



**MCI Telecommunications Corporation**

1801 Pennsylvania Avenue, NW  
Washington, DC 20006  
202 887 2307  
FAX 202 887 3175

**Susan Jin Davis**  
Senior Counsel  
Federal Law and Public Policy

EX PARTE OR LATE FILED

RECEIVED

April 9, 1998

APR - 9 1998

**VIA HAND DELIVERY**

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

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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

Dear Ms. Salas:

On Thursday, April 9, 1998, Jo Gentry, Senior Manager of Western Financial Operations, Carroll Barrack, Technical Advisor of National Carrier Requirements, Karen Reidy, Attorney, Carl Giesy, Director of Competition Policy, Mark Schneider, attorney with Jenner and Block, and the undersigned met with Bill Bailey, David Kirschner, and Melissa Newman of the Policy Division of the Common Carrier Bureau.

The purpose of the meeting was to discuss unbundled local switching. The attached documents outline 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,



Susan Jin Davis

**Attachments**

cc: Michael Pryor                      Bill Bailey  
Carol Matthey                      David Kirschner  
Melissa Newman



# **UNBUNDLED LOCAL SWITCHING**

**MCI Telecommunications  
Corporation**

**April 9, 1998**





# Unbundled Switching

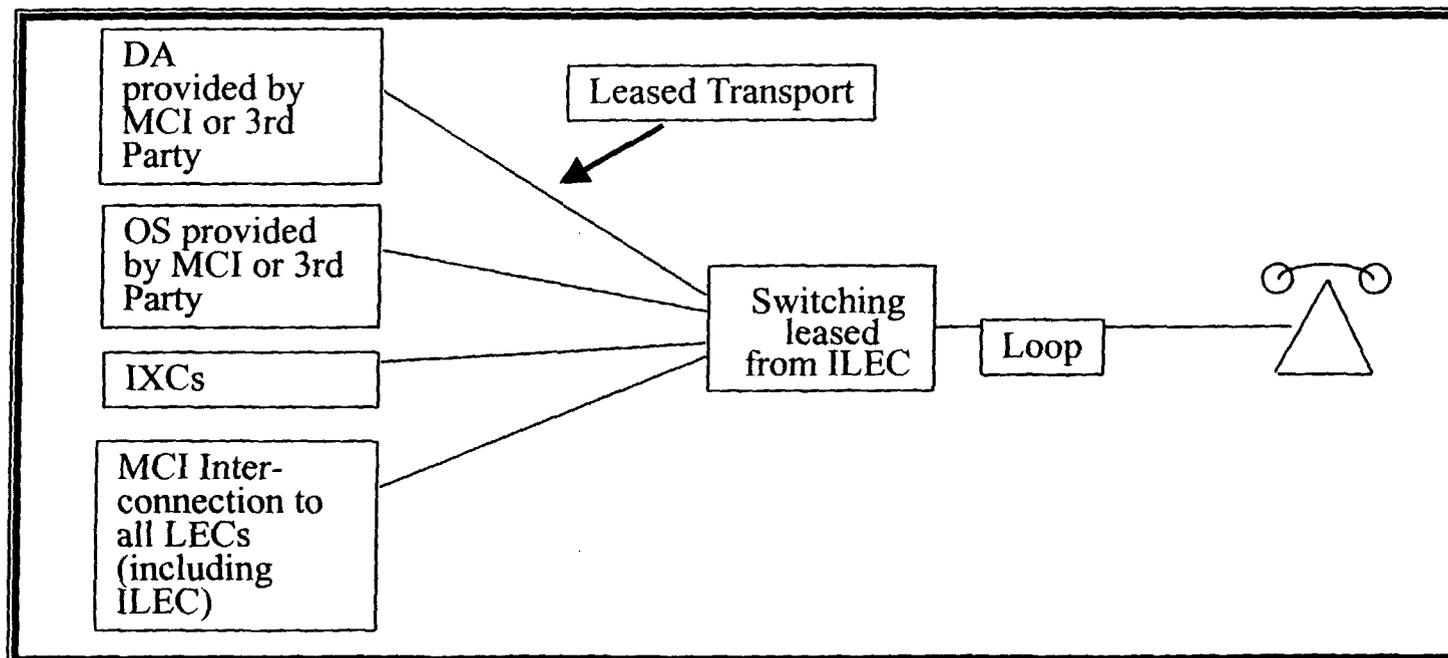
What is it and why do we need it?

