6.4 Reverse–Battery – Originating End at the MDF

6.4.1 MDF Interface

6.4.2 Idle State

In the idle state, the CLEC equipment shall maintain a dc resistance from Tip to Ring, Tip to Ground, and Ring to Ground ≥ 22,500 Ω.

If the loop is provided via Digital Loop Carrier, the loop shall provide at least 36 Vdc between Tip and Ring, with the Tip positive with respect to the Ring, in the idle state.

6.4.3 Seizure

The Originating end signals an off–hook (seizure) by placing a low resistance between Tip and Ring. In this state, the CLEC equipment shall provide a dc resistance between Tip and Ring ≤ 670 Ω.

The current provided by the loop (with CLEC equipment attached that meets the above requirement) shall meet the following requirement:

- If the absolute value of the Tip to Ring voltage is ≥ 33.8 Vdc, the current shall be at least that produced by a 36 Vdc source in series with 135 Ω.
- If the absolute value of the Tip to Ring voltage ≥ 29.5 Vdc, but < 33.8 Vdc, the current shall be at least that produced by a 41.7 dc source in series with 489 Ω.
- If the absolute value of the Tip to Ring voltage < 29.5 Vdc, the current may be as low as 0 mA.

6.4.4 Reverse–Battery State

The Terminating end signals an off–hook by reversing the polarity of the voltage applied across Tip and Ring. In this state, the CLEC equipment shall maintain a dc resistance of ≤ 670 Ω across Tip and Ring. In this state, the loop shall meet the requirements of 6.9.3.

6.4.5 End User Interface

Signaling provided by connecting equipment at the End User Interface shall meet the Customer Installation requirements in ANSI T1.405–1996. The loop shall meet the network requirements in ANSI T1.405–1996.

7. Voice–Frequency Transmission Requirements

7.1 General

When Loop–Start or Ground–Start signaling is employed, the following specifications are supported only during the off–hook state. These specifications apply to other Analog Unbundled Loops with Specified Signaling regardless of the signaling state. Specifically, the transmission of Caller–ID, or similar signals, is not supported any Unbundled Local Loop. ANSI/IEEE 743–1995 contains requirements for instrumentation necessary to measure compliance with the following requirements.

7.2 Insertion Loss

The following specifications apply when measured with a 900 Ω AC impedance at the MDF and a 600 Ω AC impedance at the End User Interface:

- The insertion loss at 1 kHz, shall be 10 dB or less.
- The insertion loss, at 2.8 kHz, shall be no greater than 9 dB above that at 1 kHz.

BST does not support transmission on any Analog Unbundled Loop with Specified Signaling at frequencies below 300 Hz, or above 3.0 kHz.

7.3 Noise

The idle–channel noise shall be less than 30 dBrnC.

The Signal to C–Notched Noise Ratio shall be at least 32 dB, when measured with a −13 dBm holding tone.

7.4 Noise–to–Ground

The Noise–to–Ground parameter has two specifications. When measured with a C–message weighting filter, it should be less than 90 dBrnC. When measured with a high–impedance voltmeter, it shall not exceed 50 V (126 dBrn).

NOTE: **While dBrn is in units of power, both of these requirements involve voltage measurement, with results displayed in units of power, assuming that the voltage is across a 600 Ω resistor.**

The longitudinal balance (longitudinal to metallic conversion loss) of any metallic component of the loop shall be at least 50 dB for frequencies up to 1 kHz. The longitudinal balance of interconnected CLEC equipment shall exceed 60 dB at any frequency up to 1 kHz,. This parameter may be measured using ANSI/IEEE 455–1985.

7.5 Voiceband Data

BST does not guarantee that an Analog Unbundled Loop with Specified Signaling will be suitable for analog data or Facsimile transmission. If a customer is able to send and receive data, BST does not guarantee a data rate.

7.6 Signal Power

The power of the voiceband signal, at either the End User Interface or the MDF, shall not exceed −9 dBm, when averaged over any 3 second period.

The out–of–band signal power shall meet the out–of–band signal power limits in Section 68.308 of FCC Part 68 requirements. In the event that connected equipment is not registered under Part 68, this requirement shall still apply.

8. Digital Unbundled Loops

8.1 General

A Digital Unbundled Loop provides a channel that can support one of a described set of digital transmission schemes. These schemes include the following:

- Digital Baseband at 64 kbps
- Basic Rate Access ISDN
- High–Bit–Rate Digital Subscriber Line
- DS1
- DS3

Requirements for the first three are described below. Requirements for Digital Unbundled Loops at the DS1 and DS3 rates are identical to those associated with tariffed BST service offerings.

