ORIGINAL

BELLSOUTH TELECOMMUNICATIONS, INC.

DIRECT TESTIMONY OF RONALD M. PATE

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 991838

JANUARY 25, 2000

Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. AND YOUR BUSINESS ADDRESS.

A. My name is Ronald M. Pate. I am employed by BellSouth Telecommunications, Inc. ("BellSouth") as a Director, Interconnection Services. In this position, I handle certain issues related to local interconnection matters, primarily operations support systems ("OSS"). My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. I graduated from Georgia Institute of Technology in Atlanta, Georgia, in 1973, with a Bachelor of Science Degree. In 1984, I received a Masters of Business Administration from Georgia State University. My professional career spans over twenty-five years of general management experience in operations, logistics management, human resources, sales and marketing. I joined BellSouth in 1987, and have held various positions of increasing responsibility.

Q. HAVE YOU TESTIFIED PREVIOUSLY?

A. Yes. I have testified before the Public Service Commissions in Alabama, Florida, Georgia, Louisiana, South Carolina, the Tennessee Regulatory Authority and the North Carolina Utilities Commission.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to provide BellSouth's position on Issue Nos. 2(b), 3, 4, 5, 6, and 7 raised by BlueStar Networks, Inc. ("BlueStar") in its Petition for Arbitration filed with the Florida Public Service Commission ("Commission") on December 7, 1999.

***Issue 2: Should BellSouth be required to:***

***a) conduct a trial of line sharing with BlueStar, and if so, when?***

***b) conduct a trial of electronic ordering and provisioning of line sharing with BlueStar, and if so, when?***

Q. WHICH PARTS OF THE ABOVE ISSUE ARE YOU ADDRESING?

A. My testimony addresses sub-part (b). Sub-part (a) is addressed in the testimony of BellSouth Witness, Mr. Alphonso Varner.

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. No, BellSouth should not be required to conduct a trial of electronic ordering and provisioning of line sharing with BlueStar. Line sharing is a recent development in the telecommunications industry, and due to the complex issues surrounding provisioning and maintaining shared lines, it is premature to consider a trial with BlueStar, or another Alternate Local Exchange Carrier ("ALEC"), at this time.

Q. WILL BELLSOUTH PERFORM TESTING UPON IMPLEMENTATION OF ORDERING AND PROVISION OF LINE SHARING?

A. Yes. BellSouth always performs thorough testing of any new interface, as well as functionality enhancements. In addition, BellSouth offers competing carriers a testing environment to certify that their electronic interfaces will be capable of interacting smoothly and effectively with BellSouth's OSS. Whenever updates or new software for an electronic interface require an ALEC to program its side of the interface, BellSouth and the ALEC will test the interface before putting it into production. However, BellSouth has not yet determined whether the best means for competing carriers to order line sharing will be electronic or manual. If electronic methods are chosen, BellSouth reserves the right to select Beta testers, if deemed necessary, based on their qualifications and the overall implementation needs of the project in order to best serve the interest of the ALEC community as a whole.

Finally, based on the information currently available to BellSouth, it would appear that BlueStar is not a suitable trial partner (even if a trial were appropriate) because BlueStar does not have in place the appropriate electronic interfaces. Therefore, BlueStar is demanding a trial in which it would participate, even though it is not currently capable of participating in such a trial.

***Issue 3: What information should BellSouth be required to provide to BlueStar on loop orders that are rejected because the requested facilities are unavailable?***

Q. WHAT IS BLUESTAR'S POSITION ON THIS ISSUE?

A. In its Issue 3 Position, BlueStar states "For those unbundled cooper loop ("UCL") orders that BellSouth rejects, it should provide BlueStar the Design Layout Record (DLR) or that data which was used to determine/reject BlueStar's order."

Q. PLEASE DEFINE A REJECTED ORDER.

A. A rejected order is one for which compatible loop facilities are not available for the requested service. Therefore, the request is rejected back to the ALEC requesting the service.

