

**BEFORE THE**  
**GEORGIA PUBLIC SERVICE COMMISSION**

<b>IN RE:</b>	)	
	)	
<b>CONSIDERATION OF BELL SOUTH</b>	)	<b>DOCKET NO. 6863-U</b>
<b>TELECOMMUNICATIONS, INC.'S</b>	)	
<b>ENTRY INTO INTERLATA</b>	)	
<b>SERVICES PURSUANT TO</b>	)	
<b>SECTION 271 OF THE</b>	)	
<b>TELECOMMUNICATIONS</b>	)	
<b>ACT OF 1996</b>	)	

**WORLDCOM'S PETITION TO ADDRESS  
OSS, CHANGE MANAGEMENT AND DATA INTEGRITY ISSUES**

COMES NOW, WorldCom, Inc. ("WorldCom") and hereby files this Petition to Address Operations Support Systems ("OSS"), Change Management and Data Integrity Issues. Since WorldCom's subsidiary MCI launched its Georgia local residential service in May 2001, it has been attempting to clear a number of significant hurdles that have impeded its progress in selling service to Georgia consumers. MCI has sought to work through these concerns with BellSouth Telecommunications, Inc. ("BellSouth") and has raised many of them with the Commission in this proceeding. The Commission attempted to remedy four of those problems in its October 19, 2001 Order in this docket ("October 271 Order"), in which it ordered BellSouth to implement solutions by specified dates. BellSouth has failed to implement the Commission's directives, missing deadlines and delivering system fixes that fall short of what the Commission required. As MCI's launch has proceeded, new issues have emerged that MCI has not been able to resolve with BellSouth. Now that BellSouth has withdrawn its Georgia 271 application at the FCC, it is time to take stock of BellSouth's

performance and drive resolution of key remaining problems. Toward that end, WorldCom proposes that the Commission hold expedited workshops and such other proceedings as the Commission deems appropriate to deal with OSS, change management and data integrity, the three areas that emerged as major concerns during the 2001 271 process.

## I. INTRODUCTION

On October 2, 2001, the Commission voted to recommend approval of BellSouth's 271 application, and also required BellSouth to implement a number of improvements to its OSS. On that same day, BellSouth filed its Georgia and Louisiana 271 application with the FCC, contending among other things that it had met the fourteen point checklist outlined in Section 271 of the Telecommunications Act of 1996 ("Act"). CLECs including WorldCom filed comments and declarations with the FCC pointing out in detail why BellSouth was failing to provide nondiscriminatory access to its OSS and otherwise had not met the 271 checklist. WorldCom's comments focused on MCI's Georgia launch and the problems MCI has experienced during its roll out of local service here, especially problems with BellSouth's OSS and its change management process. On December 20, 2001, in the face of certain rejection by the FCC, BellSouth withdrew its 271 application.

In a statement issued on the day of BellSouth's withdrawal, FCC Chairman Powell noted that "[t]he FCC cannot approve such applications by the Bell Companies unless they satisfy the requirements of section 271 of the Communications Act." He further stated that

despite extensive conversation and collaboration with the FCC, questions remain regarding whether BellSouth has satisfied the rigorous requirements of the statute and our precedents, including the adequacy of the company's operational support systems, the integrity of its performance data and its change management process, and related issues.

(Emphasis added.) BellSouth has contended that the FCC merely requested more information from BellSouth and that BellSouth intends promptly to refile its application. BellSouth's December 20 press release on its withdrawal stated that its new application will include new information "on pre-ordering and order process integration, service order and data accuracy, the order due date calculation process and the collaborative process for implementing software changes to the support systems used by CLECs."

WorldCom agrees the areas identified by Chairman Powell and BellSouth need to be addressed. But they should be addressed first by this Commission, not the FCC. On this point the FCC has been quite clear, specifically addressing BellSouth's tactics during its first round of 271 filings more than three years ago:

While we commend BellSouth for making significant improvements over the past eight months since we issued the *First BellSouth Louisiana Order*, BellSouth has filed a second application for Louisiana without fully addressing the problems we identified in previous BellSouth applications. This problem is particularly evident in BellSouth's provision of operations support systems. Because BellSouth does not satisfy the statutory requirements, we are compelled to deny its application for entry into the interLATA long distance market in Louisiana. In this regard, we caution that the Commission expects applicants to remedy deficiencies identified in prior orders before filing a new section 271 application, or face the possibility of summary denial.

