

**ORIGINAL**

**BELLSOUTH TELECOMMUNICATIONS, INC.  
DIRECT TESTIMONY OF W. KEITH MILNER  
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

**DOCKET No. 980281-TP**

**June 1, 1998**

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7 **Q. PLEASE STATE YOUR NAME, ADDRESS, AND POSITION WITH**  
8 **BELLSOUTH TELECOMMUNICATIONS, INC.**

9  
10 **A. My name is W. Keith Milner. My business address is 675 West Peachtree**  
11 **Street, Atlanta, Georgia 30375. I am Senior Director - Interconnection**  
12 **Services for BellSouth Telecommunications, Inc. ("BellSouth" or "the**  
13 **Company"). I have served in my present role since February, 1996, and**  
14 **have been involved with the management of certain issues related to local**  
15 **interconnection, resale and unbundling.**

16  
17 **Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.**

18  
19 **A. My business career spans 28 years and includes responsibilities in the**  
20 **areas of network planning, engineering, training, administration, and**  
21 **operations. I have held positions of responsibility with a local exchange**  
22 **telephone company, a long distance company, and a research and**  
23 **development laboratory. I have extensive experience in all phases of**  
24 **telecommunications network planning, deployment, and operation**  
25 **(including research and development) in both the domestic and**

1 international arenas.

2

3 I graduated from Fayetteville Technical Institute in Fayetteville, North  
4 Carolina, in 1970 with an Associate of Applied Science in Business  
5 Administration degree. I also graduated from Georgia State University in  
6 1992 with a Master of Business Administration degree.

7

8 Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY STATE PUBLIC  
9 SERVICE COMMISSION; AND, IF SO, BRIEFLY DESCRIBE THE  
10 SUBJECT OF YOUR TESTIMONY.

11

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

18

19 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY BEING FILED  
20 TODAY?

21

22 A. I will present information and recommendations regarding Issues 8, 10,  
23 12, and 13 of the complaint filed by MCImetro Access Transmission  
24 Services, Inc. ("MCImetro").

25

1 **Issue 8: Has BellSouth provided MCImetro with firm order**  
2 **confirmations (FOCs) in compliance with the Telecommunications**  
3 **Act of 1996 and the parties' Interconnection Agreement? If not, what**  
4 **action, if any, should the Florida Public Service Commission (the**  
5 **"Commission") take?**

6

7 Q. WHAT IS BELL SOUTH'S RESPONSE TO MCI metro'S ALLEGATION  
8 THAT BELL SOUTH HAS FAILED TO PROVIDE TIMELY FOCs IN  
9 CONNECTION WITH ORDERS FOR OFF-NET T-1 LINES.

10

11 A. BellSouth denies the allegation and further states that the subject is not  
12 appropriate for this proceeding. BellSouth is in compliance with the  
13 requirements of both the Act and the Interconnection Agreement between  
14 BellSouth and MCI metro.

15

16 Q. WHAT IS AN FOC?

17

18 A. FOC stands for Firm Order Confirmation. An FOC is a notification sent to  
19 ALECs confirming that a correct and complete local service request has  
20 been received and accepted.

21

22 Q. ARE MCI metro'S T-1 ORDERS GOVERNED BY THE  
23 INTERCONNECTION AGREEMENT?

24

25 A. No. Since the off-net T-1 lines (also known as DS1s) are ordered as

1 access service, they are not governed by the FOC requirements in the  
2 Interconnection Agreement between MCImetro and BellSouth. The T-1  
3 orders are provided in accordance with the access service tariff  
4 provisions. Attached to my testimony is Exhibit WKM-1, which is a copy of  
5 BellSouth's response dated February 27, 1998, to MCImetro regarding  
6 this issue.

7

8 Q. HOW IS MCImetro ORDERING OFF-NET T-1 LINES?

9

10 A. MCImetro submits access service requests (ASRs) to BellSouth's  
11 Interexchange Carrier Service Center (ICSC). This process is for access,  
12 not local, service. The off-net T-1 lines that MCImetro is ordering via  
13 ASRs are being handled as access orders and processed via the ICSC,  
14 not the Local Carrier Service Center (LCSC). Therefore, this is simply not  
15 an appropriate issue for this proceeding since it relates to access rather  
16 than local competition.

17

18 Q. COULD MCImetro HAVE ORDERED A COMPARABLE SERVICE  
19 THROUGH THE LCSC?

20

21 A. Yes. BellSouth's MegaLink Service, for example, which is available as a  
22 resold service at the Commission approved discount rate, would have  
23 provided the same technical level of functionality. The orders would have  
24 then have flowed through the LCSC and have been measured under the  
25 local interconnection FOC function.

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Q. IS THERE A TARIFF OR CONTRACTUAL FOC TIME REQUIREMENT COVERING THE PROVISION OF OFF-NET T-1'S IN THE ACCESS WORLD?

A. No. BellSouth does produce a number of measurements relating to its provision of circuits provided out of the access tariff; however, none deal with the return of FOCs at present. BellSouth is currently working with MCI (as an interexchange carrier) to provide a monthly report on FOC performance for access services.

