

08/9-26-07 (entire DN)
DECLASSIFIED

CONFIDENTIAL

ATTACHMENT C

AT&T FLORIDA
FPSC DOCKET NO. 050863-TL
REQUEST FOR CONFIDENTIAL CLASSIFICATION
PAGE 1 OF 1
9/10/2007

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S
RESPONSE TO STAFF'S FIRST REQUEST FOR DOCUMENTS, NOS. 3 AND
6, FILED AUGUST 20, 2007 IN FLORIDA DOCKET NO. 050863-TL

ONE HIGHLIGHTED COPY

DECLASSIFIED
CONFIDENTIAL

DOCUMENT NUMBER-DATE

08205 SEP 10 5

FPSC-COMMISSION CLERK

RH
000562

CONFIDENTIAL

**FPSC
Docket No. 050863-TP**

**AT&T Florida Response to
Staff's Production of
Documents**

Item No. 3

DOCUMENT NUMBER - DATE
08205 SEP 10 2008
FPSC-COMMISSION CLERK

DECLASSIFIED

000563

Proprietary

RESALE PROMOTIONS

General Overview

BellSouth is required to make available certain retail promotions to resale CLECs. Currently, there are three promotions that resale CLECs submit for processing of credits:

- Line Connection Waiver
- Secondary Service Charge Waiver
- 1FR plus 2 Free Features

In addition to promotional credits, resale CLECs are also entitled to submit credit requests for end users who fit the qualifications for contract promotions, such as:

- Key Customer Program
- Simple Savings Program
- Renewal Incentive Program
- BellSouth Business Winning Rewards
- BellSouth Business Select Program

Promotional Credit Submission Process

CLECs submit BAR forms by Q account, by promotion with accompanying spreadsheets on a monthly basis. The spreadsheets include a list of end users whom the CLEC considers meet the qualifications of the promotion. CLEC submission is sent via email to the Resale Product Manager.

Promotion Validation Process

1. Determine the sample size of end user telephone numbers to be validated by obtaining the total number of end user lines submitted per Q account. Multiply that number by the following factor:

End User Line Count	Percent to Validate
1-10	All
11-100	10%
101-250	8% minimum of 10 lines
251-500	7% minimum of 10 lines
501-1000	5% minimum of 10 lines
1001 or more	3% minimum of 10 lines

DECLASSIFIED

1

2. Randomly select end user telephone numbers to be validated. Example: With 356 end user telephone numbers, you would validate 25 numbers (356x.07). Start at the first line and count every 14 numbers (356 divided by 25). On the next spreadsheet, go through the same process, but start at line 2. The next spreadsheet, start at line 3, etc.
3. With each end user telephone number to validate, access the original service order in MOBI and verify the following:
 - Does the end user belong to the CLEC requesting the credit?
 - Is it a resale account?
 - Does it meet the qualifications of the promotion?
4. Highlight the validated numbers on the original spreadsheet – orange for those numbers that did not qualify, green for those numbers that do qualify. Calculate the percent of qualified numbers. In the case above, if 10 of the 25 numbers qualified that would equal 40% (10 divided by 25). Determine the amount of money that is to be credited to the CLEC by multiplying .40 by the monies asked for. If the requested amount is \$5,000, then the amount we would credit would be \$2,000.

Promotion Qualifications

1. Line Connection Waiver

Minimum requirement is basic local service plus 2 **purchased** Custom Calling and/or TouchStar features (includes RingMaster). USOCs without a rate (i.e., HBG, BRD, BCR) and CREX are not qualified USOCs.

2. Secondary Service Charge Waiver

Waiver of secondary service charges when customers add or change one or more of the following services/features to their **residential** service:

- Rotary Line Service
- TouchStar Service
- Custom Calling Services
- Prestige Communications Package
- Customized Code Restrictions
- Designer Listing
- Message Waiting Indication
- RingMaster Service
- Memory Call Service
- Privacy Director Service
- Voice Mail Companion Services Package
- Preferred Pack Plan

DECLASSIFIED

3. 1FR plus 2 Free Features

Minimum requirement is basic local service plus 2 *purchased* Custom Calling and/or TouchStar features (includes RingMaster). USOCs without a rate (i.e., HBG, BRD, BCR) and CREX are not qualified USOCs. Customer receives 2 free features for one year. Each month, for 12 months, CLEC sends in credit request. So, for example, you will find requests for credits in May for a line that was installed in December.

4. Key Customer (2002, 2003 and 2004)

- Existing Business Customers only
- Monthly Recurring Charge between \$75 - \$3,000
- 24 month contract receives 10% off MRC and 50% off Hunting
- 36 month contract receives 20% off MRC and 100% off Hunting
- Complete Choice customers not eligible to receive Hunting benefit

Key Customer 2005

- Existing Business Customers only
- Monthly Recurring Charge between \$75 - \$3,500
- 24 month contract receives 10% off MRC and 50% off Hunting
- 36 month contract (\$75-\$249.99) receives 20% off MRC and 100% off Hunting
- 36 month contract (\$250-\$3500) receives 25% off MRC and 100% off Hunting
- Complete Choice customers not eligible to receive Hunting benefit

5. BellSouth 2004 Simple Savings Promotion

- New Customers only
- Monthly Recurring Charge between \$75 - \$3,000 (excluding hunting, analog private line, ISDN PRI, Frame Relay, BIS-T1 and Megalink service charges)
- 24 month contract receives 10% off MRC and 50% off Hunting
- 36 month contract receives 20% off MRC and 100% off Hunting
- Complete Choice for Business customers not eligible to receive Hunting benefit

6. BellSouth Renewal Incentive Program

- Available to existing customers currently enrolled in Local Service Term Election Agreement that is about to expire.

DECLASSIFIED

- Monthly Recurring Charge between \$75 - \$3,500 (excluding hunting, analog private line, PRI, BIS-T1 and BIS-PRI charges)
- 12 month renewal agreement receives 20% off MRC and 100% off Hunting

7. BellSouth Business Winning Rewards 2005

- Available to new and existing customers
- Services included are 1FB, PBX Trunks, Centrex Service, MegaLink Service, PRI, Frame Relay, Hunting and Custom Calling Features
- Monthly Recurring Charge between \$75 - \$25,000
- 12 month contract receives 5% off MRC not to exceed \$1,250 monthly and 50% off Hunting
- 24 month contract receives 10% off MRC not to exceed \$2,500 monthly and 75% off Hunting
- 36 month contract receives 15% off MRC not to exceed \$3,750 monthly and 100% off Hunting
- Not to be combined with any other promotion

8. BellSouth Select Business Program

DECLASSIFIED

Bixler, Micheale

From: Marshman, Diana
Sent: Monday, June 06, 2005 2:37 PM
To: Allen, Advernall; Seagle, Kristy
Cc: Hogeman, Bert; Cerami, Robert; Spinelli, Andrea; Ensminger, David; Anderson, Drake; Ginn, Charles; Gray, Gloria
Subject: BC 0224 Resale Promotion Credit Processing

Attachments: BC0224 Resale Promotions Credit Processing 52505.doc; Resale Promotions Flow.ppt

Attached is the FINAL report of the Business Controls review of Resale Promotion Credit Processing. If you have any questions regarding the scope of the review or the content of the report please contact Diana Marshman at (404) 927-8496.

The mechanized tool development will be undertaken by the DATA group under the direction of Robert Cerami. A separate engagement letter will be issued. If you have any questions about the tool please contact Andrea Spinelli at 404-249-2910.

Attachments:

Final Report

Present Method of Operation Process Flows (PMO)



BC0224 Resale
Promotions Credi...



Resale Promotions
Flow.ppt (22...

