1   has no plans to continue to service orders that require manual processing" caused by the use

2   of multiple company codes, and reiterating its previous recommendation that AT&T pay for

3   a mechanization upgrade to "allow multiple ACNA orders to flow-through BellSouth's

4   systems without manual intervention".[25] This work-around (at best) or outright refusal to

5   process orders (at worst) obviously will not be sufficient in a world in which CLECs may

6   choose to purchase unbundled local switching from each other or from wholesale providers.

7   CLECs must be able to order a loop and have that loop delivered to someone else's

8   collocation space.

9   **Q.   HAS BELLSOUTH BEEN ABLE TO DEMONSTRATE AT ANY TIME**
10   **DURING THE AT&T/BELLSOUTH DISCUSSIONS THAT ITS POSITIONS**
11   **ARE SUPPORTED BY INDUSTRY STANDARDS OR TECHNICAL**
12   **INFEASIBILITY?**

13   A.   No. In fact BellSouth's correspondence clearly states that its positions are based

14   exclusively on its self-generated policy. Exhibit MDV-17 is a June 20, 2002 letter from Mr.

15   James M. Schenk of BellSouth to Mrs. Denise Berger of AT&T. In this letter Mr. Schenk

16   states:

17   "It is BellSouth's policy not to accept assignments from CLECs
18   other than the owner of the collocation space and associated cable
19   assignments. Therefore, BellSouth's ordering and provisioning
20   systems contains edits to prevent unauthorized assignment of its
21   customer's collocation assets." (Letter, page 1)

22   **Q.   WHAT SHOULD THE COMMISSION DO TO SOLVE THIS BELLSOUTH**
23   **CAUSED PROBLEM?**

24   A.   BellSouth unilaterally placed itself in the role of CLEC "asset policeman"

25   implementing edits that are not required by any industry guidelines and that needlessly

26   restrict CLECs' ability to do business in BellSouth's region. Having established these

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[25] See Exhibit MDV-18-July 21, 2003 letter from Jim Schenk of BellSouth to Denise Berger of AT&T.