

**ORIGINAL**

**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

September 11, 1998

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

RECEIVED

SEP 11 1998

Re: Written Ex Parte in CC Docket No. 98-121

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Ms. Salas:

This is to inform you that BellSouth Corporation has submitted today a written ex parte to the staff of the Common Carrier Bureau's Policy and Program Planning Division. That ex parte sets forth written answers to questions posed during a meeting on September 3, 1998, at which Bill Stacy of BellSouth discussed with the staff issues relating to the operation of BellSouth's OSS and to a question posed during a telephone conversation between Bill Bailey, Jake Jennings, and Michael Pryor of the Common Carrier Bureau and the undersigned on September 9, 1998. This information has been submitted in response to a request from the staff of the Common Carrier Bureau.

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 record of CC Docket No. 98-121.

Sincerely,



Kathleen B. Levitz

Attachment

cc: Carol Matthey

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Vice President-Federal Regulatory

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September 11, 1998

Ms. Carol Matthey, 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. 98-121

Dear Ms. Matthey:

During a meeting that Bill Stacy and the undersigned had with members of your staff on September 3, 1998, to discuss issues relating to the operation of BellSouth's OSS, your staff posed several questions and requested that BellSouth respond on writing to those questions. Subsequently, on September 9, 1998, during a telephone conversation between Michael Pryor, Bill Bailey and Jake Jennings of your staff and me, the staff posed an additional question concerning the capabilities of BellSouth's OSS and asked that the written answer to that question be included with the answers to the earlier questions. Attached is a copy of the BellSouth's written response to all those questions.

If after reviewing this attachment your staff concludes that it needs additional information, 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 and requested that it be associated with the record of CC Docket No. 98-121.

Sincerely,



Kathleen B. Levitz

Attachment

cc: Jonathan Askin  
David Kirschner

Jake Jennings  
Jason Oxman

Andrea Kearney  
Michael Pryor

**Responses to Questions posed by FCC Staff in connection with Bill Stacy's visit to the Commission on September 3, 1998**

**Question 1. Has BellSouth had any requests in Louisiana for an UNE loop in areas served by IDLCs and, if so, how has BellSouth met CLEC needs for such loops?**

**Answer:** The BellSouth personnel responsible for processing requests for UNE loops in Louisiana are unaware of any CLEC requests for UNE loops in areas served by IDLCs. To be absolutely certain, however, would require checking the records associated every loop in Louisiana for which a CLEC has made UNE loop request, a lengthy task. BellSouth has not needed to undertake any special construction to satisfy CLEC requests for UNE loops in Louisiana.

**Question 2. BellSouth claims that the trunk blocking rates for CLECs are less than the trunk blocking rates for BST. Please show how BellSouth calculated, using the BellSouth Service Quality Measurement Reports for Trunking in LA submitted with BellSouth's application, that a CLEC customer's chance of experiencing trunk blockage on any particular call is less than that experience by a BST customer.**

**Answer:**

The Trunking Reports provided in Exhibit WNS-3 to the Performance Measurement Affidavit of William N. Stacy are measures of network performance. BellSouth's trunk groups are engineered to standards set by BellCore, which require local trunks to be engineered to experience less than 3% blockage and Common Transport Trunk Group (CTTG) trunks less than 2% blockage. These same standards are followed by other LECs in the US. The procedures used by BellSouth are those used and accepted by the entire industry.

An approximation of the **worst case blocking** experienced by a CLEC customer in comparison to the worst case blocking experienced on the BellSouth local network can be determined by using a formula as follows:

A = blocking on BST administered to CLEC trunk groups = (TOT GRPS > 3 % OBSERVED BLOCKING)/TOTAL TRUNK GROUPS X WORST CASE BLOCKAGE ON THAT GROUP

B = blocking on CTTG [need to write out ] trunk groups = (TOT GRPS > 2 % OBSERVED BLOCKING)/TOTAL TRUNK GROUPS X WORST CASE BLOCKAGE ON THAT GROUP

C = BellSouth local Network blocking experience = (TOT GRPS > 3 % OBSERVED BLOCKING)/TOTAL TRUNK GROUPS X WORST CASE BLOCKAGE ON THAT GROUP

A + B = C

This formula provides the worst case probability of a customer experiencing blocking when making a call into a trunk group that had blockages that exceed a threshold.

