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Vice President-
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COMMISSION
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May 15, 1998

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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: NSD File No. L-98-27, CC Docket No. 95-116 /
Order, DA 98-614 (March 31, 1998)
Long-Term Database Method of Number Portability
(LNP), May 8th Report **Ex Parte**

Dear Ms. Salas:

This is to inform you that on May 13, 1998 a conference call was held with representatives of BellSouth Corporation and the FCC's Network Services Division of the Common Carrier Bureau concerning the referenced document. The purpose of the call was for BellSouth to address several questions in order to clarify information it provided in its May 8th report concerning progress for meeting interface requirements with Lockheed Martin's Number Portability Service Management System. The questions and associated responses discussed during the call are detailed in the attached documents.

Please associate this notification and attachment with the referenced docket proceeding. This notification is being filed two days after the conference call because the call commenced late afternoon, after 3:00 P.M. on May 13th and the need to gather information provided in the attachment materials.

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On the call representing the FCC were Geraldine A. Matisse, Gayle Radley Teicher, Andre H. Rausch, Patrick E. Forster and Jared Carlson and representing BellSouth were Doug McDougal, Vish Emani, Randy Sanders, Bill Shaughnessy, David Frolio and Ben Almond.

If you have any questions concerning this matter, please contact the undersigned.

Sincerely,



Ben G. Almond
Vice President-Federal Regulatory

cc: Geraldine A. Matisse
Gayle Radley Teicher
Andre H. Rausch

Patrick E. Forster
Jared Carlson

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Response to the FCC's Questions on BellSouth's Progress Report

Notes from Conference Call with FCC of 5-13-98

1. What version of NANC's requirements does BellSouth's software LNP G/W R1.6 correspond to?

BellSouth's LNP G/W R1.6 corresponds to a subset of NANC 1.8. It does not correspond exactly to any NANC release. Our LNP G/W R1.6 provides the NANC 1.8 functionality that, to the best of our knowledge following consultation with Lockheed and Telecom Software Enterprises, will enable BellSouth to pass the stringent testing requirements with the Lockheed NPAC and, therefore, be certified. Passing certification testing with the NPAC is the true litmus test for the software functionality of our LNP Gateway. In its May 8th Report, BellSouth indicated the areas of interface functionality that would be incorporated in subsequent versions of its LNP G/W R 1.6 release (see section I.A, May 8th Report). The deferment of these interfaces will have no impact on BellSouth's ability to meet appropriate certification requirements with its version LNP G/W R1.6. It will also have a negligible impact on CLECs' operations and minor a impact on BellSouth's operations.

2. Does BellSouth intend to bring its software up to the NANC 1.8 requirements? If so, when does BellSouth anticipate that it can accomplish this?

As stated in our response to question #1, we believe that our LNP G/W R1.6 satisfies the basic requirements for certification testing with the Lockheed Martin NPAC. BellSouth will build additional functionality from NANC 1.8 into its LNP G/W R1.7, which is scheduled for certification testing during 9-7-98 through 10-1-98. Our plans are to have R1.7 on the production platform by no later than 10-1-98. We also plan to build additional NANC 1.8 functionality into our LNP G/W R1.8, which is scheduled for certification testing during 11-20-98 through 12-7-98, and therefore, on the production platform by no later than 12-8-98.

3. By August 31, will BellSouth provide the ordering, provisioning, and associated functionality to its local exchange and CLEC customers that NANC requires in its 1.8 requirements?

Yes. We have begun the rigorous interoperability and turn up testing activities required to certify with the Lockheed NPAC. The hundreds of test suites associated with this activity will provide BellSouth and Lockheed with significant empirical data regarding the performance of our LNP Gateway vis-à-vis the Lockheed NPAC version of NANC 1.8 software. Certification is a prerequisite to begin industry, end-to-end testing. We plan end-to-end testing with CLECs in the Atlanta MSA between July 15 and August 14. This final phase requires the CLECs to send test LNP orders

to BellSouth as they will do post-LNP implementation. End-to-end testing exercises the entire ordering and provisioning systems process, including approximately 40 operations systems, culminating with LNP call through testing in the network.

4. What exactly will be the effects on CLECs of BellSouth not implementing NANC 1.8 requirements for (a) intercompany testing, and (b) LNP ordering and provisioning?

The BellSouth implementation of LNP G/W R1.6, which is a subset of NANC 1.8, should be transparent to the CLECs. We contracted with TSE because of their knowledge of the Lockheed NPAC software and because we wanted an objective, third party to evaluate our interpretation of NANC 1.8 functionality. Following consultation with both TSE and Lockheed, we have finalized development plans for our LNP G/W R1.6. All three parties concur that the subset of NANC 1.8 that will be included in LNP G/W R1.6 should provide sufficient functionality to successfully pass certification testing with the NPAC SMS. In addition, there will be no impact on the LNP ordering and provisioning process for CLECs. The exact same LNP ordering and provisioning capability available to BellSouth will be available to all CLECs when LNP is offered on 8/31/98. Also, BellSouth will be testing with a full complement of CLECs. Some CLECs will have the capability of a mechanized interface while others will utilize a low-tech interface. See the attached summary analysis of NANC change order requirements.