Q. WHEN IS THE DETERMINATION MADE THAT COMPATIBLE FACILITIES EXIST?

A. The availability of facilities is determined during pre-ordering via the Service Inquiry ("SI") process.

Q. DESCRIBE THE SI PROCESS AND THE PROVISIONING PROCESS FOR THE REQUESTED LOOP WHEN LOOP FACILITES ARE AVAILABLE.

A. BlueStar submits the local service request ("LSR") and SI form to BellSouth's Complex Resale Support Group Unbundled Network Element Team ("CRSG"). The CRSG forwards the SI form to BellSouth's Outside Plant Engineering ("OSPE") group. OSPE verifies that compatible loop facilities are available and reserves the loop facilities. OSPE completes item number "1. YES OSP FACILITIES ARE AVAILABLE/RESERVED" in the "Outside Plant Engineering" section of the SI form. OSPE returns the completed SI form to the CRSG. An example of the SI form is attached as Exhibit RMP-1.

The CRSG reviews the SI form for completeness and forwards it with the LSR to BellSouth's Local Carrier Service Center ("LCSC") for order processing. The LCSC processes the service request and then returns a Firm Order Confirmation ("FOC") to the ALEC if no corrections to the

LSR are required. The FOC provides the BellSouth order number, the service order due date and the telephone/circuit numbers.

The compatible loop facilities reserved by the OSPE are assigned to the service order. The fundamental loop design parameters ("loop design") are completed during the provisioning cycle. When the loop design is completed, BellSouth creates a Design Layout Report ("DLR") and forwards it to the ALEC. The DLR is distributed to the ALEC either mechanically or via the US Mail.

Q. DESCRIBE THE SI PROCESS FOR THE REQUESTED LOOP WHEN LOOP FACILITES ARE NOT AVAILABLE.

A. The CRSG forwards the SI form to OSPE. OSPE determines that loop facilities compatible with the requested service are not available. OSPE completes the "Outside Plant Engineering" section of the SI form and provides the reason(s) that compatible facilities are not available to provision the loop.

I will describe below two examples of the service inquiry process when compatible loop facilities are not available for the requested service.

The first example occurs when compatible facilities are not available or are in an area where copper pairs are not available. Item number "2. NO CANNOT PROVIDE" will be marked in the "Outside Plant

Engineering" section of the SI form. The Comments section will contain a note to indicate why there are no available facilities, such as "This is an all fiber area, no copper facilities exist". The OSPE returns the completed SI form to the CRSG. The CRSG reviews the SI form for completeness, including the explanation in the Comments section of why the requested service can not be provided. The CRSG returns the SI form to the ALEC.

The second example occurs when compatible facilities are not available but the facilities could be constructed upon payment of a special construction charge (SC). In this instance item number "4. NOT AVAILABLE BUT CAN BE PROVIDED WITH A JOB, SPECIAL CONSTUCTION IS APPLICABLE" is marked. A description of the required work is provided in the Comments section of the SI form. OSPE returns the completed SI form to the CRSG. The CRSG reviews the SI form for completeness and returns the SI form to the ALEC. The ALEC can use the information contained in the Comments section of the SI form to determine if it wishes to take the next step in the special construction process, which is to obtain a price quote from BellSouth to perform the necessary work.

Q. EARLIER YOU MENTIONED A DESIGN LAYOUT REPORT ("DLR"). WHAT IS A DLR?

A. The DLR is a document that contains the technical and administrative information specific to the requested service. It provides the fundamental loop design parameters of the overall service. The DLR provided by BellSouth is in accordance with the industry standards.

Q. WHEN IS THE DLR CREATED?

A. As described previously, the DLR is created during the provisioning cycle when the loop design is completed.

Q. CAN BELLSOUTH PROVIDE BLUESTAR A DLR ON LOOP REQUESTS WHEN FACILITIES ARE NOT AVAILABLE?

A. No. BellSouth can not provide a DLR because the requested service cannot be provisioned when qualified loop facilities are not available. As I explained previously when compatible loop facilities are not available, BellSouth provides adequate information to the ALEC via the SI process.

