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BELLSOUTH

Kathleen B. Levitz
Vice President-Federal Regulatory

Suite 900
1133-21st Street, N.W.
Washington, D.C 20036-3351
202 463-4113
Fax: 202 463-4198
Internet: levitz.kathleen@bsc.bls.com

May 4, 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: Written Ex Parte in:
CC Docket No. 97-208, CC Docket No. 97-231,
CC Docket No. 97-121, CC Docket No. 97-137,
CC Docket No. 96-98, and CC Docket No. 98-56

Dear Ms. Salas:

This is to inform you that BellSouth Corporation has sent a written ex parte communication to Ms. Carol Mattey, Chief of the Common Carrier Bureau's Policy and Program Planning Division. That communication presents a revised proffer of evidence of compliance with the requirements of Section 271 (c)(2)(B)(i) of the Communications Act of 1934, as amended. It is filed as part of the ongoing Section 271 collaborative process undertaken by the Bureau staff and BellSouth.

Pursuant to Section 1.1206(a)(1) of the Commission's rules, we are filing two copies of this notice and that written ex parte presentation. Please associate this notification with the above-referenced proceedings.

Sincerely,

Kathleen B. Levitz
Vice President- Federal Regulatory

Attachment

cc: Carol Mattey
Joe Welch

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May 4, 1998

Ms. Carol Mattey, Chief
Policy and Program Planning Division
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Written Ex Parte in CC Docket No. 97-208, CC Docket No. 97-231, CC Docket No. 97-124, CC Docket No. 97-137, CC Docket No. 96-98, and CC Docket No. 98-56

Dear Ms. Mattey:

Over the past several weeks representatives of BellSouth have met regularly with your staff to discuss the showings that must be made to receive Commission approval of a Section 271 application. To facilitate those discussions, BellSouth had filed proffers describing the evidence it would offer to show compliance with each of the fourteen checklist items appearing in Section 271 (c)(2)(B) of the Communications Act of 1934, as amended. As the discussions progressed, BellSouth amended its initial proffers for specific checklist items to reflect the insights we had received from our meetings with the staff. BellSouth has shared each of those revised proffers with the staff and filed them with the Commission's Secretary in order to make them part of the record in the relevant proceedings listed above. Today we file a revised proffer of evidence to show BellSouth's compliance with Checklist item #1.

If after reviewing the revised proffer, your staff concludes that it needs additional or different information related to the topics discussed in it, please call me at (202) 463-4113.

In compliance with Section 1.1206(a)(1) of the Commission's rules, we have today filed with the Secretary of the Commission two copies of this

written ex parte presentation in each of the proceedings listed above and requested that it be associated with each of those proceedings.

Sincerely,

Kathleen B. Levitz
Vice President - Federal Regulatory

Attachment

BELLSOUTH'S EVIDENCE OF COMPLIANCE WITH CHECKLIST ITEM 1: INTERCONNECTION

- BellSouth's interconnection agreements and its Statements of Generally Available Terms and Conditions make available interconnection for the exchange of local traffic between BellSouth and a CLEC.

- Establishing complete and efficient interconnection of networks requires determination of: 1) termination points; 2) trunk directionality; 3) trunk termination method; and 4) interconnection billing.

  - Termination points. BellSouth allows interconnection at the line-side or trunk-side of the local switch, as well as at trunk interconnection points for a tandem switch, central office cross-connect points, and out-of-band signal transfer points. Pursuant to a Bona Fide Request Process that was developed jointly with AT&T and is available to all CLECs, BellSouth also will provide local interconnection at any other technically feasible point, including meet-point arrangements. The Bona Fide Request Process is described more fully in connection with Checklist Item 2.

    - To date, four CLECs in Georgia and Tennessee - MCImetro, NextLink, Hyperion, and ICG - have requested local tandem interconnection. The latter two requests have been completed (with nearly 250 trunks in use), while the details of the former two are still being negotiated.

    - Although local tandem interconnection was formerly accomplished through the BFR process, BellSouth now offers local tandem interconnection for carrying traffic destined for BellSouth end offices that subtend a local tandem as a standard arrangement.

  - Trunk directionality. BellSouth offers routing of local and intraLATA traffic over a single trunk group. Access traffic, as well as all other traffic utilizing BellSouth's intermediary tandem switching function, is routed via a separate trunk group.

    - The CLEC may choose to order two-way trunks for exchange of combined local and intraLATA toll traffic at BellSouth end offices or access tandems. Both companies must agree to the following two-way trunking principles.

      - The CLEC will initiate a request for two-way trunking, BellSouth will concur, and two-way trunking will be jointly provisioned.