5. What exactly are the problems BellSouth has with addressing NPA Split functionality? Will these problems be addressed and rectified by August 31, 1998?

The first occurrence of a state PSC mandated NPA split in the post-LNP environment will occur in the New Orleans MSA. Our plan is to modify the LNP G/W R1.7 by October 1, 1998, which will provide in a timely manner the necessary functionality for the three switches impacted by the NPA split associated with the New Orleans Phase III implementation presently scheduled for completion 10-31-98.

Summary of the Telecom Software Enterprises, LLC and

BST's Analysis of NANC Change Orders

Final Version Dated April 27, 1998

Introduction

In February, 1998, when it became apparent that the SE LLC would have to transition from the Perot Systems NPAC to the Lockheed NPAC, BellSouth systems engineers and software developers initiated a review of the 57 NANC and 1 Illinois Change Orders that differentiate NANC IIS/FRS R1.1 (the software release being used by Perot Systems) and NANC IIS/FRS R1.8 software (the software release being used by Lockheed).

Due to their extensive knowledge of the Lockheed NPAC and the NANC IIS/FRS specifications, and their knowledge of Lockheed's testing methodology, TSE was contracted by BellSouth during March, 1998 to review our LNP Gateway systems architecture and functionality and conduct a technical review and analysis of the change order conclusions that our engineers had reached.

In the Executive Summary of their evaluation paper dated April 27, 1998, TSE indicated that the BellSouth LNP Gateway must be 1.8-compliant for **required functionality** over the NPAC Interface, and **should be** 1.8-compliant for other functionality that relates to the LNP Gateway.

The TSE Evaluation that has been performed assumes the general intent of each NANC Change Order. Each of the NANC's change orders had to be evaluated in terms of its relevancy to the BellSouth's LNP gateway system architecture. The majority of the ordering, provisioning and/or measurement administration functionalities as defined by the 58 change orders have already been designed into BellSouth's system. This reduced the extent of new software development required by BellSouth.

Summary of the TSE and BellSouth's Evaluation

The final assessment of the change order requirements is provided below along with a chart which list the specific NANC change orders involved.

<u>TSE & BST</u>	<u>Description</u>
43	(N) Change Orders requiring no LNP Gateway development The functionalities associated with these change orders are already provided for in BellSouth's system
3	(R) Change Orders requiring a GDMO and/or ASN.1 recompile
5	(L) Change Orders requiring a low level of development
4	(M) Change Orders requiring medium level of development
0	(H) Change Orders requiring high level of development
3	(Z) Change Orders scheduled for a future release

Additionally, **TSE and BellSouth mutually agreed that there is functionality that can be deferred to a future release(s)**. There are two Change Orders relating to the provisioning of NPA splits that BellSouth will not require until 10-1-98. There also is a Change Order related to filtering functionality that BellSouth identified as being deferrable to a future release. In our meeting of 4-22-98 with TSE they concurred with our assessment and modified their level of effort rating from (N) to (Z). There also is a Change Order relating to SOA Audits that BellSouth initially assessed as a (Z), deferrable to a future release. In discussion with TSE on 4-20-98, we agreed that processing of audits from the NPAC via the LSMS was sufficient. Therefore, this Change Order was reclassified to (N), no work effort required.

Conclusion

We believe that the BellSouth LNP G/W R1.6 will satisfy the rigorous Lockheed Martin certification testing requirements. Further, we believe that the CLECs that participate in end-to-end testing beginning July 15, 1998 will interface with a robust and fully functional LNP Gateway that will meet their requirements.

May 15, 1998

The following 43 Change Orders can be implemented in LNP G/W R1.6, with **no** software development required at the LNP Gateway:

Change Order

ILL142

NANC87, 88, 89

NANC91, 92, 93, 94, 95, 96

NANC98, 99, 100, 101, 102, 103, 104

NANC106, 107

NANC110, 111, 112

NANC115

NANC123, 124

NANC130

Nanc133, 134

NANC137

NANC140

NANC141

NANC143

NANC152

NANC155

NANC157

NANC161

NANC164, 165, 166

NANC170, 171, 172

NANC182

Descriptions of the above Change Orders may be found in the NANC Interoperability Interface Specification.

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The following three Change Orders require a low level of system testing and will be implemented in LNP G/W R1.6:

NANC51

NANC84

NANC97

The following five Change Orders require a low level of software development and will be implemented in LNP G/W R1.6:

NANC85, 86

NANC126

NANC142

NANC176

The following four Change Orders require a medium level of software development and will be implemented in LNP G/W R1.6:

NANC105

NANC135, 136

NANC173

The following three Change Orders will be deferred to later software releases as follows:

NANC144 LNP G/W R1.8, currently planned for 12-98 production

NANC163 LNP G/W R1.7, currently planned for 10-98 production

NANC190 LNP G/W R1.7, currently planned for 10-98 production

Descriptions of the above Change Orders may be found in the NANC Interoperability Interface Specification.