Q. PLEASE COMMENT ON THE FOLLOWING STATEMENT CONTAINED IN BLUESTAR'S POSITION, "BELLSOUTH SHOULD PROVIDE BLUESTAR WITH THE DLR, OR ITS EQUIVALENT, OF THE BEST AVAILABLE LOOP AT THAT PREMISE".

A. BellSouth is providing BlueStar with what it needs. As previously explained, when a request is submitted for a UCL one of three results will occur. The first and most desired is facilities are available and provisioned per the request. Second and least desired is facilities are not available and cannot be provided. Third is facilities are not currently available but can be provided, i.e. – special construction. With this information BlueStar can make the decision that best suits its business plan in serving the needs of its end user customer. Only BlueStar can make this decision as only BlueStar is privy to the needs of its end user customers, the type of service requested and the facilities necessary to provide the requested service. It is not appropriate or feasible for BlueStar to contemplate delegating such a decision to BellSouth.

***Issue 4: When should the information identified in Issue 3 be provided?***

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. In my response to Issue No. 3, I described the information that BellSouth provides to BlueStar, which is more than adequate to meet the ALEC's needs. If facilities are not available for the requested loop, BellSouth typically provides the ALEC a completed SI form, within the three to five day targeted service interval described in the *BellSouth Products & Services Interval Guide for Interconnection Services*, that explains the reason(s) why the requested service cannot be

provisioned. BellSouth can not provide a DLR when qualified loop facilities are not available.

***Issue 5: Should BellSouth be required to implement a process whereby xDSL loop orders that are rejected are automatically converted to orders for UCLs without requiring BlueStar to resubmit the order?***

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

Q. As I stated earlier in my testimony, BlueStar must decide the "best available loop" when the type of loop that has been requested is not available. The "conversion" requested by BlueStar would require that BellSouth make decisions based on the business needs of BlueStar. Such decisions can only be made by BlueStar and cannot be delegated to BellSouth. The BellSouth representatives process service requests only from complete and accurate information submitted by the ALEC. It is not reasonable to expect the BellSouth representative to make decisions on behalf of BlueStar or any ALEC with regard to local service request submissions, particularly when such decisions would impact the final service rendered to the ALEC's end user.

Q. WILL BELLSOUTH PROVIDE INFORMATION THAT ALLOWS THE ALEC TO SELECT A "BEST AVAILABLE LOOP" TO MEET ITS NEEDS?

A. BellSouth is currently developing the capability to provide the ALEC information concerning the characteristics of the loop serving the location designated on the SI form. The ALEC then can review this information and make the appropriate decisions to itself and its end user customers.

Q. DOES THE FCC ADDRESS THIS ISSUE?

A. Yes. In paragraph 427 of its Third Report and Order and Fourth Further Notice of Proposed Rulemaking ("UNE Remand Order") in CC Docket No. 96-98 and released on November 5, 1999, the Federal Communications Commission ("FCC") states that "an incumbent Local Exchange Carrier ("LEC") must provide the requesting carrier with nondiscriminatory access to the same detailed information about the loop that is available to the incumbent, so that the requesting carrier can make an independent judgement about whether the loop is capable of supporting the advanced services equipment the requesting carrier intends to install." BellSouth will comply with the requirements of the FCC's Order within the timeframe provided by the Order.

***Issue 6: For xDSL orders, should BellSouth be required to provide real time access to the following, and if so, when?***

***a) OSS for loop makeup information qualification;***

***b) Preordering;***

***c) Provisioning;***

***d) Repair/maintenance, and***

***e) Billing***

Q. WHAT IS BLUESTAR'S POSITION IN THIS ISSUE?

A. In its Petition, BlueStar asks the question "When should BellSouth be required to provide real time access to OSS for loop make-up information qualification, pre-ordering, provisioning, repair/maintenance, and billing?" It is unclear from its position what specific functions BlueStar wishes to obtain.