- The parties will agree upon a mutually acceptable Point of Interconnection. (If an agreement cannot be reached, each party will establish its own one-way trunk group.) BellSouth and the CLEC will each be responsible for installation and maintenance of its own trunks and facilities.

- BellSouth and the CLEC will jointly review the trunk forecast on a periodic basis, as needed, but at least every 6 months.

- The CLEC will order trunks using the Access Service Request process in place for local interconnection.

- BellSouth and the CLEC must agree on standard traffic engineering parameters that will be used in the engineering of the trunk groups.

- Either the CLEC or BellSouth can request one-way trunk groups, even after two-way trunk groups are in place.

- For technical reasons, two-way trunk groups may not be used with a BellSouth DMS100 local tandem switch or a DMS100 end office switch. (Calls from cellular type 1 trunk groups and some PBXs would otherwise automatically fail.)

- To date, two-way trunking has been ordered by one CLEC, Continental Cable, in Jacksonville, Florida.

- If the CLEC is also an IXC, the IXC's Access trunking must remain separate from the local interconnection trunking.

- Trunk termination method. BellSouth offers interconnection of facilities and equipment through: 1) physical collocation; 2) virtual collocation, and 3) interconnection via purchase of facilities from either company by the other company.

  - Physical collocation is available from BellSouth as evidenced by the fact that, from late 1996 through February 28, 1998, 52 physical collocation arrangements were accepted for service in BellSouth's nine-state region.

    - Physically collocated equipment is placed in areas separated from BellSouth's equipment area. The CLEC

may elect to terminate its own fiber entrance cables on its collocated equipment. The CLEC is able to install, operate and maintain its equipment within that space and arrangements are made for the installation of cross-connections to BellSouth's unbundled network elements, transport services, and trunking to other BellSouth central offices.

- BellSouth places no restrictions on the type of telecommunications equipment that may be physically collocated within a BellSouth central office. However, in order to protect BellSouth facilities, equipment and personnel, and the equipment and personnel of collocators, all collocation arrangements must be engineered and installed by a BellSouth-certified supplier and must comply with the BellSouth Engineering and Installation Standards for Central Office Equipment (TR 73503). A CLEC may be approved to perform those tasks by using BellSouth certified suppliers.

- BellSouth permits a CLEC to place interconnection facilities between its physical collocation spaces within a building in those cases when a single CLEC has more than one physical collocation arrangement in a given central office building.

- *If space is not available for physical collocation, BellSouth will provide the state commission information needed to confirm unavailability.*

- Where space is not available for physical collocation, or upon request of the CLEC, BellSouth will offer virtual collocation for local interconnection in accordance with the existing BellSouth Tariff FCC Number 1, Section 20, Virtual Expanded Interconnection Service. Across BellSouth's nine-state region, there were 160 virtual collocation arrangements accepted for service to CLECs with an additional 86 arrangements in progress as of February 28, 1998.

  - Under this option, the CLEC installs fiber optic transmission cable to the entrance manhole of the BellSouth tandem or end office and provides sufficient additional cable for BellSouth to pull the cable into a cable vault. BellSouth splices the CLEC's transmission cable to a CLEC-provided riser tail and cable termination shelf

assembly. The CLEC directly contracts with a BellSouth-certified supplier for the engineering and installation of its collocation equipment arrangement.

- The CLEC leases to BellSouth all equipment, facilities and support components required to provision, maintain, and repair the arrangement on an ongoing basis for the nominal fee of one dollar ($1.00).

- Performance monitoring, alarm monitoring and software cross-connect control of all collocator-owned/BellSouth-leased facilities and equipment are the responsibility of the CLEC. Once notified by the CLEC that work is necessary, BellSouth will, at a minimum, maintain and repair collocated equipment within the same time periods as those that apply to the performance of similar functions for the same types of equipment used by BellSouth for itself.

- The facilities installed under this option can be used for interoffice trunking between the CLEC and BellSouth and for access to unbundled network elements.

- Switching equipment cannot be installed under this option.

- SONET-based interconnection is similar to virtual collocation, except that both the CLEC and BellSouth install SONET-based equipment in their respective locations and each can choose the SONET equipment supplier of their choice. All of the same options for service configurations exist for this arrangement as with the virtual collocation interconnection.

- With either physical collocation or virtual collocation, BellSouth provides an interconnection point or points, physically accessible by both BellSouth and the requesting CLEC, at which the transmission cables carrying the CLEC's circuits enter BellSouth's premises. At each of its premises where space is available, BellSouth will make available at least two such interconnection points for CLECs.