DECLASSIFIED



Business Controls

*BC-0224 Resale Promotions Credit Processing
May 25, 2005*

Executive Summary

Overview

Resale Product Management processes requests by CLECS for credits due to them from two areas: 1) Promotions and 2) Contract Terminations.

1) BellSouth through Customer Markets (retail) creates a promotion. A tariff is filed by state. Some promotions by tariff allow resale CLECS to request a billing adjustment if their customer qualifies for the promotion. This is completed through the use of a Billing Adjustment Request form (commonly known as a BAR Form) with attached customer information.
2) A BellSouth customer (end user), through Customer Markets signs a contract. At some point during the contract the end user switches to a CLEC. BellSouth bills the end user termination liability charges. If the CLEC assumes the contract, BellSouth reimburses the CLEC upon submission of the BAR form. Approximately six million dollars was credited last year to CLECs through these methods.

Background

In order to process credits in these two areas, Resale Product Management researches the end user accounts manually to determine eligibility. (Please see present method process flows attached) A statistical method of sampling and researching end user telephone numbers is used to determine eligibility. The amount credited to the CLEC is based on the percent of end user telephone numbers that qualify. For example, a small pre-determined percent of the claim is researched. If for example 50 percent of the sample claims are eligible, then only 50 percent of the total claim would be paid.

A current backlog of claims exists due to an increased volume of claims from the CLECs. This is due in part to increased need by CLECs to improve profitability and the creation of firms who assist CLECs in locating potential sources of funds.

Analysis

Due to the manual nature of the submission process, claim requests are received in an inconsistent format. The BAR form, while standard can have missing information. Subsequent attachments containing the end user customer account information, TN and other information are not consistent. This can cause additional work by the claim processor. Individual research of each TN is preferred over statistical sampling. While sampling is a valid method, it may not be as accurate.

Due to the backlog and the manual steps required, the claims are not processed in a timely manner. Claims are presently received in an employee's electronic mailbox. No tracking number is assigned and no automatic acknowledgement is sent to the CLEC.

Research done to confirm eligibility involves many manual research steps. A mechanized process tool that could compare and eliminate as many ineligible claims as possible would significantly reduce the number of steps of eligibility that may need to be manually researched.

No archive of claims paid is readily accessible to compare against new claims thus increasing the likelihood of duplicate claims.

There is difficulty with manual process in tracking various metrics and measurements. This reduces management's ability to have up to date workflow information.

Notification output consists of two manually prepared spreadsheets, one for the CLEC with eligibility results on their claims and another to Billing and Collections to process the adjustments.

Recommendations

Suggested corrective actions are summarized below.

DECLASSIFIED

Private / Proprietary
Contains Private and/or Proprietary Information
May Not Be Used or Disclosed Outside the BellSouth Companies
Except Pursuant to a Written Agreement.

000569

Proprietary

Interim

- Retain additional resources, either permanent or temporary to reduce backlog. Resource should be familiar in CRIS/MOBI research.
- While still in the manual mode, prepare interim claim responses and data as they are completed into new standard format capable of being downloaded into the new system tool. This would build the archive file to be used for future claims.

Process Improvement and Mechanized Tool Development

Note: Tool development would be undertaken by the DATA group under the direction of Robert Cerami. A Subsequent engagement letter by the DATA group will detail tool functionality and timeline. Expected phases are: Phase One – End of July, 2005. Phase Two – End of fourth quarter 2005. These dates are contingent on receiving design feedback from Resale Product Management by the agreed detailed timeline.

Mechanize the validation process to the extent feasible. Claims will be electronically validated in various systems and against archival information.

- Develop standard formats for both BAR and backup data.
- Develop a generic email box to parse and accept new claim formats.
- Prepare a CLEC communication to advise them of improved service using a mechanized tool, mailbox, etc. (BellSouth is unable to insist that CLECs use the new data format, however we can advise them that response to their claims will be more expedient with this method.) If Resale Product Management receives any unformatted claims, these claims should be reformatted by RPM to be able to be accepted by the tool.
- Review the ability to respond with a mechanized acknowledgement to the CLEC that their claim has been received. If possible have the system assign a tracking number to the claim.
- Archive all accepted and denied claims for comparison to prevent future duplicate or fraudulent claims.
- Develop measurements and metrics to create mechanized reports to assist management. Some suggested areas:
 - Timeliness – When claims received and when processed.
 - Rejected vs. accepted claims
 - Scorecard type metrics. Compare CLECs, number of claims, number of ineligible, dollar amounts, etc.
 - Tariffs, type of promotions and contracts that generate claims by CLECs.
- ~~• Assign responsibility for preparation and review of mechanized reports on a regular time interval~~
- Develop mechanized output forms for notification to the CLEC and submission of the requested credits to billing and collections.

Deliverable(s)

PMO Process flows
Summary Report.

Follow-up

Business Controls recommends a follow up after tool is in place. As impact of claims by certain tariffs and promotions is ascertained, Business Controls would broker a meeting with Offer Development, Strategic Pricing and other groups to discuss any actions that could prevent or reduce CLEC claims.