- What is unbundled switching?
- Not just another element
- Opportunities and benefits
- Component parts
- Approach and current problems



## What is Unbundled Switching ?

- MCI leases only the switching from the ILEC and provides **ALL** other elements itself or leases them from CAPs and CLECs.
- ULS is technically feasible (e.g. MCI trial with Hancock Rural Electric Company)





## Not Just Another Element

- Networks consist of two parts: Transport and Switching.
- Most of the other unbundled elements are variations of transport.

### → Transport

- Dedicated
- Common/Shared
- Loops
- Cross Connects

### → Switching

- End Office
- Tandem



## ULS: Opportunities and Benefits

### → Opportunities

- Locations with no switch or fiber ring
- Where MCI has a fiber ring but no switch
- Relieve congested switches

### → Benefits

- Timing: Speed to market (over constructing facilities)
- Lease v. Capital cost
- Product Differentiation: facilities-based v. resale
- Vendor Options: choose optimum provider of each element v. captive of ILEC



## Key Component Parts of Unbundled Switching

- ➔ Switching matrix
- ➔ Line port
- ➔ Trunk port
- ➔ Recording Capability (originating and terminating)
- ➔ Customized routing: All technically feasible routing options:
  - 411, 0+ and 0- (local operator)
  - NXX
  - PIC



## Approach

→ Walk before we can run. Utilize different elements in trials with different ILECs.

- Ameritech-Illinois (Beverly) - DA, OS, MCI NXXs
- Ameritech-Illinois (Chicago) - DA, OS, MCI NXXs
- Ameritech-Michigan (Detroit) - Loop, Transport, MCI IXC
- Bell Atlantic - North - DA, OS, MCI NXXs, Voicemail
- Bell Atlantic - South - DA, OS, MCI NXXs, IntraLATA Toll, code conversion
- Bell South (unbundled tandem switching) - DA, OS, MCI NXXs
- PacBell - DA, OS, MCI NXXs, IntraLATA toll, code conversion
- SWBT - DA, OS, MCI NXXs, IntraLATA toll, code conversion
- USWC - DA, OS, MCI NXXs, IntraLATA toll, code conversion



## Current Problems

- NRCs excessive, unjustified, and unclear
- No agreement of points of interconnection
- Terminating traffic issue
- No reasonable process for ordering
- No timelines
- No traffic reporting
- No code conversion
- 8th Circuit impact



## Specific Problems

### → Ameritech

- Request:

- MCI issued a BFR in Illinois and Michigan to develop ULS product
- MCI issued an order for ULS in Michigan using MCI provided “loop” and “trunk” facility

- Problems:

- Ameritech took 4 months to walk MCI through their ordering process
- “Opening up” of end office translations for ULS takes 30 days.
- Terminating traffic issue
- Points of Interconnection
- Ameritech halted both BFR projects after 8th Circuit ruling



## Specific Problems - Cont.

### ● Problems - Cont.

- Ameritech refuses to shorten Line Class Code (LCC) 30 day interval.
  - Ameritech was able to build Line Class Code (LCC) for MCI's first ULS order in 10 days.
- Ameritech assesses "Billing Development Fee":
  - Billed MCI \$33K in OH
  - Billed MCI \$390K in IL (11 x \$35K)
- Not receiving auditable records.
- No comprehensive measuring and billing system in place.



