BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re:	)	
	)	
Consideration of BellSouth	)	
Telecommunications, Inc.'s Entry	)	**Docket No. 6863-U**
Into InterLATA Services Pursuant	)	
To Section 271 of the	)	
Telecommunications Act of 1996	)	
	)	
Review of Cost Studies,	)	
Methodologies, and Cost-based	)	**Docket No. 7061-U**
Rates for Interconnection and	)	
Unbundling of BellSouth	)	
Telecommunications Services	)	
	)	
BellSouth Telecommunications,	)	
Inc.'s Statement of Generally	)	**Docket No. 7253-U**
Available Terms and Conditions	)	
Under Section 252(f) of the	)	
Telecommunications Act of 1996	)	
	)	
Performance Measurements for	)	
Telecommunications,	)	**Docket No. 7892-U**
Interconnection, Unbundling and	)	
Resale	)	
	)	
Investigation into Development of	)	
Electronic Interfaces for	)	**Docket No. 8354-U**
BellSouth's Operational Support	)	
Systems	)	
	)	
Generic Proceeding to Establish	)	
Long Term Pricing and Policies	)	**Docket No. 10692-U**
For Unbundled Network Elements	)	

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PETITION TO ESTABLISH A COMPREHENSIVE PROCEDURE TO FURTHER LOCAL COMPETITION IN GEORGIA

The Association of Communications Enterprises (ASCENT) f/k/a Telecommunications Resellers Association, AT&T Communications of the Southern States, Inc. ("AT&T"), BlueStar Networks, Inc. ("BlueStar"), Competitive Telecommunications Association ("CompTel"), DIECA Communications, Inc. d/b/a Covad Communications Company, e.spire Communications, Inc. ("e.spire"), ICG Telecom Group, Inc., MediaOne Telecommunications of Georgia, LLC ("MediaOne"), NEXTLINK GEORGIA INC, Southeastern Competitive Carriers Association ("SECCA"), Sprint Communications Company, L.P. ("Sprint"), and US LEC of Georgia, Inc., (hereinafter referred to collectively as "named CLECs") hereby move this Commission to establish a comprehensive procedure to complete the opening of the local telecommunications market to competition. In particular, this Commission should review BellSouth's compliance with the requirements of the Georgia Telecommunications and Competition Development Act of 1995 ("the Georgia Act") and the Telecommunications Act of 1996 ("the Act").

I. INTRODUCTION

A. BellSouth is Focused Upon 271 Long Distance Entry and Not Upon Opening the Local Market to Wide Scale Competition.

As this Commission is aware, to date, there has been some progress in prying open Georgia's local telephone market to competition. That progress is due to directives of this Commission, not because of any voluntary steps taken by BellSouth. Instead,

BellSouth has focused solely upon obtaining in-region long distance entry under Section 271 of the Act ("271") and attempting to chip away at Commission decisions that encourage competition. A slew of recent filings by BellSouth, both before this Commission and in Federal Court, demonstrates this point. These filings include three (3) revisions to BellSouth's Statement of Generally Available Terms and Conditions ("SGAT"), three (3) sets of unbundled network element (UNE) cost studies, a revised TAFI and LEO-IG Guide as part of its operations support systems ("OSS"), an affidavit by Keith Milner addressing the 271 fourteen (14) point competitive checklist and revisions to both the Master Test Plan ("MTP") and Supplemental Test Plan ("STP") in conjunction with the OSS Third Party Test ("TPT"). [1] These unilateral filings reveal that despite significant attempts by this Commission in forcing BellSouth to comply with the terms of both Acts, BellSouth has failed and, in many instances, simply refused to take the actions necessary to irreversibly open the local telecommunications market to competition. As always, these filings either support BellSouth's 271 efforts (i.e., SGAT revisions and Affidavit by Keith Milner) or undercut pro-competitive Commission decisions (i.e., cost studies that do not comply with any Commission Order).

Despite Commission efforts, BellSouth continues to stymie attempts by CLECs to compete fully in the marketplace. This is evidenced by recent cost studies filed by

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[1] The complete list of filings by BellSouth since January, 2000 is as follows: BellSouth's SQM data for December 1999 filed 1/31/2000; BellSouth's Revised SGAT filed 2/9/2000; BellSouth's Supplemental Test Plan Version 1.1 filed 3/2/2000; BellSouth's Revised SGAT and UNE Cost Studies filed 3/2/2000; BellSouth's Revised SQM data for December 1999 filed 3/9/2000; BellSouth's SQM data for January 2000 filed 3/9/2000; Milner Affidavit filed 3/15/2000; BellSouth's Revised SGAT filed 3/17/2000; BellSouth Non-recurring Cost Study for UNEs filed 3/17/2000; BellSouth's TAFI and LEO-IG filed 3/17/2000; BellSouth's STP Version 2.0 filed 3/17/2000; BellSouth's Proposed Standards and Benchmarks filed by KPMG on 3/22/2000; BellSouth's Revised MTP Version 4.1 filed 3/31/2000; Complaint for Declaratory, Injunctive and Other Relief filed in the U.S. District Court (N.D.Ga.) on 4/20/ 2000 (Appeal of

BellSouth that contain new rates as well as rates for new elements this Commission has never approved, interim results from the TPT which show significant problems with almost every area under review, BellSouth's failure to propose comprehensive performance measurements and self-enforcing penalties which can gauge and enforce parity of service and BellSouth's failure to comply with the FCC's *Advanced Wireline Services Order* on collocation. If BellSouth truly intended to provide CLECs with a meaningful opportunity to compete on a level playing field, BellSouth would adhere to the letter and spirit of both Acts, as well as to the Commission's previous orders in dockets addressing local competition issues. Rather than treating CLECs as business partners, BellSouth treats them as competitive adversaries. As a result, CLECs are forced to seek Commission intervention on most business and customer affecting issues to which BellSouth should readily agree.

This Commission should not let BellSouth continue to stand in the way of CLECs vying to provide competitive offerings. Additional Commission intervention is needed to "nudge" BellSouth to *fully* open the local market to competition.

B. <u>Additional Generic Proceedings on Performance Measurements, OSS, UNE Costs and Collocation Issues Can Help Break Through Impediments CLECs Face in Serving All Local Customers.</u>

As previously noted herein, BellSouth has "papered" this Commission with various documents since January 31, 2000. However, these documents are 271 related pleadings, not steps that advance competition. This Commission must continue to build upon its policy of fostering local competition in Georgia by directing BellSouth to take action on performance measurements, enforcing the terms of its UNE Cost Orders and

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Commission Decision in Docket No. 10692-U) and BellSouth Revised SGAT, UNE Cost Studies filed 4/28/2000.

holding hearings on collocation and OSS issues (at the conclusion of the TPT). CLECs should have the opportunity to point out the flaws in the cost studies as well as comment upon the revisions to the SGAT. Updated business rules and documentation, cost studies and information contained in revisions to the SGAT are all crucial for CLECs who rely upon BellSouth systems and services to serve their customers. The Commission therefore needs CLEC input on the recent filings and time to review these filings to determine whether BellSouth's proposals comply with the Act. All performance measurement proposals, results from the TPT, new cost studies and rates, SGAT revisions and collocation issues should be analyzed by all of the parties. The Commission should structure its decision-making process with the goal of breaking down the barriers and impediments for CLECs trying to serve local customers. BellSouth should not be permitted to dictate to CLECs what is required and needed to serve CLEC customers in the absence of formal review by the Commission. A comprehensive proceeding would include a review of all of the filings and issues previously noted as well as a complete review and analysis of the results of the TPT to ensure that CLECs are accorded due process by full participation at a hearing. Any procedural method other than a hearing would limit the parties' ability to develop and present the facts and the Commission's ability to make a full and fair factual determination on BellSouth's recent filings.