BC Staff

- Diana Marshman

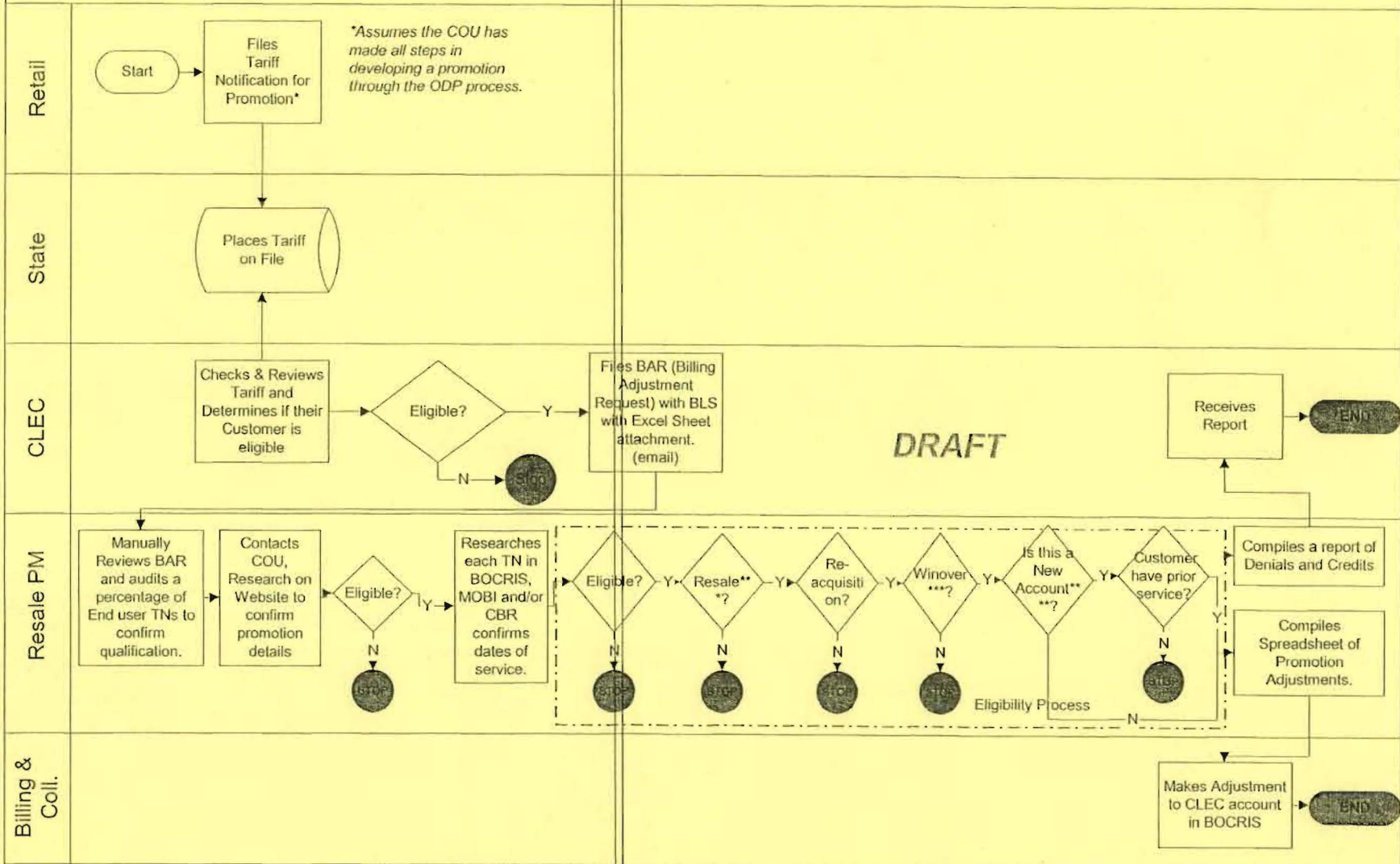
DATA Staff

- Andrea Spinelli
- David Ensmiger

DECLASSIFIED

Private / Proprietary
Contains Private and/or Proprietary Information
May Not Be Used or Disclosed Outside the BellSouth Companies
Except Pursuant to a Written Agreement.

Resale Promotions Credit Processing - Promotional Credits (PMO)



DRAFT

**Resale - eligible UNE-P - Not eligible

**Reacquisition- Customer was the CLEC customer, came to BLS or another CLEC and has now returned to CLEC.

***Winover- An existing customer of BLS or another CLEC and is new to this CLEC.

*****New Account - New Number

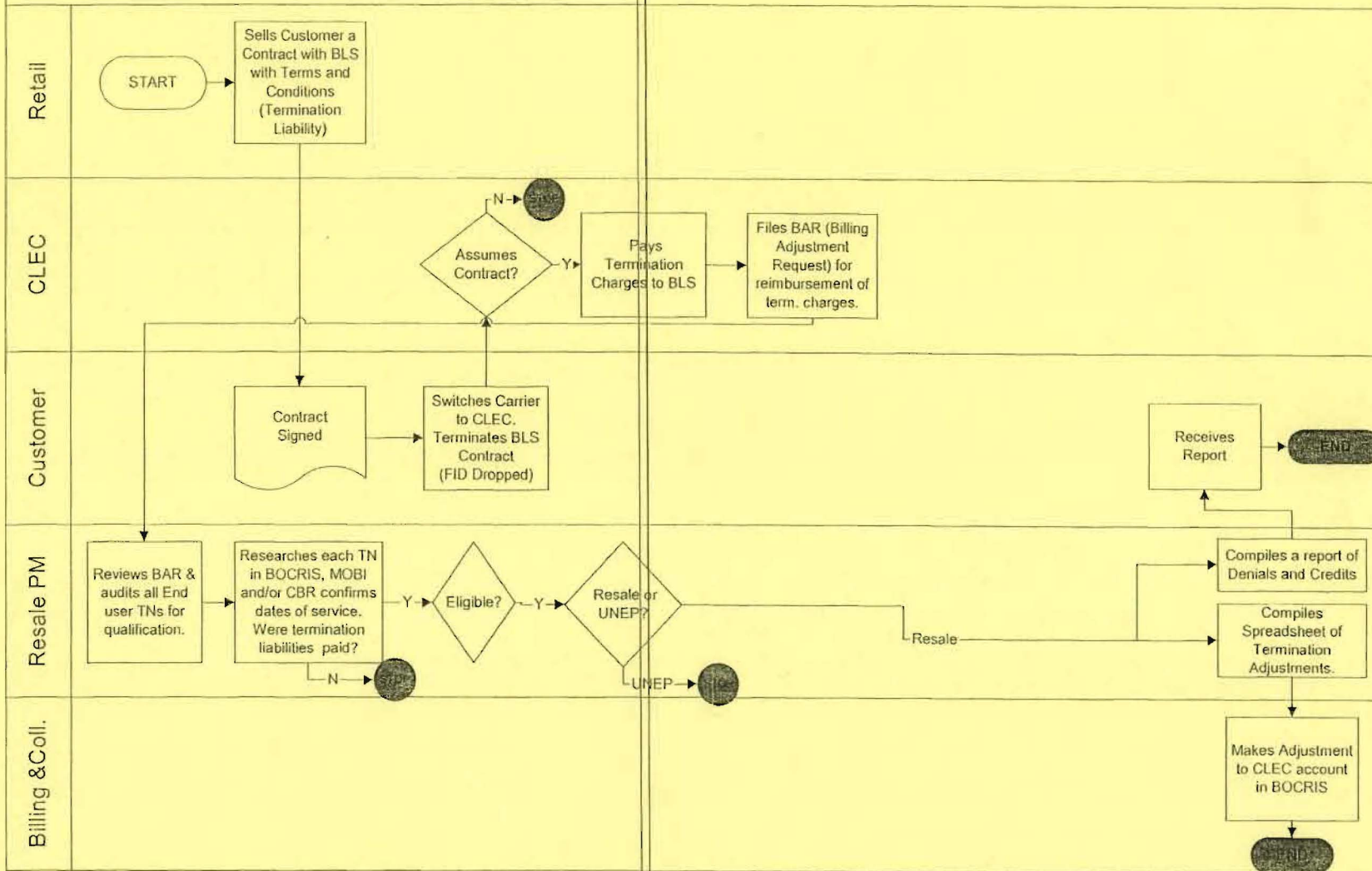
Prepared by : Diana Marshman

Private/Proprietary
Contains Private and/or Proprietary Information
May not be Used or Disclosed Outside the BellSouth Companies
Except Pursuant to a Written Agreement

Proprietary

DECLASSIFIED
000571

Resale Promotions Credit Processing - Termination Liabilities (PMO)



FID is dropped upon switch to CLEC. If account switches back to BLS or another CLEC, no signal is available to alert in order to bill termination charges to the assuming party.

Prepared by : Diana Marshman

Private/Proprietary
 Contains Private and/or Proprietary Information
 May not be Used or Disclosed Outside the BellSouth Companies
 Except Pursuant to a Written Agreement

Proprietary

DECLASSIFIED

000572

Bixler, Micheale

From: Spinelli, Andrea
Sent: Tuesday, July 12, 2005 3:28 PM
To: Seagle, Kristy
Cc: Cerami, Robert; Ensminger, David
Subject: RE: BC 0224 Resale Promotion Credit Processing

Hi Kristy,

Development of the mechanized tool is well underway.

Specifically,

We have developed the backend database and loaded it with test data. We've started the website (which will be used internally for management reporting) but it will require additional development. David Ensminger is performing this technical work. He is currently out of the office participating in training. He will be returning on Thursday, 7/21. He will be contacting you when he returns to sit with you and review what he has so far as well as perform some additional testing. He would also like to load some actual data into the database to make sure the design is appropriate. After those items occur, it should take a few additional weeks to get the remaining parts of the tool up and running.

Andrea

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

From: Seagle, Kristy
Sent: Monday, July 11, 2005 10:26 AM
To: Cerami, Robert; Spinelli, Andrea
Subject: FW: BC 0224 Resale Promotion Credit Processing

Hello Everyone - Where do we stand on this? What are the next steps? What do you need from me? Thanks!