BellSouth acknowledges that explosive, unforecasted growth of circuit orders in 1997 (up 35% over 1996) combined with an increase in short interval orders caused a short term decline in BellSouth's performance in the provisioning of orders, which include the off-net T-1s at issue here. However, a variety of corrective measures were taken which brought performance back within acceptable levels. Other significant measures of performance on these circuits are the Customer Desired Due Date (CDDD) performance and the Committed Due Date (DD) performance. The results on these measures thus far in 1998 are as follows:

1

Month	Customer Desired Due Date Performance	Committed Due Date Performance
January	79.55 %	85.21%
February	87.19%	91.78%
March	89.33%	94.62%
April	91.02%	93.24%

2

3 Q. WHAT ACTION SHOULD THIS COMMISSION TAKE WITH REGARD TO  
4 ISSUE 8?

5

6 A. None.

7

8 ***Issue 10: Has BellSouth provided MCImetro with local tandem***  
9 ***interconnection information in compliance with the***  
10 ***Telecommunications Act of 1996 (the "Act") and the parties'***  
11 ***interconnection agreement? If not, what action, if any should the***  
12 ***Commission take?***

13

14 Q. WHAT IS BELL SOUTH'S RESPONSE TO MCI metro'S ALLEGATION  
15 THAT BELL SOUTH HAS NOT PROVIDED MCI metro WITH  
16 INFORMATION REGARDING INTERCONNECTION WITH  
17 BELL SOUTH'S LOCAL TANDEMS?

18

19 A. BellSouth denies MCI metro's allegation. BellSouth is in compliance with

1 the requirements of both the Act and the Interconnection Agreement  
2 between BellSouth and MCImetro. BellSouth has informed MCImetro of  
3 the availability of local tandem interconnection and has provided  
4 information regarding how such interconnection would be ordered.  
5

6 Q. WHAT IS YOUR UNDERSTANDING OF MCImetro'S REQUEST  
7 REGARDING INTERMEDIARY OR TRANSIT TRAFFIC AT  
8 BELLSOUTH'S LOCAL TANDEMS?  
9

10 A. My understanding is that MCImetro has two requests. The first is that  
11 BellSouth allow MCImetro to send transit traffic to BellSouth's local  
12 tandems for completion. The second request is that, where BellSouth has  
13 more than one local tandem serving a given local calling area, that  
14 MCImetro be allowed to send its transit traffic to only one of those local  
15 tandem switches instead of interconnecting with all of BellSouth's local  
16 tandem switches serving a given local calling area.  
17

18 Q. WHAT IS TRANSIT TRAFFIC?  
19

20 A. Transit traffic is traffic incoming to a BellSouth tandem from a  
21 telecommunications carrier other than BellSouth that is destined for a  
22 telecommunications carrier other than BellSouth. For example, ALEC A  
23 might send traffic which is bound for the customers of and served by the  
24 switch of ALEC B by way of a BellSouth tandem switch. Additionally, in  
25 delivering transit traffic to the terminating carrier, BellSouth assumes the

1           originating and terminating carriers have negotiated appropriate  
2           interconnection agreements.

3

4   Q.     DOES THE TERM "TRANSIT TRAFFIC" HAVE THE SAME DEFINITION  
5           AS THE TERM "INTERMEDIARY TRAFFIC"?

6

7   A.     Yes. As used herein, the terms "transit traffic" and "intermediary traffic"  
8           are synonymous and may be used interchangeably. For clarity, I will use  
9           the term "transit traffic" in the discussion that follows.

10

11   Q.     WHAT IS LOCAL TANDEM INTERCONNECTION?

12

13   A.     Interconnection with a BellSouth local tandem allows an ALEC to  
14           terminate local traffic to end offices within a local calling area as  
15           defined by BellSouth, rather than the ALEC interconnecting its  
16           switch(es) directly with each end office within that local calling area.  
17           ALECs may also interconnect with BellSouth and other service  
18           providers via BellSouth's access tandems to exchange local traffic.

19

20   Q.     MAY A GIVEN LOCAL CALLING AREA BE SERVED BY MORE  
21           THAN ONE LOCAL TANDEM?

22

23   A.     Yes. For reasons of total traffic load offered or tandem switch  
24           capacity, there is sometimes a requirement for more than one local  
25           tandem to serve a given local calling area. The multiple local



1 tandems are sometimes referred to as "sector tandems" in that each  
2 generally covers a geographic part ("sector") of the local calling area.  
3 For example, one local tandem might serve the subtending end  
4 offices in the northern half of the local calling area while a second  
5 local tandem serves the subtending end offices in the southern half of  
6 the local calling area.

7  
8 Q. WHAT ARE AN ALEC'S OPTIONS WHERE THERE IS MORE THAN  
9 ONE LOCAL TANDEM SERVING A GIVEN LOCAL CALLING AREA?

10  
11 A. When a local calling area is served by more than one local tandem,  
12 the ALEC may choose to connect to one or to all of BellSouth's local  
13 tandems serving that local calling area. If the ALEC chooses to  
14 connect to only one of the local tandems serving a given local calling  
15 area, BellSouth will switch local traffic to all the end offices within the  
16 same local calling area. BellSouth will not accept traffic for end  
17 offices that are not within the local calling area. Also, BellSouth will  
18 not handle traffic from an ALEC that is routed to BellSouth local  
19 tandem in error. For example, interLATA traffic sent to the local  
20 tandem in error will not be "back-hauled" to the access tandem for  
21 delivery to the interexchange carrier.