Therefore, the named CLECs propose that this Commission establish generic hearings in open dockets on four (4) important issues: 1) performance measurements, 2) OSS at the conclusion of the TPT, 3) costs, and 4) collocation. However, the named CLECs supporting this petition do not propose eliminating any of the specific issues

raised by CLECs in their individual arbitrations.[2] But, this Commission would save valuable time and resources by addressing the broad issues raised in this Petition in generic proceedings. To ensure that this Commission is fully aware of the reasons the named CLECs believe generic proceedings are not only necessary, but required, the issues and problems associated with BellSouth's performance measurements plan, OSS, UNE costs and collocation policies are outlined below.

II. PERFORMANCE MEASUREMENTS

The Commission Should Adopt a Comprehensive Performance Measures Methodology for Georgia.

During the infancy stage of the Act, the performance measurements and disaggregation ordered by this Commission on May 6, 1998 in Docket No. 7892-U (*In Re: Performance Measurements for Telecommunications, Interconnection, Unbundling and Resale*) (the "May 1998 Order") provided a beginning baseline to gauge BellSouth's performance. That last proceeding on performance measurements was over two (2) years ago. Since that time CLECs have gained much experience in what it takes to enter local markets. This base of knowledge has provided CLECs and this Commission with a greater level of expertise on what needs to be measured and how it should be measured. By current standards, the May 1998 Order does not go far enough to establish a comprehensive performance measures plan for Georgia. For example, the May 1998 Order does not address what statistical methodology to use when comparing BellSouth's

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[2] Pursuant to Section 252(b) and (c) of the Act, this Commission has the responsibility to arbitrate and resolve "any unresolved" issues between the parties which are properly set forth in a Petition for Arbitration.

results to CLEC results. Without the use of a quantitative methodology, BellSouth is able to camouflage its poor performance for CLECs, resulting from the difference between the performance it provides to its retail operations compared to the performance it delivers for CLECs' customers. This additional marketplace knowledge can easily be translated into the elements that are needed for an effective performance measurements methodology— including a self-enforcing remedies plan-- that could build upon and exceed the work undertaken by the Florida, Texas and Louisiana Commissions.[3]

A. BellSouth's Current SQM Does Not Capture Essential Data Needed to Determine Parity and Lacks Remedies.

BellSouth's current SQM is incomplete. For example, BellSouth's SQM contains no measure of its performance on "hot cuts." Poor "hot cuts" have left some customers without service. Similarly, BellSouth offers no measure for order acknowledgement, yet order acknowledgement has been shown to be one of the most effective and early signals that an order will or will not be provisioned on time. Each of these activities have significant impacts on customers and their impressions of the service they are receiving from CLECs.

CLECs have developed measures for key activities that are not currently captured in BellSouth's SQM. These measures are in addition to those in the early list of measures contained in the Local Competition User's Group ("LCUG") document, Version 7.0,

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[3] The Florida Public Service Commission thus far has adopted an interim and partial performance measures plan, and only for the purpose of testing. On March 30, 2000, the Florida Public Service Commission held its first workshop in its proceeding to establish a permanent performance measures methodology for the state of Florida. In re: Petition of Competitive Carriers for Commission Action to Support Local Competition in BellSouth Telecommunications, Inc.'s Service Territory, Docket No. 981834-TP. The New

released in April 1998. These additional measures capture performance data in such critical areas as "hot cuts," xDSL, and order acknowledgements. Further, much additional work has been done to identify the appropriate statistical methodology that should be employed so that reliable comparisons of results are made and random variations are appropriately factored.[4]

Just as important, the recent loop provisioning problems that Bell Atlantic-New York has experienced highlight the crucial need for a remedies plan. Such a plan must be triggered automatically and require payments significant enough to be an incentive to BellSouth to correct performance failures quickly and decisively when performance failures reach the designated level. None of these issues are appropriately addressed in BellSouth's SQM.

The recent experiences of thousands of CLEC customers in New York who could not get service provisioned, or even confirmation that their orders were in progress, underscores the need for this Commission to adopt a comprehensive self-executing performance measure methodology after a hearing on the matter. Customers who lose service complain to the Commission, and CLECs' hard-earned reputations are instantly destroyed when the incumbent provider, in this case BellSouth, does not perform. As far as the customer is concerned, it does not matter that BellSouth failed to properly

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York and Texas Public Service Commissions required their RBOCs to implement permanent performance measures plans.

[4] Much of the work on the statistical methodology was done by statisticians for BellSouth and AT&T during 1999 in the active performance measures docket before the Louisiana Public Service Commission, In re: BellSouth Telecommunications, Inc., Service Quality Measurements, Docket No. U-22252-C. The industry is awaiting the Louisiana Commission's Staff's recommendation and the Louisiana Commission's subsequent decision concerning many performance measurements issues, including adoption of the modified z statistic as the appropriate statistical methodology and setting the parameter delta value at 0.25 so that the modified z statistic can be implemented in such a way that discriminatory performance is detected and not masked.

provision or even lost the order. The only thing that matters is that the telephone has no dial tone -- and the CLEC gets the blame. This Commission can ensure that neither CLECs nor their customers must face this situation by setting an appropriate set of measures that are sufficiently disaggregated, with standards for comparing performance, and a remedies provision so that the right data is captured for monitoring BellSouth's performance and assisting CLECs in achieving parity of service with BellSouth's retail customers.

B. <u>BellSouth's Current SQM Lacks Key Requirements.</u>

For a performance measurements plan to be effective, there are eight key characteristics as follows:

1. A comprehensive set of comparative measurements to monitor all areas of support (pre-ordering, ordering, provisioning, collocation, maintenance & repair, operator services, directory assistance, bona fide requests and billing).
2. Detailed documentation of measurements and appropriate methodologies (calculations, business rules, and exclusions).
3. Sufficient disaggregation of measurement results.
4. Performance standards (retail analogs or benchmarks) that are pre-specified and non-discriminatory.
5. A sound quantitative methodology (statistical process) for comparing CLECs' support to the analogous support that BellSouth provides to its operations.
6. Initial and periodic validations (audits) of performance measurement processes and data.

