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January 28, 1998

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, D.C. 20554

RE: Ex Parte
Application by SBC Communications, Inc. Pursuant to Section 271 of the Communications Act of 1934, as Amended, to Provide In-Region, interLATA Service in Oklahoma, CC Docket No. 97-121

Dear Ms. Roman Salas:

On Tuesday January 27, 1998, David Eppsteiner, John Hamman, Steve Garavito and I of AT&T and Mark Haddad of Sidley & Austin met with Michael Pryor, Jordan Goldstein, Michelle Carey, Audrey Wright, Jonathan Askin, Susan Launcer, David Kirschner, and Bill Bailey of the Policy and Planning Division of the Common Carrier Bureau. The purpose of this meeting was to discuss AT&T's experiences in the BellSouth region with the Issue Groups 1, 2 and 3 identified in the Public Notice dated January 27, 1998 announcing meetings on Section 271 of the Communications Act. Attached is a summary that AT&T provided and used during its presentation.

Two copies of this Notice are being submitted on the next business day to the Secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's rules.

Sincerely,

Robert W. Quinn, Jr.

Attachments

cc: M. Pryor, A. Wright, J. Askin, D. Kirschner, J. Goldstein, M. Carey, S. Launcer, B. Bailey

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AT&T's Experience With Checklist Items In The BellSouth Region to Date

January 27, 1998

Overview

- AT&T intends to enter markets, where economically feasible, using combinations of Network Elements.
  - AT&T will place a single "footprint" order for a city, state or region which identifies or engineers its desired infrastructure for elements like signaling, transport, end office switching, customized routing and databases.
  - AT&T will then place individual orders on a customer by customer basis for the loop and port (on one order) which should match in BellSouth's systems with the footprint order to provide all required information to put AT&T's UNE combination customer in service.

Overview

- AT&T's experience with checklist items to date (leaving aside resale):
  - BellSouth now provisioning UNE combination orders in Florida and Kentucky (approximately 50 to date).
  - Initial phase of AT&T's Digital Link service being offered in each state.
- All UNE orders deemed "complex" requiring manual intervention for processing and provisioning so far, including no electronic order status and confirmation.

Interconnection Issues - Item (i)

- Issues will arise, initially through AT&T's Digital Link service offering.
- Others have pointed out deficiencies in collocation.
- To date, AT&T has experienced some problems in the initial phase (Georgia):
  - Significant delays negotiating and deploying PLU factors.
  - Currently, incorrect PLU factors in place which are being manually adjusted on bill.

Poles, Ducts & Conduits - Item (iii)

- BellSouth's License Agreement lacks critical specificity.
  - No deadline to complete "make ready" survey.
  - No deadline to complete "make ready" work.
- BellSouth seeks competitively sensitive information before it will provide records.
  - Type and quantity of CLEC proposed facility.
  - In-service date.
- Access requirements are deficient.
  - No emergency access provisions.
  - 48 hour written notice for access to manholes.

Unbundled Local Loop - Item (iv)

- CLECs have described problems with provision of local loops.
  - Disruption of service
  - Lack of coordination with INP
  - Missed commitments
- Not clear that BellSouth will update downstream OSS databases (i.e., LFACs, TIRKs, Cosmos) to reflect new CLEC loop characteristics.
  - CLEC status; changes in loop caused by collocation
- No viable process to provide IDLC loops.
- BellSouth treatment of loops as "complex" or "designed" -- manual provisioning

Unbundled Local Transport - Item (v)

- Issues will arise as part of our UNE combination trial in Kentucky and Florida.
  - To date, BellSouth has stated it will provide common transport, however, it has not demonstrated that it can record and bill usage data.

Unbundled Local Switching - Item (vi)

- Per BellSouth, purchaser of ULS is not entitled to bill and collect intrastate access.
- BellSouth's position on interstate access is unclear. To our understanding, BellSouth permits only in Kentucky.
- BellSouth has not provided accurate bills for switch usage.
- Despite its claimed capability, BellSouth has not provided <u>any</u> terminating access records to AT&T.

Unbundled Local Switching (cont.)

- BellSouth has not yet provided selective routing across region.
  - Tested in Georgia using line class codes (LCCs).
  - BellSouth proposes only a customer-by-customer transition of existing customers.
    - Able to convert only 100 per business day, taking approximately six months.
    - SNET transferred customers in bulk on a switch-by-switch basis.
  - BellSouth insists that AT&T designate LCCs on each new customer order.
    - BellSouth has LCC information.
    - No field on LSR, Placing LCC information in Remarks section would result in manual processing for all orders.

Unbundled Local Switching (cont.)

- Delay implementing AIN-based selective routing has delayed any selective routing in some states.
  - LA PSC denied LCC-based selective routing.
    - BellSouth represented not technically feasible.
    - BellSouth said AIN would be available 1st Qtr '98.
  - BellSouth now states AIN solution will not be available until the end of 1998 in Louisiana.
  - No dates for AIN capability in other states.
- BellSouth continues to brand resold OS/DA service as "BellSouth."

Operator Services/Directory Assistance - Item (vii)

- Applies to resale and UNEs.
- Selective routing using AIN solution in testing stage, BellSouth not deploying line class code solution other than in Georgia.
- Cost-based rate for of line class code conversion, AIN solution and database DIPS have not been established in every state.
- Non-published information is being excluded from DADS when directory information is provided to CLECs.

White Pages - Item (viii)

- For several months, AT&T has complained that its resale customers are not always apperaing in BellSouth directories.
- BellSouth has not provided a list of its SOER edits for directory listings.
  - Directory listing can clear initial edits and still fall out at SOCS.

White Pages - Item (viii) (cont.)

- Until 12/97, BellSouth refused to provide BAPCO directory listing edits (business rules for ordering directory listings).
  - Orders can clear SOCS and fall out at BAPCO.
  - Orders were being provisioned, but white pages listings were not being provisioned.
  - Not clear yet whether AT&T has received all BAPCO edits.
- Same problems exist for yellow pages.

Telephone No. Administration - Item (ix)

- Telephone number exhaust issues are becoming a serious issue, especially in Florida.
  - Unclear how BellSouth will handle such issues.
- BellSouth has stated that it <u>will</u> remove restrictions it has imposed on telephone number reservation at end of January.
  - Lifting of restriction needs to be verified.

Access To Databases - Item (x)

- Issues for most database access will initially arise with AT&T's Digital Link offer.
- To date, BellSouth requires CLECs to purchase its Design Edge service in order to access its service creation environment ("SCE"). CLECs should be permitted to use its own software.

Local Number Portability - Item (xi)

- Issues will initially arise with AT&T's Digital Link offering.
- Route Index-Portability Hub has not yet been tested.
- Potential issues on converting customers from interim to permanent LNP, especially given problems associated with converting OS/DA platform customers (100 per business day).

Dialing Parity - Item (xii)

- Plans are not in place in each state identifying
  - Implementation schedules
  - Cost recovery
- FCC should require plan to be filed for implementation "Coincident" with interLata entry.

Reciprocal Compensation - Item (xiii)

- No ability to transmit terminating local usage information to CLECs for billing.
- BellSouth has not accepted call flows reflecting billing practices to use when BellSouth provides tandem transiting function.