8.2 Digital Baseband at 64 kbps

8.2.1 Interfaces

The interface at the MDF is a 4–wire interface, described as a DS–0A interface in Bellcore TA–TSY–000077. The End User Interface is a 4–wire interface described in ANSI T1.410–1992. Signals applied at either interface shall meet the requirements of these documents.

8.2.2 Transport

The loop facility may be provided via metallic facilities, DLC, or both. The insertion loss of the metallic facility, measured at 28 kHz between 135 Ω terminations, shall be less than 40 dB. DC signaling, in the simplex path, is only supported to the extent necessary to provide maintenance functions as described in Bellcore TA–TSY–000077 and ANSI T1.410–1992.

8.3 Basic Rate Access ISDN

8.3.1 Interfaces

The interface at both the ALEC (collocated or elsewhere) and the End User Interface is a 2–wire interface as defined in ANSI T1.601–1992. The supported arrangement involves an NT at the end–user and an LT provided by the ALEC. No other arrangements are supported. Signals applied at either interface shall meet the requirements of this document.

8.3.2 Transport

The loop facility may be provided via metallic facilities, DLC, or both. The insertion loss of the metallic facility, measured at 40 kHz, shall be less than 42 dB. No dc specifications are supported. Sealing current — even if not provided by the ALEC equipment (LT) — may be provided, but is not guaranteed.

8.4 HDSL–capable

8.4.1 Availability

This channel is not available when DLC is employed. This channel is not available if the loop facilities do not meet Carrier Serving Area (CSA) guidelines as described in Committee T1 Technical Report No. 28.

8.4.2 Interfaces

At the CLEC's request, either a 2–wire or 4–wire channel will be provided. The signal applied at either interface shall meet the following specifications:

- The average signal power shall not exceed +15.0 dBm across 100 Ω .
- The Power Spectral Density shall not exceed −35 dBm/Hz at any frequency. This requirement shall be met when measured with a 100 Ω termination.

8.4.3 Transport

The loop facility consists of only metallic facilities meeting CSA design guidelines as documented in Committee T1 Technical Report No. 28. The dc resistance of a single wire pair should not exceed 850 Ω The insertion loss of a pair, measured between 135 Ω terminations, shall not exceed 35 dB.

9. Electrical Disturbances

Unbundled Local Loops may be exposed to electrical surges from lightning and commercial power system disturbances. Despite protective devices on the MDF, some of these disturbances are likely to reach CLEC equipment. CLEC equipment shall be designed to withstand certain surges without being damaged, and shall fail in a safe manner under infrequent high stress.

The prevalent voltage–limiting device available for CO use is the 3–mil carbon block. The performance of these devices can best be characterized by a normal distribution function. The upper 3σ firing voltage is 1000 volts peak under surge conditions. The protector may also limit — to about 350 mA over extended periods — the current that is permitted to flow to equipment. In addition, a protective fuse cable located outside the CO incorporating 24 or 26 AWG conductors to coordinate with the protector, serves to limit current to safe levels in the event of prolonged operation of the protector during power fault conditions.

10. ANNEX A

Characteristics of Tie Cable(s) and/or Wiring Component

The cabling and/or wire between the MDF interface and the collocated CLEC equipment (if any) is not a component of the Unbundled Local Loop. It is an unbundled element. The following specifications apply:

- The total length should be less than 1500 feet.
- The dc resistance should be less than 80 ohms.
- The insertion loss, measured between 900 Ω terminations at 1 kHz, should be 0.5 dB or less.
- The noise shall be 15 dBrnC or less.

BELLSOUTH'S EVIDENCE OF COMPLIANCE WITH CHECKLIST ITEM 5: UNBUNDLED LOCAL TRANSPORT

- BellSouth offers unbundled local transport with optional channelization for such local transport from the trunk side of BellSouth's switch. BellSouth offers both dedicated and common transport for use by CLECs. BellSouth has technical service descriptions outlining both dedicated and shared interoffice transport and has procedures in place for the ordering, provisioning, and maintenance of these services.