*In re Application of BellSouth Corp., BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Louisiana*, CC Docket No. 98-121, Memorandum Opinion and Order ¶ 5 (rel. Oct. 13, 1998) ("*Louisiana II Order*") (emphasis

added) (footnotes omitted). The FCC also has addressed the responsibilities of state commissions with respect to subsequent 271 applications:

We fully acknowledge and are sensitive to limitations on state commissions' resources for purposes of developing their recommendation on a BOC's 271 application. We believe, however, that in making its recommendation on a BOC's section 271 application, a state commission may assist us greatly by providing factual information. When a BOC files a subsequent application in a state, it is important for the state commission to provide the factual information gathered and relied upon by the state commission concerning changes that have occurred since the previous application was filed. Thus, for subsequent applications, we encourage state commissions to submit factual records, in addition to their comments, demonstrating that: (1) the BOC has corrected the problems identified in previous applications; and (2) there are no new facts that suggest the BOC's actions and performance are not longer consistent with the showing upon which this Commission based any determination that the statutory requirements for certain checklist items have been met.

*Id.* ¶ 21 (emphasis added).

The only difference between the BellSouth's Georgia 271 application and its first Louisiana application is that in this case BellSouth chose to withdraw its application at the last moment rather than face yet another FCC 271 rejection order. As a result, the Commission does not have before it an FCC order outlining in detail where BellSouth fell short in its application. Indeed, the obvious reason BellSouth withdrew the application was to prevent such a list of problems from being made public so it could put its own spin on why withdrawal was necessary. But there is no doubt concerning the main areas that must be addressed: both Chairman Powell's statement and BellSouth's press release identified OSS, change management and data integrity as key. The *Louisiana II Order* requires BellSouth to address these areas before it refiles, and "encourages" this Commission to develop a

factual record demonstrating that these areas have been appropriately addressed and that no new problems have emerged. In this Petition, WorldCom proposes a constructive way to go about complying with the *Louisiana II Order*.

## II. MCI'S LOCAL LAUNCH

Georgia remains the only state in BellSouth's service territory where MCI has been able to roll out local residential service throughout a significant portion of BellSouth's service territory.<sup>1</sup> Georgia consumers have responded to MCI's product offerings -- MCI continues to submit more than 1000 local service requests per day for local residential service. MCI's order volume is still less than it could be if BellSouth's OSS functioned well, but at present MCI's launch represents the high water mark in BellSouth's region. To put that sales volume in perspective, in November 2001 LSRs submitted by MCI for local residential service constituted 80% of the EDI orders for UNEs and 33% of all UNE orders throughout BellSouth's entire region. It also constituted approximately half of all the EDI orders for all local products submitted in the nine BellSouth states. These numbers reveal that not only is MCI the only company to launch this type of local residential business in Georgia, but that its Georgia launch is the only one of its kind anywhere in BellSouth's territory. Certainly the Commission deserves credit for being the first and only commission in the Southeast to make such a local service launch possible. Georgia consumers have been the beneficiaries of the Commission's vision and its steadfast determination to lay the groundwork for real local residential competition.

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<sup>1</sup> MCI currently provides service throughout zone 1 in Georgia, but is not able because of UNE pricing to provide service in the rest of the state. MCI recently launched its local residential service in Florida, but there MCI has been able to offer service only on a limited basis because of Florida's UNE prices.

But clearing the way for launch is only the first step, albeit a crucial one. MCI's experience in other states where it has begun providing higher volume local residential service has been that after launch it uncovers myriad OSS problems and flaws that must be corrected. That has been the case in Georgia as well, but unfortunately MCI has found that BellSouth's systems are so riddled with problems that it must devote a disproportionate share of its information technology resources to fixing them. This undue expense is a significant competitive barrier.

