved "non- BellSouth" originated traffic to a different tandem. Following are the results of BellSouth's investigation:

On Wednesday, March 21, 2001, AT&T submitted a trouble ticket to the BellSouth Access Customer Advocacy Center (ACAC) and reported that AT&T's customers, Adelphia Business Solutions and wireless customers, were having dead air problems. BellSouth conducted extensive cooperative testing with AT&T and it was determined that there were no routing or translation problems.

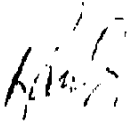
On Tuesday, April 3, 2001 at 1232 Central Daylight Time (CDT), a second trouble ticket was submitted by AT&T to the ACAC indicating "sometimes dead air, please check translations and routing." At 1302 CDT, the BellSouth Network Infrastructure Support Center (NISC) and AT&T conducted tests. Again, it was determined that there were no routing or translation problems, but that a defective T1 card problem existed. At 1640 CDT, the trouble was handed off to the Amory Place Central Office technicians to change out the card. The BellSouth work log in the Central Office indicates that the BellSouth technicians were working on the problem from 1302 CDT through 1721 CDT on April 3, 2001. At 1721 CDT the work log remarks clearly stated that "no access until CLEC ready to start trouble shooting this issue / CLEC will be calling to start." Based on this information, any delays in resolution appeared to be caused by AT&T's failure to properly follow up on agreed upon testing. The trouble ticket was cleared and closed out at 0930 CDT on April 4, 2001.

BellSouth disagrees with AT&T's assertion that BellSouth technicians stated that they would not work that evening unless overtime was authorized. The Armory Place Central Office has personnel on site 24 hours a day during the week. Also, there is a supervisor on call 24 hours a day, 7 days a week. This supervisor is available to authorize call-outs that may be necessary.

BellSouth also disagrees with AT&T's allegation that AT&T experienced 100% blocking during this period because one of the two T1s was not working. BellSouth does not believe that this incident is indicative of gaps or service quality issues in any of BellSouth's Central Offices, especially at Louisville Armory Place.

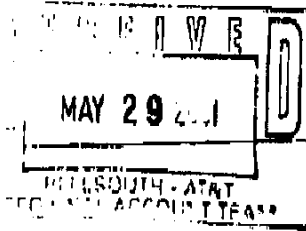
If you have any further questions regarding this issue, please feel free to contact me.

Sincerely,



Randy Jenkins
AT&T Account Team

cc: Bill Michael
Jan Burriss
Jon Rey Sullivan
Christopher Barnes



Denise C Berger
Customer Manager
BellSouth Network

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May 25, 2001

Jan Burriss
BellSouth Telecommunications
1960 West Exchange Place
Suite 200
Tucker, Georgia 30084

RE: AT&T Insight Customer Problems

Dear Jan:

The purpose of this letter is to ask your assistance in isolating the cause of some problems that are negatively affecting AT&T's customers because of gaps in BellSouth's porting process for residential numbers. Additionally, I would like for your involvement in developing and implementing the necessary improvements to close those gaps.

The attached matrix will give detail on eleven (11) customers who experienced trouble associated with ported service in Kentucky. As you can see, in these instances, BellSouth failed to complete its activities relative to the number port or placed an intercept message on the customer telephone number in error. In one instance translations in the BellSouth switch were not updated. This is data for only one market. It is imperative that this sort of chronic problem be quickly remedied before additional customers are affected.

I would like to understand the root cause of these continuing problems and BellSouth's plans for an immediate fix.

- What are the gaps in BellSouth's work center Methods & Procedures that are causing these problems to happen?
- What are the gaps in BellSouth's porting process that cause BellSouth's failure to complete the appropriate porting activities?
- What sort of intercept message is placed on customers who port their service to AT&T from BellSouth? Is this a problem unique to porting only orders?

RE: AT&T Insight Customer Problems
Page 2 of 2

- BellSouth continues to have problems with translations removal. What causes this and what is the remedy?

I will look forward to your analysis and response no later than Monday, June 4, 2001. Should you be unable to meet that target, please let me when I can expect a response as soon as possible.