## Specific Problems - Cont.

### → Bell Atlantic - North

- Refuses Code Conversion - cites “technical infeasibility”
- FGD instead of MOSS - cites “technical infeasibility”



## Specific Problems - Cont.

### → BellSouth (Georgia):

#### ● Request:

- Common transport to route 0+, 0- local operator calls and 611 calls from the BellSouth Alpharetta End Office to Norcross Tandem.
- From Tandem, FGD to direct 0+, 0-, 611 local calls to MCI switch on FGD trunk group.

#### ● Problems:

- 1st test failed (0+, 0-, 611)
- 2nd test: 0- failed. 0+ call completed but did not go to MCI's operator services. 611 made it to MCI switch but routing instructions not in place



## Specific Problems - Cont.

- Open Issues:
  - BS trunks do not conform to FGD requirements
  - Can BS use CIC to signify operator services?
  - Can MCI use the 148 pseudo code to route the call properly?



## Specific Problems - Cont.

### → Pacific Bell:

- IntraLATA Toll - only 0- and 0+
  - Via MOSS only
  - Refused to provide FGD
- Refused Code Conversion - considered outside scope of Unbundled Switching
- Refused overflow traffic from MCI dedicated to PB common facilities - Business Decision
- NXX routing - Claimed technical limitations without additional detail
- Refused traffic studies from dedicated trunk - considered outside scope of unbundled switching
- No standard process or order examples
- Excessive pricing



## Specific Problems - Cont.

### → SWBT

- SWBT to determine which technology offered: AIN or Line Class Code
- All or nothing by NXX: No individual routing allowed - Business Decision
- Destination Code Routing not technically feasible - no justification provided
- Refused IntraLATA Toll - requires PUC decision
- Refused overflow -
  - Claims not technically feasible
  - Would cause union problems with staffing



## Specific Problems - Cont.

### → SWBT - Cont.

- Code Conversion

- Claimed MCI request insufficient but did not clarify what is necessary

- FGD instead of MOSS

- Requires additional information but would not specify needed information

- Price

- Line Class Codes: Upfront charge of \$351,634
- Rate per LCC determined by switch type and quantity ordered (e.g. 5ESS: (1) LCC = \$561 and (2) 1st and additional with additional = \$510) per switch



## Specific Problems - Cont.

### → USWC

- Refuses to offer dedicated transport. Requires the use of Interconnection Local Transport Restructure (Access) trunks and the associated access charges
- Refuses Code Conversion - cites MFJ restriction and a USWC Business Decision
- Refuses FGD instead of MOSS. States FGD is restricted to Interexchange Carrier Traffic and all OS must be MOSS
- Verbal pricing only. Refused to provide written cost estimate or justify pricing
- Did not address if they will allow IntraLATA toll routing



**MCI Telecommunications  
Corporation**

Northern Carrier Management  
205 North Michigan Avenue  
Suite 3700  
Chicago, IL 60601

**TO: Joanne Missig**

**FROM: Chris Gushue**

**DATE: July 10, 1997**

**SUBJECT: BFR REQUEST**

Attached to this letter is a BFR request for a combination of Network Elements allowing MCI to use its own Operator Services and Directory Assistance Platforms. MCI has chosen the Detroit University Central Office (DTRTMIUVC0) as the designated location. The specifics of this BFR are included in the BFR attachments. MCI intends to unbundle local switching from other Network Elements provided by Ameritech.

Chris Gushue  
MCI  
Contract Specialist

**MCI Bona Fide Request For Switched Combination of Unbundled Elements**

This BFR uses the format required by Ameritech. **Bold** typeface identifies a question posed by Ameritech. MCI's response is in plain typeface.