22  
23 If the ALEC chooses to connect its switches to each of the local  
24 tandem switches within the same local calling area, the ALEC must  
25 designate a "home" local tandem for each of the ALECs assigned

1 NPA-NXX(s). Of course, due to standard routing practices, the ALEC  
2 must establish a trunk group to each local tandem to which it assigns  
3 a NXX. This is so that all telecommunications carriers (including  
4 BellSouth and other ALECs) may know to which BellSouth tandem  
5 the ALEC's traffic should be routed and delivered. Here again,  
6 BellSouth will not handle traffic from an ALEC that is routed to a  
7 BellSouth local tandem in error.

8  
9 Q. MAY BOTH ONE-WAY AND TWO-WAY INTERCONNECTION  
10 TRUNK GROUPS BE ESTABLISHED BETWEEN THE ALEC'S  
11 SWITCH AND BELLSOUTH'S LOCAL TANDEM?

12  
13 A. Yes. *Interconnection to the local tandem can be provisioned as one*  
14 *one-way trunk group for traffic to BellSouth's end office switches and*  
15 *one two-way trunk group for local transit traffic or, at the ALEC's*  
16 *option, a single two-way trunk group may be established. BellSouth*  
17 *will continue to place its local traffic on a one-way trunk group to the*  
18 *ALEC from an end office, local tandem, or access tandem switch*  
19 *location at BellSouth's discretion.*

20  
21 Q. WHAT FORMS OF ACCESS TO ITS LOCAL TANDEMS DOES  
22 BELLSOUTH OFFER TO ALECS?

23  
24 A. BellSouth has committed to offering two Options for interconnection to its  
25 local tandems. The two Options for interconnection are referred to as

1           **“Basic” and “Enhanced”. The Basic Local Tandem Interconnection**  
2           **arrangement has been available since June 30, 1997, in all BellSouth**  
3           **local tandem switching offices. Specifically, BellSouth offered MCImetro**  
4           **local tandem interconnection in October 1997, and to date MCImetro has**  
5           **chosen not to order trunks for such interconnection. The Basic Option is**  
6           **for ALEC terminating traffic to BellSouth and Wireless Service Providers**  
7           **(WSP) end office switches within a local calling area served by a**  
8           **BellSouth local tandem. An ALEC’s traffic would travel over the same**  
9           **trunk groups as are used from the BellSouth local tandem to the BellSouth**  
10           **end office switch or the WSP’s switch. BellSouth defines the local calling**  
11           **area served by each of its tandem switches. BellSouth is in the process**  
12           **of expanding the offering to an enhanced service offering. The Enhanced**  
13           **Local Tandem Interconnection Option will be available where technically**  
14           **feasible. In this regard, technical feasibility is evidenced by BellSouth’s**  
15           **ability to both switch the call and to record sufficient data for billing of**  
16           **interconnection charges. Enhanced Local Tandem Interconnection allows**  
17           **an ALEC to terminate traffic to and receive traffic from all network service**  
18           **provider end office switches within a local calling area served by a given**  
19           **BellSouth local tandem, assuming the two parties have negotiated**  
20           **appropriate local interconnection agreements. An ALEC’s traffic would**  
21           **travel over the same trunk groups as are used from the BellSouth local**  
22           **tandem to the BellSouth end office switch.**

23  
24    **Q.    IS ENHANCED LOCAL TANDEM INTERCONNECTION**  
25    **CURRENTLY AVAILABLE IN ALL OF BELL SOUTH’S LOCAL**

1 TANDEMS IN FLORIDA?

2

3 A. Yes. All required software packages are currently in place which  
4 would allow BellSouth to provide its Enhanced Local Tandem  
5 Interconnection option to requesting ALECs except for the  
6 Gainesville local tandem. BellSouth will equip the Gainesville local  
7 tandem with required software packages upon request from an  
8 ALEC.

9

10 Q. HOW DOES AN ALEC REQUEST EITHER BASIC LOCAL TANDEM  
11 INTERCONNECTION OR ENHANCED LOCAL TANDEM  
12 INTERCONNECTION?

13

14 A. BellSouth currently offers the Basic Local Tandem Interconnection Option  
15 via the same ordering process utilized for ordering all local interconnection  
16 trunking arrangements used by all facility-based ALECs. This is the same  
17 ordering process that would be utilized for ordering the Enhanced Local  
18 Tandem Interconnection Option.

19

20 Q. MCImetro ASSERTS THAT BELL SOUTH HAS NOT PROVIDED  
21 MCImetro WITH INFORMATION AS TO WHAT ALEC AND  
22 INDEPENDENT COMPANY SWITCHES SUBTEND THE BELL SOUTH  
23 LOCAL TANDEMS. PLEASE RESPOND.