- BellSouth permits the placement of interconnection facilities that allow a collocating CLEC to connect its equipment in its physical collocation space to the equipment in another CLEC's physical collocation space within the same central office. The CLECs may provide such interconnection facilities themselves or, at the CLECs' request, such facilities will be provided by BellSouth. In

the event that the equipment of either or both CLECs is placed in virtual collocation space, BellSouth will provide such interconnection facilities for their use.

- A CLEC may use its collocated facilities to provide interoffice trunking for the purpose of originating and terminating calls between a CLEC's switch and a BellSouth switch, and for intermediary traffic to or from a third party via a BellSouth tandem switch.

- Other interconnection arrangements may be negotiated using the BFR process.

- For example, some companies prefer a mid-span meet for interconnection in addition to or in lieu of tandem and/or end office interconnection.

- Other examples of negotiated interconnection arrangements include Super Groups and Multiple Tandem Access ("MTA").

  - *The BFR process is used for meet points and other arrangements because of the need to coordinate specific points of interconnection with the CLEC.*

- BellSouth has recognized that a CLEC might wish to interconnect with another carrier besides BellSouth through a BellSouth tandem. Although this functionality is not required by the checklist, BellSouth offers intermediary service which provides for such functionality at the access tandem and at some local tandems.

- *BellSouth provides nondiscriminatory trunk installation.*

  - *BellSouth follows the same processes for installing CLEC trunks as for installing BellSouth's own trunks.*

    - *The normal interval for new or additional trunks is twenty-two days. However, this interval is agreed to between BellSouth and the other carrier and can be as short as one day in an emergency situation or as long as six months if either BellSouth or the other carrier must add equipment for switching the traffic carried over such trunks. Following are the latest historical data (December 1997) related to pending service orders for Interconnection Trunks:*

	Total	*# Met*	*% Met*	*# Not Met*	*% Not Met*
BLS Trunk Orders	*20,480*	*17,692*	*86.4*	*2,788*	*13.6*
CLEC Trunk Order	*5,671*	*5,380*	*94.9*	*291*	*5.1*

- BellSouth has accumulated trunk blockage data revealing that BellSouth's performance for CLECs is at parity with BellSouth's performance for its retail customers.

  - Using the latest data from December 1997, and assuming that all of the trunk groups had the same busy hour in the same time period, the trunk blocking rate for CLECs is 1.4 percent (0.9 percent between the tandem and the CLEC switch, plus 0.5 percent between the tandem and a BellSouth end office). Compared to 4.0 percent for BellSouth (2.0 percent for each group from a BellSouth end office to the tandem), this data reveals that the service quality provided to CLECs meets or exceeds the service quality that BellSouth provides its own retail customers.

  - BellSouth identifies where a blockage is occurring by collecting data, on a weekly basis, from both BellSouth's and CLECs' trunk groups. The data are processed weekly to calculate the percent blocking during a time-consistent busy hour ("TCBH"). The TCBH is defined as the identical hour each day during which, over a number of days, the highest traffic is measured. BellSouth breaks down the data indicating percent blocking, size of trunk groups, and busy hour.

    - BellSouth works with CLECs on trunk forecasts and planning, participates in numerous meetings with CLECs to gather trunking information and thereby minimize blockages.

      - BellSouth has found that when problems do arise, they are largely due to CLECs responding to actual blockage that is occurring rather than forecasts. BellSouth does not maintain spare terminations and facilities that would be ready immediately to accommodate such requests.

      - Some CLECs do not provide <u>any</u> forecasts. They simply request trunks after already having committed to end users. In these instances, blocking is highly probable due to unexpected, unforecasted CLEC volume.

      - Blocking also arises because CLECs are not ready to add the trunks requested to the CLEC's network or require a

long lead time of several weeks before the CLEC is able to turn up the requested trunks.

- BellSouth reroutes calls that otherwise would be blocked.

  - BellSouth's trunking network relies heavily on alternate routing first to high usage trunk groups (often directly between the originating and terminating switches) and final trunk groups (between the original switch and the tandem switch and between the tandem switch and the terminating switch.) Trunk forecasts, developed using actual measured volumes, contribute significantly to the effective use of this trunking network architecture.

  - Where sufficient information regarding traffic volumes and patterns is available, a call may be rerouted from the high usage trunk group to the final group.

  - The use of this trunking architecture permits a high volume of calls that would have been blocked to be rerouted from the high usage trunk group to the final trunk group.

  - *BellSouth does not differentiate between trunks of CLECs and BellSouth for repair duration. Trunks are repaired on a "first come first served" basis. Reports displaying the repair duration time for trunks will be produced for April on May 15, 1998. Trunking data is displayed on the Internet site www.bellsouth.com/interconnection/markets/local.htm and will be enhanced on May 15, 1998. CLEC specific information for this measurement will not be available.*