A review of the trunk blocking data for Louisiana furnished in the reports in Exhibit WNS-3 reveal the following:

CLEC Aggregate Reports (Report not furnished)

March-BST Administered - 36 Total Trunk Groups with 0 having > 3%  
April-BST Administered - 36 Total Trunk Groups with 0 having > 3%  
May-BST Administered - 36 Total Trunk Groups with 0 having > 3%

BST CTTG

March-BST Administered - 4388 Total Trunk Groups with 47 having > 2%  
April-BST Administered - 4367 Total Trunk Groups with 43 having > 2%  
May- BST Administered - 4335 Total Trunk Groups with 24 having > 2%

BST Local Network

March-BST Administered - 4414 Total Trunk Groups with 80 having > 3%  
April-BST Administered - 4429 Total Trunk Groups with 116 having > 3%  
May-BST Administered - 4498 Total Trunk Groups with 146 having > 3%

March Calculation

(A)0/36 X 0\* + (B)47/4388 X .092\* compared to (C) 145/4414 X .328\*  
(A)0.0 + (B)0.0010 = 0.0010 = 0.1% compared to (C) 0.0110 + 1.1%

April Calculation

(A)0/36 X 0\* + (B) 43/4367 X .024\* compared to (c) 116/4429 X .271\*  
(A)0.0 + (B) 0.0002 = 0.0002 = 0.02% compared to ((C) 0.0071 = 0.71%

May Calculation

(A)(0/36 X 0) + (B)(24/4435 X .057) compared to (C) 80/4496 X .082\*  
(A)0.0 + (B)0.0003 = 0.0003 = 0.03% compared to (C) 0.015 = 0.15%

Therefore in the month of March in Louisiana, a CLEC customer would have had less than a 0.1% probability of calling into a trunk group that experienced blocking greater than the threshold, whereas a caller using the BST Local Network would have had a 1.1% probability. These numbers will vary each month. For May, a CLEC customer had less than a .03% probability, whereas a customer using BellSouth's local network had a 0.15% probability of being blocked.

\* These numbers are the worst case observed blocking percentages from the Detail Trunk Group Service Report for the trunks used in the applicable case.

**Question 3. Please identify which document(s) BellSouth has submitted, either in support of BellSouth's application or as an attachment to its reply, state(s) that the BellSouth ASR is mechanized. Where in that document does this statement appear?**

**Answer:** This is discussed in the Stacy OSS Affidavit filed in support of BellSouth's application at paragraphs 77-80 and 96-97 and in Exhibit WNS-24.

**Question 4. Please describe the procedures BellSouth followed to establish the change control process.**

**Answer:** BellSouth's External Change Control Process was established based on BST's desire to secure customer input regarding future enhancements to the existing BST Electronic Interfaces, and to have an organized means of securing and understanding the CLEC's requirements. Therefore, in late October 1997, BST began having discussions with individual CLECs (Sprint, AT&T, and MCI) regarding change control.

The initial meetings with the CLECs to discuss a formal change control process was set for December 11, 1997, and included MCI, Sprint and AT&T. After the Georgia Workshop on December 9, 1997, it was decided to include in these discussions all of the CLECs who participated in the workshop. Thus BellSouth invited 8 CLECs to participate in the Change Control Formulation Process. Those CLECs were: AT&T; Winstar; MCI; Sprint; Tel Link; ICI; LCI; and ACSI. Of these Tel Link declined to participate because of resource limitations and three of the others each sent a representative to only one meeting.

Further meetings with the CLECs were held in early 1998. These meetings led to the formal rollout of the External Change Control Process and its supporting documentation on April 30, 1998.

