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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

February 4, 1998

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

Re: Ex Parte Presentation in CC Docket No. 97-208, CC Docket No. 96-98, CC Docket No. 97-137, CC Docket No. 97-231, CC Docket No. 97-121

Dear Ms. Salas:

On Tuesday, February 3, 1998, marcel Henry, Vice President of MCI's Southern Financial Operations, Ron Martinez, MCI Senior Staff Member, Susan Jin Davis of MCI, Jerry Epstein from the law firm of Jenner & Block, representing MCI, and the undersigned, met with Michael Pryor, Jordan Goldstein, David Kirschner, Michelle Carey, Gregory Cooke, Michael Riordan, Jonathan Askin, Bill Bailey, and Carol Mattey.

The purpose of the meeting was to discuss issues related to the status of certain non-OSS checklist issues in the BellSouth region. The attached document briefly outlines the topics discussed.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(2) of the Commission's rules.

Sincerely,

Kimberly M. Kirby

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Attachment

(All cc's w/out attachment)

cc: Michael Pryor, CCB
Jordan Goldstein, CCB
David Kirschner, CCB
Gregory Cooke, CCB
Michael Riordan, OPP
Jonathan Askin, CCB
Michelle Carey, CCB
Bill Bailey, CCB
Carol Mattey, CCB
Melissa Newman, CCB

BELLSOUTH: STATUS OF SELECTED NON-OSS CHECKLIST ISSUES

Marcel Henry, Vice President of Southern Financial Operations and Ron Martinez, Executive Staff Member of Law and Public Policy

MCI Telecommunications Corporation

February 3, 1998

Introduction

➔Regional Profile:

- Lack of Profitability
- Lack of Working OSS
- Lack of Process

Interim Number Portability

- **Problem:**
  - **BS Claimed in LA Application that Problems with Coordinated Cutovers Have Been Resolved**
  - **Coordinated Cutovers - 4 Recent Problems for which BS has acknowledged fault:**
    - Large customer experienced 2 outages and today some of customer service still down
    - Large customer was down for 2 days.
    - Large customer had all outbound trunks removed by BS causing trunks to be down for 5 days.
    - Large customer's trunks and lines were disconnected for over 10 hours.
- **Competitive Impact: MCI customers are out of business because they lose service in order to keep their phone numbers. MCI's suffers potentially irreparable image problems.**

Permanent Local Number Portability

- Problem: Permanent LNP deployment date of 3/31/98 will not be met due to software development delays
- Competitive Impact: Delayed permanent solution for customers to keep their telephone numbers

Resale

➔Problem: Loss of Dialtone:

- BS requires disconnect and reconnect of service for migrations without any coordinated process
- Results in loss of dialtone
- BS has not yet addressed coordination for complex orders

➔Competitive Impact: Customers reluctant to switch to MCI for fear of loss of service associated with switching and with migrating back to BS.

Directory Assistance

→Problems:

- BS refuses to provide listings of independent local companies
- BS refuses to include MCI's facilities-based customers in directory listing database: recent issue

→Competitive Impact:

- MCI customers do not have the same quality directory assistance that is provided to BS customers
- MCI unable to provide its customers any and all listings available to BS customers

MCI

E911/911

- Problems:
  - BS refused to accept 911 updates for MCI's KY orders for loop/port
    - BS never notified MCI of role of 3rd party 911 database administrator
  - No process to verify accuracy of numbers or that numbers are in database
- Competitive Impact:
  - Customers experience undue delays in getting MCI service.
  - Potential public safety dangers and liability

Operator Services

➔Problems:

- MCI-Branded OS only if MCI builds out dedicated facilities
- Selective Routing for a price
- Emergency interrupt
- Busy line verification

➔Competitive Impact: MCI customers cannot receive MCI-branded OS/DA. MCI precluded from providing own OS/DA service to its customers.

Unbundled Local Switching

→Problems:

- Customized routing issue (OS/DA): requiring build-out of dedicated facilities
- BS will not provide FGD for OS/DA transport between end office and BS tandem and MCI point of presence
- BFR required
- Pricing

→Competitive Impact: MCI cannot utilize most efficient means to provide own DA/OS and cannot utilize ULS as an option to building out switching facilities

Interconnection

→ Problems:

- Local Tandem Interconnection:
  - BS has not confirmed that MCI's traffic will travel on same trunk groups as BS local traffic
  - BS has not confirmed that all existing independent telephone company local and EAS traffic routes served by local tandem will be identified and made available to MCI traffic
- Competitive Impact: Causes degradation of MCI local and long distance service; BS service kept superior. MCI cannot provide reliable service to its customers.

Interconnection, Cont.

➔Problem:

- Network Blockages on MCI trunks:
  - MCI is unable to properly size its network to handle its volumes because:
    - BS refuses to monitor trunk volumes
  - MCI requests that BS engineer MCI trunks in same manner done for own trunks via monitoring traffic reports
- Competitive Impact: MCI needs to be able to guarantee reliable service to its customers. Customers should not get fast busy due to network blockages when trying to place local calls.

Reciprocal Compensation

- ➔Problem: BS won't allow reciprocal compensation for Internet Service Provider traffic:
  - Doesn't consider internet traffic local
  - BS fails to utilize industry procedures (pay amount due and then dispute): BS simply refuses to pay
- ➔Competitive Impact: MCI not compensated for handling local traffic

Unbundled Local Transport

→Problem:

- BS has delayed provision of trunk ports
- MCI needs BS trunk ports in end office and tandem to use CAP-provided transport facilities

→Competitive Impacts:

- Sharing of transport is cost effective: eliminates need for MCI minute volumes to support
- Allows MCI to control its traffic
- Use of Competitive Access Provider provides for ease of converting traffic to 3rd party or MCI tandem