**1) Requested By**

**Company:** MCI

**Address:** 205 N. Michigan Ave.  
Suite 3700  
Chicago, IL 60601

**Contact:** Chris Gushue

**Phone:** 312-470-4812

**Fax:** 312-470-4778

**Date of Request:** 9 July 1997

**2) Description of the network interconnection capability, function, system, information or feature, or combination requested**

MCI wishes to establish a process to unbundle local switching from other network elements provided by Ameritech. At this stage, MCI intends to provide its customers with MCI DA and OS services as well as a direct link to the MCI local switch. MCI intends to follow this with further levels of unbundling involving the replacement of elements provided by Ameritech, with elements provided by MCI.

MCI wishes to lease a simple service delivery mechanism, consisting of a specified combination of elements at selected Ameritech end offices. These elements will establish an MCI platform presence at the selected end offices.

The initial combination will be elements required to provide switched service to customers, consisting of combinations of loops, unbundled switching (including ports), dedicated, shared and common transport, DA, OS and 911. This will enable MCI to offer its customers end to end service using a combination of its own network elements and network elements provided by Ameritech. For the purposes of this BFR, MCI has identified a specific End Office at which to establish the first customer service.

MCI intends to provide some of its customers with DA and OS service using MCI's DA and OS platforms. MCI also intends that calls to MCI local NXXs are routed via a direct link to MCI's own switches in the vicinity.

Ameritech Bona Fide Request Form

**3) Is this a request for a modification or combination to existing services or network elements. If so, please explain the modification or combination and describe the existing service(s) or element(s) or indicate its name.**

It is a simple modification of the service described as Unbundled Element Platform with Operator Services and Directory Assistance. (Interconnection contract Schedule 9.3.4, combination 1). The modification requires the establishment of MCI specified routing of calls to MCI service platforms.

Further modifications will replace elements provided by Ameritech with elements provided by MCI. MCI believes that these are all part of the requirement for Ameritech to provide unbundled switching, not additional or different combinations of elements requiring separate BFRs.

**4) Is this a service or network element available from any other source or a service or network element already offered by Ameritech. If yes, please provide the source's name and the name of the service or network element.**

Unbundled switching and combinations of elements are available from other ILECs. MCI is not aware if they are currently provided by Ameritech, but would expect Ameritech to be aware of such information and to advise MCI immediately.

**5) Is there anything special about the manner that you would like this feature, function or combination to operate ?**

MCI expects the combination to operate as follows:

1) At each specified Ameritech facility MCI will establish a pre-specified network configuration consisting of :

- Dedicated/shared transport and port facilities (specified in Attachment 2) to convey specified classes of call (Directory Assistance, Operator Services and calls to MCI's local switch) to MCI facilities.
- Common facilities will be used to deal with all other classes of calls and also for Directory Assistance, Operator Services and calls to MCI's local switch in congestion and blockage situations.

A set of line class codes (identified in Attachment 1) will be established identifying a range of calling options that MCI will offer to its customers.

2) Following Ameritech's advice that the work is completed, MCI will place with Ameritech, individual orders for loops and ports to be provided from the specified facility, to customers, against the pre-specified network configuration. MCI will

Ameritech Bona Fide Request Form

include in the orders the line class code to be provided to the customer. Ameritech will provide an ANI for each customer.

3) MCI may carry out a series of tests to ensure the efficacy of the process, for example:

- calls to ensure that routing has been implemented correctly.
- move a customer to a different line class code.
- change the routing details of a particular line class code using the existing elements.

4) Ameritech will provide to MCI:

- Actual line class codes to be used when customer order placed
- Daily Call Billing Records consistent with the arrangements specified in the interconnection contract.
- Monthly element and call billing to MCI consistent with the arrangements specified in the interconnection contract.
- Weekly traffic data for MCI dedicated trunking (See Attachments 5, 6 and 7).
- Process for MCI advising Ameritech of amendments to the NXX list for local call routing.
- Process for setting this combination up at additional end-offices.
- Maintenance consistent with that specified in the interconnection agreement.
- Process for replacing elements provided by Ameritech with elements provided by MCI.

