

**Before the
GEORGIA PUBLIC SERVICE COMMISSION
Atlanta, Georgia**

<p>In re:</p> <p>CONSIDERATION OF BELL SOUTH TELECOMMUNICATIONS, INC.'S ENTRY INTO INTERLATA SERVICES PURSUANT TO SECTION 271 OF THE TELECOMMUNICATIONS ACT OF 1996</p>	<p>Docket No. 6863-U</p>
---	--------------------------

AFFIDAVIT OF JOHN FURY

State of South Carolina)
) SS.
County of Greenville)

I, **JOHN FURY**, being duly sworn upon oath, do hereby depose and state as follows:

1. My name is John Fury. I am employed by NewSouth Communications Corp. as Carrier Relations Manager. My business address is Two North Main Street, Greenville, SC 29601. I have personal knowledge of the matters set forth in this Affidavit.

2. I am the same John Fury who submitted an affidavit ("Fury Opening Affidavit") in support of the Opening Comments of NewSouth Communications Corp. ("NewSouth Opening Comments") in Georgia Public Service Commission Docket No. 6863-U on May 31, 2001.

3. In the matter before Commission Staff and regarding WorldCom's petition for "expedited workshops or other proceedings" to address OSS, change management and data integrity issues, NewSouth files the following response.

4. Issue (1): Migration by telephone number and name – NewSouth has experienced the issue with RSAG and CSR address mismatches that WorldCom alleges in its petition. Our business and the products that NewSouth offers are distinct from WorldCom, and for that reason NewSouth is not affected to the degree that WorldCom would be. BellSouth uses BOCRIS to match address on flowthrough orders while NewSouth uses LENS and CAFE for address validation. Where

inconsistencies exist, BellSouth insists that a manual order be submitted rather than correcting “in flight” and allowing flowthrough. A spreadsheet itemizing recent RSAG errors is attached to this affidavit as Exhibit A.

5. Issue (2): Parsed CSRs – NewSouth does not currently use pre-order functions provided by BellSouth. CSRs are accessed through LENS and are manually processed.

6. Issue (3): Line Loss Reporting – New South does experience the double billing issues that WorldCom alludes to in its petition. Attached as Exhibit B is a report from NewSouth’s maintenance and repair system enumerating recent double billing cases. Data correlating these cases to BellSouth’s Line Loss Notification Reporting could not be generated. In addition, the timeframes for resolving billing related issues with BellSouth are excessive.

7. Issue (4): Single C Order Process – Relative to the early experience with migrating customers to the UNE Platform, current BellSouth performance is substantially improved. There have been sporadic cases of premature disconnects which are enumerated in Exhibit C to this affidavit.

8. In addition to the order handling and premature disconnect issues, BellSouth’s process impacts customers who request Memory Call and hunting features. Customer mailboxes are torn down in the migration process. Not only is this an inconvenience to the customer, but it also results in order errors when ports are exhausted on the platform currently used by the customer. This also results in a change to the access number for the customer.

9. NewSouth receives numerous complaints related to customer’s hunting features. Order handling and translations errors are common. These errors could be mitigated through development of a migration process that did not require separate disconnect and new order actions to be carried out and coordinated.

10. I hereby declare that the foregoing information is true and correct to the best of my knowledge, information and belief.