Sincerely,

A handwritten signature in black ink, appearing to read "Russell Bug". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

cc: Greg Terry

**LOUISVILLE INSIGHT PROJECT
 CUSTOMER PORTING PROBLEMS**

Customer Name	Phone	AT&T Remedy Ticket Number	BellSouth Ticket Number	Date Trouble Open with BellSouth	Data Closed	Resolution Details
Cindy Bundy	502-366-5195	549119	227781	01/26/2001	01/26/2001	Port completed
Alan Murray	502-361-7076	632153	403489	02/12/2001	02/14/2001	Updated translations
Jane Younger	502-366-3903	775343	435729	03/29/2001	03/30/2001	Update AN database
Tommy Reggs	502-375-4959	656051	469426	04/24/2001	04/24/2001	Intercept message removed
Monica Marcum	502-742-0044	866274	1016797	04/27/2001	05/02/2001	BellSouth Maintenance
Dyan Rainey	502-239-1001	868909	29660 43734	04/27/2001	04/30/2001	Intercept message removed and port completed
Terra Grant	502-366-3286	874730	86669	04/30/2001	05/01/2001	Intercept message removed and port completed
John Mattingly	502-367-4888	887194	154032	05/03/2001	05/04/2001	Intercept message removed
Joseph Carter	502-361-1946	884948	148390	05/03/2001	05/03/2001	Intercept message removed
Harold Davis	5023681556 5023640919 5027420185	916757	348837	05/11/2001	05/14/2001	Intercept message removed and port completed
Stanley Clemens	502-361-0736	932715	6673	05/21/2001	05/22/2001	Intercept message removed and port completed

File



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Jan.Burriss1@bridge.bellsouth.com

Jan M. Burriss
Sales Assistant Vice President
AT&T Regional Account Team

June 5, 2001

Ms. Denise Berger
AT&T
1200 Peachtree Street
12th Floor
Atlanta, Georgia 30039

Dear Denise:

This is in response to your letter dated May 25, 2001, regarding BellSouth's provisioning of AT&T Insight Customer orders in Kentucky.

The account team is researching the issues raised in your letter concerning the provisioning of port services in Kentucky. BellSouth will not agree that there are gaps in BellSouth's porting process for residential numbers. In order to fully investigate the allegations and provide detailed results, BellSouth will need additional time and, therefore, is unable to meet the requested commitment date of June 4, 2001. BellSouth will respond to your request for an investigation of these issues as soon as possible.

Please feel free to call me at 770-492-7590, if there are additional questions.

Sincerely,
Jan Burriss

Jan Burriss
BellSouth Interconnection Services

cc. Jan Flint
Jan Burriss



BellSouth Interconnection Services
1960 West Exchange Place
Suite 200
Tucker, GA 30084

AT&T Regional Account Team
770-492-7550
Fax 770-492-9412

June 25, 2001

Ms. Denise Berger
AT&T
Room 12256
1200 Peachtree St. NE
Atlanta, GA 30309

Dear Denise:

This is in response to your letter of May 25, 2001 and is a follow-up to the interim letter dated June 5, 2001, regarding BellSouth's provisioning of AT&T Insight Customer orders in Kentucky. I am also responding to Mellony Mechaux's letter of June 15, 2001, regarding duplicate billing of AT&T Kentucky customers. This issue stems from the same cause as those identified in your letter. BellSouth's investigation of the root cause of these problems identify AT&T as the source of the problem. Therefore, this letter also requests AT&T's attention to resolving the situation.

As you know, on Friday, June 15, 2001, AT&T and BellSouth held a conference call to discuss BellSouth's findings regarding the list of telephone numbers attached to AT&T's May 25, 2001 letter. BellSouth shared with you and Greg Terry, AT&T Regional Vice President, that the root cause for the problems described in your letter actually were the result of AT&T's erroneously porting Kentucky and users' service using an Operating Company Code (OCN) of 7606, which is different than the 7125 OCN AT&T provided to BellSouth on the Local Service Request (LSR). We also discussed that this problem was not limited to only those telephone numbers provided by AT&T, but was rather a recurring problem.