- Dedicated Transport. Voice grade or DS0 channels would typically be used to transport an unbundled loop to a CLEC's switch. A DS1 could also be used for this purpose, typically in conjunction with central office multiplexing or concentration (discussed under Checklist Item No. 4). DS1 transport can also be used if a CLEC wishes to purchase transport facilities from BellSouth rather than providing its own facilities when interconnecting its switch with BellSouth's network.

  - As of November 30, 1997, BellSouth had provided 1,223 dedicated trunks providing interoffice transport to CLECs in its nine-state region.

  - **BellSouth provides dedicated transport to and from each BellSouth central office in its nine-state region, as well as between all BellSouth end offices and BellSouth tandem central offices.**

- **DS3 dedicated transport is being made available as a standard offering in Mississippi and North Carolina, pursuant to state commission decisions. Elsewhere, requests for DS3 dedicated transport, or for other forms of transport requiring high levels of capacity, are available through the BFR process. As discussed in connection with Checklist Item 2 (access to UNEs), the BFR process assures CLECs timely access to such transport, without unnecessary delay.**

- Common (Shared) Transport. BellSouth offers to provide common transport when a CLEC requests unbundled local switching from BellSouth. In such a case, CLEC traffic follows the identical transmission paths as BellSouth's traffic, in accordance with the routing tables in the BellSouth central office switches.

  - **BellSouth offers shared transport between all BellSouth tandems and switches that subtend those tandems.**

  - **BellSouth permits a requesting carrier to use shared transport to carry any type of traffic, other than intrastate exchange access, the carrier is authorized to carry. In particular, the carrier may provide interstate exchange access to customers for whom the carrier provides local service and collect the associated interstate access charges.**

- **Recovery of intrastate access charges is an intrastate pricing issue reserved to the states.**

- **If a state commission were to deny BellSouth the ability to recover intrastate access charges for shared transport, a state commission would then have to decide how BellSouth's other intrastate prices should be adjusted to compensate for this loss of revenue.**

- **BellSouth's rates for shared transport include charges for (1) transport per mile, per minute of use and (2) per-minute use of facilities.**

  - **When a tandem switch is utilized, a charge for tandem switching applies in addition to the transport charges. This is similar to the application of a tandem switching charge for interconnection at a tandem switch. Because BellSouth cannot determine on a per-call basis when a call transits a tandem, a state-specific formula is applied to the per-minute charge for use of facilities. This formula is based upon the percentage of calls that are interoffice as opposed to intraoffice and, for interoffice calls, the percentage that transit a tandem.**

- BellSouth is providing shared transport to two CLECs. Specific counts of trunks providing service to CLECs can not be determined, because all trunks in a given trunk group are available for any carrier using that group, including BellSouth and in some cases multiple CLECs.

- **BellSouth makes unbundled digital cross-connect capacity available through its unbundled channelization offering. Unbundled channelization utilizes digital cross-connect devices for channelization of DS3s to DS1s to DS0s, where these devices are available. Digital cross-connect devices are not available in every BellSouth central office; these devices have been deployed primarily in BellSouth's major hubbing central offices. Where digital cross-connect devices are not available, stand-alone 3/1 and 1/0 multiplexers are utilized.**

- Unbundled interoffice transport (both dedicated and shared) is very similar to the interoffice transport components of special access services that BellSouth has been providing for years. Nevertheless, BellSouth has conducted testing which verified that service orders for dedicated transport, shared transport, and unbundled channelization flowed through the back office systems as planned and that accurate bills were generated.

- Mechanized billing has been available since September 25, 1997. Mechanized data to permit billing of interstate access has been available since December 19, 1997. Paper data has been available since November 1997. BellSouth requires contract provisions (either in a new contract or as part of an amendment to an existing interconnection agreement) before CLECs may receive the Access Daily Usage File ("ADUF").

  - BellSouth currently provides OLEC (Other Local Exchange Carrier) Daily Usage File or Optional Daily Usage File ("ODUF") information electronically to CLECs.

  - ADUF charges mirror ODUF charges, with the exception of the Recording Service. The ODUF rate for Recording Service is not applicable to these messages. It only applies to unbundled operator services messages. An example of the charges that apply, as approved by the Louisiana PSC, is: $0.0024 per message for Message Distribution and $0.00003 per message for Data Transmission. A CLEC may choose to receive this data using the Direct Connect Service (at no additional charge) or magnetic tape (for a charge).

BELLSOUTH'S EVIDENCE OF COMPLIANCE WITH CHECKLIST ITEM 11: NUMBER PORTABILITY

- As of November 30, 1997, BellSouth had ported 27,487 business and 57 residence directory numbers.