7. Performance results reports and access to the raw data underlying BellSouth's reported results.

8. A system of self-effectuating consequences (a remedies plan) for poor performance.

BellSouth's SQM fails to fully incorporate these eight key requirements. BellSouth's SQM has numerous deficiencies including: (1) an inadequate set of defined measures (e.g., no measure for "hot cuts," no measure for xDSL services, no measure for acknowledging receipt of a customer's order from a CLEC); (2) inadequate calculations, business rules, and exclusions; (3) insufficient levels of disaggregation (allowing BellSouth to hide discriminatory performance); (4) inappropriate retail analogs and benchmarks (also allowing BellSouth to hide discriminatory performance); (5) an inadequate methodology to verify parity; (6) an inadequate audit policy (will not allow the Commission or CLECs to verify how and whether the plan actually works as BellSouth claims); (7) inadequate access to the raw data underlying some of its reports (prohibits review of a key ingredient—BellSouth's underlying data--for confirming that BellSouth's reported results are accurate); and (8) a remedies plan that is too weak to incent proper marketplace behavior.[5]

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[5] On April 5, 2000, AT&T filed with this Commission a response to BellSouth's proposed benchmarks and analogs for use in the third party test of BellSouth's Operational Support Systems. In that filing, AT&T highlighted additional measures and aggregation that should be implemented. Also on April 5, 2000, MCI WorldCom ("MCIW") filed with the Federal Communications Commission ("FCC") a letter that highlighted various deficiencies as it relates to the third party test, some of which identified deficiencies with the measures, standards for comparisons of measures, results, and disaggregation. While AT&T's and MCIW's responses were submitted in the context of the third party test, the substantive issues raised are applicable to any discussion of the appropriate performance measures methodology for Georgia.

C. A Generic Hearing to Adopt Comprehensive Performance Measurements and Self-Enforcing Penalties Would Save Commission Time and Resources.

In the course of re-negotiating interconnection agreements, several CLECs in Georgia have proposed to BellSouth provisions for performance measurements. BellSouth has not accepted those proposals nor agreed to incorporate appropriate provisions into its SQM. BellSouth has refused to negotiate any form of self-effectuating enforcement remedies, although they have made proposals to the FCC. As a direct result of this refusal, several CLECs have had to file arbitration petitions with this Commission.

To encourage competition, the Commission should re-open the generic proceeding on performance measures so that all interested parties can be heard and the issues necessary for an effective performance measures plan for Georgia can be fully investigated. By doing so, individual CLECs may decide to defer this very significant issue to the generic proceeding. This would conserve the time and resources of this Commission while preserving the rights of individual CLECs to arbitrate the issue under the Act.

To accomplish a generic proceeding with administrative ease, this Commission can utilize its decisions on performance measurements which have been rendered in the individual arbitrations, the interim performance measurements plan adopted by Florida and the plans in place in Texas and New York as a starting point. The parties could then address any major requirements that should be in place for Georgia and deficiencies in those plans. Without a hearing to investigate fully the appropriate performance measures plan for Georgia and whether or not BellSouth's current SQM is a sufficient plan for Georgia, CLECs will be left without an adequate remedy for measuring, monitoring, and

correcting BellSouth's performance. Ultimately, it is the consumer who stands to lose the most.

III. OPERATIONAL SUPPORT SYSTEMS ("OSS")

BellSouth's OSS do not Provide Non-Discriminatory Access to CLECs in Accordance with FCC Requirements.

In its Interconnection Order, the FCC found that nondiscriminatory access "necessarily includes access to the functionality of any internal gateway systems the incumbent employs in performing [pre-ordering, ordering, provisioning, maintenance and repair, and billing] functions for its own customers." FCC Order No. 96-325 ¶ 523, n. 1274 (Aug. 8, 1996), emphasis added (hereinafter "*FCC Interconnection Order*"). The FCC defined "internal gateway system" as "any electronic interface the incumbent LEC has created for its own use in accessing support systems for providing pre-ordering, ordering, provisioning, repair and maintenance, and billing." see *FCC Interconnection Order*.

The FCC provided greater detail regarding the incumbent LEC's obligation to provide nondiscriminatory access to OSS functions in its various orders on Section 271 applications from BellSouth and other RBOCs. The FCC explained that incumbent LECs must provide access to OSS functions that sufficiently supports each of the three modes of competitive entry strategies established by the Act (interconnection, unbundled network elements, and services offered for resale) and must not favor one strategy over another. FCC Order 97-298 ¶ 133 (Aug. 19, 1997) ("*FCC Ameritech Order*").

The FCC found that "[f]or those OSS functions that are analogous to OSS functions that an incumbent LEC provides to itself -- including pre-ordering, ordering and provisioning for resale services -- a BOC must offer access to competing carriers equivalent to the access the BOC provides itself." see *FCC South Carolina Order* ¶ 98;

see *FCC Ameritech Order* ¶ 139. The FCC also found that "access to OSS functions must be offered such that competing carriers are able to perform OSS functions in 'substantially the same time and manner' as the BOC." see *FCC South Carolina Order* ¶ 98; see *FCC Second Louisiana Order* ¶ 87.

In addition, the FCC noted that "for those OSS functions that have no retail analogue, such as ordering and provisioning of unbundled network elements, a BOC must offer access sufficient to allow an efficient competitor a meaningful opportunity to compete." see *FCC South Carolina Order* ¶ 98; *FCC Ameritech Order* ¶ 141; *FCC Second Louisiana Order* ¶ 87; *FCC New York Order* ¶ 83.

The OSS interfaces, processes and functions currently offered by BellSouth do not comply with the Act and its implementing regulations. Although this Commission has attempted to identify and address some of the deficiencies with BellSouth's OSS through the establishment of Third Party Testing, the utility of the test results have been severely limited by BellSouth's original test design and subsequent amendments and supplements to the test plan. For example, with the exception of two specific tests neither the Master Test Plan nor the Supplemental Test Plan provides for the comparison of test or CLEC results to the performance BellSouth provides to its own retail operations. Many test scenarios proposed originally in the Master Test Plan were removed in later revisions. One revision removed over 20% of the previously proposed scenarios and another removed scenarios which called for the tester to access and evaluate CLEC Customer Service Records ("CSRs") following implementation of test orders.

Under the Master Test Plan, proposed and written by BellSouth and approved by the Commission, CLEC's were provided with only the ability to provide retrospective comments on the plan and events identified in either Interim Reports or Exception Reports. This has deprived CLECs of the opportunity to provide valuable input and reduced the Commission's ability to supervise the test and review test results. Interim

reports provide only a limited view of the problems, and KPMG's OSS testing has by and large excluded active participation by CLECs. KPMG recently initiated a weekly informational conference call, but much of the testing occurred prior to the initiation of these conference calls. Although CLECs have been allowed to comment on KPMG's reports and exceptions, these comments are filtered through a process about which CLECs have no knowledge. Finally, paper comments are insufficient to allow the Commission and CLECs the opportunity to thoroughly sift through all of the data collected during the test and determine whether, based upon the results, BellSouth offers CLECs non-discriminatory access to and use of BellSouth OSS. This determination is essential if competition is to develop and be sustained with CLECs relying upon BellSouth's OSS.

Based upon the few Exception Closure Reports that have been issued to date it appears that KPMG may have accepted BellSouth's approach of changing documentation to incorporate system problems, rather than correcting system defects. This approach does not fix the underlying problem and costs CLECs time and money. Every CLEC, no matter how large or small, whether providing service through resale, via UNEs, or over its own facilities, must rely upon BellSouth's OSS to serve customers. In order to ensure that BellSouth's OSS meets the needs of CLECs, this Commission, at the conclusion of the TPT, should undertake a generic proceeding to examine and correct the remaining deficiencies with BellSouth's OSS. Key areas that must be addressed include but are not limited to: (1) A comprehensive change control process; (2) Fully electronic ordering for retail services and network elements, with BellSouth to electronically receive and process CLEC orders without manual processing; (3) Maintenance and repair access; and (4) Additional OSS improvements to give CLECs the quality of service enjoyed by BellSouth's retail customers, such as electronically parsed CSR records and access to loop qualification information. The following provides a more detailed analysis for each category.