Your May 25, 2001 letter provided a list of thirteen telephone numbers assigned to eleven Kentucky AT&T Insight customers. Your letter attributed the service problems they experienced to a failure by BellSouth. Of the thirteen telephone numbers, two are numbers "owned" by AT&T. They have never resided with BellSouth and have not been ported from BellSouth. It is unclear why AT&T included its own numbers as examples of BellSouth's porting problems. BellSouth's analysis below deals with the remaining eleven ported telephone numbers.

Below I have addressed each of the issues raised in your letter:

- **AT&T:** What are the gaps in BellSouth's work center Methods & Procedures that are causing these problems to happen?
- **BellSouth Response:** The problems experienced by AT&T's Kentucky end users, as provided in the attached list, were caused by AT&T's sending LSRs with OCN 7125 (Teleport/AT&T Local Services), but porting the numbers using OCN 7606 (TCI Telephony).

- **AT&T:** What are the gaps in BellSouth's porting process that cause BellSouth's failure to complete the appropriate porting activities?
- **BellSouth Response:** BellSouth's porting process is not the cause of the service problems. The discrepancy created by AT&T's use of OCN 7606 when activating these ports effectively suspends BellSouth's pending service order activity.
- **AT&T:** What sort of intercept message is placed on customers who port their service to AT&T from BellSouth? Is this a problem unique to porting orders only?
- **BellSouth Response:** BellSouth's investigation of this problem, found that in instances where AT&T's discrepant porting activities prevented the completion of BellSouth's pending service order, the resulting customer experience will be failure to receive some local calls and billing for service from both AT&T and BellSouth. Further investigation determined that the intercept messages on these numbers were a result of AT&T's end users contacting BellSouth's business office, presumably to stop "duplicate" billing and asking that their service be disconnected. The disconnect billing request to our business office initiated the intercept message. The intercept message on these numbers was in no way related to porting local service, but in this case was initiated inadvertently by the end users to address a billing problem created by AT&T.
- **AT&T:** BellSouth continues to have problems with translations removal. What causes this and what is the remedy?
- **BellSouth Response:** As explained above, inappropriate porting activity by AT&T prevented BellSouth's service orders for "translations removal" from completing. As a result, the telephone numbers ported by AT&T in this manner were not removed from BellSouth's switch, which prevented the end user from receiving some local calls. The remedy in this case is AT&T's ensuring prior to port activation that all relevant records are in place without conflict.

During the course of our investigation, the Account Team learned that AT&T was continuing to port service in Kentucky with conflicting OCNs even after it was aware of the problem. BellSouth advised AT&T on June 7, 2001 that inappropriate porting activity by AT&T was preventing BellSouth from completing the disconnect portion of its service ports. BellSouth also advised AT&T that its end users ported in this manner would experience a loss of some local calls and continued billing by both local carriers. The Account Team provided a list of approximately 30 telephone numbers having this problem and asked AT&T when and how it would rectify the problems.

During the Friday, June 15, 2001 conference call, BellSouth requested that AT&T provide a list of all the telephone numbers ported incorrectly and to proactively contact those end users to advise them that calling BellSouth's business office would not resolve the service and/or billing problems. AT&T was also asked to provide its plan and timeline for resolving this situation. BellSouth offered to provide its full support to ensure all necessary steps were taken to completely resolve the end users port status.

Without receiving any response from AT&T, by Tuesday, June 19, 2001, the Account Team was made aware by BellSouth's Local Carrier Service Center (LCSC) that AT&T had begun changing the 7606 OCN records to reflect 7125. The Account Team again advised AT&T that

merely changing the record was not sufficient to correct the problems made by the incorrect porting problem. In this instance, as with all service-affecting issues, it is essential that AT&T communicate its plans with BellSouth so we can work together to identify and resolve the problems affecting your end users. Further action by AT&T without concurrence from BellSouth could compound the negative effect on these end users.