**6) If possible, please include a drawing or illustration of how you would like the request to operate and interact with the network**

See attachment 4

**7) Please describe the expected location life, if applicable, of this capability (i.e. period of time you will use it). Do you view this as a temporary or long range solution ?**

MCI expects this capability to have a medium to long range life in this and other locations in the Ameritech region.

**8) If you wish to submit this information on a non-disclosure basis, please indicate this here. If non-disclosure is requested, either attach a prepared Ameritech non-disclosure agreement or request one to be sent to you for completion or identify an existing agreement that covers the transaction, and properly identify any information you consider confidential.**

MCI is not submitting this on a non-disclosure basis other than that covered in the MCI/Ameritech interconnection agreement.

**9) Where do you want this capability deployed ?**

MCI will want this capability deployed at locations to be specified across all states in the Ameritech region (Illinois, Michigan, Ohio, Wisconsin, Indiana) . This BFR specifically identifies the Detroit University end office as the initial location.

**A) State: Michigan**

**B) Major Metropolitan Area: Detroit**

**C) Specific Wire Center: Detroit University Wire Center**

**D) CLLI Code: DTRTMIUVCG0**

**10) What is the expected demand for each location. e.g. estimated number of customers, subscriber lines, number of units to be ordered:**

Initially, this site will only have a small number of line and port orders (less than 10) will be placed to ensure the efficacy of the process. However MCI intends to deploy this as a key service delivery method to its customers. Forecasts will depend upon the price and quality of the service.

MCI is expecting that the pre-specified network will be provisioned within 15 days of receipt of this BFR, such that port and loop orders can be placed on day 16.

**11) What are your pricing assumptions ? In order to potentially obtain lower non-recurring or recurring charges you may specify quantity and/or term commitments you are willing to make. Please provide any price/quantity forecast indicating one or more desired pricing points (use additional sheets as necessary)**

MCI expects that prices will be charged for unbundled elements as agreed in the Interconnection Agreement between the parties.

**12) Please include any other information that could be of assistance to Ameritech in the evaluation of this service**

Attachment 1 describes the line classes that MCI intends to be able to provide to its customers. MCI's expectation is that Ameritech will allocate specific codes to each of these classes of service and advise MCI of these codes. MCI will use these codes when ordering loop and port service for a specific customer.

Attachment 2 describes for specified call types (DA, OS, local MCI NXXs, and all other calls) the dedicated, shared and common routing that MCI requires to be provisioned by Ameritech. Also described are the overflow requirements in cases of congestion, blockage or other deterioration of service on the dedicated/shared trunks.

Attachment 3 identifies the MCI local NXXs. Calls to these NXXs are to be routed to the dedicated transport link established for this purpose.

Attachment 4 is the supplied network diagram requested by Ameritech

Attachment 5, 6, and 7 represent the minimum traffic statistics that MCI has requested Ameritech supply for our dedicated trunk groups. They are displayed in an example report format. MCI is aware that Ameritech currently has traffic reporting systems that provide these statistics for their trunk groups. We invite Ameritech to provide these existing reports for MCI to evaluate. MCI will then determine if they will meet our traffic statistic report requirements.

Ameritech Bona Fide Request Form

Updated - July 9 1997

**Attachment 1 - Description of Line Classes**

	<b>Line Class</b>					
	<b><u>1</u></b>	<b><u>2</u></b>	<b><u>3</u></b>	<b><u>4</u></b>	<b><u>5</u></b>	<b><u>6</u></b> Spare
<b>Dedicated Routing Requirements</b>						
<b>MCI DA</b>	X					
<b>MCI OS</b>	X	X				
<b>MCI Local</b>	X	X	X	X		
<b>All other calls via ILEC Tandem</b>	X	X	X	X		
<b>All calls via Common Facilities</b>					X	
<b>Line Class Code Allocated by Ameritech</b>						