A. BellSouth Should be Required to Provide a Comprehensive Change Control Process.

The charter for development of a change control process grew out of CLEC complaints to this Commission regarding inaccuracies and omissions in the information available to them concerning interfaces that existed in late 1997. Thereafter, BellSouth and several CLECs, including AT&T, signed the Electronic Interface Change Control Process ("EICCP") document ("the change control document") in April 1998. The change control document, which was produced only as a result of regulatory "prodding" of BellSouth by this Commission, is extremely limited in scope and is insufficient to meet the needs of CLECs. For example, it encompasses only BellSouth's existing interfaces and does not apply to new interfaces until they are deployed. Thus, BellSouth is free to unilaterally develop and introduce new interfaces without appropriate notice to and input from the CLECs that will use those interfaces.

In February 2000, BellSouth began developing an Interim Change Control Process ("I-CCP") in response to certain findings by KPMG in the TPT. The I-CCP is a work in progress, and BellSouth is currently replacing the EICCP procedures with I-CCP procedures in near real-time and often without the full concurrence of the CLECs participating in the process. While the I-CCP attempts to address the shortcomings of the EICCP, its final form and BellSouth's future adherence to its requirements are speculative.

Without a comprehensive, well documented process to handle changes that BellSouth makes to its interfaces and processes, and their supporting documentation (such as specifications, business rules, methods and procedures), CLECs cannot make

corresponding changes in their own interfaces and processes, and their customers repeatedly encounter delay and frustration.

Just as BellSouth requires time to make necessary modifications to its systems and processes, CLECs need sufficient advance notice of such modifications to allow them to make responsive changes in their own systems and processes, and thereby continue to provide service to their customers. All too often, CLECs receive little or no notice of upcoming changes. Similarly, when CLECs request changes to BellSouth's systems and processes, there should be an orderly and predictable method by which such change requests will be handled. Thus, the quality of BellSouth's Change Control Process directly affects CLEC's ability to offer competitive service to their customers.

BellSouth should be required to incorporate the following attributes in its Change Control Process:

1. It should cover the following processes:
    - changes to manual as well as electronic processes, whether sought by BellSouth or by CLECs;
    - introduction of new interfaces; and
    - retirement of existing interfaces.
2. It should provide processes for the following issues:
    - exceptions to the Change Control Process;
    - defect correction;
    - stratification of changes;
    - escalation of change requests; and
    - dispute resolution.
3. It should allow for monthly meetings between BellSouth and CLECs, with a process for more frequent meetings if necessary.

4. It should require a firm notification schedule for changes initiated by BellSouth.
5. The process should be legally binding upon BellSouth and subject to regulatory oversight.
6. The process should include regularly scheduled releases, i.e., quarterly. The schedule should be provided to CLECs annually.

B. BellSouth Should be Required to Provide the Ability to Submit and Process Orders Electronically for all Services and Elements.

Lack of electronic ordering increases the possibility of errors, increases costs and is discriminatory when compared to the service BellSouth provides itself. It also leads to service delays as BellSouth takes much longer to return status notices such as rejections and Firm Order Confirmations for manual orders. Further, BellSouth fails to provide some status notices such as jeopardy notices and completion notices for manual orders. Examples of instances in which CLECs require electronic ordering capability are the UNE Platform, handling of remaining service on partial migrations, use of LSR fields to establish proper billing accounts, ability to order xDSL loops, ability to order digital loops, ability to order complex directory listings, ability to order loops and LNP on a single order, and ability to change main account number on a single order.

CLECs are particularly concerned about the high number of orders placed electronically that "fall out" of the electronic processing system and therefore require manual processing. These orders are processed manually by individual employees in one of BellSouth's two Local Carrier Service Centers (LCSCs). Individual employees tend to interpret BellSouth's business rules subjectively, which results in varying treatment of similar orders and orders that are rejected in error. Orders that electronically flow through BellSouth's ordering system, on the other hand, are treated the same way and are

rejected or processed on a consistent basis.[6] Thus, a high "fall out" rate (and conversely, a low flow-through rate) results in a greater number of problem orders. It also leads to delays as it takes longer to obtain status notices from BellSouth for manually processed orders. Additionally, the FCC has recognized that low order flow-through can "indicate a wide range of possible deficiencies in a BOC's OSS that may deny an efficient competitor a meaningful opportunity to compete in the local market" see *FCC New York Order* ¶ 162.

C. BellSouth Should Provide a Full Function, Machine-to-Machine, Integrateable Maintenance and Repair Interface.

BellSouth provides two options for electronic trouble reporting. For telephone number-based exchange services, BellSouth offers access to its proprietary Trouble Analysis Facilitation Interface ("TAFI"). For both telephone number-based exchange services and other individually designed services, BellSouth provides electronic trouble reporting through an electronic communications gateway which BellSouth calls the Electronic Communication Trouble Administration ("ECTA") gateway. Neither interface provides equivalent service to that which BellSouth provides itself. TAFI has more extensive functionality than ECTA, but TAFI is a human-to-machine interface. Consequently, when a CLEC submits a trouble report via TAFI, that order must be manually entered into the CLEC's own internal OSS. ECTA, on the other hand, is a machine-to-machine interface, but does not have the functionality of TAFI. Thus, CLECs must opt for either equivalent functionality with manual processes or an integrateable gateway that lacks full functionality, a choice that the Act does not require them to make.

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[6] See KPMG's Exception 32 in the Georgia TPT.

In its preliminary report to this Commission on OSS interfaces dated June 21, 1996 (page 15), BellSouth stated that it "has investigated the possibility of adding to the existing [EBI] gateway a system called . . . TAFI." In response to BellSouth's preliminary report, this Commission ordered BellSouth to complete "the TAFI enhancements to allow full operation of the required access by March 31, 1997." Georgia PSC Order, Docket No. 6352-U (July 2, 1996). To date, BellSouth has refused to provide that arrangement.

D. BellSouth Should Provide Additional OSS Improvements to Give CLECs the Quality of Service Enjoyed by BellSouth Customers

Specifically, BellSouth should provide CLECs with electronic pre-order xDSL loop qualification, service inquiry and ordering ability. BellSouth also should provide CLECs with parsed customer service records for preordering pursuant to industry standards. CLECs require this functionality to fully integrate their ordering systems with BellSouth's, thereby obtaining the functionality now available to BellSouth.

As noted previously herein, it is essential that the Commission address the issues with BellSouth's OSS, after the conclusion of the TPT. The CLECs strongly urge this Commission to hold generic proceedings on this issue.

IV. UNBUNDLED NETWORK ELEMENT COSTS

The Commission Should Open a Generic Proceeding to Review the New Cost Studies Filed by BellSouth

BellSouth's recent flurry of cost studies filings undercut the Commission's directives in the February 1, 2000 Order in Docket No. 10692-U, *Generic Proceeding to Establish Long-Term Pricing Policies for Unbundled Network Elements*, ("Order"). The Commission ordered BellSouth to file a cost study for one narrow area, nonrecurring charges for new UNE combinations:

> However, the nonrecurring costs generated by BellSouth's model may be inappropriate for those UNE combinations where the elements are not, in fact, currently in place. The Commission finds, on an interim basis, that for those UNE combinations where the elements are not currently in place, The nonrecurring charge for such UNE combinations shall be the sum of the stand-alone NRCs of the UNEs which make up the combination. These interim rates shall be subject to true-up. Within 45 days of the date of this Order, BellSouth shall file a cost study for nonrecurring charges for such new UNE combinations. The Commission shall conduct a review of the cost study.