BellSouth's OSS problems also affect consumers directly. MCI has seen a high rate of Georgia customers leaving MCI and returning to BellSouth for local service. Often the problem is that the customer has had a bad experience during his or her migration to MCI – perhaps a provisioning delay or the loss of dial tone for some period after migration. No doubt in many cases a poor provisioning experience combined with BellSouth's aggressive win-back efforts have been enough to convince the customer not to experiment further with MCI's new service. A competitive marketplace always will involve some degree of turnover as customers make choices and search for the best deals. But when the incumbent provider uses a substandard OSS process as a competitive weapon, regulatory action is necessary. MCI has found that only with commission support is it possible to prompt a Bell company to undertake the arduous process of dealing with the many OSS problems that surface during service roll out and – just as importantly – implementing an effective process for addressing those problems on an ongoing basis. Given the seriousness of the problems MCI has encountered, it is critical that they be addressed quickly, in expedited workshops and proceedings.

### III. OUTSTANDING ISSUES MUST BE ADDRESSED

WorldCom proposes that the Commission move quickly to address the problem areas identified in Chairman Powell's statement – OSS, change management and data integrity. WorldCom respectfully submits that workshops and other appropriate proceedings should address outstanding issues that are identified in each of these three areas. Experts should be required to attend so workable solutions can be developed and implemented under the Staff's supervision. Unresolved issues should be submitted to the Commission so it can resolve them and order implementation schedules as appropriate. Given its strong interest in improving OSS as soon as possible, WorldCom is prepared to address all identified problems on an expedited basis. A brief summary of the key issues from WorldCom's perspective follows.

#### A. OSS Issues

##### 1. Migration by telephone number and name

In its October 271 Order, the Commission required "BellSouth to implement by November 3, 2001, migration by Telephone Number and name." The purpose of this improvement was to better integrate the pre-ordering and ordering processes, thus reducing BellSouth's high reject rate and improving flow through. BellSouth's implementation was both late and flawed. Its initial effort was accompanied by a number of glitches that delayed final implementation to November 17. Even then, unlike other Bell companies, BellSouth was not able to implement the functionality ordered by the Commission, but instead implemented migration by telephone number and street address number. This approach has led to a significant problem. MCI obtains the customer's street address number from the Regional Street Address Guide ("RSAG") and transmits that number on the order, but BellSouth

verifies the street address number against both RSAG and the Customer Service Record (“CSR”) databases. If the street address number does not match both databases, BellSouth rejects the order, a not infrequent occurrence because the two databases sometimes do not match. When that is the case, the CLEC has no way of correcting the rejected order because there is no way to make the address on the order match both back-end databases. Currently, the only way for MCI to deal with the situation is to call BellSouth’s Local Carrier Service Center to fix the problem, which takes about twenty-five minutes for each rejected order. A solution to this problem needs to be developed.

## 2. Parsed CSRs

In its October 271 Order, the Commission directed BellSouth “to implement fully fielded parsed CSRs by January 5, 2002.” BellSouth has failed to comply with the Commission’s Order. BellSouth issued its business rules for the parsed CSR late, and since implementation has flagged seventeen defects that are not scheduled for correction until February 2, 2002. More importantly, BellSouth again has not provided the full functionality that was ordered, because it is not providing “fully fielded” parsed CSRs. In November 2000, CLECs and BellSouth discussed implementation of the parsed CSR project. CLECs presented draft user requirements and the parties reached agreement on what would be included. Nearly a year later, in September 2001, BellSouth provided CLECs with documentation reflecting a parsed CSR product that was different than what CLECs had requested, even though BellSouth did not tell CLECs about any differences in the intervening months. Despite objections from CLECs, BellSouth proceeded to implement its revised version of CSR parsing rather than what CLECs requested and agreed to.



BellSouth's CSR parsing release failed to include nineteen fields in parsed format that were requested by CLECs in November 2000. BellSouth has stated that some of these fields are not part of the CSR and some cannot be parsed. But all of these fields are used on either the inquiry or response pre-order CSR transactions. For example, the company code and inquiry number are codes that CLECs transmit on the CSR inquiry. BellSouth must send those codes back on the response transaction to establish the proper handshake between the companies; yet BellSouth's documentation does not say BellSouth will return this information. Moreover, other ILECs have been able to parse these fields and there is no reason to believe BellSouth cannot do so. And these fields are important. For example, BellSouth's implementation of parsed CSRs does not include end user name, unit number or hunting information.