- BellSouth provides interim number portability through both Remote Call Forwarding ("RCF") and Direct Inward Dialing ("DID").

  - BellSouth has technical service descriptions outlining RCF and DID and has procedures in place for ordering, provisioning, and maintaining these services.

  - RCF is an existing switch-based BellSouth service that redirects calls within the telephone network by translating the dialed number to a new number.

  - For DID, BellSouth routes the call over a dedicated facility to the CLEC's switch, instead of translating the dialed number to a new number.

  - Other methods of number portability such as Route Index-Portability Hub ("RI-PH"), Direct Number Route Index ("DNRI"), and Local Exchange Routing Guide ("LERG Reassignment") have been negotiated with AT&T and are available to other carriers through the BFR process.

  - The technical feasibility of RI-PH was confirmed in lab testing conducted by BellSouth and a CLEC during November 1996. RI-PH can be implemented as requested by CLECs, except that this method will not function with Lucent 1AESS switches in an area where ten-digit local dialing is required.

  - BellSouth has likewise confirmed the technical feasibility of DNRI. However, unlike RI-PH, no CLEC has yet agreed to test DNRI.

- Attachment G to BellSouth's Statements of Generally Available Terms and Conditions provides that in the event BellSouth or the CLEC determines in its reasonable judgment that the other company is impairing or likely will impair service to the first company's end users, that company may either refuse to provide Service Provider Number Portability ("SPNP") service or may terminate SPNP service to the other party after providing appropriate notice.

  - *To date, BellSouth has never suspended SPNP service.*

  - *BellSouth will not terminate service unless the CLEC, after full discussion and attempts to solve the problem, still is not able to correct a situation*

that is causing impaired service to BellSouth customers, such as dropped calls or an inability to complete calls.

- *In an emergency, BellSouth may terminate SPNP service under Attachment G even if the CLEC cannot be reached.*

- *BellSouth does not block default-routed calls and does not plan to do so. BellSouth will, however, block default-routed calls when performing database queries on such calls if necessary to protect network reliability.*

- BellSouth coordinates number portability and loop cutovers.

  - Pages five and six of Attachment A set out the work steps for the number portability process.

  - Although the porting of numbers and cutover of loops is coordinated, BellSouth has advised CLECs that number portability and unbundled loop cutover may not occur simultaneously. BellSouth will advise the CLEC as to when it will put the number portability order into the switch, but the exact timing of when the switch will complete the order is beyond the control of either BellSouth or the CLEC.

  - *The loop cutover procedure is far more complicated than simply porting numbers. It involves far more work steps, making coordination between cutovers and number porting extremely difficult. Accordingly, BellSouth does not perform the loop cutover simultaneously with number porting; to do so would run the risk of misdirecting calls bound to the end user customer, which would occur if the number porting were completed before the loop cutover. Instead, BellSouth performs all "up front" work, such as creating and readying the change messages needed to port the number, before performing the loop cutover. As soon as the loop cutover is complete, BellSouth ports the telephone number. This approach minimizes the time period between the porting of the number and the completion of the loop cutover, as well as service disruption.*

  - *BellSouth has recently completed a study of loop cutovers in Florida. During January and February 1988, the average cutover took approximately 6.1 minutes, while porting the number took approximately 42 seconds. The total out-of-service time needed to accomplish both procedures therefore was less than seven minutes.*

  - Switch translations and Recent Change messages for Remote Call Forwarding ("RCF") are prepared beforehand and released only after the loop cutover has been successful. This process minimizes the time required to complete the RCF process.

loop cutover has been successful. This process minimizes the time required to complete the RCF process.

- In the early stages of implementing number portability, BellSouth experienced some technical problems (such as incorrect switch translations) that caused service to certain customers of certain CLECs to be disrupted. BellSouth took appropriate steps to correct those problems. For example:

  - BellSouth has added an "overflow" route from the BellSouth switch to the CLEC switch for calls to ported telephone numbers.

  - BellSouth has modified the process for making related switch translations such that BellSouth's technicians are automatically reminded of proper procedures and prompted to affirm the technician's intent to make changes.

- BellSouth is implementing long-term number portability in accordance with FCC rules.

  - BellSouth is an original member of the Southeast Region Limited Liability Corporation and, along with CLEC and IXC members, is overseeing implementation of the southeast region Number Portability Administration Center ("NPAC") database.