Order at p. 17. BellSouth's March 17 filing purported to comply with that Order; however, that filing, as well as the cost studies filed on February 9, March 2 and April 28, contains much more than nonrecurring charges for new UNE combinations. BellSouth's new cost studies have changed the situation from one where the Commission had only to review the last piece part of Docket 10692-U to one where a broad array of proposed new rates and changed rate structure must be examined.

A review of BellSouth's recently filed cost studies quickly reveals that they are indeed different from the cost studies previously filed in Docket Nos. 10692-U and 7061-U. BellSouth's new cost studies generate different rates for Voice Grade, advanced services, DS1 and other high capacity facilities depending on where (i.e., customer location, CLEC POP, BellSouth CO) the facility originates and terminates. They propose rates for UNEs not yet addressed by the Commission. For example, in addition to the existing loop types, BellSouth now proposes the following new UNE loops: DS3 loop, OC-3 loop, OC-12 loop, OC-48 loop, and STS-1 loop. The nonrecurring charge structure is different from that for existing loops, which is separated into manual versus electronic ordering, but for these, also bifurcated into installation and disconnection charges. Similarly, new sets of local channel UNEs, local transport UNEs, loop channelization UNEs, unbundled network terminating wire, riser cable, line sharing, and subloop

unbundling UNEs are proposed as well as new UNE combinations. Also proposed in these filings are UNEs and services being considered in Docket No. 11900-U, *Investigation of BellSouth Telecommunications, Inc.'s Provision of Unbundled Network Elements for xDSL Service Providers*. These new UNEs and services include 2-wire copper (up to 18k feet), 2-wire copper (over 18k feet), 4-wire copper (up to 18k feet), 4-wire copper (over 18k feet), unbundled cooper loop ("UCL"), loop modification, loop testing and loop qualification database.

BellSouth's cost study filed on February 9 similarly proposed rates for new items in response to the FCC's Orders in CC Docket No. 98-147, *In the Matters of Deployment of Wireline Services Offering Advanced Telecommunications Capability*, which included additional rules regarding collocation for CLECs. Thus, costs are proposed for adjacent collocation and assembly points, as set forth in Attachment A.[7] The March 2 cost study also proposed costs for DSLAM collocation in remote terminals and access to DCS, an important new UNE which provides CLECs access to BellSouth's network management system in order to view its assigned digital cross-connects, to have real time reconfiguration for its circuit connections and allow alarm surveillance of its UNE facility network. In particular, it allows CLECs to manage DS3, DS1, and DS0 level circuits. These as well as other components of the new cost studies are set forth in detail in Attachment A to this Petition.

Moreover, even as to non-recurring charges for "new" combinations of network elements, it is not clear that BellSouth has complied with the Commission's Order.

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[7]On May 4, 2000 BellSouth filed corrections to its studies in order to use the correct Gross Receipts Tax factor. Those corrections do not affect Attachment A.

Without any narrative description whatsoever, BellSouth simply modified its rate structure to include non-recurring rate elements for "new" combinations in addition to the rates established by the Commission for "currently combined" elements. Without knowing just what BellSouth means by "new combinations" and "currently combined" combinations, it is impossible to determine (1) whether this new rate structure complies with the Commission's Order or (2) whether the cost studies for the new non-recurring rates are appropriate or accurate.

Thus, BellSouth's three recently filed cost studies include new rates for certain new services and network elements which the Commission has not determined to be cost-based and which do not appear to be in compliance with the methodology approved by the Commission. Although this Commission indicated in the February 1, 2000 Order in Docket 10692-U that any new cost studies would be reviewed, BellSouth apparently disagrees. According to BellSouth, "The prices contained in the SGAT, which mirror the cost study results, *became effective sixty days after the filing of the revised SGAT*. Therefore, the Commission need not take action to establish prices for these network elements because permanent prices are already in effect." (*See* Petition of BlueStar Networks, Inc. for Arbitration with BellSouth Telecommunications, Inc. Pursuant to Section 252(b) of the Telecommunications Act of 1996, Docket No. 11641-U; Direct Testimony of Alphonso J. Varner at 5-6).

The Commission cannot allow BellSouth to unilaterally change the pro-competitive terms of the combinations of network elements order by filing non-compliant cost studies which have not been reviewed or adopted and would hinder CLEC entry into the local market.

Their breadth warrants full review of the new items in a generic docket, although it would be appropriate for the examination of xDSL costs to be continued in Docket 11900-U. These new BellSouth cost studies are a significant departure from those previously considered by the Commission, making it all the more urgent that they be fully reviewed in a docket devoted to that purpose.

V. COLLOCATION

1. BellSouth has Failed to Make Space Available to CLECs for Cageless Collocation

CLECs continue to have difficulties establishing collocation in offices. As an incumbent LEC, BellSouth is required by Section 251(c)(6) of the Federal Telecommunications Act of 1996, to provide physical collocation in both "caged" and "cageless" forms except where BellSouth "demonstrates to the State commission that physical collocation is not practical for technical reasons or because of space limitations."

Indeed, BellSouth is required to provide, on terms and conditions that are just, reasonable, and nondiscriminatory, any technically feasible method of obtaining interconnection or access to unbundled network elements at a particular point upon a request by a telecommunications carrier.[8] In order to be in compliance with this requirement, BellSouth must demonstrate to the Commission that collocation is not feasible for technical reasons or because of space limitations.[9] BellSouth routinely fails to adequately demonstrate the basis for its denial of collocation due to space limitations

[8] 47 C.F.R. 51.321(a)

[9] 47 C.F.R. 51.321(e)

or provide evidence that physical collocation cannot be accomplished for technical reasons.

Moreover, BellSouth must, upon request, remove obsolete unused equipment from its premises to increase the amount of space for collocation.[10] BellSouth has not complied with this requirement.

The law provides that while BellSouth, as an ILEC, may retain a limited amount of floor space for its own specific future uses, BellSouth may not reserve space for future use on terms more favorable than those that apply to other telecommunications carriers seeking to reserve collocation space for their own future use.[11] However, BellSouth routinely reserves floor space for its own future use, without furnishing forecasts or other information to support that such space reservation is appropriate and not on more favorable terms that those applied to CLECs. Forecasts are essential to determining whether or not collocation space is available. As such, the circuit, facilities, and switching forecasts, as well as the engineering diagrams and Demand and Facility Charts that were used in making the determination that collocation space was not available must be supplied by BellSouth if it is to be properly determined that collocation space is, or is not, available.