The purpose of the parsed CSR is to integrate BellSouth's OSS and thus reduce rejects and improve flow through. But BellSouth has approached this project without regard for CLECs' stated needs or the interests of consumers, but rather with the intention of checking a box it perceives to be necessary for 271 approval. The Commission should not allow this tactic to succeed. It should supervise discussions between the parties that will upgrade BellSouth's parsed CSR so it is useful to CLECs. In the meantime, BellSouth should not be considered to have complied with the Commission's October 271 Order.

### 3. Single C Order process

The Commission directed BellSouth to adopt a single C order process in its back-end systems by January 2002 to eliminate at least part of the lost dial tone problem. But BellSouth has announced it

will not implement this change until April. It also has stated that this change is not “CLEC impacting” and therefore will not be subject to a CLEC test period, nor will documentation explaining the changed processes be provided to CLECs despite the significant customer impact should these processes fail. Two percent of MCI customers continue to lose dial tone in the first thirty days after migration, and to date more than 5000 MCI customers have lost dial tone after migration. BellSouth’s willingness to incur a \$10,000 a day penalty rather than comply with the Commission’s Order speaks volumes about BellSouth’s unwillingness to devote resources to address OSS problems that harm Georgia consumers. BellSouth should be required to meet with CLECs and the Commission and rethink its cavalier approach to this serious problem.

4. Interactive Agent

Use of a Value Added Network (“VAN”) delays transmission of orders, as well as FOCs, rejects, and completion notices between MCI and BellSouth – delays that are not captured in BellSouth’s performance measures. Yet BellSouth, alone among the Bell companies, has refused to adopt Interactive Agent, the industry standard mode of transmission. WorldCom submitted a change management request for the Interactive Agent on September 26, 2000, but Interactive Agent has not been implemented and is not one of the upgrades BellSouth has scheduled for implementation during 2002. Unfortunately, it appears that Commission action will be required to force BellSouth to implement this industry standard.

5. Line loss reporting

About a month after MCI began its launch, it raised with BellSouth the issue of BellSouth's failure to provide complete line loss reports. Obtaining complete reports is critical because without a line loss report MCI does not know to stop billing a customer who has migrated to another company (in most cases, BellSouth). Because of this problem, thousands of former MCI customers have been double billed through no fault of MCI. MCI has received more than 1285 complaints of continued local billing since it launched service. After months of stonewalling, BellSouth finally provided missing line loss reports from October 1 through December 1, which included 2744 customers who had left MCI in those two months.<sup>2</sup> BellSouth still has not provided the data for customers who were left off the line loss reports prior to October 1, many of whom probably still are being double billed. BellSouth should be required to address this issue.

#### 6. Billing problems

Not surprisingly, billing problems are among the last to be detected because of the lag between provisioning and billing. A number of billing problems have surfaced since MCI's launch began. MCI has found, for example, that six and a half percent of the lines for which MCI is billed do not include a billing telephone number, which prevents MCI from determining whether bills on these lines were proper. Another problem with BellSouth's wholesale bills is that BellSouth is not using the correct billing number to bill WorldCom for UNE-P usage. MCI requested that BellSouth fix this problem after MCI received its very first bill, but BellSouth still has not done so. MCI also has discovered that BellSouth has improperly routed tens of thousands of intraLATA calls through its own switches, rather than through the switches of the intraLATA carriers chosen by MCI's customers (generally MCI's long

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<sup>2</sup> Since then, BellSouth has implemented an interim process in which it provides additional line loss reports on a

distance operation). This misrouting denies the customer service from the carrier of its choice and leads to a loss of revenue for the chosen intraLATA carrier. BellSouth itself identified “translation errors” as the cause of the problem. Finally, CLEC orders sometimes drop into various pending billing states requiring manual work to correct errors and complete the final step of the order before BellSouth’s billing systems are updated – which leads to the potential for double billing. MCI has provided BellSouth numerous examples of orders for which MCI has received completion notices but for which BellSouth has not updated the CSR. MCI believes that in many instances, the cause of this problem is that orders have dropped into a billing discrepancy file, but since no one at BellSouth has answered MCI’s questions about the systems and processes used in updating CSRs, it cannot determine whether this is the root cause of the problem.