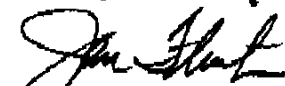
Late on June 20, 2001, AT&T confirmed that it was indeed making the code changes prior to verifying all of the steps required. You also advised that AT&T had discovered that one of AT&T's work center representatives was responsible for activating ports using the 7606 OCN and would be trained on proper porting procedures.

In addition to requesting your help in quickly identifying the scope of and resolving this situation, I feel I must address the manner in which AT&T has handled this perceived BellSouth problem. Your letter was delivered to BellSouth on Tuesday, May 29, 2001, and demanded a final response by Monday, June 4, 2001. Given that no previous notification of these problems or request for support had come to the Account Team from AT&T, even though the customer experiences you documented began in January 2001, BellSouth believes your requested resolution interval was not indicative of a cooperative business relationship. I hope that in the future, AT&T will not "sit on" similar issues for months, but will work cooperatively to identify the true cause and implement a solution, should either company be at fault. Had AT&T brought these port problems to the Account Team earlier, the error could have been identified and AT&T personnel re-trained much sooner. Many of the end user problems identified in your letter and those provided to AT&T by BellSouth could have been avoided. Additionally, adequate investigation by AT&T of its end user's problems should have prevented AT&T from wrongly attributing these problems so categorically to BellSouth.

Lastly, I received a letter dated June 15, 2001 from Mellony Mechaux, of your team requesting a root cause analysis of the continued billing by BellSouth of AT&T Kentucky Insight customers as well as the disconnect charges applied by BellSouth's business office. As stated above, these billing problems are the result of AT&T's porting errors and, as such, BellSouth believes that the duplicate billing and disconnect charges are the responsibility of AT&T. If AT&T had correctly ported the telephone numbers, billing would not have continued.

I hope that the analysis of the problems experienced by AT&T's customers in Kentucky provided by the Account Team will be helpful to AT&T. If we can support AT&T's Kentucky local service market-entry in any way, please contact me immediately.

Sincerely,



Jan Flint

Attachment

CC: Jan Burriss
Greg Terry
Bob Bickerstaff
Mellony Michaux
Donnie Dobbins

ANALYSIS OF PROBLEMS EXPERIENCED BY AT&T'S NY INSIGHT CUSTOMERS.

Note: Shaded columns contain data provided by BellSouth's Investigation. This in italics were never "owned" by or ported from BellSouth.

Customer Name	Phone	Port Date	Date Trouble Open with BellSo	Date Closed	Resolution Details provided by AT&T	BellSouth's Maintenance/Resolution Details	BellSouth's Analysis
Candy Bundy	502-366-5105	1/5/01	1/26/01	1/26/01	Port Completed	Only History record 1/12/2001 No Trouble Found (NTF) in Translations	502-366-5105 It appears this one ported properly and all CC matched for the LSR and the SV. All orders appear to have been worked in a timely manner. Billing records are correct and show the customer ported out on 1/5.
Alan Murray	502-361-7078	1/4/01	1/12/01	2/12/01	Updated translations	02-13-01 NTF in Translations 02-13-01 Dispatch out tech replaced Outside Network Interface (ONI)	502-361-7078 This customer was ported without a active LSR on 1/4. A LSR was sent to Bell South from AT&T on 1/5 requesting a Due Date of 1/8. The LSR was subsequently cancelled on 1/5. On 1/11 another LSR was submitted to Bell South requesting the number be ported with a due date of 1/17. However, they had already ported the number on 1/4. It appears someone called the LCSC to get the records corrected and stop the customer billing from us, because on 5/15 our customer records were updated to show the port out information.
Jane Younger	502-366-3803		3/29/01	3/30/01	Update AIN Database	03-30-01 Translations advised not BellSouth's problem	N/A
Tommy Riggs	502-375-4969	4/16/01	4/24/01	4/24/01	Intercept Mess. Removed	04-24-01 RCMAG removed Intercept on disconnected number	502-375-4969 A LSR was submitted for a port with a due date of 4/16. The company code used for this LSR was 7125. When the SV was created the company code of 7606 was used. The number was ported on 4/16 on a SV not associated with the LSR. Because the company codes did not match the Gateway did not associate the LSR and the SV. Because of the mismatch of company code we did not get the proper number ported message on the LSR and therefore the orders did not flow and we did not recognize the port in our system. Someone has called the business office and had this number disconnected in our records as of 4/19. Because it does not reflect the Port Out ID Bell South may reassign this number in error to a new customer.
Monica Marcum	502-742-0044	N/A	4/27/01	5/2/01	BellSouth Maintenance	04-27-01 502-742 CLEC's NPA NXX No trouble listed in history	502-742-0044 This number is not a Bell South number. It appears if belongs to AT&T. As far as I can tell this number was not ported from us but originates with AT&T.