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[10] 47 C.F.R. 51.321(i)

[11] 47 C.F.R. 51.323(f)(4)

2. BellSouth Has Failed to Provision Collocation at Reasonable Intervals

One of the most critical issues regarding collocation is the time period between the date a CLEC submits a final order for collocation and the date BellSouth physically provisions the collocation arrangements. Despite mounting authority directing ILECs to provision cageless and shared collocation at intervals reflective of the time needed to complete the work necessary to establish such arrangements, BellSouth clings to its position that collocation arrangements (regardless of the form) must only be provisioned within 90 business days of the date upon which an order is confirmed by a CLEC. Moreover, BellSouth takes the position that in "extraordinary" or "special" circumstances it can take an additional 30 business days. There is simply no justification for such a long provisioning interval. BellSouth will undoubtedly attempt to mitigate the Commission's concerns regarding this issue by suggesting that it will provision collocation "as soon as possible" after a firm order is submitted. While this promise is certainly encouraging, such an unenforceable standard simply cannot form the basis of a CLEC's plans for service in a particular area and should not form the basis of a Commission established interval.

BellSouth takes the position that the proper interval for provisioning collocation should be 90 to 130 *business* days. In an effort to construct a barrier to the utilization of cageless collocation in Georgia, BellSouth has suggested that the same intervals needed for caged separate collocation arrangements are applicable to all collocation. This position strains credulity. The 90 to 130 business day interval assumes space identification, build-outs of enclosures, power and HVAC, all of which are not necessary

in a cageless environment.[12] Furthermore, pursuant to the *Advanced Wireline Services Order*, the FCC has directed ILECs to identify existing space to make cageless arrangements available before applications for cageless collocation space are submitted. Specifically, the *Advanced Wireline Services Order* states that BellSouth must make collocation space available "without waiting until a competing carrier requests a particular arrangement so that competitors will have a variety of collocation options from which to choose." *See ¶40, Advanced Wireline Services Order.* If BellSouth fulfills this duty, which is imposed upon it by the FCC, cageless collocation can be provided to competing carriers without significant delay.

The FCC emphasized the importance of the timely and efficient provisioning of cageless collocation at ¶54 of the *Advanced Wireline Service Order*. Indeed, the FCC encouraged this Commission to adopt specific intervals and implies that such intervals should be markedly shorter than those for more cumbersome forms of collocation, which require separate space. *See Advanced Wireline Services Order*, ¶38. Cageless collocation is akin to virtual collocation. Indeed, without examination of serial numbers or equipment ownership labels, even a telecommunications engineer could not distinguish virtual collocation arrangements from cageless collocation arrangements in a central office.

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[12] During the hearings in the ITC^DeltaCom case, Commissioner Baker asked ITC^DeltaCom to provide information regarding its collocation requests through a late-filed hearing exhibit. Two days later, on December 3, 1999, ITC^DeltaCom filed an exhibit showing that over the past year it has submitted 9 requests for collocation in Georgia central offices. Those requests were for "caged" or "walled" collocation space – not for cageless arrangements. BellSouth applied the 90-130 *business* day interval and in some cases meet their self-imposed requirement. However, the critical point illustrated by those exhibits is that the interval used by BellSouth excludes the 30-day period during which BellSouth responds to ITC^DeltaCom's application. Thus, the 90-130 day interval is in reality 120-160 days.

Other state commissions have examined this issue and established cageless collocation intervals that are substantially less than BellSouth's. For example, the Texas Public Utility Commission has established, for active collocation space, a cageless collocation interval of seventy (70) days where Southwestern Bell installs the bays/racks and fifty-five (55) days where such work is done by the CLEC.[13] The Utah Commission, pursuant to Utah Regulation R746-365-3(c)(iv) (Network Guidelines Applicable to All Telecommunications Corporations), requires that collocation arrangements must be completed by an ILEC within forty-five (45) days of the telecommunications corporation's acceptance of the ILEC's quotation.

More recently, the Virginia Corporation Commission Staff filed its report and recommendation that the provisioning intervals for cageless collocation for space that is already conditioned should be comparable to that of virtual collocation of equipment in a premise. The Virginia Staff also recommended that Bell Atlantic must provide cageless collocation within an interval of sixty (60) calendar days.[14] The Louisiana Public Service Commission Staff has also recently recommended a 60-day interval for the provision of cageless collocation for the interconnection agreement between ITC^DeltaCom and BellSouth.[15]

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[13] *Investigation of Southwestern Bell Telephone Company's Entry Into Texas InterLATA Telecommunications Market*, Texas PUC Order No. 51, Project No. 16251, *Approving Time Intervals for Provisioning Collocation Under Revised Collocation Tariff* (August 18, 1999).

[14] *Re: Application of Bell Atlantic -- Virginia, Inc., For Approval of its Network Services Interconnection Tariff*, SCC-Va.- No. 218, Case No. PUC990101, p. 39 (October 27, 1999.)

[15] LPSC Docket No. U-24206, *Post Hearing Brief of the Louisiana Public Service Commission Staff*, p. 16 (November 30, 1999).

3. BellSouth's Rates for Collocation are Not Cost Based

The Commission has done a commendable job in establishing a $100 per square foot recurring rate for collocation space. However, BellSouth's imposition of other charges that it deems necessary to provision collocation in Georgia continues to act as a barrier to local entry by CLECs. In particular, BellSouth's application charge has no relationship to the cost of processing an application. For CLECs seeking to establish collocation arrangements in only a few central offices in Georgia, an above-cost application charge may not completely bar entry but could hinder the Commission policy of facilitating widespread deployment of telecommunication services, often accomplished through collocation arrangements.

With regard to rates for cageless or shared collocation, BellSouth has never submitted a cost study to the Commission. BellSouth's position is simply that the rates for physical collocation should apply to cageless collocation. The Commission should establish interim rates for cageless collocation immediately that are based on BellSouth's rates for virtual collocation with adjustments to remove charges for installation, maintenance and repairs and training. The FCC's description of cageless collocation mirrors the characteristics of a virtual collocation arrangement. The exception is that under a virtual collocation arrangement, the CLEC does not have physical access to the ILEC premises and their equipment is under the physical control of the ILEC (including installation, maintenance and repair responsibilities). From a cost and rate perspective, the characteristics of a virtual collocation arrangement is the same as a cageless collocation or shared collocation arrangement. The party paying the maintenance engineer would be the only means for determining whether it was a virtual collocation

(BellSouth would be paying for maintenance) or cageless collocation (the CLEC would be paying for the maintenance directly). The CLEC is also responsible for training and repair charges in a cageless collocation arrangement. Under cageless collocation, therefore, BellSouth will incur less cost than under virtual collocation.

Thus, calculations of the rates that may be charged for cageless collocation are relatively simple. The Commission should utilize the BellSouth rates for virtual collocation with adjustments to remove charges for installation, maintenance and repair and training. Those functions are to be performed directly by the CLEC and thus the costs are to be borne directly by the CLEC, not the ILEC. These rates should remain in effect in the absence of a cost study performed specifically for cageless collocation -- something BellSouth has not done. This is exactly the approach recently adopted by the Tennessee Regulatory Authority in the ITC^DeltaCom arbitration with BellSouth.[16]

4. <u>A Separate Proceeding Should be Established To Address Collocation</u>

Given the stark, undisputed factual differences between physical caged and cageless or shared collocation, it is obvious that using physical "caged" or "walled" collocation rates would greatly overstate the actual costs to BellSouth and using the same provisioning intervals is equally inappropriate. BellSouth should be required to produce a collocation cost study that specifically relates to cageless forms of collocation and takes into account the FCC's requirement that ILECs perform certain functions prior to application for a collocation arrangement that can be scrutinized by the Commission and

[16] No Order has been issued in that case yet. The decision was by a 3-0 vote on April 4, 2000. The TRA's deliberations were on the record and very detailed.