Q. WHAT IS BELLSOUTH'S POSITON ON THIS ISSUE?

A. In its UNE Remand Order, the FCC clarifies that the pre-ordering function includes access to loop qualification information. Specifically, the FCC states that "an incumbent Local Exchange Carrier ("LEC") must provide the requesting carrier with nondiscriminatory access to the same detailed information about the loop that is available to the incumbent." BellSouth will comply with the requirements of the FCC's Order within the timeframe provided by the Order. BellSouth declines to provide functions that are beyond the requirements of this order.

Q. DOES BELLSOUTH CURRENTLY PROVIDE NONDISCRIMINATORY ACCESS TO THE FUNCTIONS OF PREORDERNG, PROVISIONING,

REPAIR/MAINTENANCE, AND BILLING FOR XDSL?

A. Yes. BellSouth currently provides non-discriminatory access to its OSS for ALECs. Section 251(c)(3) of the Telecommunications Act of 1996, ("Act"), imposes a duty upon the incumbent Local Exchange Carrier ("ILEC"), such as BellSouth, to provide non-discriminatory access to its OSS functions for pre-ordering, ordering, provisioning, maintenance/repair and billing for network elements and resale services. The FCC requires that ALECs be provided access to these required functions and information for resold services in "substantially the same time and manner" as it provides for itself. For unbundled network elements, an ILEC must provide access that provides efficient ALECs with a meaningful opportunity to compete. Neither the ACT nor the FCC requires that ALEC's access be identical but rather it must be non-discriminatory access. BellSouth is in strict compliance with these requirements.

The FCC's recently enunciated rules in the UNE Remand Order further define an ILEC's obligations regarding nondiscriminatory access by clarifying that loop qualification information is part of pre-ordering functionality. BellSouth currently provides an avenue for competing carriers to obtain information regarding BellSouth's loops with respect to ADSL service. For a limited number of central offices, BellSouth provides the Loop Qualification System ("LQS"), a mechanized loop qualification process, that indicates whether a loop is qualified for ADSL

service. To access this mechanized system a carrier must sign a contract with BellSouth as a wholesale provider of ADSL services.

***Issue 7: Should the interconnection agreement include a time interval for BellSouth provisioning of xDSL loops and UCLs?***

Q. WHAT IS BLUESTAR'S POSITION ON THIS ISSUE?

A. BlueStar states in its Position on this issue that "BlueStar believes there should be a 3-5 day limit on this service inquiry". Apparently BlueStar wants a guaranteed interval that BellSouth could not exceed.

Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

A. BellSouth assigns targeted intervals for the provisioning of services based on the complexity of the services requested. BellSouth makes every effort to accommodate these targeted intervals. However, BellSouth can not assign and BlueStar can not expect guaranteed intervals.

The interconnection agreement should not include a specific time interval for the provision of xDSL loops and UCLs. Rather, the interconnection agreement should reference the *BellSouth Products & Services Interval Guide for Interconnection Services*. This guide establishes the same target intervals to be used for all ALECs. Thus, it is the tool for parity among all ALECs. The guide is available on

BellSouth's website at:

"http://www.interconnection.bellsouth.com/guides/intl_i2a/indexf.htm"

I am attaching Chapter 4.0 of that guide as Exhibit RMP-2. This chapter sets forth in table format the provisioning intervals for all UNES, including those for ADSL and HDSL loops. The guide also contains an important footnote that reads as follows:

> 3. Service Inquiry is required. Typically the targeted interval for the Service Inquiry process for these UNEs is 3-5 business days from date of submitting the inquiry and is in addition to the Targeted Service Interval and FOC Interval. (Emphasis added.)

The service inquiry, which is required on both BellSouth's retail orders and UNES for this level of service, is necessary to determine whether network facilities are available to provide the desired service. BellSouth has committed that it will exert its best efforts to respond to the service inquiry within the 3-5 day business day period. The complexity of individual requests varies widely, and therefore some inquiries may require a longer period to be evaluated by BellSouth's field forces and/or engineers.

Again, as to both the SI process and the provisioning process, BellSouth always makes its best effort to meet the targeted interval.

