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November 24, 1998

EX PARTE**RECEIVED****NOV 24 1998**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARYMs. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, NW, Room 222  
Washington, DC 20554

Re: CC Docket No. 98-121

Dear Ms. Salas:

On November 23, 1998 Sid Boren, Bob Blau, Randy New, Allan Price, Bill Stacey, and Kathie Levitz, representing BellSouth, met with Larry Stickling, Chief of the Common Carrier Bureau, and members of his staff. Bureau staff members attending some or all of the meeting included Yog Varma, Carol Matthey, Linda Kinney, Claudia Fox, and Jake Jennings. The meeting focused upon the OSS requirements, collocation requirements and performance measurement data discussed in the Commission's recent order denying BellSouth's application for authority to provide in-region, interLATA service in Louisiana. Documents attached to our notice of oral ex parte filed November 13, 1998 provided the framework for the discussion that ensued. At the close of the meeting, BellSouth shared a list of outstanding questions based upon earlier meetings with the Bureau staff related to the subjects of today's meeting.

Two copies of this notice are filed in accordance with Section 1.1206(a) of the Commission's rules. Please associate this notification with the proceeding identified above.

Sincerely,



David G. Frolio

Attachment

cc: Larry Strickling  
Carol Matthey  
Jake JenningsYog Varma  
Claudia Fox  
Linda KinneyNo. of Copies rec'd 011  
List ABCDE

## Questions

1. Issue: Repair and Maintenance TAFI integration  
Action Item: Answer to following question:  
If it is not necessary to make TAFI integrable, what would constitute an adequate showing that the BellSouth repair and maintenance interfaces provided nondiscriminatory access to BellSouth's back office systems?
  2. Issue: 3<sup>rd</sup> Party Testing demonstration of operational readiness.  
Action Items: Answers to following questions:
    - a. If third-party testing of BellSouth's OSS interfaces is not required to show operations readiness, what testing would be sufficient to make this showing (i.e., what constitutes internal "end-to-end" testing)
    - b. What volume of commercial use must exist before BellSouth can rely on commercial use to show operational readiness (i.e., is the volume of CLEC resale adequate to rely on CLEC commercial use to show adequacy of interfaces for resale operations?)
  3. Issue: Complex Ordering/ Partial Migration Orders  
Action items: Answers to the following questions:
    - a. Must BellSouth wait until August, 1999, when it will have completed upgrades to interfaces that will permit at least some types of partial migrations and complex directory listings to be performed electronically? (August is when the "best of EDI Versions 8.0, 9.0, and 10.0" is scheduled to become operational.)
    - b. What is the correct BST retail analog to which partial migrations should be compared?
  4. Issue: Flowthrough  
Action Items: Answers to the following questions:
    - a. What CLEC orders are to be counted in defining denominator of flowthrough rate? (i.e., what is a complex order and what is a valid order?)
    - b. How disaggregated must flowthrough data be? (i.e., must it be presented for each interface; must it be reported by order type – UNE, resale residential and resale business?)
  4. Issue: Retail Analogs/Performance Standards/Statistical Measurements  
Action Items: Answers to following questions:
    - a. For a successful 271 application, must each FCC identified CLEC performance criterion have an associated retail analog?
    - b. Short of filing a 271 application, how can a BOC learn whether a retail analog, whether prescribed by a state in its service area or selected by itself, will be acceptable to the FCC?
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- c. In the absence of FCC prescribed measurement standards and methods of analyzing relevant data, what standards and analytic methods should a BOC apply to demonstrate that it has met its nondiscrimination obligation(s) for a specific checklist item? If a BOC can show that one of its states has prescribed performance standards and methodologies (e.g. a z-test) to determine compliance with these obligations, would the FCC accept a showing of compliance using these standards and methodologies as evidence of that the BOC had met its nondiscrimination obligations?