**Question 5. Please describe the status of the discussions on the length of time during which BellSouth will maintain the "old" version of the EDI interface following the introduction of a new EDI interface.**

**Answer:** Several CLECs, including AT&T, MCI, Sprint and LCI have requested that BellSouth support multiple versions of EDI. BellSouth's original policy was to support the most current version of EDI as well as the previous version for 90 days past BellSouth's implementation of the most current version. AT&T, MCI, Sprint and LCI asked BellSouth to reconsider this policy.

On August 28, 1998, BellSouth modified its policy on supporting multiple version of EDI. BellSouth will now support two software maps at all times. The older

map will be frozen, i.e. no changes will be made to it, when the newer map is issued. BellSouth will support both those maps until a newer map is issued. At that time BellSouth will support the two newer software maps. For example, if version A were the current version, then following issuance of new version B, BellSouth would freeze version A. BellSouth would support both version B and the frozen version A until BellSouth issued version C. When it issued version C, BellSouth would no longer support version A, would freeze version B and would support both version C and the frozen version B until the issuance of another version. As with the previous policy, CLECs will have 6 months advance notice of BellSouth's plans to implement a new version of OBF standards. This policy extends only to EDI standard OBF versions. Also new measurements will not be added to the old version, only the new version.

BellSouth is preparing correspondence to give CLECs notice of its new policy.

Question 6. Please identify which document(s) submitted by BellSouth, either in support of its application or as an attachment to its reply comments, explain(s) the process a CLEC follows to request that BellSouth correct a defect or make a change to the EDI interface.

**Answer.** There are two ways a CLEC can make a change to EDI: 1) through the Change Control process, which is documented in paragraphs 229-234 of the Stacy OSS Affidavit filed in support of BellSouth's application and in Exhibit WNS CD-7, and 2) through the OBF standards forum. The Change Control process is most likely the faster way to seek an EDI change. An example of a change to EDI in advance of OBF standards is adding service jeopardies to EDI, for which there is no standard. This issue was first discussed in the July 13, 1998 Change Control meeting, and BellSouth will implement this change effective in December 1998.

**Question 7. Please identify which document(s), submitted by BellSouth either in support of its application or as an attachment to its reply comments, discuss(es) BellSouth's ability to handle reasonable volume increases relating to AT&T orders placed in connection with its Digi-Link service.**

Answer: The Funderburg Affidavit filed in support of BellSouth's Application discusses BellSouth's ability and willingness to respond to increases in the volume of LSRs generally. The Milner Reply Affidavit at paragraph 10 also describes the BellSouth commitment to meet increasing volumes of CLEC orders. At paragraphs 7 and 8, the Milner Reply Affidavit specifically discusses BellSouth's ability to provide Route Index-Portability Hub (RI-PH) functionality, which is part of the larger Digital Link project. BellSouth believes that BellSouth's provision of RI-PH provides an example of BellSouth's willingness and ability to work to meet its CLEC customers' needs on or ahead of schedule.

See also, Stacy OSS Affidavit filed in support of BellSouth's Application, paras. 191-219 (electronic interface capacity).

**Question 8. Please identify which document(s) submitted by BellSouth, either in support of its application or as an attachment to its reply comments, contain(s) an "error analysis report" describing BellSouth's basis for rejecting CLEC orders.**

**Answer:** The error analyses for June and July are attached to the Stacy Performance Measurements Reply Affidavit as Exhibits WNSPM-Reply 5a and 5b .

**Question 9. Please identify which documents submitted by BellSouth, either in support of its application or as attachments to its reply comments, discuss(es) whether a CLEC can use BellSouth's TAFI to make trouble reports relating to UNE loops.**

**Answer:** Paragraph 164 of the Stacy OSS Affidavit submitted in support of BellSouth's application explains that TAFI can handle troubles associated with UNEs that can be identified with a telephone number, such as unbundled ports, interim number portability, and non-designed UNE loops. The interface to be used to report troubles with designed UNE loops, which are identified by circuit identification numbers, is EC-TA, as noted in paragraph 175 of the Stacy OSS Affidavit.