Given the complexity of some orders, however, it is not reasonable for BlueStar to expect these targeted intervals to be treated as if they are "drop dead" dates that can never be exceeded in any circumstance.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

# Transmittal Cover Sheet for Pate Exhibit RMP-1

This sheet transmits

the BellSouth form entitled

UDL-2W/EE, UDL-4W/EE or UCL Unbundled Loop Service Inquiry

which consists of 1 page.

General Information:

## UDL-2W/EE, UDL-4W/EE or UCL Unbundled Loop Service Inquiry

(Chose one)

1. UDL-2W/EE (UAL) _____ 2. UDL-2W/EE (UHL) _____ 3. UDL-4W/EE (UHL) _____

4. New UCL Unbundled Loop (UCL)____ 5. Conversion of Existing line to UCL _____ Existing TN# _____

SI # _____ Firm Order ____ Change ____ Cancel ____

Order # _____ Negotiator

_____

_____Provide UCL loop >18kf as an exception Negotiator Telephone Number _____

Customer Information:

CLEC Name _____ Customer Contact/Telephone number _____

Address _____ Local Serving Central Office _____

_____ Number of lines requested _____

_____ Due Date/Requested Service Date_____

(To be filled out by Account team/CRSG should SC job be required)
Does the CLEC agree to SC quote billing? _____YES (OSPE will prepare SC quote) ____NO (OSPE will take no further action)
Date CLEC contacted about SC quote billing:_____

**Outside Plant Engineering:** One of the following five selections must be filled out:

1. _____ YES OSP Facilities are Available/reserved for 10 days FRN:_____

   Cable and Pair:_____

2. _____NO CANNOT PROVIDE, Check here if facilities are out of design range or in an area where copper pairs are not available and cannot be provided.

3. _____**NOT Available but can be provided with a job, no special construction.** Job Number: _____
   What is the expected completion interval of job after service order is rcvd. in SAC? (In Calendar Days) ____

4. _____**NOT Available but can be provided with a job, special construction is applicable.**[1]

5. _____Facilities are not immediately available, will supply by one of the following: ____CDP____LST
   (List facilities involved in Comments section.)

[1]Provide a description of the work required in the "Comments" section. The CLEC can use this information to determine if they want to pursue a quote of SC charges. If the CLEC agrees to the SC quote billing conditions, OSPE will return an "Authorization Letter" which will contain a detailed description of the work and the total billable amount. The completion interval and job number will be supplied on the job quote.

Comments (describe work required on job, exceptions, etc.)

_____

_____

_____

Prepared by (Facility Engineer) _____ Telephone Number _____

Revised 11-18-99

Return to Negotiator within 2 working days. Call negotiator if any delay is expected or incurred.

# Transmittal Cover Sheet for Pate Exhibit RMP-2

This sheet transmits Chapter 4 of

*BellSouth's Product & Services Interval Guide*

which consists of 6 numbered pages.

**CG-INTL-001**
**Issue 2a-August, 1999**
**CHAPTER 4.0 - Unbundled Network Elements**

# 4.1 Unbundled Network Elements

The Unbundled Network Elements Interval Table consists of the following Terms and Definitions:

| Term | Definition |
|---|---|
| Product | BellSouth Product |
| Quantity | Number of lines, trunks, circuits, or points |
| Targeted Service Interval | The number of days from receipt of request to completion of order |
| FOC Interval | The number of days from receipt of request to Firm Order Confirmation (FOC) |

**UNE Interval Table**

| Product | Quantity | Targeted Service Interval | FOC Interval |
|---|---|---|---|
| Unbundled Loops | | | |
| 2 Wire analog voice grade loopnon-designed (SL1) | 1-5 | 7 days | 2 days |
| | 6-14 | 10 days | 3 days |
| | 15+ | Negotiated | Negotiated |
| 2 Wire analog voice grade loop designed (SL2) | 1-5 | 7 days | 2 days |
| | 6-14 | 10 days | 3 days |
| | 15+ | Negotiated | Negotiated |
| 4 Wire analog voice grade loop | 1-5 | 7 days | 2 days |
| | 6-14 | 10 days | 3 days |
| | 15+ | Negotiated | Negotiated |