24

25 A. MCImetro requested a list of the switches subtending the local tandems in

1 the Atlanta, Georgia, LATA (see Exhibit WKM-2). BellSouth provided that  
2 information as well as information regarding what switches subtend  
3 BellSouth's toll tandems in the Atlanta LATA to MCImetro on December  
4 10, 1997 (see Exhibit WKM-3). Should MCImetro request a similar list of  
5 switches subtending BellSouth's local tandems in Florida, BellSouth will  
6 provide such information to MCImetro on an interim basis. However, the  
7 Local Exchange Routing Guide (LERG) is the national routing data base  
8 that contains the NPA/NXXs that are associated with local tandems  
9 throughout the nation, including BellSouth. As has always been the case  
10 with the LERG, each telecommunications carrier bears the responsibility  
11 for keeping the LERG updated regarding its NPA/NXX network routing  
12 decisions and the access tandems or local tandems with which its  
13 NPA/NXXs are associated.

14  
15 Q. WHAT ACTION SHOULD THIS COMMISSION TAKE REGARDING  
16 ISSUE 10?

17  
18 A. None.

19  
20 **ISSUE 12: HAS BELLSOUTH PROVIDED MCImetro WITH ACCESS**  
21 **TO DIRECTORY LISTING INFORMATION IN COMPLIANCE WITH THE**  
22 **TELECOMMUNICATIONS ACT OF 1996 AND THE PARTIES'**  
23 **INTERCONNECTION AGREEMENT? IF NOT, WHAT ACTION, IF ANY,**  
24 **SHOULD THE COMMISSION TAKE?**

25

1 Q. WHAT IS YOUR RESPONSE TO MCImetro'S ALLEGATION THAT  
2 BELLSOUTH HAS FAILED TO PROVIDE MCImetro WITH DIRECTORY  
3 ASSISTANCE LISTING INFORMATION?  
4

5 A. BellSouth denies MCImetro's allegation. BellSouth is in compliance with  
6 the requirements of both the Act and the Interconnection Agreement  
7 between BellSouth and MCImetro.  
8

9 Q. WHAT IS YOUR UNDERSTANDING OF THE ISSUE MCImetro RAISES  
10 REGARDING DIRECTORY ASSISTANCE LISTING INFORMATION?  
11

12 A. First of all, I would point out that if a MCImetro end user customer dials  
13 411 and reaches a BellSouth directory assistance operator, that operator  
14 will give the MCImetro customer any directory listing in the database  
15 including the listings of independent telephone companies and other  
16 ALECs (except, of course, for non-listed numbers and such). The issue  
17 instead relates to two services offered by BellSouth for use in accessing  
18 the BellSouth directory assistance database.  
19

20 Q. WHAT ARE THOSE TWO SERVICES?  
21

22 A. BellSouth offers two forms of access to its databases that include  
23 directory assistance listings. The first is called Directory Assistance  
24 Database Service (DADS), which can be thought of as a periodic  
25 "snapshot" of the database at a given point in time that can be provided in

1 a variety of media forms including magnetic tape. In this sense, the  
2 information accessed via DADS is accurate at the time it is provided but  
3 becomes outdated over time as BellSouth updates the database in  
4 response to new or changed customer directory assistance listings. DADS  
5 is available as often as daily on an update basis.

6  
7 The second service is called Direct Access to Directory Assistance  
8 Services (DADAS), which is most easily envisioned as a data link to  
9 BellSouth's on-line directory assistance database containing customer  
10 directory assistance listings. This form of access gives continual access  
11 to the database including the periodic updates which BellSouth makes in  
12 response to new or changed directory assistance information.

13  
14 Q. DOES BELLSOUTH PROVIDE ALL OF THE LISTINGS WITHIN ITS  
15 DIRECTORY ASSISTANCE DATABASE VIA DADS OR DADAS  
16 INCLUDING THE LISTINGS OF CUSTOMERS OF ALECs?

17  
18 A. No. BellSouth has contracts with some local service providers which  
19 preclude BellSouth from making that provider's listings available through  
20 DADS and DADAS. BellSouth believes it would be most appropriate to  
21 make all of the listings ( that is, BellSouth's listings, Independent  
22 Companies' listings, and ALECs' listings) available in both the DADS and  
23 DADAS product offerings. However, BellSouth must honor its contractual  
24 commitments that preclude it from doing so.

25

1 Q. WHICH ALECs AND INDEPENDENT TELEPHONE COMPANIES IN  
2 FLORIDA HAVE PROVISIONS IN THEIR CONTRACTS WITH  
3 BELLSOUTH PREVENTING BELLSOUTH FROM INCLUDING THE  
4 DIRECTORY LISTINGS OF THOSE ALECs AND INDEPENDENT  
5 COMPANIES IN THE BELLSOUTH'S DADS AND DADAS SERVICES?  
6

7 A. In the case of independent telephone companies, all companies for which  
8 BellSouth provides directory assistance service have agreed to have their  
9 listings included in BellSouth's DADS and DADAS services.  
10

11 In the case of ALECs in Florida, BellSouth wrote to or specifically  
12 contacted ALECs which BellSouth understood had language in their  
13 interconnection agreements with BellSouth that prevented BellSouth from  
14 including their directory listings in BellSouth's DADS and DADAS services  
15 and questioned whether the ALEC was willing to renegotiate that portion  
16 of the interconnection agreement. The following ALECs were contacted:  
17

- 18 • Interprise America
  - 19 • ALLTEL of Florida
  - 20 • AT&T
  - 21 • Golden Harbor of Florida, Inc. d/b/a Hometown Telephone
  - 22 • Sprint
- 23

