

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

In Re: Consideration of BellSouth)
Telecommunications, Inc.'s Entry Into)
Inter LATA Services Pursuant to) Docket No. 6863-U
Section 271 of the Telecommunications)
Act of 1996)

AFFIDAVIT OF RENEE TERRY ON BEHALF OF
e.SPIRE COMMUNICATIONS, INC.

Personally appeared before me, the undersigned officer duly authorized to administer oaths, RENEE TERRY, who, upon being duly sworn, deposes and states as follows:

1.

I am the Director of Regulatory Affairs for e.spire Communications, Inc., a competitive local exchange company operating in the State of Georgia.

2.

I give this affidavit on my own personal knowledge, having reviewed information provided by e.spire personnel, and in response to the February 18, 2002 correspondence from the Georgia Public Service Commission requesting information to assist the Commission Staff and the Commission in determining what future proceedings should be held, if any, in the above-docket.

3.

In response to the numbered requests of the Commission staff, e.spire provides the following information:

REQUEST 1: Migration by telephone number and name - The parties should provide data concerning the number of LSRs submitted using this functionality, including the number of LSRs rejected or clarified and the reasons given for the rejection or clarification. Data concerning any problems encountered in using this functionality also should be provided, including the problem of a mismatch between the customer's address in RSAG and on the CSR, as alleged in WorldCom's petition.

e.spire RESPONSE: During the last three months (Nov. 20, 2001 - Feb. 20, 2002), the numbers are as follows:

BellSouth: Number of LSRs = 598

Number of Errors (rejects and clarifications combined) = 813

At this time, e.spire cannot provide with reasonable certainty the reasons given for the rejects and clarifications during this time period because there is no tracking field for “reasons for rejects and clarifications” in the database (DSET) that e.spire uses. Instead, the information is recorded in the “free text” or general comment field and so every LSR would have to be reviewed individually to obtain this information.

BellSouth issues monthly clarification reports, but the reports are not sent routinely on a timely basis unless requested by e.spire. Even when sent, the

clarification reports on electronic orders generally do not provide any information other than raw data.¹

Although e.spire has encountered problems in using this functionality (including the problem of a mismatch between the customer's address in RSAG and on the CSR, as alleged in WorldCom's petition), e,spire has not compiled data on this functionality.

REQUEST 2: Parsed CSRs - The parties should provide all testing results or commercial usage concerning parsed CSR functionality. Data about any problems encountered in using this functionality also should be provided. Finally, parties should identify any fields that BellSouth does not provide in parsed format and indicate whether other ILECs provide such fields in parsed format.

e.spire RESPONSE: e.spire does not use this functionality.

REQUEST 3. Line Loss Reporting - The parties should provide detailed information concerning the line loss reports BellSouth has provided and is providing. Any party that claims customers have been double billed as a result of BellSouth's failure to provide timely or accurate line loss report should provide specific data to support this claim.

e.spire RESPONSE - e.spire has not asserted that claim in this docket.

Therefore, e.spire has not compiled data to support the claim that its customers

¹ e.spire found the clarification reports issued with manual orders somewhat more helpful, but as e.spire processes more orders electronically, it sees less manual order clarification reports.

have been double-billed based on BellSouth's failure to provide an accurate listing of line loss reports.

REQUEST 4: Single C Order Process - The parties should provide data concerning the number of customers that have lost dial tone as a result of BellSouth's use of an "N" and "D" order. This data should include the date of the conversion and the date dial tone was lost as well as an explanation for why the lost dial tone was caused by use of an "N" and "D" order.

e.spire RESPONSE: From the information currently available, it does not appear that e.spire has had significant problems recently with BellSouth completing disconnects prematurely in a port scenario.

FURTHER AFFIANT SAYETH NOT.

Renee Terry
Director, Regulatory Affairs
e.spire Communications, Inc.

Sworn to and subscribed before me
this ___ day of February, 2002.

Notary Public

My Commission expires:_____