  - In cooperation with the state commissions, the switch selection process has been completed for Georgia and Florida.

  - In addition, members of the Southeast Operations/Implementation Subcommittee have met with the staffs of the Tennessee Regulatory Authority and state Commissions in Louisiana, North Carolina, South Carolina, Alabama, Florida, Georgia, and Kentucky. The Tennessee Regulatory Authority and the Public Service Commission staff in Louisiana, North Carolina, and South Carolina have agreed to perform the function of impartial agent for the switch selection process in their respective states.

  - *On March 2, 1998, BellSouth filed a petition in CC Docket No. 95-116 requesting an extension of time in which to implement a long-term database method of number portability. BellSouth's petition, a copy of which is provided as Attachment B, was necessary because of the original local number portability administrator's inability to establish a service management system database and the projected unavailability of such a database from a new vendor until May 11, 1998. Attachment B provides BellSouth's schedule and implementation plan for long-term number portability.*

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Telephone Number Portability	)	CC Docket No. 95-116

To: Chief, Common Carrier Bureau

PETITION TO EXTEND TIME FOR IMPLEMENTATION

RECEIVED
MAR 2 '98
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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SUMMARY

BellSouth Corporation, on behalf of its affiliated incumbent, alternative and competitive local exchange carrier (LEC) operations, requests a three month extension of time in which to implement a long-term database method for number portability (LNP) in the BellSouth LEC network in the Southeast Number Portability Administration Center (NPAC) Region 4 on a phased sequence basis until March 31, 1999, and a waiver of the applicability of 47 C.F.R. § 52.23(c) until that date. The extension is necessary in order to ensure the efficient development of number portability in the Southeast Region. Notwithstanding BellSouth's diligence in implementing LNP within its network pursuant to the Commission's LNP implementation schedule, BellSouth is constrained to file this petition because of the failure of the original local number portability administrator (LNPA) to establish the NPAC Region 4 Service Management System (SMS) database, and the projected lack of availability of an NPAC SMS database until May 11, 1998.

On February 10, 1998, the Southeast Region Number Portability Administration Company, L.L.C. (Southeast LLC) terminated its contract with the former LNPA as a result of its failure to provide the NPAC SMS database, and subsequently entered into a master agreement with a new LNPA. The NPAC SMS database that is to be provided by the new LNPA is a full seven software specification releases beyond the NPAC SMS database that was to have been delivered by the former LNPA. This change will require BellSouth to engineer and develop significant software modifications to its LNP operations systems that were previously developed to interface with former LNPA's NPAC SMS database. This work will take an additional sixteen weeks beyond the current projected regional database delivery date.

As detailed herein, BellSouth undertook substantial activities to meet the Commission's implementation schedule prior to requesting this extension of time for each affected switch within the Southeast Region. These activities included establishing LNP within its network using Advanced Intelligent Network (AIN) protocol between BellSouth service switching points (SSP) and the BellSouth AIN Service Control Point (SCP) and building a new LNP Gateway operations system (Gateway LSMS) designed to interface with the NPAC SMS database which was to have been provided by the former LNPA. These efforts resulted in operational readiness for timely implementation of Southeast Region Phase I and Phase II MSAs had the NPAC SMS database been delivered as promised. Despite the significant reengineering that must take place as a result of the change in database specifications, and which BellSouth has already begun, BellSouth believes that through rigorous parallel planning work efforts it can certify its LNP operations systems to the new NPAC SMS database on September 1, 1998, and reduce the currently applicable number portability deployment intervals for the 21 Southeast Region metropolitan statistical areas (MSAs) from 457 days to 182.

It is neither technically feasible, nor prudent from a network reliability standpoint, to attempt to implement all 21 MSAs in the Southeast Region in a 90 day region wide "flashcut" following NPAC certification by BellSouth in order to meet the Commission's current December 31, 1998 deadline for Phase V MSAs. However, based on current information, BellSouth believes that it can ensure the efficient deployment of LNP in the Southeast Region as follows:

Phase I	Phase II	Phase III	Phase IV	Phase V
Orig.: 182 days	Orig.: 135 days	Orig.: 91 days	Orig.: 92 days	Orig.: 92 days
10/1/97-3/31/98	1/1/98-5/15/98	4/1/98-6/30/98	7/1/98-9/30/98	10/1/98-12/31/98
Now: 45 days	Now: 47 days	Now: 30 days	Now: 30 days	Now: 30 days
10/1/98-11/14/98	11/15/98-12/31/99	1/1/99-1/30/99	1/31/99-3/1/99	3/2/99-3/31/99
Atlanta	Miami Ft. Lauderdale Orlando Tampa	New Orleans Charlotte Greensboro Nashville	Memphis Louisville Jacksonville Raleigh W. Palm Beach Greenville	Birmingham Knoxville Baton Rouge Charleston Mobile Columbia

Assumptions:

(1) February 20, 1998 - August 31, 1998 BellSouth incremental work effort to reengineer operational systems to new NPAC SMS specifications

(2) NPAC SMS Delivery prior to September 1, 1998

(3) September 1, 1998 Post-delivery production ready sequencing completed

(4) September 1 - September 30, 1998 Inter-Company End-to-End Testing

The net effect, a 90 day extension in the overall implementation schedule, is reasonable considering the anticipated seven month delay in NPAC delivery and the large number of MSAs in Region 4, and is well within the nine month period which the Chief of the Common Carrier Bureau may, on delegated authority of the Commission, waive or stay any of the dates of the implementation schedule as the Chief may determine is necessary in order to ensure the efficient development of number portability.

Under Section 52.23(d) of the Commission's rules, the Chief of the Common Carrier Bureau may waive or stay any of the dates of the LNP implementation schedule as the Chief determines is necessary to ensure the efficient deployment of number portability. As shown

herein, BellSouth in this petition has submitted a timely request for extension that complies with the special procedures established by the Commission to obtain a limited waiver of the LNP implementation schedule, and has further established good cause under the Commission's general standard for granting waivers of its rules.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Telephone Number Portability	)	CC Docket No. 95-116

To: Chief, Common Carrier Bureau

PETITION TO EXTEND TIME FOR IMPLEMENTATION

BellSouth Corporation,[1] on behalf of itself and each of its affiliated companies that are subject to Part 52, Section 52.23(a) of the Commission's Rules, 47 C.F.R. § 52.23(a) (BellSouth), hereby files this petition to extend the time by which implementation of a long-term database method for number portability (LNP) in the BellSouth network will be completed. This petition is specifically authorized under the Commission's Rules and orders and is occasioned by the inability of the original local number portability administrator (LNPA) to establish the Number Portability Administration Center (NPAC) Region 4 Service Management System (SMS) database. Availability of the NPAC SMS database is beyond BellSouth's control. As a result, BellSouth is unable to meet the Commission's deadlines for implementing LNP within the Southeast Region.

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[1] BellSouth Corporation (BSC) is a publicly traded Georgia corporation that holds the stock of, among other companies, BellSouth Telecommunications, Inc. (BST), a Bell operating company and local exchange carrier (LEC) that provides wireline telephone exchange service and exchange access service in parts of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina and Tennessee ("NPAC Region 4" or the "Southeast Region"). BST and BSC have or may form alternative local exchange carrier (ALEC), and competitive local exchange carrier (CLEC) affiliates to serve customers within and outside the Southeast Region where BellSouth has not traditionally held a franchise to provide telephone service.

As detailed herein, BST undertook substantial activities to meet the Commission's implementation schedule prior to requesting this extension of time for each affected switch within the Southeast Region. These activities included establishing a long-term number portability database method (LNP) using Advanced Intelligent Network (AIN) protocol between BellSouth service switching points (SSP) and the BellSouth AIN Service Control Points (SCP) and building a new LNP Gateway operations system (Gateway LSMS) designed to interface with the new master database of all ported numbers in the Southeast Region (the NPAC SMS database) which was to have been provided by the former LNPA. On February 10, 1998, the Southeast Region Number Portability Administration Company, L.L.C. (Southeast LLC) terminated its contract with the former LNPA, Perot Systems, as a result of its failure to provide the NPAC SMS database, and substituted the current LNPA, Lockheed Martin. The new LNPA has indicated that it can deliver an NPAC SMS database by May 11, 1998.