CLECs. This should be done as soon as possible. Similarly, a separate docket for establishment of collocation policies regarding intervals for ordering and provisioning and rates is the appropriate procedure to address the myriad of issues CLECs face in serving local customers on a wide scale basis. Until such docket is concluded, the rates for shared and cageless collocation should be the same as those for virtual collocation, adjusted to remove costs related to installation, maintenance and repair and training.[17]

CONCLUSION

Now is the ideal time for this Commission to push BellSouth to solve issues that discourage CLECs from entering the local market. Workable OSS and meaningful updated performance measurements with self-executing remedies must be solidly in place for any CLEC to invest the resources needed for mass-market entry. Hearings are needed for a full airing of these and the cost and collocation issues noted herein are needed.

The Commission should focus on solving these issues and not be distracted by some of the 271 related pleadings that BellSouth has filed. To further competition, this Commission should establish generic proceedings to review and adopt effective Performance Measurements and Penalties, cost based rates for all network elements, address collocation issues, and at the conclusion of the TPT, improvements to BellSouth's OSS. Comprehensive proceedings will assure this Commission, CLECs and Georgia customers that when a customer switches their telecommunications carrier from

[17] In the Louisiana arbitration between ITC^DeltaCom and BellSouth, the Staff has adopted this position. Docket No. U-24206, *Post Hearing Brief of the Louisiana Public Service Commission Staff*, p. 23 (November 30, 1999).

BellSouth to a CLEC, it can be done seamlessly and without any interruption of service. Only when this occurs can full-scale market competition grow and flourish in Georgia.

Respectfully submitted this 19th day of May, 2000.

THE NAMED CLECS (Signatures on attached pages)

The Association of Communications Enterprises (ASCENT) f/k/a Telecommunications Resellers Association,
AT&T Communications of the Southern States, Inc.
BlueStar Networks, Inc.
Competitive Telecommunications Association
DIECA Communications, Inc. d/b/a Covad Communications Company
e.spire Communications, Inc.
ICG Telecom Group, Inc.
MediaOne Telecommunications of Georgia, LLC
NEXTLINK GEORGIA INC
Southeastern Competitive Carriers Association ("SECCA")
Sprint Communications Company, L.P.
US LEC of Georgia, Inc.

ATTACHMENT A

OUTLINE OF EXISTING (APPROVED BY THE GPSC) AND PROPOSED UNEs

(BELLSOUTH's 2/9, 3/2 and 3/17 FILINGS)

I. Local Loop

Definition: An unbundled local loop provides a transmission path and associated electronics between the BellSouth SWC and the CLEC's customer's premises. Local loop facilities are dedicated to a single customer.

A. Existing Loop Types (includes NID)

1. 2 wire Voice Grade SL1 (non-designed)
2. 2-wire Voice Grade SL2 (designed)
3. 4-wire Voice Grade
4. 2-wire ISDN
5. 2-wire ADSL Capable
6. 2-wire HDSL Capable
7. 4-wire HDSL Capable
8. 4-wire DS1

Rate structure for all existing Loops is fixed monthly facility termination charge and distance sensitive monthly per mile charge. Nonrecurring charges are bifurcated by Manual Ordering or Electronic Ordering.

B. Proposed UNE Loops (proposed in 3/2 filing)

1. 2-wire Copper - Up to 18kft
2. 2-wire Copper - Over 18kft
3. 4-wire Copper - Up to 18Kft
4. 4-wire Copper - Over 18Kft

Unbundled Copper Loop (UCL) description: Physical transmission facilities (or channel or group of channels on such facilities) which extend from the main distribution frame (MDF) connection in the end office to a demarcation point at the customer premises (i.e.

the NID). The facilities are provided as designed circuits and include test points. These loops are commonly referred to as "dry copper" loops because they have no intervening equipment such as load coils, bridged tap, repeaters, etc. between the customer premises and the MDF connection. The Unbundled Copper loop does not support any particular service and is not guaranteed to provide any specific performance standard.

5. DS3 Loop
6. OC3 Loop
7. OC12 Loop
8. OC48 Loop
9. STS-1 Loop

Proposed rate structure for all new Loops is fixed monthly charge per facility termination plus a variable distance sensitive per mile charge. Nonrecurring charges are bifurcated into installation and disconnection charges, which are also bifurcated in manual versus electronic ordering.

II. Local Channel

Definition: An unbundled local channel provides a dedicated transmission path and the associated electronics between the BellSouth SWC and the CLEC POP, Point of Interconnection or collocation.

A. Existing UNE Local Channels

1. 2-wire Voice Grade
2. 4-wire Voice Grade
3. DS1

Rate structure for existing UNE Local Channels are fixed facility termination monthly charges. No distance sensitive per mile charge. Nonrecurring charges are dependent on electronic versus manual ordered.

B. Proposed UNE Local Channels (proposed in 3/2 filing)

1. DS3 Local Channel
2. OC3 Local Channel
3. OC12 Local Channel
4. OC48 Local Channel
5. STS-1 Local Channel

Proposed rate structure for new UNE local channels include fixed facility termination monthly charge, plus a variable distance sensitive per mile charge. The proposed nonrecurring charge rate structure is dependent on electronic versus manual ordered and is also separated between installation and disconnect.

III. Local Transport

Definition: Unbundled interoffice transport provides a transmission path and associated electronics between BellSouth's end offices so that CLECs can transport traffic from one location to another.

A. Existing Local Transport UNEs

1. Common Transport per mile per mou, and per mou per termination.
2. Dedicated Voice Grade, monthly facility and per mile monthly
3. Dedicated DS0 56/64 Kbps, monthly facility and per mile monthly
4. Dedicated DS1, monthly facility and per mile monthly

Nonrecurring charges are dependent upon manual versus electronic ordered.

B. Proposed Local Transport UNEs (Proposed in 3/2 filing)

1. DS3 Transport
2. OC3 Transport
3. OC12 Transport
4. OC48 Transport
5. STS-1 Transport

Proposed rate structure for new UNE transport include fixed facility termination monthly charge, plus a variable distance sensitive per mile charge. The proposed nonrecurring charge rate structure is dependent on electronic versus manual ordered and is also separated between installation and disconnect.

IV. Loop Channelization

Definition: Provides the multiplexing capability that allows a DS1 or DS3 UNE or collocation cross connect to be channelized at a BellSouth Central Office. A multiplexer or a digital cross connect system accomplishes this. Channels can be activated for the entire system or on an as-needed basis once he basic channelization has been installed.

A. Existing Loop Channelization

1. Digital Loop Carrier System
2. CO Channel Interface - 2-wire voice grade

B. Proposed Loop Channelization UNEs (Proposed in 3/2 filing)

1. DS1 to DS0 Channel System

    a. OCU-DP Card DS1 to DS0 Interface Unit
    b. BRITE Card DS1 to DS0 Interface Unit
    c. Voice Grade Card DS1 to DS0 Interface Unit

2. DS3 to DS1 Channel System

    a. DS3 to DS1 Interface Unit

Proposed Rate structure: Fixed monthly rates with installation and disconnect

nonrecurring charges.