Kristy

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

From: Marshman, Diana
Sent: Monday, June 06, 2005 1:37 PM
To: Allen, Advornall; Seagle, Kristy
Cc: Hogeman, Bert; Cerami, Robert; Spinelli, Andrea; Ensminger, David; Anderson, Drake; Ginn, Charles; Gray, Gloria
Subject: BC 0224 Resale Promotion Credit Processing

Attached is the FINAL report of the Business Controls review of Resale Promotion Credit Processing. If you have any questions regarding the scope of the review or the content of the report please contact Diana Marshman at (404) 927-8496.

The mechanized tool development will be undertaken by the DATA group under the direction of Robert Cerami. A separate engagement letter will be issued. If you have any questions about the tool please contact Andrea Spinelli at 404-249-2910.

Attachments:

Final Report

Present Method of Operation Process Flows (PMO)

DECLASSIFIED

<< File: BC0224 Resale Promotions Credit Processing 52505.doc >> << File: Resale Promotions Flow.ppt >>

DECLASSIFIED

Bixler, Micheale

From: Boyd, Margaret
Sent: Monday, October 31, 2005 4:41 PM
To: Allen, Advernall; Deason, Keith; Maziarz, Jim; Seagle, Kristy
Subject: ICS ReSale Tool
Attachments: D05013_Engagement Letter.pdf

Attached is the original engagement letter for the ICS ReSale engagement. The DATA group plans to have the tool completed and ready for presentation by Tuesday, November, 15. An outlook message has been sent requesting attendance at a meeting at 2pm November 15 in the 5A South Conference room at the Colonnade.

Thanks,

Margaret Boyd

Margaret Boyd

BELLSOUTH

Data Analysis & Technical Assurance (DATA)
email: margaret.boyd@bellsouth.com
ipage: mboyd@imcingular.com
office: 205.403.1869

DECLASSIFIED

BELLSOUTH

C. J. Lathram
Assistant Vice President
Security and Business Control

1155 Peachtree Street, N.E.
Room 3F01
Atlanta, Georgia 30309-3610
404-249-3150

June 3, 2005

TO: Robert W. Bickerstaff
Vice President, Marketing
Interconnection Marketing
BellSouth Telecommunications

FROM: C. J. Lathram
AVP-Security and Business Control
BellSouth Corporation

COPY TO: Advernull Allen
Jim Maziarz
Kristy Seagle

SUBJECT: Data Analysis and Technical Assurance (DATA)
Engagement # D05013: Process Automation Tool: Resale Promotions Credit Processing

DATA Tool Development Overview

As discussed in the recent Business Controls Engagement #BC-0226: Resale Promotions Credit Processing, the DATA team has been requested by Interconnection Services (ICS) Marketing to: (1) develop a tool to automate the process of reviewing the eligibility of reseller claims for reimbursement, and (2) construct a database that will track all submitted, accepted, and rejected claims. The tool will be developed in two phases.

Phase One will include the following functionalities:

1. Opening of e-mails sent to a generic e-mail box
2. Automatic e-mail acknowledgement to the reseller that their claim has been received
3. Parsing (Reading) email text and attachments and automatically populating database (see item 4.)
4. Creation of a database to manage, track, and report all reseller claims for promotions credits
 - Archive of all accepted and denied claims for comparison and to prevent payment of duplicate claims
5. Mechanized output forms for CLEC notification (accept/deny) and submission to billing and collections for processing
6. Canned reports (criteria defined by management) with metrics and measurements to track timeliness, volume, and other criteria as defined by management

These represent high-level features. Specific, detailed requirements will be discussed with the users.

Upon completion of Phase One, Phase Two development will begin. The major functionality to be included in Phase Two is automated eligibility checking which will decrease manual processing time. *Similar to Phase One, specific, detailed requirements will be discussed with the users.*

We encourage your organization to partner with the DATA team in this effort. The input from the subject matter experts in your organization is valuable to the overall results of the engagement. It will ensure that we succeed in achieving our common goal of improving BellSouth through identification of potential revenue opportunities or cost savings.

DECLASSIFIED

PRIVATE/PROPRIETARY/SECURE

Contains Private and/or Proprietary Information. May Not Be Used Or Disclosed Outside The BellSouth Companies
Except Pursuant To A Written Agreement. Must Be Securely Stored When Not In Use.

Proprietary

000576

Please forward this engagement information to any individuals who you believe should be included.

DATA Team Background

The DATA Team is a component of the Security and Business Control organization. The DATA Team specializes in the areas of Revenue Assurance, Forensic Data Engagements, Corporate Security Logical Investigations, Application Prototype Development, and Process Automation Tools for all BellSouth companies.

DATA Engagement Deliverables

When the engagement is completed, the review teams will reconvene with Management to report review results, assess findings, and determine an action plan in those areas where needed.

A final report will be issued to Management at the end of tool development. We will request that your organization prepare a written response (email) from the department head level or above stating the helpfulness of the tool. Such response should be sent to the attention of Charlie Latham.

Other Items

We request that Management ensure that the necessary assistance is provided on a timely basis to help ensure that the work occurs in an efficient and effective manner.

If you feel any other topics should be included or if you have any concerns or suggestions, please contact Andrea Spinelli at (404) 249-2910.



for AVP-Security and Business Control

DECLASSIFIED

PRIVATE/PROPRIETARY/SECURE

Contains Private and/or Proprietary Information. May Not Be Used Or Disclosed Outside The BellSouth Companies
Except Pursuant To A Written Agreement. Must Be Securely Stored When Not In Use.

000577

Proprietary

Bixler, Micheale

From: Bodana, Sravan
Sent: Friday, November 18, 2005 10:35 AM
To: Seagle, Kristy; Deason, Keith
Subject: PDT Email tool

Attachments: PDT_email_parser.zip

Keith and Kristy,

I have made instructions on how to configure your PCs to run the PDT email tool that we ran in the demo on Tuesday. Please give them a try and let me know if you have any questions or problems. Thanks.

Instructions:

I. Install Oracle 9.2 client

1. Go to PCSelfHelp website
2. Go to Downloads at top of page and select Software
3. Choose your Operating System and for Software Type, select "ALL" and press submit
4. Scroll down to "Software" section and in there click "Oracle9i v9.2.0.1.0"
5. Click "Download" and when it prompts, click open to open the install executable.
6. Follow on screen install instructions.

II. Configure Oracle TNS Name

1. Click Start->Programs->Oracle-OraHome92->Configuration and Migration Tools->Net Configuration Assistant
2. Choose "Local Net Service Name configuration" option and click next.
3. Choose "Add" option and click next
4. Choose "Oracle 8i or later database or service" option and click Next
5. For Listener name, type "TESTADJ" and click Next
6. Select "TCP" for protocol and click Next
7. In host name type "90.13.174.117" and choose "Use the standard port number of 1521" option and click Next
8. Choose "Yes, perform a test" and click Next
9. Press "Change Login" and type "pdt_test" for the username and "pdttest" for the password and press OK.
10. It should say "Connecting...Test Successful". Click Next
11. For Net Service Name, type "TESTADJ_TNS" and click Next
12. Choose "No" option when it asks "Would you like to configure another net service name?"
13. Click Next, Click Next again and Click Finish.

III. Configure ODBC Data Source Name

1. Goto Control Panel->Administrative Tools->Data Sources(ODBC)
2. Click on "System DSN" tab
3. Click "Add..."
4. Choose "Oracle in Oracle_Home92" driver and click Finish.
5. A box titled "Oracle ODBC Driver Configuration" should appear.
6. For Data Source Name type "TESTADJ_DSN", for TNS Service Name and choose "TESTADJ_TNS" and click

Test Connection

7. Type "pdt_test" for the username and "pdttest" for the password and press OK. It should say connection successful.
8. Click OK to close the ODBC Data Source Administrator.