24 A copy of a typical letter sent to the ALECs is attached to my testimony as  
25 Exhibit WKM-4. To date, two of these ALECs have responded to



1 BellSouth's letter (Copies of ALLTEL of Florida's letter and Interprise  
2 America's signed amended agreement are attached as Exhibits WKM-5  
3 and WKM-6). ALLTEL of Florida refused to amend its agreement while  
4 Interprise America agreed to amend its agreement. At the time of filing  
5 this testimony, BellSouth had not heard from AT&T or Golden Harbor of  
6 Florida. Sprint has taken the matter under consideration. Thus, at the  
7 time of filing this testimony, the following ALECs have provisions in their  
8 interconnection agreements with BellSouth preventing the inclusion of  
9 their listings in BellSouth's DADS and DADAS services:

- 10
- 11 • ALLTEL of Florida
- 12 • AT&T
- 13 • Golden Harbor of Florida, Inc. d/b/a Hometown Telephone
- 14 • Sprint
- 15

16 Q. WHAT ACTION SHOULD THIS COMMISSION TAKE REGARDING  
17 ISSUE 12?

18

19 A. The Commission should initiate a generic proceeding to determine  
20 whether all local exchange companies should make their listings available  
21 to each other regardless of previous contractual obligations.

22

23 **ISSUE 13: HAS BELLSOUTH PROVIDED MCImetro WITH SOFT DIAL**  
24 **TONE SERVICE IN COMPLIANCE WITH THE**  
25 **TELECOMMUNICATIONS ACT OF 1996 AND THE PARTIES'**

1           **INTERCONNECTION AGREEMENT? IF NOT, WHAT ACTION, IF ANY,**  
2           **SHOULD THE COMMISSION TAKE?**

3  
4    Q.    WHAT IS YOUR RESPONSE TO MCImetro'S ALLEGATION THAT  
5           BELLSOUTH HAS FAILED TO PROVIDE MCImetro WITH SOFT DIAL  
6           TONE?

7  
8    A.    *BellSouth denies MCImetro's allegation. BellSouth is in compliance with*  
9           *the requirements of both the Act and the Interconnection Agreement*  
10          *between BellSouth and MCImetro.*

11  
12   Q.    WHAT IS "SOFT DIAL TONE"?

13  
14   A.    Soft dial tone is the term MCImetro uses to describe BellSouth's QUICK  
15          Service capability. QUICK Service provides the capability, where facilities  
16          exist, to activate a customer's service in a reduced interval (typically one  
17          day) because the physical facilities providing the basic exchange service  
18          are already connected between the central office and the customer's  
19          premises. A line equipped with QUICK Service capability allows anyone  
20          accessing the line to hear a recording advising them that they can only  
21          place a "911" emergency call from the line and that they must use another  
22          line to order service, either from BellSouth or another service provider.  
23          With QUICK Service, the activity typically required to provide the customer  
24          with local exchange service from BellSouth is limited to software  
25          translations.

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Q. WHAT IS THE NATURE OF THE DISPUTE BETWEEN MCImetro AND BELLSOUTH REGARDING LINES EQUIPPED FOR QUICK SERVICE?

A. The BellSouth/MCImetro agreement provides that BellSouth provide soft dial tone on a competitively neutral basis where soft dial tone is available. QUICK Service is available to all ALECs who resell BellSouth's services. MCImetro states that BellSouth has breached the agreement between BellSouth and MCImetro by referring to itself by name on BellSouth's QUICK Service recording. BellSouth contends it has not breached its agreement with MCImetro by referring to itself in the recording and further has not violated any requirement of the Act regarding provision of telecommunications services.

Q. WHAT ANNOUNCEMENT IS PLAYED TO CUSTOMERS ON QUICK SERVICE EQUIPPED LINES?

A. BellSouth believes its current announcement is fully compliant with both state and federal law and the interconnection agreement with MCImetro. The announcement simply says:

*"You can only dial '911' from this line. To reach BellSouth or another local service provider, you must call from another location."*

Work to put this announcement in place in all of BellSouth's central

1 offices was completed by February 28, 1998.

2  
3 Q. IS BELLSOUTH PROVIDING QUICK SERVICE ON A COMPETITIVELY  
4 NEUTRAL BASIS?

5  
6 A. Yes. The customer is advised to use another line to reach BellSouth or  
7 any other provider. This is a competitively neutral statement. In addition,  
8 BellSouth has the right to market its services in connection with the  
9 provision of its own facilities. Therefore, BellSouth is well within its rights  
10 to refer to itself on the QUICK Service recording associated within its own  
11 network facilities.

12  
13 Competitive neutrality does not mean that BellSouth is restricted from  
14 mentioning itself on its QUICK Service recording. Recently, the Federal  
15 Communications Commission ("FCC") noted (FCC Order 97-418, Section  
16 VII), regarding inbound telemarketing calls, that a Bell Operating  
17 Company (BOC) could recommend its own long distance affiliate so long  
18 as it also states that other carriers also provide long distance services. In  
19 this instance BellSouth identifies itself as a provider of local exchange  
20 service and also indicates that there are other providers of local exchange  
21 service. Similarly, BellSouth's QUICK Service recording strikes a balance  
22 by stating that other local service providers are available while continuing  
23 to allow BellSouth an opportunity to market its services provided via its  
24 own facilities.