V. Proposed Sub-Loop UNEs (Proposed in 3/2 filing)

BellSouth has proposed sub-loop unbundling of the feeder and distribution portion of its existing ISDN, ADSL, HDSL, 56/64 Kbps loops (voice grade loops already have sub-loop distribution and feeder unbundled) and new Unbundled Copper Loops.

VI. UNE Combinations

A. Existing UNE Combinations

1. 2-wire Voice Grade Loop - 2-wire Line Port
2. 2-wire Voice Grade Extended Loop - DS1 Dedicated Interoffice Transport
3. 4-wire Voice Grade Extended Loop - DS1 Dedicated Interoffice Transport
4. 4 wire 56/64 Kbps Extended Digital Loop - DS1 Dedicated Interoffice Transport
5. Extended 2-wire Voice Dedicated Local Channel - DS1 Dedicated Interoffice Transport
6. Extended 4-wire Voice Dedicated Local Channel - DS1 Dedicated

Interoffice Transport
7. Extended 4-wire DS1 Loop - DS1 Dedicated Interoffice Transport
8. Extended 4-wire DS1 Loop - DS3 Dedicated Interoffice Transport
9. Extended DS1 Dedicated Local Channel - Dedicated DS3 Interoffice Transport
10. 2-wire Voice Grade Loop - 2-wire Line Port
11. 2-wire Voice Grade Extended Loop - DS1 Dedicated Interoffice Transport

B. Additional proposed UNE combinations (proposed in 3/2 filing)

1. 2-wire Design Loop - Line Side Port
2. 4-wire Design Loop - Trunk Port

C. "Newly" combined UNEs (proposed in 3/17 filing)

BellSouth's March 17, 2000 filing was a response to the Commission's order in Docket No. 10692-U that requested cost studies for UNE combinations that are not ordinarily combined by BellSouth. BellSouth maintains that existing UNE combinations cost one thing and UNE combinations that do not currently exist (i.e. that they have to put together at the time of the CLEC order) have an additional charge. As such, BellSouth has proposed additional nonrecurring charges for all UNEs that are newly combined.

VII. Other proposed offerings (proposed in 3/2 filing)

A. Loop Modification

Description: Deconditioning a copper loop through the removal of equipment such as load coils, low-pass filters, range extenders and/or removing bridged taps that have been attached to the copper loop.

B. Loop Testing (proposed in 3/2 filing)

Description: By request of a CLEC, BellSouth will provide testing services beyond voice grade transmission for an identified line's features, functions and capabilities. The

testing function is based on a trouble reported on a conditioned line previously ordered by the CLEC.

C. Loop Qualification Database (proposed in 3/2 filing)

Description: Mechanized interface to loop make-up information that generates preordering transactions. Loop Facilities Assignment and Control System (LFACS) will contain loop qualification data composed of loop material, including but not limited to: fiber optics or copper; the existence, location and type of any electronic or other equipment on the loop, including but not limited to, digital loop carrier or other remote concentration devices, feeder/distribution interfaces, bridge taps, load coils, pair-gain devices in the same or adjacent binder groups; loop length, wire gauge and electrical parameters of the loop. BellSouth proposes .9916761 per query charge.

D. Unbundled Network Terminating Wire

Description: Unbundled Network Terminating Wire (UNTW) is unshielded twisted copper wiring that is used to extend circuits from an intrabuilding network cable (INC) terminal or from a building entrance terminal to an individual customer's point of demarcation. It is the last segment of the field-side loop distribution facilities which in multi-subscriber configurations, represents the point at which the network branches out to serve individual subscribers.

This element provides a communication pathway from the CLEC to the end user's wire. This facility will allow an end user to send and receive telecommunications traffic when it is properly connected to the CLEC's required network elements such a loop distribution facility, loop feeder facility, or NID.

This element will be provided in Multi-Dwelling Units (MDUs) and/or Multi-Tenants Units (MTUs) where BellSouth provides wiring all the way to the end users premises.

E. ODUF, ADUF, EODUF (proposed in 3/2 filing)

Optional Daily Usage File (ODUF), Access Daily Usage File (ADUF) and Enhanced Optional Daily Usage File (EODUF). Data charged for per message or per tape.

Description: Access Daily Usage File (ADUF) is a service that provides electronic data of billable messages recorded on the BellSouth network and processed in the BellSouth Customer Record Information System (CRIS) billing system (UNE only). ADUF provides daily information of end users' originating and terminating access Carrier messages. ADUF data is billable access detail messages in industry standard Exchange Message Interface (EMI) format.

Enhanced Optional Daily Usage File (EODUF) provides usage data for local calls originating from resold Flat Rate Business and Residential lines.

Optional Daily Usage File (ODUF) is a service that provides electronic billing data for billable messages carried over the BellSouth network, processed in the BellSouth CRIS billing system and billed to BellSouth CLEC customer. The ODUF file also includes electronic billing data for operator handled calls originating from CLEC subscriber lines for those CLECs who purchase Operator Services from BellSouth. Rated Incollects (originated in BellSouth and from other companies) can also be on ODUF.

F. Physical Collocation - Security Access System (proposed in 2/9 filing)

Description: A card reader access system that allows entry to the central office with an approved card while tracing and recording the times of entry of the cardholder.

G. Adjacent Collocation (proposed in 2/9 filing)

Description: Adjacent collocation is outside the BellSouth CO but on BellSouth adjacent property. BellSouth will provide adjacent collocation arrangements where space within the CO is "legitimately" exhausted. floor space, AC power to adjacent site, 2-wire, 4-wire, DS1, DS3, 2-fiber and 4-fiber cross connects, and 120V & 240V single phase and three phase standby power are offered.

H. DSLAM Collocation in Remote Terminal (proposed in 3/2 filing)

Description: This UNE unbundles the high frequency portion of the local loop at the remote terminal. While CLECs can use this UNE to provide xDSL based services, the loops remaining transmission frequencies continue to provide voice grade service from BellSouth. For each loop, BellSouth provides this UNE only to a single requesting carrier and only for use at the same customer address. BellSouth will not provide this UNE if BellSouth does not currently provide analog voice service to the end user. A CLEC is provided a 1 ¾" of vertical rack space (monthly fee and nonrecurring installation fees) and a $1.66 monthly cost per line activation (plus nonrecurring installation ($328) and disconnect ($57) fees. BellSouth has proposed that the CLEC incur on a recurring and nonrecurring charge per line for each end user loop cross connected by BellSouth at the splitter.

I. Assembly Points (proposed in 2/9 filing)

1. 2-wire Cross Connects
2. 4-wire Cross Connects
3. DS1 Cross Connects

Description: An assembly point provides an alternative method for CLECs to connect to BellSouth's UNEs. Offers CLECs the ability to recombine UNEs themselves at an assembly point location. Rates for assembly point cross connects are different than the rates for collocation cross connects.

J. Access to DCS - Customer Reconfiguration (proposed in 3/2 filing)

Description: Access to Network Management systems that allows CLECs to view their assigned digital cross connect within the BellSouth network, to have real time reconfiguration for their circuit connections and alarm surveillance of their UNE facility network. This UNE allows CLECs to manage DS3, DS1 and DS0 level circuits. Provide secure access to a CLECs elements to receive alarms and to send commands for reconfigurations.

VIII. Missing Items

A. Line Sharing at Central Office
B. Geographically Deaveraged Loop rates