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BELLSOUTH

Ben G. Almond
Vice President-
Federal Regulatory

Suite 900
1133-21st Street N.W.
Washington, D.C. 20036-3351
202 463-4112
Fax 202 463-4198
Internet: almond.ben@bsc.bls.com

April 1, 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, DC 20554

RE: BellSouth's Request for Expedited Declaratory Ruling, Administration of the North American Numbering Plan, Carrier Identifications Codes (CICs), CC Docket 92-237 **Ex Parte**

Dear Ms Salas:

Attached is additional information that relates to BellSouth's desired plans for phase implementation of three-digit CICs blocking beginning July 1, 1998, which will ensure permissive dialing during the transition period but may allow inadvertently dialed three-digit CICs to be recognized during a two month phased implementation period, depending on when and where such calls are dialed.

Please associate this notification and accompanying materials with the referenced docket proceeding.

If there are any questions concerning this matter, please contact the undersigned.

Sincerely,



Ben G. Almond
Vice President-Federal Regulatory

Attachment

cc: Kris Anne Montheith

No. of Copies rec'd 021
List A B C D E

The network operations process to finalize implementation from 3 digit CICs to 4 digit CICs must be done in a phased manner for the following reasons:

1. BellSouth must complete translations work in over 850 switches for 4 digit CICs implementation. (There are an additional 750 plus remote switches. The actual translations changes for remote switches are performed in the associated host switches.) The changes required to end the permissive dialing period cannot be done using a flash cut approach due to the volume of switches and the complexity of translation changes required. Depending on the switch type, the time required to make translation changes will vary. The attached table provides a breakdown of switch types and the estimated average time required for technicians to pull the work requests, prepare and execute the translations work documents. The estimated time will vary from an average of less than one hour for 5ESS and 1A switches up to an average of six hours for other switch types. The estimated translation time does not reflect the administrative activities and time required to generate the work request documents provided to the translations work centers.
2. BellSouth has 10 centers located throughout its nine-state territory that perform all switch translations work required for BellSouth's switches. The work required to implement and test mandatory 4-digit CICs must be done concurrent with all other required switch translation activities. These activities include, but is not limited to, new NXX/NPA activations, new or modification of Interexchange Carrier Identification Codes, new or modification of trunking/traffic routing for CLECs (Competitive Local Exchange Carriers), and new or modification of translations for ISDN customers. A two month mandatory 4-digit CIC implementation period will permit BellSouth to properly manage the tremendous workloads involved with all of these activities, not to mention implementation of local number portability.
3. The Commission should understand that other companies might require a different 4-digit CIC implementation period other than two months, depending upon their unique circumstances, including each company's number and mix of switch types, etc.

Translation Time Required for Mandatory 4 - digit CICs

Office Type	Quantity in BellSouth	Estimated Translation Time Required/Switch	Estimated Testing Time Required/Switch	Total Estimated Time Required
Siemens Stromberg Carlson DC0	48	1 hour	1 hour	96 hours
Siemens Stromberg Carlson RNS	62	1 hour	1 hour	124 hours
Nortel DMS 100 & 100/200	269	6 hours	1 hour	1883 hours
Nortel DMS 10	41	6 hours	1 hour	287 hours
Siemens EWSD	29	.5 hours	1 hour	43.5 hours
Lucent 1AESS	105	.5 hours	1 hour	157.5 hours
Lucent 5ESS	309	.5 hours	1 hour	463.5 hours
Totals	863			3054.5 hours