25

1 Q. WHAT ACTION SHOULD THIS COMMISSION TAKE REGARDING  
2 ISSUE 12?

3

4 A. None.

5

6 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

7

8 A. Yes.



BellSouth Interconnection Services  
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770 482-7510  
Fax 770 821-0632  
MCI ID 361-2846

Pam Lee  
Sales Assistant Vice President  
MCI Account Team

February 27, 1998

Ms. Charlene Keys  
Director of Carrier Markets  
MCI Telecommunications Corporation  
Two Northwinds Pkwy., Suite 500  
2520 Northwinds Pkwy.  
Alpharetta, GA 30004

Dear Charlene:

This is in response to your letter dated January 28, 1998, regarding receipt of Firm Order Confirmations (FOC) following MCI's submission of an Access Service Request (ASR) to BellSouth for local service. In your letter, you requested a response by February 9, 1998. However, as you are already aware from our conversation, I did not receive the January 28th letter until it was faxed to my office on February 12, at 5:30 PM. With the understanding that you required a quick response, Steve Harris left you a voice mail on Friday, February 13. This issue was also discussed in our executive meeting on February 17. This letter confirms the discussions that have taken place as a result of your letter.

MCI refers to ASRs submitted for local service to BellSouth. The ASR process is used to order access service, not local service. The Off-Net T1s that MCI is ordering via the ASR process are being handled as access orders and are processed through the Interexchange Carrier Service Center (ICSC) as opposed to the Local Carrier Service Center (LCSC), which handles local service orders. Since the T1s were ordered as access service, the T1s are not governed by the FOC requirements in the Florida and Tennessee Interconnection Agreements as referenced by MCI. The T1 orders are provided in accordance with the access services tariff(s) provisions.

I trust that the above information satisfies your concerns. If you have additional questions, please call me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Pam', written over a circular stamp or mark.

Pamela K. Lee  
Sales Assistant Vice President

cc: Larry Cost

Stephen R. Harris /AL, 888887 12/11/97 8:35

MESSAGE  
Subject: FW: BellSouth tandems  
Sender: Mark!E!Turner /internet (Mark.E.Turner@nci.com)

Dated: 12/3/97 at 12:35  
Contents: 3

Item 1

FROM: Mark!E!Turner /internet (Mark.E.Turner@nci.com)  
TO: Stephen R. Harris /AL, 888887  
CC: mark!e!turner /internet (mark.e.turner@nci.com)

Item 2

AREA MESSAGE HEADER

Item 3

Would you help me shorten the process for this one order. Attached is end offices subtending the tandem, but there are issues with LERS accuracy until mid-December.

How about providing me the list of end offices subtending East Point and we can move on. I have included what we were able to pull so can you have someone say verify the list and make any needed changes.

Mark Turner  
404-267-6599

-----Original Message-----

From: Rama Thiagarajan [SMTP:Rama.Thiagarajan@nci.com]  
Sent: Wednesday, December 03, 1997 11:57 AM  
To: Mark Turner  
Cc: Wally Schmidt (E-mail) (E-mail)  
Subject: RE: BellSouth tandems

I do not think so. According to Jeanie Ash, they have changed the BellSouth tandem clli code from ATLNGAEP01T to ATLNGAEP11T and the clli to be used is the new ATLNGAEP11T (This does not have data yet). I am assuming that this change has not become effective in LERS yet. Jeanie also mentioned in her message to me that the person who would be able to tell me how to pull the info from LERS is on vacation.

ATLNGAEP11T, which is the code you had asked for originally, does not return any data from LERS, whereas the older clli code ATLNGAEP01T does. I would suggest we wait for the December LERS (This data is expected in mid December) to see if the changed code ATLNGAEP11T would return any data in LERS. I provided information on the older clli code ATLNGAEP01T, just for your information.

Please call me if you have any questions.

Thanks

Rama Thiagarajan

Message-ID: <01BCFFC9.808500C9@mark.E.Turner@nci.com>  
From: Mark Turner <Mark.E.Turner@nci.com>  
Reply-To: "Mark.E.Turner@nci.com" <Mark.E.Turner@nci.com>  
To: "Rama.Thiagarajan@nci.com" <Rama.Thiagarajan@nci.com>  
Cc: "Wally Schmidt (E-mail) (E-mail)" <Wally.Schmidt@nci.com>  
Subject: RE: BellSouth tandems  
Date: Wed, 3 Dec 1997 08:54:00 -0800  
Organization: SFO  
Encoding: 80 TEXT

Is this the data we should use based on your contacts with BellSouth? I just want to be sure.

Thanks again,

Mark Turner

-----Original Message-----

From: Rama Thiagarajan [SMTP:rthiagar@rthiagarajan]  
Sent: Tuesday, December 02, 1997 8:29 AM  
To: Mark.E.Turner@nci.com  
Subject: BellSouth tandems

Jeanie Ash /AL,BRHM03 12/17/97 13:16

MESSAGE

Subject: Atlanta Local Tandem Moming Arrangements  
Creator: Jeanie Ash /AL,BRHM03

Dated: 12/10/97 at 16:13

Contents: 3

Item 1

FROM: Jeanie Ash /AL,BRHM03 ( Undisplayable address parts )  
TO: Jamie Smith /smtp (@bstfirewall:jamie.g.smith@mci.com)  
Mark Turner /smtp (@bstfirewall:mark.e.turner@mci.com)

Item 2

As requested, the attached EXCEL spreadsheet includes a list of offices that subten the Atlanta Local Tandems. For your information, I have also included the Atlanta Toll Tandems.