IV. Load the Email Parser Program

1. Your system is now configured to run the PDT Email Parser program.
2. Create a new folder "C:\PDT_Email"
3. Unload the attached zip file contents into that folder
4. Create a shortcut on the desktop and point the executable "Get_PDT_Emails.exe" that is in this folder.

Bixler, Micheale

From: Boyd, Margaret
Sent: Monday, December 12, 2005 3:20 PM
To: Bickerstaff, Bob
Cc: Allen, Advornall; Deason, Keith; Maziarz, Jim; Seagle, Kristy
Subject: DATA Engagement # D05026: CBR CLEC Disputes

Attachments: D05026_CBR_CLEC_Dispute_Engagement Letter.pdf



D05026_CBR_CLE
C_Dispute_Engage...

Attached is the engagement letter announcing the DATA team's review of CBR CLEC Disputes.

If you have any questions regarding the scope of the engagement, please contact Andrea Spinelli at (404) 249-2910. If you have any problems printing or reading the documents, please contact Margaret Boyd at (205) 403-1869.

Thank you,

Margaret Boyd

BELLSOUTH

Data Analysis & Technical Assurance (DATA)

email: margaret.boyd@bellsouth.com

ipage: mboyd@imcingular.com

office: 205.403.1869

DECLASSIFIED

BELLSOUTH

C. J. Lathram
Assistant Vice President
Security and Business Control

1155 Peachtree Street, N.E.
Room 3F01
Atlanta, Georgia 30309-3610
404-249-3150

December 12, 2005

TO: Bob Bickerstaff
VP-Marketing
Interconnection Services
BellSouth Telecommunications

FROM: C. J. Lathram
AVP-Security and Business Control
BellSouth Corporation

COPY TO: Ad Allen
Keith Deason
Jim Maziarz
Kristy Seagle

SUBJECT: Data Analysis and Technical Assurance (DATA)
Engagement # D05026: CBR CLEC Disputes

DATA Engagement Overview

A Data Analysis and Technical Assurance (DATA) engagement for CLEC disputes in CBR is scheduled to begin in January 2006. This engagement will review CLEC disputes that claim they are qualified for various discounts per the CLEC end customer's contract of service. The purpose of the DATA engagement is to identify data discrepancies and to determine the business and financial impacts of the discrepancies identified. Based on the disputes sent to ICS by the CLECs, the scope areas include, but are not limited to:

- Verify that the customer met the terms of the contract (with qualifying products/services)
- Verify that the customer remained with the CLEC the entire term
- Quantify the amount of non-qualifying discounts given to the CLEC
- Perform feasibility of mechanizing any manual processes where analysis identifies an opportunity for process improvement via automation
- Additional Items as Needed

The engagement will focus on analyzing a year of data from CLEC disputes, CRIS, and CBR. The engagement team will include David Ensminger, Hamid Mashayekh, and Patricia Ezell.

We encourage your organization to partner with the DATA team in this effort. The input from the subject matter experts in your organization is valuable to the overall results of the engagement. It will ensure that we succeed in achieving our common goal of improving BellSouth through identification of potential revenue opportunities or cost savings.

DECLASSIFIED

An opening meeting to discuss our scope and to introduce the DATA team at a date and time to be determined. Please forward this engagement information to any individuals who you believe should be

PRIVATE/PROPRIETARY/SECURE

Contains Private and/or Proprietary Information. May Not Be Used Or Disclosed Outside The BellSouth Companies
Except Pursuant To A Written Agreement. Must Be Securely Stored When Not In Use.

000580

Proprietary

included.

DATA Team Background

The DATA Team is a component of the Security and Business Control organization. The DATA Team specializes in the areas of Revenue Assurance, Forensic Data Engagements, Corporate Security Cyber Investigations, Application Prototype Development, and Process Automation Tools for all BellSouth companies.

DATA Engagement Deliverables

When the engagement is completed, the review teams will reconvene with Management to report review results, assess findings, and determine an action plan in those areas where needed.

A final report will be issued to Management at the end of the engagement. We will request that your organization prepare a written response (email) from the department head level or above stating if your organization plans to take action based upon the results described in this report. Such response should be sent to the attention of Charlie Latham.

Other Items

We request that Management ensure that the necessary assistance is provided on a timely basis to help ensure that the work occurs in an efficient and effective manner.

If you feel any other topics should be included or if you have any concerns or suggestions, please contact Andrea Spinelli at (404) 249-2910.



for AVP-Security and Business Control

DECLASSIFIED

PRIVATE/PROPRIETARY/SECURE

Contains Private and/or Proprietary Information. May Not Be Used Or Disclosed Outside The BellSouth Companies
Except Pursuant To A Written Agreement. Must Be Securely Stored When Not In Use.

Proprietary

000581

Bixler, Micheale

From: Boyd, Margaret
Sent: Friday, January 06, 2006 4:49 PM
To: Bickerstaff, Bob
Cc: Allen, Advornall; Maziarz, Jim; Seagle, Kristy
Subject: DATA Engagement # D06005: PD Track Tool Phase II

Attachments: PD TRack_ICS_ReSale Promotions Phase 2 Engagement Letter.pdf



PD

ack_ICS_ReSale Promotior

Attached is the engagement letter announcing the DATA team's review of the PD Track Tool Phase II.

If you have any questions regarding the scope of the engagement, please contact Andrea Spinelli at (404) 249-2910. If you have any problems printing or reading the documents, please contact Margaret Boyd at (205) 403-1869. Thank you,

Margaret Boyd

BELLSOUTH

Data Analysis & Technical Assurance (DATA)

email: margaret.boyd@bellsouth.com

ipage: mboyd@imcinqular.com

office: 205.403.1869

DECLASSIFIED

BELLSOUTH

C. J. Lathram
Assistant Vice President
Security and Business Control

1155 Peachtree Street, N.E.
Room 3F01
Atlanta, Georgia 30309-3610
404-249-3150

January 6, 2006

TO: Robert W. Bickerstaff
Vice President, Marketing
Interconnection Marketing
BellSouth Telecommunications

FROM: C. J. Lathram
AVP-Security and Business Control
BellSouth Corporation

COPY TO: Advernull Allen
Jim Maziarz
Kristy Seagle

SUBJECT: Data Analysis and Technical Assurance (DATA)
Engagement # D06005: Process Automation Tool: Resale Promotion Credit
Processing/PD Track Tool: Phase II

DATA Tool Development Overview

As discussed in the Business Controls Engagement #BC-0226: Resale Promotions Credit Processing, Interconnection Services (ICS) Marketing has requested that the DATA team: (1) develop a tool to automate the process of reviewing the eligibility of reseller claims for reimbursement, and (2) construct a database that will track all submitted, accepted, and rejected claims. Phase I of this engagement was completed during the fourth quarter of 2005, and the DATA team expects to begin Phase II in January 2006.

Phase Two will include the following functionalities:

1. Add automatic validation of eligibility for re-imbursement requests
2. Implement additional automated controls to strengthen data integrity
3. Other functionalities as needed

These represent high-level features. Specific, detailed requirements will be discussed with the users.

We encourage your organization to partner with the DATA team in this effort. The input from the subject matter experts in your organization is valuable to the overall results of the engagement. It will ensure that we succeed in achieving our common goal of improving BellSouth through identification of potential revenue opportunities or cost savings.

Please forward this engagement information to any individuals who you believe should be included.

DATA Team Background

The DATA Team is a component of the Security and Business Control organization. The DATA Team specializes in the areas of Revenue Assurance, Forensic Data Engagements, Corporate Security Logical Investigations, Application Prototype Development, and Process Automation Tools for all BellSouth companies.

DECLASSIFIED

PRIVATE/PROPRIETARY/SECURE
Contains Private and/or Proprietary Information. May Not Be Used Or Disclosed Outside The BellSouth Companies
Except Pursuant To A Written Agreement. Must Be Securely Stored When Not In Use.