| | | | |
|---|---|---|---|
| 4 Wire DS1 & PRI digital loop | 1-5 | 7 days | 2 days |
| | 6-14 | 10 days | 3 days |
| | 15+ | Negotiated | Negotiated |
| 2 Wire ISDN digital loop | 1-5 | 7 days | 2 days |
| | 6-14 | 10 days | 2 days |
| | 15+ | Negotiated | Negotiated |
| 4 Wire 56 OR 64 Kbps digital loop | 1-5 | 7 days | 2 days |
| | 6-14 | 10 days | 3 days |
| | 15+ | Negotiated | Negotiated |
| ADSL-2 Wire asymmetrical digital subscriber line loop* **(Note 3)** | 1-5 | 7 days | 2 days |
| | 6-14 | 10 days | 3 days |
| | 15+ | Negotiated | Negotiated |
| HDSL-2 Wire& 4 Wire high bit rate digital subscriber line loop* **(Note 3)** | 1-5 | 7 days | 2 days |
| | 6-14 | 10 days | 3 days |
| | 15+ | Negotiated | Negotiated |
| Unbundled CopperLoop* **(Note 3)** | 1-5 | 7 days | 2 days |
| | 6-14 | 10 days | 3 days |
| | 15+ | Negotiated | Negotiated |
| Unbundled Network Terminating Wire* **(Note 4)** | | 30 days | 7 days |
| LoopConcentration (inside plant) | | | |

| | | | |
|---|---|---|---|
| Unbundled Loop Concentration (ULC) System* **(Note 3)** | 1 | 90 days | 15 days |
| ULC Loop Interfaces* **(Note 3)** | 1 | 7 days | 2 days |
| Sub Loops (outside plant) | | | |
| Unbundled Sub-loop Distribution* **(Note 3) (Note 5)** | 1 | 30 days | 7 days |
| Unbundled Sub-loopConcentration *(dependent upon equipment and right of way **(Note3) (Note 5)** | 1 | 30-90 days | 15 days |
| Network Interface Device (NID) | | | |
| NID to NID cross connect | 1-14 | 7 days | 2 days |
| | 15+ | Negotiated | Negotiated |
| NID | 1-14 | 7 days | 2 days |
| | 15+ | Negotiated | Negotiated |
| Open AIN (OAIN) | | | |
| OAIN tool kit* | 1 | 45 days | 10 days |
| OAIN service management system* | 1 | 45 days | 10 days |
| CCS7 Signaling Transport Service | | | |
| A-Link signaling | 1 | 60 days | 12 days |
| D-Link signaling | 1 | 60 days | 12 days |
| STP-signaling transfer point | 1 | 60 days | 12 days |
| Unbundled Interoffice Transport | | | |
| Interoffice transport analog line grade **(Note 5)** | 1 | 30 days | 7 days |
| Interoffice transport DSO **(Note5)** | 1 | 30 days | 7 days |
| Interoffice transport DS1 **(Note 5)** | 1 | 30 days | 7 days |
| Interoffice transportDS3* **(Note 4) (Note 5)** | 1 | 30 days | 7 days |
| Dedicated 2 wire voice grade **(Note 5)** | 1 | 30 days | 7 days |
| Dedicated 4 wirevoice grade **(Note 5)** | 1 | 30 days | 7 days |