Customer Name	Phone	Port Data	Date Trouble Open with BellSo	Date Closed	Resolution Details provided by AT&T	BellSouth's Maintenance/Resolution Details	BellSouth's Analysis
Dyan Ramey	502-239-1001	4/23/01	4/27/01	4/30/01	Intercept msg removed and port completed	04-28-01 NTF in Translations Test Call completes	502-239-1001 A LSR was submitted for a port with a due date of 4/23. The company code used for this LSR was 7125. When the SV was created the company code of 7606 was used. The number was ported on 4/23 on a SV not associated with the LSR. Because the company codes did not match the Gateway did not associate the LSR and the SV. Because of the mismatch of company code we did not get the proper number ported message on the LSR and therefore the orders did not flow and we did not recognize the port in our system. Someone has called the business office and had this number disconnected in our records as of 4/26. Because it does not reflect the Port Out FID Bell South may reassign this number in error to a new customer.
Terra Grant	502-366-3266	4/24/01	4/30/01	5/1/01	Intercept msg removed and port completed	05-01-01 Translations corrected information	The company code used for this LSR was 7125. When the SV was created the company code of 7606 was used. The number was ported on 4/24 on a SV not associated with the LSR. Because the company codes did not match the Gateway did not associate the LSR and the SV. Because of the mismatch of company code we did not get the proper number ported message on the LSR and therefore the orders did not flow and we did not recognize the port in our system. Someone has called the business office and had this number disconnected in our records as of 4/25. Because it does not reflect the Port Out FID Bell South may reassign this number in error to a new customer.
John Manning	502-367-4888	4/28/01	5/3/01	5/4/01	Intercept msg removed	05-03-01 RCMAG removed intercept on disconnected number	502-367-4888 A LSR was submitted for a port with a due date of 4/27. The company code used for this LSR was 7125. When the SV was created the company code of 7606 was used. The number was ported on 4/27 on a SV not associated with the LSR. Because the company codes did not match the Gateway did not associate the LSR and the SV. Because of the mismatch of company code we did not get the proper number ported message on the LSR and therefore the orders did not flow and we did not recognize the port in our system. Someone has called the business office and had this number disconnected in our records as of 5/1. Because it does not reflect the Port Out FID Bell South may reassign this number in error to a new customer.