000583

Proprietary

DATA Tool Deliverables

When the tool is completed, the team will reconvene with Management to deliver the tool, train users on tool capabilities, and seek feedback in those areas where needed.

A final report will be issued to Management at the end of tool development. We will request that your organization prepare a written response (email) from the department head level or above stating the helpfulness of the tool. Such response should be sent to the attention of Charlie Lathram.

Other Items

We request that Management ensure that the necessary assistance is provided on a timely basis to help ensure that the work occurs in an efficient and effective manner.

If you feel any other topics should be included or if you have any concerns or suggestions, please contact Andrea Spinelli at (404) 249-2910.



for AVP-Security and Business Control

DECLASSIFIED

PRIVATE/PROPRIETARY/SECURE
Contains Private and/or Proprietary Information. May Not Be Used Or Disclosed Outside The BellSouth Companies
Except Pursuant To A Written Agreement. Must Be Securely Stored When Not In Use.

Proprietary

000584

Bixler, Micheale

From: Bodana, Sravan
Sent: Thursday, April 06, 2006 9:57 AM
To: Seagle, Kristy; Deason, Keith
Subject: RE: Reason codes

There is a slight difference.

AV-LCCW-Not a new customer to CLEC pretty much applies to a C order with no IRESH, so is not a valid dispute customer.

AV-LCCW-Disqualified due to customer coming from same company applies if the customer is a valid incoming CLEC customer, but they disconnected previously from the same company.

Basically one has an IRESH, the other doesn't.

From: Seagle, Kristy
Sent: Thursday, April 06, 2006 8:52 AM
To: Bodana, Sravan; Deason, Keith
Subject: RE: Reason codes

Looks good. I have one question is AV-LCCW-Not a new customer to CLEC the same as AV-LCCW-Disqualified due to customer coming from same company? Thanks so much for all of your hard work.

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

From: Bodana, Sravan
Sent: Thursday, April 06, 2006 8:31 AM
To: Deason, Keith; Seagle, Kristy
Subject: Reason codes

I have changed the reason codes to these. Let me know if these are ok or if you think they should be different.

AV-No C or N Service Order found for CLEC
AV-Service Order date out of 90 day range
AV-Service Order # did not match
AV-Service Order dates did not match
AV-LCCW-Did not meet minimum feature requirement
AV-LCCW-Not a new customer to CLEC
AV-LCCW-Disqualified due to customer coming from same company
AV-SSCW-Incorrect or invalid feature activity
AV-SSCW-New Customer
AV-SSCW-Disconnecting Customer

Sravan Bodana
BELLSOUTH Data Analysis and Technical Assurance
Phone: (205)-988-7148
Email: Sravan.Bodana@bellsouth.com
lpage:sbodana@imcingular.com

DECLASSIFIED

Bixler, Micheale

From: Boyd, Margaret
Sent: Monday, April 17, 2006 9:40 AM
To: Seagle, Kristy; Allen, Advernull; Deason, Keith
Subject: **DRAFT_PD Track Phase II Report

Attachments: Pd Track Phase II_Tool_Transmittal_Letter.doc; FINAL_PD
Traack_ToolSummaryDeliverables.doc



Pd Track Phase
II_Tool_Transmi...



FINAL_PD
Traack_ToolSummaryDel...

Please review the attached letter and report ASAP. I want to be sure you guys are "OK" with the content and the distribution before I issue the final report.

Let me know if you this is OK and I will send it on.

Thanks so much,

Margaret

Margaret Boyd

BELLSOUTH

Data Analysis & Technical Assurance (DATA)

email: margaret.boyd@bellsouth.com

ipage: mboyd@imcingular.com

office: 205.403.1869

DECLASSIFIED

C. J. Lathram
Assistant Vice President -
Security & Business Control

1155 Peachtree Street, N.E.
Room 3F01
Atlanta, Georgia 30309-3610
404-249-3150

April 11, 2006

TO: Martin Chandler
Vice President - Product Management
Technology Development Group - Core Marketing
BellSouth Business Systems

FROM: C. J. Lathram
AVP-Security & Business Control
BellSouth Corporation

COPY TO: Advernull Allen
Jack Hullings
Jim Maziarz
Keith Milner
Kristy Seagle

SUBJECT: DATA-developed Automation Tools: Resale Promotion Credit Processing/Promotion Dispute
Tracking (PD Track) Tool

We have recently delivered a tool for use in your organization. Attached is a Summary of Deliverables which describes its functionality.

We request that your organization prepare a written response (email) from the department head level stating the overall effectiveness of the delivered tools. Such response should be sent to the attention of Charlie Lathram.

Please address any questions or concerns with Dave Ensminger at (205) 988 - 1292.



For AVP - Security and Business Control

DECLASSIFIED

SUMMARY OF DELIVERABLES

OVERVIEW

A Data Analysis and Technical Assurance (DATA) tool for Interconnection Services (ICS) Marketing was recently completed. DATA was requested to: (1) construct a database to track all submitted, accepted, and rejected Competing Local Exchange Company (CLEC) re-imbursement claims, and (2) develop a tool to automate the process of reviewing the eligibility of these reseller's claims for reimbursement.

Justification:

CLEC customers are eligible for some of the promotions that BellSouth offers to customers. If a CLEC claims to be eligible for a promotion, and BellSouth determines (validates based on predetermined, specific rules/standards) that the CLEC is in fact eligible for the promotion, the CLEC is reimbursed. Currently, CLECs submit Billing Adjustment Request (BAR) Forms explaining reimbursement claims to BellSouth via email (to a BellSouth shared email folder). Before this tool was implemented, the process of receiving, tracking, and verifying CLEC claims for promotions was manual and left room for human error. The creation of this tool eliminates the manual nature of the process, and increases the credibility/accuracy of the process.

Benefits/Functionality:

The PD Track Tool is a user-friendly, comprehensive, centralized source for managing CLEC reimbursement request data and includes the following functionalities:

- Automatically opens e-mails (and the attached BAR forms) sent by CLECs, extracts the information contained in the BAR forms, and loads the information into a database which serves as an archive of all accepted and denied disputes for historical tracking purposes and to prevent payment of duplicate claims.
- Sends an acknowledgement email and a tracking number to the CLEC after each submission ~~stating that information from the email was either successfully loaded~~ into the database or contained errors.
- If there is an error in receiving the claim, an email will automatically be sent to the CLEC informing them of the error and requesting that the information be re-submitted.
- Front-end website allows users to query the database in order to more efficiently process, manage, view, and administer disputes that have been filed by CLECs.
- Reporting capabilities allow users to track disputes that have already been filed, are currently in progress, etc.
- The rules/standards that determine whether or CLECs are eligible for BellSouth promotions have been inputted into the tool enabling it to automatically test the validity of CLEC requests. (automatic validation feature is currently available for two promotions)
- The automatic validation function minimizes the risk associated with validating (approving/denying) CLEC requests based on random samples of submitted disputes by validating *ALL* CLEC claims for BellSouth's two, current promotions.
- Provides CLEC with the exact reason for denial of a particular claim
- Export feature organizes completed disputes in an excel spreadsheet.
- Additional filters that separate CLEC claims by state and RAO are available for ease of reporting/querying.