The resolution of these billing problems is critical to MCI’s business and to the experience of MCI’s customers. The Commission should require BellSouth to give these issues the attention and resources they are due.

B. Change Management

Change Management is critical for CLECs. Without a change management process that enables CLECs to obtain needed improvements, allows them effectively to test that changes work and that the changes do not cause downstream difficulties (including rejects), and ensures rapid repair of any defects that are introduced by changes, CLECs lose their ability to compete effectively. BellSouth lacks such a process. BellSouth largely ignores CLEC input on what changes are required, does not perform effective initial release testing to weed out defects in new releases, fails to provide notice to CLECs of

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weekly basis.

many key changes, and excludes key functions, such as billing, from the change management process altogether. Moreover, change requests often take many months or even years before BellSouth even presents them to CLECs to be prioritized; and once change requests are prioritized they take many months or years before they are implemented. Perhaps the biggest problem is that BellSouth simply implements far too few change requests. In 2001, BellSouth implemented only five prioritized change requests (four of them from CLECs), and it appears BellSouth plans to implement only twenty-five change requests (eleven of them from CLECs) in 2002. In contrast, from October 2000 to October 2001 Verizon implemented 170 prioritized changes. Verizon has developed a satisfactory change management process; BellSouth should be required to emulate Verizon's example.

As part of the performance measurement docket, Staff has required CLECs to red line BellSouth's change management process document by January 30, 2002 and BellSouth to respond by February 15. No decision has been made how to proceed once the red-line and response have been filed. WorldCom respectfully submits that a change management workshop should be scheduled after the filings to work through revisions to the change management process and also to review and seek improvements to BellSouth's implementation of that process. CLECs need a process that is fair, that is followed and that ultimately results in a higher volume of implemented change requests. Commission focus is necessary to accomplish these objectives.

C. Data Integrity

During the 271 proceedings before this Commission and the FCC, WorldCom chose to focus its advocacy on specific problems it has experienced with BellSouth, rather than criticisms of

BellSouth's data. But in the areas of central concern to WorldCom, it is clear that BellSouth's data is not accurate – or at least does not accurately represent the underlying problems. For example, WorldCom has encountered flaws in BellSouth's flow through data and has found that BellSouth's reject data does not match WorldCom's internal data. Also telling is that KPMG's testing of BellSouth's performance metrics in Georgia continues to find data problems. Obviously, if the Commission cannot rely on BellSouth's data, it cannot assess BellSouth's performance. The Commission should undertake appropriate proceedings to ensure that it can rely on the performance data being reported by BellSouth.

#### **IV. CONCLUSION**

WorldCom recognizes that this Commission stands alone in the Southeast because it is the only commission in BellSouth's territory that has shown the political fortitude to make local residential competition a reality. And although the Commission does not have the most resources or the largest staff, it has stepped up to the technical challenges involved and done much of the heavy lifting for the entire region. For that WorldCom is grateful, and so should be Georgia consumers, who are benefiting from the Commission's hard work and determination. Yet WorldCom hastens to add that success is by no means assured. If problems described above that affect Georgia consumers every day are not resolved, if the remaining work is not done, if BellSouth's system for addressing those problems is not fixed, there remains the real possibility that residential competition will not survive. While WorldCom recognizes the resource constraints confronting the Commission, this work is too important to be left

undone. WorldCom believes the proposal outlined above would address outstanding issues efficiently and can be implemented with the resources available to the Commission. WorldCom respectfully requests that its proposal be adopted.

For the foregoing reasons, WorldCom respectfully requests that the Commission establish expedited workshops or other proceedings it deems appropriate to address OSS, change management and data integrity issues.

RESPECTFULLY SUBMITTED, this 18<sup>th</sup> day of January, 2002.

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**CERTIFICATE OF SERVICE**

This is to certify that copies of the **WORLDCOM'S PETITION TO ADDRESS OSS, CHANGE MANAGEMENT AND DATA INTEGRITY ISSUES** have been served upon the following persons and parties of record by hand delivery or first class mail, postage prepaid, this 18<sup>th</sup> day of January, 2002.

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