Customer Name	Phone	Port Date	Date Trouble Open with BellSo	Date Closed	Resolution Details provided by AT&T	BellSouth's Maintenance/Resolution Details	BellSouth's Analysis
Joseph Carter	502-361-1946	4/12/01	5/3/01	5/3/01	Intercept msg removed	05-03-01 NTF tested ok	502-361-1946 A LSR was submitted for a port with a due date of 4/12. The company code used for this LSR was 7125. When the SV was created the company code of 7606 was used. The number was ported on 4/12 on a SV not associated with the LSR. Because the company codes did not match the Gateway did not associate the LSR and the SV. Because of the mismatch of company code we did not get the proper number ported message on the LSR and therefore the orders did not flow and we did not recognize the port in our system. Someone has called the business office and had this number disconnected in our records as of 5/7. Because it does not reflect the Port Out FID Bell South may reassign this number in error to a new customer.
Harold Davis	502-368-1556	4/6/01	5/11/01	5/14/01	Intercept msg removed and port completed	05-11-01 502-368-1556 Translations OK 502-364-0919 Translations OK CLEC problem 502-742 CLEC's NPA INX	502-368-1556 A LSR was submitted for a port with a due date of 4/3. The company code used for this LSR was 7125. When the SV was created the company code of 7606 was used. The number was ported on 4/6 on a SV not associated with the LSR. Because the company codes did not match the Gateway did not associate the LSR and the SV. Because of the mismatch of company code we did not get the proper number ported message on the LSR and therefore the orders did not flow and we did not recognize the port in our system. Someone has called the business office and had this number disconnected in our records as of 5/16. Because it does not reflect the Port Out FID Bell South may reassign this number in error to a new customer.
Harold Davis	502-364-0919	4/6/01	5/11/01	5/14/01			502-364-0919 A LSR was submitted for a port with a due date of 4/2. The company code used for this LSR was 7125. When the SV was created the company code of 7606 was used. The number was ported on 4/6 on a SV not associated with the LSR. Because the company codes did not match the Gateway did not associate the LSR and the SV. Because of the mismatch of company code we did not get the proper number ported message on the LSR and therefore the orders did not flow and we did not recognize the port in our system. Someone has called the business office and had this number disconnected in our records as of 5/10. Because it does not reflect the Port Out FID Bell South may reassign this number in error to a new customer.
Harold Davis	502-742-0185		5/11/01	5/14/01			502-742-0185 This number is not a Bell South number. It appears to belong to AT&T. As far as I can tell this number was not ported from us but originates with AT&T.

Customer Name	Phone	Port Date	Date Trouble Open with BellSo	Date Closed	Resolution Details provided by AT&T	BellSouth's Maintenance/Resolution Details	BellSouth's Analysis
Stanley Clemmons	502-361-0736	4/13/01	5/27/01	5/22/01	Intercept msg removed and port completed.	05-18-01 RCMAG removed intercept on disconnected number	502/361-0736 "Customer can't receive calls from 502/368-8823." According to NPAC records 502/361-0736 was ported to TCI Telephony Services (SPID 7606) on 4/14/01. BellSouth received an LSR (PCN Z45023610736) from AT&T to port with number with a Company Code of 7125. Subsequently AT&T ported the number using a SPID of 7606 resulting in a mismatch in the BellSouth Gateway that did not associate the port of the number with the LSR. This resulted in no disconnect order being issued on this number. Based on our records it appears the customer subsequently contacted the BellSouth Business Office and requested a disconnect (non-port) and a D order was issued. This resulted in no indication on the disconnect order that the number was ported.



BellSouth Interconnection Services
1960 West Exchange Place
Suite 200
Tucker, GA 30084

AT&T Regional Account Team
770-492-7550
Fax 770-492-9412

June 27, 2001

Ms. Denise Berger
AT&T
Room 12256
1200 Peachtree St. NE
Atlanta, GA 30309

Dear Denise:

This is in response to AT&T's request for BellSouth's assistance in resolving the incomplete porting orders currently experienced by AT&T's end users in Kentucky. As you will recall, this situation was a result of AT&T's porting service from BellSouth using an Operating Company Number (OCN) different than the OCNs on the Local Service Requests (LSRs). The OCN of 7606 used by AT&T to activate the service porting is for a company that does not currently have an Interconnection Agreement with BellSouth. As such BellSouth could not complete the porting procedures. AT&T activated these ports incorrectly, disregarding the conflict notification it received from the Number Portability Administration Center (NPAC).

At some point after the June 15, 2001 conference call between BellSouth and AT&T regarding this issue, AT&T began changing the OCN in NPAC to correspond with the OCN on the LSRs AT&T had sent to BellSouth. BellSouth advised AT&T that there would be additional LSRs required from AT&T to complete the BellSouth portion of the service ports. Because most of the LSRs for the 300-plus telephone numbers that were ported incorrectly by AT&T are more than 30 days old, unless AT&T specifically provides authority to BellSouth, BellSouth no longer has authority to take action on those numbers.