DECLASSIFIED

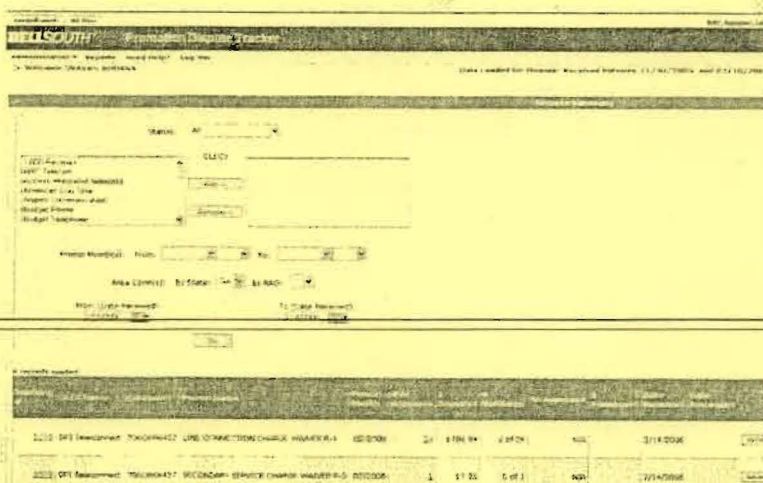
Development:

- General process enhancements were identified for development in a two-phase approach: Phase 1-Core Tool Functionality, and Phase 2-Automatic Validation. Both phases are complete.
- The data extraction files and reports will be retained on-line for a rolling three-year period.

Development began April 21, 2005. Phase I of the tool was delivered to Interconnection Services (ICS) Marketing in December 2005, and Phase II was delivered in April 2006. The tool is currently in use. A training manual is also available for assistance on the website. The website address is <http://adtrack.bls.com/PDTrack/>.

SCREEN SHOTS

The PD Track Tool homepage



The PD Track Tool Validation Screen

Case ID	Case Name	Case Description	Case Status	Case Date	Case Amount	Case Type	Case Category	Case Action	Case Date	Case Amount	Case Type	Case Category	Case Action	Case Date	Case Amount	Case Type	Case Category	Case Action	
0/2005	2	\$77.04	0 of 3	N/A	3/7/2005														
1/2006	3	\$123.92	4 of 4	100 %	\$123.92	3/7/2006	4/12/2006	Valid	Y	Approved									
1/2006	2	\$104.85	3 of 3	100 %	\$104.85	3/7/2006	4/6/2006	Valid											

Submit Changes

DECLASSIFIED

Bixler, Micheale

From: Boyd, Margaret
Sent: Tuesday, April 18, 2006 10:05 AM
To: Chandler, Martin
Cc: Allen, Advernull; Hullings, Jack; Maziarz, Jim; Milner, Keith; Seagle, Kristy
Subject: DATA Engagement # D06005: Promotion Dispute Tracking (PD Track) Tool

Attachments: Pd Track Phase II_Tool_Transmittal_Letter.pdf; FINAL_PD
Traack_ToolSummaryDeliverables.pdf



Pd Track Phase
II_Tool_Transmi...



FINAL_PD
Traack_ToolSummaryDel...

The DATA Team has completed development of the Promotions Dispute Tracking (PD Track) Tool. Attached are the transmittal letter and the summary of deliverables. If you have any questions regarding the tool development or the content of the report please contact Karen Kaetz at (205) 988-1296. If you have any problems printing or reading the documents please contact Margaret Boyd at (205) 403-1869.

Margaret Boyd
BELLSOUTH
Data Analysis & Technical Assurance (DATA)
email: margaret.bovd@bellsouth.com
ipage: mbovd@imcingular.com
office: 205.403.1869;

DECLASSIFIED

BELLSOUTH

C. J. Lathram
Assistant Vice President -
Security & Business Control

1155 Peachtree Street, N.E.
Room 3F01
Atlanta, Georgia 30309-3610
404-249-3150

April 18, 2006

TO: Martin Chandler
Vice President - Product Management
Technology Development Group - Core Marketing
BellSouth Business Systems

FROM: C. J. Lathram
AVP - Security & Business Control
BellSouth Corporation

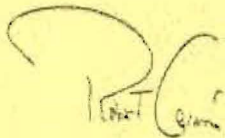
COPY TO: Advermall Allen
Jack Hullings
Jim Maziarz
Keith Milner
Kristy Seagle

SUBJECT: DATA-Developed Automation Tools; Resale Promotion Credit Processing/Promotion Dispute
Tracking (PD Track) Tool

We have recently delivered a tool for use in your organization. Attached is a Summary of Deliverables which describes its functionality.

We request that your organization prepare a written response (email) from the department head level stating the overall effectiveness of the delivered tools. Such response should be sent to the attention of Charlie Lathram.

Please address any questions or concerns with Dave Ensminger at (205) 988 - 1292.



For AVP - Security and Business Control

DECLASSIFIED

PRIVATE/PROPRIETARY/SECURE
Contains Private and/or Proprietary Information. May Not Be Used Or Disclosed Outside The BellSouth Companies
Except Pursuant To A Written Agreement. Must Be Securely Stored When Not In Use.

000591

Proprietary

SUMMARY OF DELIVERABLES

OVERVIEW

A Data Analysis and Technical Assurance (DATA) tool for Interconnection Services (ICS) Marketing was recently developed. DATA was requested to: (1) construct a database to track all submitted, accepted, and rejected Competing Local Exchange Company (CLEC) re-imbursement claims, and (2) develop a tool to automate the process of reviewing the eligibility of these reseller's claims for reimbursement.

Justification:

CLEC customers are eligible for some of the promotions that BellSouth offers to customers. If a CLEC claims to be eligible for a promotion, and BellSouth determines (validates based on predetermined, specific rules/standards) that the CLEC is in fact eligible for the promotion, the CLEC is reimbursed. Currently, CLECs submit Billing Adjustment Request (BAR) Forms explaining reimbursement claims to BellSouth via email (to a BellSouth shared email folder). Before this tool was implemented, the process of receiving, tracking, and verifying CLEC claims for promotions was manual and left room for human error. The creation of this tool eliminates the manual nature of the process, and increases the credibility/accuracy of the process.

Benefits/Functionality:

The PD Track Tool is a user-friendly, comprehensive, centralized source for managing CLEC reimbursement request data and includes the following functionalities:

- Automatically opens e-mails (and the attached BAR forms) sent by CLECs, extracts the information contained in the BAR forms, and loads the information into a database which serves as an archive of all accepted and denied disputes for historical tracking purposes and to prevent payment of duplicate claims.
- Sends an acknowledgement email and a tracking number to the CLEC after each submission stating that information from the email was either successfully loaded into the database or contained errors.
- If there is an error in receiving the claim, an email will automatically be sent to the CLEC informing them of the error and requesting that the information be re-submitted.
- Front-end website allows users to query the database in order to more efficiently process, manage, view, and administer disputes that have been filed by CLECs.
- Reporting capabilities allow users to track disputes that have already been filed, are currently in progress, etc.
- The rules/standards that determine whether CLECs are eligible for BellSouth promotions have been inputted into the tool enabling it to automatically test the validity of CLEC requests. The automatic validation feature is currently available for two BellSouth promotions.
- The automatic validation function minimizes the risk associated with validating (approving/denying) CLEC requests based on random samples of submitted disputes by validating ALL CLEC claims for BellSouth's two, current promotions.
- Provides CLEC with the exact reason for denial of a particular claim.
- Export feature organizes completed disputes in an Excel spreadsheet.
- Additional filters that separate CLEC claims by state and RAO are available for ease of reporting/querying.

DECLASSIFIED

PRIVATE/PROPRIETARY/SECURE

Contains Private and/or Proprietary Information. May Not Be Used Or Disclosed Outside The BellSouth Companies
Except Pursuant To A Written Agreement. Must Be Securely Stored When Not In Use.