Normally, the best source for this information is the LERG. However, since our LERG representative has been out of the office and since there have been many recent changes, the attached list was compiled by our Circuit Capacity Managers. You will probably want to use the LERG as a resource for ongoing updates.

If you have difficulty opening the attached file or have additional questions, I can be reached at 770 492-7541.

Jeanie Ash  
BellSouth Interconnection Services  
MCI Account Team

Item 3

This item is of type MS EXCEL SPREADSHEET and cannot be displayed as TEXT



TOLL TANDEM HOMING ARRANGEMENTATLNGABU01T

ACWOGAMA97E  
 ASTLGAMA94F  
 ATLNGABU84C  
 ATLNGABUDS2  
 ATLNGACD28F  
 ATLNGACS33A  
 ATLNGACS65C  
 ATLNGACSDS3  
 ATLNGAEL37C  
 ATLNGAEP64A  
 ATLNGAHR79E  
 ATLNGAIC29A  
 ATLNGAPP34A  
 ATLNGAPPDS2  
 ATLNGASSDS1  
 ATLNGAWD35F  
 BRMNGAES53A  
 CDTWGAMA74C  
 CNTNGAXADS0  
 CNTNGAXADS1  
 DLLSGAES44A  
 FAMTGAXA33A  
 FRBNGAMADS1  
 FYVLGASG46A  
 JNBOGAMA47F  
 LLBNGAMADS1  
 MCDNGAGS84A  
 MRTTGAEA97F  
 MRTTGAMA42G  
 NLSNGAXADS1  
 PWSPGAAS94A  
 RCKMGAES68A  
 ROMEGATL28A  
 RSWLGAMADS1  
 RVDLGAMA99A  
 SMYRGAMADS1  
 SNMTGALRDS1  
 STBRGANH47C  
 TUKRGAMADS2  
 VLRCGAES45A  
 WDSTGACR92E

NRCRGAMA01T

ALPRGAMA47C  
 ATLNGATH78A  
 BUFRGABH94A  
 CHMBGAMADS0  
 CNYRGAMA48F  
 CRVLGAMA38C  
 CVTNGAMT78C  
 DLTHGAHS47C  
 DNWDGAMA67A  
 GRFNGAMA22C  
 LRVLGAOSDS1  
 LTHINGAJS48C  
 NRCRGAMA84A  
 PANLGAMA98F  
 SMYRGAPP95C  
 SNLVGAMA97F

GSVLGAMA02T

CMNGGAMA88C  
 FLBRGAMADS1  
 GSVLGAMA53C

ATHINGAMA02T

CMRCGAXADS1  
 HRWLGAAEDS0  
 HRWLGAXA37A  
 MDSNGAMA34E

ATLANTA LOCAL TANDEN HOMING ARRANGEMENTATLNGABU01T

ACWOGAMA97E  
 ATLNGABUB4C  
 ATLNGABUDS2  
 ATLNGACD28F  
 ATLNGACS33A  
 ATLNGACS65C  
 ATLNGACSD63  
 ATLNGAEL37C  
 ATLNGAHR79E  
 ATLNGAIC29A  
 ATLNGAPP34A  
 ATLNGAPPDS2  
 ATLNGASSDS1  
 ATLNGAWD35F  
 BRMNGAES53A  
 CDTWGAMA74C  
 CLMTGAMA28C  
 CMNGGAMA88C  
 DLLSGAES44A  
 FLBRGAMADS1  
 GSVLGAMA53C  
 LLBNGAMADS1  
 MRTTGAEA97F  
 MRTTGAMA42G  
 PWSPGAAS94A  
 ROMEGATL29A  
 RSWLGAMADS1  
 SMYRGAMADS1  
 SMTGALRDS1  
 TLLPGAES57F  
 TUKRGAMADS2  
 VLRCGAES45A  
 WOSTGACR92E

ATLNGAEP01T

ASTLGAMA94F  
 ATLNGAAD69F  
 ATLNGABH34F  
 ATLNGAEP64A  
 ATLNGAFP36F  
 ATLNGAGR24F  
 ATLNGALADS1  
 ATLNGAWE75F  
 CLMBGABV68C  
 CLMBGAMW58C  
 CRTNGAMA83C  
 DGVLGAMA94F  
 FRBNGAEB96A  
 FVVLGASG46A  
 JNBOGAMA47F  
 MCDNGAGS95A  
 MRRWGAMA96F  
 NWNNGAMA25C  
 PLMTGAMA48C  
 PTCYGAMA48C  
 RVDLGAMA99A  
 STBRGANH47C

NRCRGAMA01T

ALPRGAMA47C  
 ATLNGATH78A  
 BUFRGABH94A  
 CHMBGAMADS0  
 CNYRGAMA48F  
 CRVLGAMA38C  
 CVTNGAMT78C  
 DLTHGAHS47C  
 DNWDGAMA67A  
 GRFNGAMA22C  
 LRVLGADSDS1  
 LTHINGAUS48C  
 NDSNGAMA34E  
 NRCRGAMABA  
 PANLGAMA98F  
 SMYRGAPP95C  
 SNLVGAMA97F

SAMPLE LETTER TO ICOs and CLECs

Date:

Ms. Jane Doe  
XYZ Telephone Company  
12345 6th Street  
Anytown, USA 55555

Dear Ms. Doe:

On numerous occasions we have received requests from CLECs and others to provide your directory assistance listings in our Directory Assistance Database Service (DADS) offering. However, we are unable to fulfill these requests because the language in our Agreement does not allow us to respond to the request or release your directory assistance listings to third parties.