| | | | |
|---|---|---|---|
| Localchannel dedicated DS1 **(Note 5)** | 1 | 30 days | 7 days |
| Dark fiber | 1 | Negotiated | Negotiated |
| O/S and D/A UNEs | | | |
| Operator call processing-OPCH, FACH, BLV, EI,ECT | 1 | 30 days | 7 days |
| Operator call processing- facility based OPCH, FACH, ECT | 1 | 30 days | 7 days |
| Operator call processing-facility based BLV, EI | 1 | 30 days | 7 days |
| Inward operator services | 1 | 30 days | 7 days |
| Directory assistanceaccess service (DAAS) | 1 | 30 days | 7 days |
| Directory assistancecall completion (DACC) | 1 | 30 days | 7 days |
| Directory assistancenumber services intercept (DANSI) | 1 | 30 days | 7 days |
| Directoryassistance transport | 1 | 30 days | 7 days |
| Directory assistancedatabase service (DADS) | 1 | 30 days | 7 days |
| Direct access toDA service (DADAS) | 1 | 30 days | 7 days |
| Customized Call Routing (selective routing-LCC) | | | |
| 1-5 LCC | 1-5 | 30 days | 7 days |
| 6-25LCC | 6-25 | 60 days | 15 days |
| 25 LCC | 25+ | Negotiated | Negotiated |
| Unbundled Local Switching | | | |
| 2 Wire analog line port | 1-10 | 3 days | 2 days |
| | 11-25 | 4 days | 2 days |
| | 25+ | Negotiated | Negotiated |
| Hunting | 1 | 5 days | 2 days |
| 2 Wireanalog DID trunk port | 1-10 | 5 days | 2 days |
| | 11-25 | 6 days | 2 days |

| | | | |
|---|---|---|---|
| | 25+ | Negotiated | Negotiated |
| 2 Wire ISDN digital line side port | 1-10 | 5 days | 2 days |
| | 11-25 | 6 days | 2 days |
| | 25+ | Negotiated | Negotiated |
| 4 Wire ISDN DS1 digital trunk port | 1-10 | 5 days | 2 days |
| | 11-25 | 6 days | 2 days |
| | 25+ | Negotiated | Negotiated |
| Switching functionality **(Note 5)** | 1 | 5 days | 2 days |
| Unbundled local usage (entire local calling area) **(Note 5)** | 1 | 5 days | 2 days |
| UnbundledAccess to OSS | | | |
| Preorder* | 1 | 30 days | N/A |
| Order/ Provisioning* | 1 | 30 days | N/A |
| Maintenance/ Repair* | 1 | 30 days | N/A |
| Access to Databases | | | |
| 800 database | 1 | 10 days | 3 days |
| Line information database (LIDB) | 1 | 60 days | 7 days |
| PhysicalCollocation | | | |
| ApplicationAccepted or Denied | | 10 Business days | N/A |
| ApplicationResponse | 1-5 | 30 Business days | N/A |
| | 6-10 | 36Business days | N/A |
| | 11-14 | 42 Business days | N/A |
| | 15+ | Negotiated project | N/A |
| Ordinary provisioning | 1-5 | 90 Businessdays (Florida 90 Calendar days) | N/A |

| | | | |
|---|---|---|---|
| | 6+ | Negotiatedproject | N/A |
| Extraordinary provisioning | 1-5 | 130 Business days | N/A |
| | 6+ | Negotiated project | N/A |
| Virtual Collocation | | | |
| Application Accepted or Denied | | 10 Business days | N/A |
| Application | 1-5 | 20 Business days | NA |
| | 6-10 | 26 days | NA |
| | 11-14 | 32 days | |
| | 15+ | Negotiated project | |
| Ordinaryprovisioning | 1-5 | 50 Business days (Florida 60 Calendar days) | NA |
| | 6+ | Negotiated project | NA |
| Extraordinary provisioning | 1-5 | 75 Businessdays | NA |
| | 6+ | Negotiated project | NA |

**Note:**

1. *=Service Inquiry required. Service Inquiry interval included in TargetedService Interval and FOC Interval
2. NA=Not applicable
3. Service Inquiry is required. Typically the targeted interval for theService Inquiry process for these UNEs is 3-5 business days from dateof submitting the inquiry and is in addition to the Targeted Service Intervaland FOC Interval
4. Service Inquiry is required. Typically the targeted interval for theService Inquiry process for these UNEs is 5-7 business days from dateof submitting the inquiry and is in addition to the Targeted Service Intervaland FOC Interval
5. Product under development
6. Negotiated=The BellSouth Project Manager will negotiate with the NewService Provider, for all targeted intervals