The new NPAC SMS database, however, is a full seven (7) NANC LNP software specification releases beyond the NPAC SMS database that was to have been delivered by the former LNPA. This fundamental difference in NPACs will require BellSouth to engineer and develop significant software modifications to two of its previously developed operations systems. This work will take an additional sixteen weeks beyond the current projected NPAC delivery date. After the BellSouth Gateway LSMS passes certification testing with the NPAC SMS on September 1, 1998, a minimum of 30 days is required to perform end-to-end systems testing with other local telecommunications carriers. BellSouth believes it can reduce the currently applicable number portability deployment intervals for the 21 Southeast Region metropolitan statistical areas ("MSAs") from 457 days to 182 days. BellSouth therefore

requests, on behalf of its affiliated LECs, ALECs or CLECs, an extension of the implementation schedule for all five Phases in the Southeast Region on a phased sequence basis until March 31, 1999, and a waiver of the applicability of 47 C.F.R. § 52.23(c) until that date.[2] BellSouth reserves its right to seek an additional waiver in the event of further vendor delivery failure or other unforeseen circumstances, and to supplement this petition in the event new information becomes available.

REGULATORY FRAMEWORK - LEC LNP IMPLEMENTATION

Section 251(b) of the Communications Act of 1934, as amended, requires all LECs to provide, to the extent technically feasible, number portability in accordance with requirements prescribed by the Commission.[3] On June 27, 1996, the Commission established rules designed to implement Section 251, and directed the North American Numbering Council (NANC) to make recommendations regarding specific aspects of number portability.[4] The Commission's rules establish performance criteria for long-term database method number portability (LNP), and required NANC to "direct establishment of a nationwide system of regional SMS databases for the provision of long-term database methods for number portability" as well as to "select a local number portability administrator(s) (LNPAs)) to administer the regional databases."[5] The Commission also established a Deployment Schedule, as well as the rule allowing LECs the

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[2] 47 C.F.R. § 52.23(c).

[3] 47 U.S.C. § 251(b)(2). This requirement was added by the Telecommunications Act of 1996, Public L. No. 104-104, 110 Stat. 56, *codified* at 47 U.S.C. §§ 151 *et seq.* (1996 Act).

[4] *Telephone Number Portability*, First Report and Order and Further Notice of Proposed Rulemaking, 11 FCC Rcd 8352 (1996) (*First Report and Order*), *recon. pending.*

[5] 47 C.F.R. §§ 52.23, 52.25.

opportunity to request an extension of time by which network implementation will be completed.[6]

On October 1, 1996, NANC convened to address the Commission's directives and established the Local Number Portability Administration Selection Working Group, comprised of participants from every segment of the telecommunications industry, industry trade associations, state public service commissions and vendors.[7] The Working Group in turn established two task forces -- the Local Number Portability Administration Architecture Task Force and the Local Number Portability Administration Technical & Operational Requirements Task Force.[8] Membership of both Task Forces was as broadly representative as that of the Working Group, and included both the former and current LNPAs for the Southeast Region NPAC.

On April 25, 1997, the NANC forwarded its Local Number Portability Administration Selection Working Group Report to the FCC. This report was adopted by the FCC and incorporated by reference in the Commission's Rules.[9] The Commission adopted the NANC's recommendation that an NPAC database be established for each of the original RBOC regions and established NPAC Region 4 (Southeast) to cover the states served by the former Southern Bell and South Central Bell Telephone Companies.[10] The Commission also adopted the

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6 *Id.* at §§ 52.23(b), (e).

7 Telephone Number Portability, Second Report and Order, 12 FCC Rcd 12281 (1997) ("Second Report and Order") *recon. pending*, ¶ 11.

8 *Id.* at ¶ 12.

9 47 C.F.R. § 52.26.

10 *Second Report and Order*, ¶¶ 16, 21.

NANC's recommendation that Perot Systems serve as the LNPA for the Region 4 (Southeast) NPAC.[11] The Commission adopted NANC's recommendation that both LNPAs be responsible for all regional SMS database (NPAC) administration, user support and system support pursuant to technical and operational standards developed by the Working Group and its Task Force.[12]

On January 21, 1998, the NANC requested an extension of the Commission's deadline for filing petitions to extend the time to implement number portability as a result of vendor failure to provide a stable platform to support local number portability in the Southeast, Western and West Coast regions.[13] On January 28, 1998, the Commission granted NANC's request, and extended the deadline until March 1, 1998.[14] On February 10, 1998, the number portability LLCs for the Southeast, Western and West Coast NPAC regions voted to terminate their

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[11] *Id.* at ¶ 33. The Commission also adopted NANC's recommendation that Perot Systems serve as the LNPA for NPAC Regions 1 (Western) and 2 (West Coast) and that Lockheed Martin serve as LNPA for NPAC Regions 3 (Mid-West), 5 (Mid-Atlantic), 6 (Southwest) and 7 (Northeast). The Commission did not adopt a requirement that two or any other number of entities serve as LNPAs. *Id.* at ¶ 38, but noted that NANC identified that one advantage that would result from the selection of two regional SMS database administrators was that "if one administrator could not or would not perform its obligations under its master contract, or declines to renew this contract, there would be another administrator with the experience and expertise required to provide the services quickly and with minimal disruption to the industry." *Id.* at 36.