AT&T expressed its concerns with the procedures outlined by BellSouth to resolve the fall-out from the conflicting ports. AT&T requested that the Account Team investigate the possibility of providing AT&T with a method to minimize the number of orders and service changes required to bring both company's records, the NPAC database and E911 database into agreement. In order to satisfy that request, BellSouth will need AT&T's written authorization to initiate BellSouth's disconnect portion of the ports. In addition, BellSouth will need, attached to your letter of authorization, a list (preferably in spreadsheet format) of each telephone number, date the telephone number ported and the date AT&T advised NPAC to change the OCN from 7606 to 7125 to match the original LSRs.

Once AT&T provides this authorization to the Account Team, BellSouth will begin the process of creating port-out disconnect orders for the numbers that AT&T has corrected with NPAC. Due to the large volume of customer numbers involved, this manual process is targeted for completion approximately eight business days from the time authorization is received from AT&T.

I look forward to receiving AT&T's authorization in order for BellSouth to begin resolving the problems created by the conflicted service ports. If we need to discuss this issue further, please call me at 770-492-7575.

Sincerely,



Jan Flint

cc: Greg Terry
Bob Bickerstaff
Jan Burriss



BellSouth Interconnection Services
1960 West Exchange Place
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AT&T Regional Account Team
770-492-7550
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July 17, 2001

Ms. Mellony Michaux
AT&T
Room 12229, Promenade I
1200 Peachtree Street, N.E.
Atlanta, GA 30309

Dear Mellony:

This is in response to your letter of July 2, 2001, concerning AT&T's authorization to disconnect the Kentucky telephone numbers that AT&T erroneously ported as AT&T Broadband.

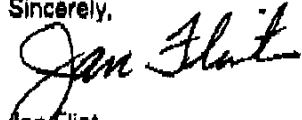
Your letter contains great detail explaining AT&T's position that, although AT&T received a message from the Number Portability Administration Center (NPAC) that the telephone numbers were in "conflict," AT&T made no error when it ported these telephone numbers. NPAC notifies CLECs of port "conflicts" to protect end users' service. It appears that AT&T disregarded the conflict message and continued with the port activity, which is completely controlled by AT&T, with full knowledge that there was inconsistent information on these telephone number ports. AT&T is aware that the conflict was created by the use of a company code of 7125 on the Local Service Requests (LSR) sent to BellSouth and a company code of 7606 sent to NPAC, an action that is clearly contrary to the telecommunications industry's porting procedures. The fact that AT&T has ultimately submitted modifications to NPAC to change the codes from 7606 to 7125 validates that AT&T recognizes the need for consistency between the codes.

The duplicate billing experienced by end users ported by AT&T was a result of the conflict in company codes created by AT&T at the time of the port. The discrepancy in company codes prevented BellSouth from receiving an indication from NPAC to disconnect the telephone numbers. Therefore, BellSouth had no authorization to disconnect the customers' service. The result was the continued billing by BellSouth and new billing by AT&T to its new customers. Had AT&T investigated the cause of the conflict message prior to porting the numbers and determined that the discrepancy between the codes was an error, the ports would have been successful. This situation could have been prevented by AT&T and the end users would have been relieved of the inconvenience and confusion that did occur. Your latest letter, as well as AT&T's previous statements, continues to attempt to attribute the cause to BellSouth, which is, in fact, not the case.

In addition, AT&T refused to resend the LSRs that would have allowed BellSouth to disconnect the 300+ ported numbers and stop the end users' billing, where appropriate. As a result, BellSouth's Local Carrier Service Center (LCSC) must devote resources to manually correct each number from the list of numbers that accompanied AT&T's letter of authorization. While onerous to the LCSC, BellSouth believes that the end users must not continue to receive billing from both parties. Therefore, BellSouth cleaned up the consequences of AT&T's failure to process the LNP requests correctly.

On July 12, 2001, the LCSC completed the resolution of the Kentucky LNP telephone numbers that were provided with your letter.

Sincerely,



Jan Flint

Cc: Denise Berger
Greg Terry
Jan Burriss
Bob Bickerstaff
Fred Gerwing