

**BELLSOUTH**

**Kathleen B. Levitz**  
Vice President-Federal Regulatory

September 2, 1998

EX PARTE OR LATE FILED

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

EX PARTE

**ORIGINAL**

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

**RECEIVED**

SEP - 2 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: CC Docket No. 98-121

Dear Ms. Salas:

This is to inform you that William Stacy and the undersigned met with Commission staff on September 2, 1998. The following Common Carrier Bureau staff members attended some or all of this conference: Jonathan Askin; Jake Jennings; Andrea Kearney; David Kirschner; Jason Oxman; and Michael Pryor.

To receive authority to provide in-region, interLATA services to customers in Louisiana, BellSouth must show its compliance with the checklist requirements of Section 271 of the Communications Act of 1934, as amended. In particular, BellSouth must demonstrate that it is offering to competitive local exchange carriers (CLECs) nondiscriminatory access to its operating support systems (OSS). The interfaces are the mechanisms through which BellSouth gives CLECs such access. BellSouth has also developed a set of performance measurements to demonstrate its success in providing CLECs nondiscriminatory access to unbundled network elements and its OSS.

Today's discussion focused upon specific issues relating to CLECs' ordering and BellSouth's providing unbundled network elements, or UNEs. During the discussion, Mr. Stacy identified for the staff the parts of his affidavits and the related exhibits that present performance measurements related to provision of UNE loops, trunking, and combinations. We then discussed how the industry developed and operates the "change control" process governing OSS interface development. Mr. Stacy described BellSouth's procedures for handling service and facilities request that combine requests that can be ordered electronically with requests that must be handled manually and the testing underlying Ernst and Young's attestation audit of BellSouth's OSS. Finally we discussed the question of whether it should be BellSouth or the requesting CLEC that incurs the upfront costs of developing software and firmware needed for the CLEC to be able to order UNEs in the format the latter desires.

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As required by Section 1.1206(a)(2) of the Commission's rules, we are filing two copies of this notice and ask that you associate this notification with the proceeding identified above.

Sincerely,

A handwritten signature in black ink that reads "Kathleen B. Levitz". The signature is written in a cursive style with a large initial 'K' and a long, sweeping tail on the 'z'.

Kathleen B. Levitz

cc: Jonathan Askin  
David Kirschner

Jake Jennings  
Jason Oxman

Andrea Kearney  
Michael Pryor