Page 1

C00592

Proprietary

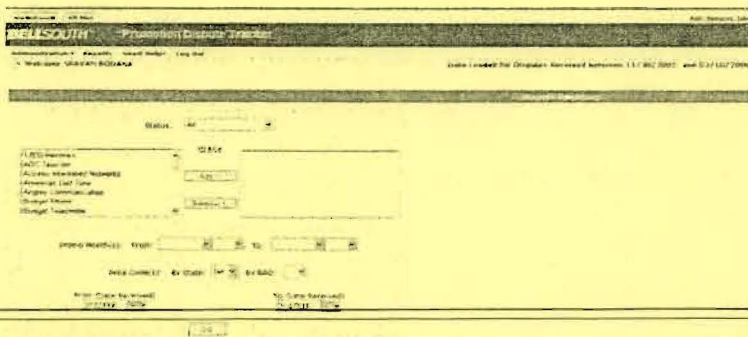
Development:

- General process enhancements were identified for development in a two-phase approach: Phase 1-Core Tool Functionality, and Phase 2-Automatic Validation. Both phases are complete.
- The data extraction files and reports will be retained on-line for a rolling three-year period.

Development began April 21, 2005. Phase I of the tool was delivered to Interconnection Services (ICS) Marketing in December 2005, and Phase II was delivered in April 2006. The tool is currently in use. A training manual is also available for assistance on the website. The website address is <http://adtrack.bls.com/PDTrack/>.

SCREEN SHOTS

The PD Track Tool Homepage



The PD Track Tool Validation Screen

ID	Product	W/O	Accounts	Disputed	Validated	% Approved	Not Approved	Received	Date	Processed	Credit Completed	Approved
DISPATCHED TRANSMISSION CONNECTION CHARGE WAIVER P-3	02/2006	206	\$9521.82	386 of 306	16.3 %	\$1,535.85	2/6/2006	4/17/2006	Validate			
DISPATCHED TRANSMISSION CONNECTION CHARGE WAIVER P-3	02/2006	2	\$77.52	0 of 2	N/A		2/6/2006		Validate			
DISPATCHED TRANSMISSION SECONDARY SERVICE CHARGE WAIVER P-3	02/2006	25	\$234.50	0 of 25	N/A		2/6/2006		Validate			
DISPATCHED TRANSMISSION SECONDARY SERVICE CHARGE WAIVER P-3	02/2006	33	\$725.32	0 of 30	N/A		2/6/2006		Validate			
DISPATCHED TRANSMISSION SECONDARY SERVICE CHARGE WAIVER P-3	02/2006	102	\$667.48	0 of 102	N/A		2/6/2006		Validate			

DECLASSIFIED

Bixler, Micheale

From: Allen, Advornall
Sent: Tuesday, April 18, 2006 10:51 AM
To: Chandler, Martin
Cc: Hullings, Jack; Maziarz, Jim; Milner, Keith; Seagle, Kristy
Subject: RE: DATA Engagement # D06005: Promotion Dispute Tracking (PD Track) Tool

Martin,

We (Marketing) engaged the DATA Team to assess and develop a tool which would eliminate a tremendous amount of manual activity in processing the Resale promotional credit requests for the CLECs. I will prepare a response from you to Charlie Lathram addressing the extent to which the Promotions Dispute Tracking Tool delivered aligns with our needs and expectations.

I am available at your convenience, if you have questions or would like to discuss.

Ad Allen

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

From: Boyd, Margaret
Sent: Tuesday, April 18, 2006 10:05 AM
To: Chandler, Martin
Cc: Allen, Advornall; Hullings, Jack; Maziarz, Jim; Milner, Keith; Seagle, Kristy
Subject: DATA Engagement # D06005: Promotion Dispute Tracking (PD Track) Tool

<< File: Pd Track Phase II_Tool_Transmittal_Letter.pdf >> << File: FINAL_PD
Traack_ToolSummaryDeliverables.pdf >>

The DATA Team has completed development of the Promotions Dispute Tracking (PD Track) Tool. Attached are the transmittal letter and the summary of deliverables. If you have any questions regarding the tool development or the content of the report please contact Karen Kaetz at (205) 988-1296. If you have any problems printing or reading the documents please contact Margaret Boyd at (205) 403-1869.

Margaret Boyd

BELLSOUTH

Data Analysis & Technical Assurance (DATA)

email: margaret.boyd@bellsouth.com <<mailto:margaret.boyd@bellsouth.com>>

ipage: mboyd@imcingular.com <<mailto:mboyd@imcingular.com>>

office: 205.403.1869;

DECLASSIFIED

FPSC
Docket No. 050863-TP

**AT&T Florida Response to
Staff's Production of
Documents**

Item No. 6

DECLASSIFIED

Proprietary

000596

LCCW

	# of Lines Submitted	% Denied	Approximate # of Lines Denied	5(a) Approximate # of Lines Denied because not enough features	5(b) Approximate # of Lines Denied because existing customer
Jan-04	214	45%	96	48	48
Feb-04	538	37%	199	149	50
Mar-04	626	34%	213	136	77
Apr-04	422	54%	228	212	16
May-04	272	51%	139	122	17
Jun-04	188	49%	92	92	0
Jul-04	184	76%	140	140	0
Aug-04	181	84%	152	28	124
Sep-04	119	43%	51	20	31
Oct-04	130	76%	99	85	14
Nov-04	155	100%	155	131	24
Dec-04	20	100%	20	20	0
Jan-05	99	91%	90	72	18
Feb-05	144	75%	108	88	20
Mar-05	103	88%	91	72	19
Apr-05	173	93%	161	72	89
May-05	215	81%	174	124	50
Jun-05	102	48%	49	29	20
Jul-05	58	100%	58	43	15
Aug-05	86	97%	83	71	12
Sep-05	68	76%	52	52	0
Oct-05	66	81%	53	26	27
Nov-05	70	86%	60	51	9
Dec-05	41	70%	29	27	2
Jan-06	36	86%	31	29	2
Feb-06	85	60%	51	47	4
Mar-06	52	80%	42	37	5
Apr-06	66	82%	54	52	2
May-06	10	70%	7	3	4
Jun-06	14	21%	3	3	0
Jul-06	14	21%	3	3	0
Aug-06	30	7%	2	2	0
Sep-06	46	0%	0	0	0
Oct-06	35	0%	0	0	0
Nov-06	40	0%	0	0	0
Dec-06	29	0%	0	0	0
Jan-07	92	1%	1	0	1
Feb-07	37	0%	0	0	0
Mar-07	42	0%	0	0	0
Apr-07	32	0%	0	0	0
May-07	34	0%	0	0	0
	4968		2786	2086	700
				75%	25%

DECLASSIFIED

Proprietary

00597

SSCW

	5(c) Denied because new customer	
2005		138
2006		32
2007		2
		172

DECLASSIFIED

000598

Proprietary

TFFF

	# of Lines Submitted	% Denied	Approximate # of Lines Denied	5(d) Approximate # of Lines Denied because Exceeds 12 months	5(b) Approximate # of Lines Denied because existing customer
Jan-05	43	0%	0		
Feb-05	57	4%	2	2	
Mar-05	64	0%	0		
Apr-05	44	14%	6	4	2
May-05	39	2%	1	1	0
Jun-05	25	0%	0		
Jul-05	22	0%	0		
Aug-05	27	4%	1	1	
Sep-05	17	12%			2
Oct-05	29	24%	7	4	3
Nov-05	24	25%	6	6	
Dec-05	35	17%	6	5	1
Jan-06	29	3%	1		1
Feb-06	22	9%	2		2
Mar-06	10	10%	1		1
Apr-06	6	17%	1		1
May-06	3	33%	1	1	
Jun-06	2	0%	0		
Jul-06	1	0%	0		
Aug-06	1	0%	0		
Sep-06	1	0%	0		
Oct-06	1	0%	0		
	502		35	24	13
				69%	

DECLASSIFIED

000599

Proprietary