[12] *Id.* at ¶¶ 39-82, *passim*.

[13] *Common Carrier Bureau Seeks Comment on the NANC Recommendation to Delay Filing of 47 C.F.R. § 52.23(e) Waiver Requests by Individual Carriers for Local Number Portability Phase I Implementation*, Public Notice DA 98-109 (January 21, 1998) (NANC request attached thereto).

[14] *Local Number Portability Phase I Implementation Order*, CC Docket 95-116, Order, DA 98-152 (January 28, 1998) ¶ 9.

contracts with Perot Systems, and substitute Lockheed Martin as the new LNPA.[15] This action was formally recognized by NANC at its February 18, 1998 meeting.

REGION 4 LNP IMPLEMENTATION

Efforts to begin implementing number portability in the Southeast Region predate the Commission's *Telephone Number Portability* order. The Georgia Public Service Commission convened an LNP workshop in 1995. Members of the workshop eventually formed a limited liability company (the Southeast LLC) for the purpose of preparing a request for proposal, selecting a number portability database administrator, and finalizing a contract with the successful bidder. Discussions ensued to expand the database to include neighboring states, and Perot Systems was selected by Southeast LLC to perform the NPAC database administration functions. Following release of the *First Report and Order*, Perot Systems was confirmed as the LNPA for the Southeast Region 4 NPAC. A master contract between Southeast LLC and Perot Systems obligated Perot Systems to deliver a functional NPAC regional SMS database by October 1, 1997.[16] A functional regional NPAC SMS database was never provided, and on

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[15] LNPA Working Group, Status Report to NANC (February 18, 1998); oral report by Pamela Connell, Richard Scheer and Tommy Thompson to NANC (February 18, 1998). *See also* letter from Pamela Connell, President, Southeast Number Portability Administration Company, L.L.C., to John Bavis, Perot Systems Corporation (February 10, 1998).

[16] A concise and accurate summary of this and subsequent events is set forth in the letter from Pamela Connell, President, Southeast Region Number Portability Administration Company, LLC, and Richard Scheer, Chair, West Coast Portability Services, LLC, to A. Richard Metzger, Chief, Common Carrier Bureau, Federal Communications Commission, dated January 23, 1998 ("LLC Letter"). BellSouth specifically adopts and incorporates by reference herein the LLC Letter, attached hereto as Exhibit A.

February 10, 1998, the Southeast LLC terminated its contract with Perot Systems and concluded a new master agreement with Lockheed Martin as the new LNPA.[17]

REQUIRED ELEMENTS FOR AN EXTENSION

Section 52.23(e) of the Commission's number portability rules states that, in the event a LEC is unable to meet the Commission's deadlines for implementing a long-term database method for number portability, it may file with the Commission at least 60 days in advance of the deadline a petition to extend the time by which implementation in its network will be completed.[18] A LEC seeking such relief must demonstrate through substantial, credible evidence the basis for its contention that it is unable to comply with the deployment schedule set forth in the appendix to this part 52. Such requests must set forth: (1) the facts that demonstrate why the carrier is unable to meet the Commission's deployment schedule; (2) a detailed explanation of the activities that the carrier has undertaken to meet the implementation schedule prior to requesting an extension of time; (3) an identification of the particular switches for which the extension is requested; (4) the time within which the carrier will complete deployment in the affected switches; and (5) a proposed schedule with milestones for meeting the deployment date.[19]

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[17] Affidavit of Douglas W. McDougal at ¶ 3. As this Petition was being prepared, BellSouth and other members of Southeast LLC were in the process of signing individual user agreements with Lockheed Martin.

[18] 47 C.F.R. § 52.23(e). The deadline was extended for Phase I MSAs, under limited conditions applicable here, on January 28, 1998. *LNP Phase I Implementation Order* at ¶ 9.

[19] 47 C.F.R. § 52.23(e).