We, at BellSouth, are not comfortable in representing your interest and the interest of CLECs and others unless we have the ability to pass your directory assistance listings along with our own. Therefore, we would like to have your written permission allowing us to include your listings in all our directory assistance services and provide them to CLECs and others who request them. We will start passing this information once we have your authorization.

Please let us know by (15 days from date of letter) how you wish for us to proceed regarding passing your listings to third parties.

Thank you in advance for your cooperation in helping to resolve this issue.

Sincerely,

Ida Bourne /AL,BRHM08 5/5/98 15:03

Page 1

MESSAGE  
Subject: DADS proposal  
Sender: Ida Bourne /AL,BRHM08

Dated: 5/4/98 at 16:12  
Contents: 3

Item 1

FROM: Ida Bourne /AL,BRHM08 { Undisplayable address parts }  
TO: Linda L. Myler /AL,BRHM09 { Undisplayable address parts }

Item 2

Linda,

As discussed, ALLTEL does not wish to amend their NC or FL agreements.

Ida

Item 3

MESSAGE  
Subject: DADS proposal  
Creator: Jayne.T.Eve@alltel.com

Dated: 4/30/98 at 11:04  
Contents: 3

Item 3.1

FROM: Jayne.T.Eve@alltel.com  
TO: Ida Bourne /AL,BRHM08

Item 3.2

ARPA MESSAGE HEADER

Item 3.3

Ida, ACI prefers to keep the existing Agreement language related to directory assistance listings and would hope that BST would be able to distinguish the two company's listings.

Please call me if you would like to discuss.

Thanks, JE 704-660-6680

**CLEC NAME:** *Interprise America*

**Check one:**

Interconnection Agreement                       Interconnection Amendment  
 Resale Agreement     Resale Amendment  
 Collocation Agreement     Collocation Amendment  
 CMRS Agreement     CMRS Amendment

**Check one:**             New                       Renegotiated

**Please enter effective date of agreement/amendment:** *May 27, 1998*  
**If an amendment, please enter effective date of original agreement:** *October 8, 1997*

**Check appropriate states:**

AL             FL             GA             KY             LA             MS  
 NC             SC             TN             ALL BST STATES

**Provide Brief Synopsis of Agreement (to include significant provisions/changes):**

Pursuant to Sections 251 and 252 of the Telecommunications Act of 1996, BellSouth is filing an executed Interconnection amendment by and between BellSouth Telecommunications, Inc. and Interprise America.

**Check One:**

BST to File with Commission                       CLEC to File with Commission

**Provide Any Additional Special Filing Instructions:**

<b>Negotiator Name:</b>	<i>Lynn Juneau</i>
<b>Telephone No:</b>	<i>205 977-1380</i>
<b>Date:</b>	<i>May 26, 1998</i>

**Amendment One to Interconnection Agreement  
by and between BellSouth Telecommunications, Inc.  
and Interprise America**

This Agreement refers to the Interconnection Agreement ("the Agreement") entered into by U S WEST Interprise America, Inc. ("Interprise America") and BellSouth Telecommunications, Inc. ("BellSouth") on October 8, 1997 in the state of Florida. This Amendment ("Amendment") is made by and between Interprise America and BellSouth and shall be deemed effective on the date executed by Interprise America and BellSouth.

NOW THEREFORE, in consideration of the mutual provisions contained herein and other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, Interprise America and BellSouth (individually, a "Party" and collectively, the "Parties") hereby covenant and agree as follows:

1. BellSouth and Interprise America are entering into this Agreement for the purpose of amending section 20.1 of the Terms and Conditions contained in their existing Agreement to allow BellSouth to provide Interprise America subscriber listings contained in BellSouth's Directory Assistance Database to third parties such as other CLEC's, Independent Companies and Interexchange Carriers or other telecommunications service providers who may request such information.

2. The Parties agree that all other provisions of the Interconnection Agreement, dated October 8, 1997, shall remain in full force and effect.

3. The Parties further agree that either or both of the Parties is authorized to submit this Amendment to the Florida Public Service Commission or other regulatory body having jurisdiction over the subject matter of this Amendment, for approval subject to Section 252(e) of the federal Telecommunications Act of 1996.

IN WITNESS WHEREOF, the parties hereto have caused this Amendment to be executed by their respective duly authorized representatives on the date indicated below.

**U S WEST Interprise America, Inc.**

Signature

Mary E. LaFave

Name

Director Regulatory Affairs

Title

May 21, 1998

Date

**BellSouth Telecommunications, Inc.**

Signature

Jerry D. Hendrix

Name

Director - Interconnection Services

Title

Date

5/27/98