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February 1, 1999

EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th St. SW
Washington, D.C. 20554

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FEB - 1 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket No. 98-56 and CC Docket No. 98-121

Dear Ms. Salas:

This is to inform you that on January 29, 1999 Chris Shagnea and I, both of BellSouth, and Dr. Fritz Scheuren and Dr. Ed Mulrow of Ernst & Young met with members of the Common Carrier Bureau staff. The following Common Carrier Bureau staff members attended at least part of the meeting: Alex Belinfante; Andre Rausch; Florence Setzer; Daniel Shiman; and Whitey Thayer.

During the meeting, BellSouth representatives gave a status report on the workshops that the Louisiana Public Service Commission ("LPSC") staff held on in LPSC Docket No. U22252 – Subdocket C).The purpose of these workshops is to identify the performance measurements, standards and statistical analyses that the LPSC should use to determine whether BellSouth is meeting its statutory obligation to provide CLECs with nondiscriminatory access to UNEs and services. We then focused upon the efforts of Ernst and Young to develop statistical tests for analyzing performance data to determine whether BellSouth was meeting those statutory obligations. Using the attached document, our subject matter experts answered the questions of the Bureau staff about BellSouth's proposed methodology for performing the necessary analysis.

Because the Commission has been considering issues related to performance measurements and standards in both proceedings identified above, we are filing

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notice of this ex parte meeting in both dockets, as required by Section 1.1206(a)(2) of the Commission's rules. Please associate this notice with the record of both dockets.

Sincerely,

Kathleen B. Levitz

Kathleen B. Levitz
Vice President – Federal Regulatory

Attachment

cc: Alex Belinfante (w/o attachment)
Andre Rausch (w/o attachment)
Florence Setzer (w/o attachment)
Daniel Shiman (w/o attachment)
Whitey Thayer (w/o attchment)

[redacted]

Order Completion Interval

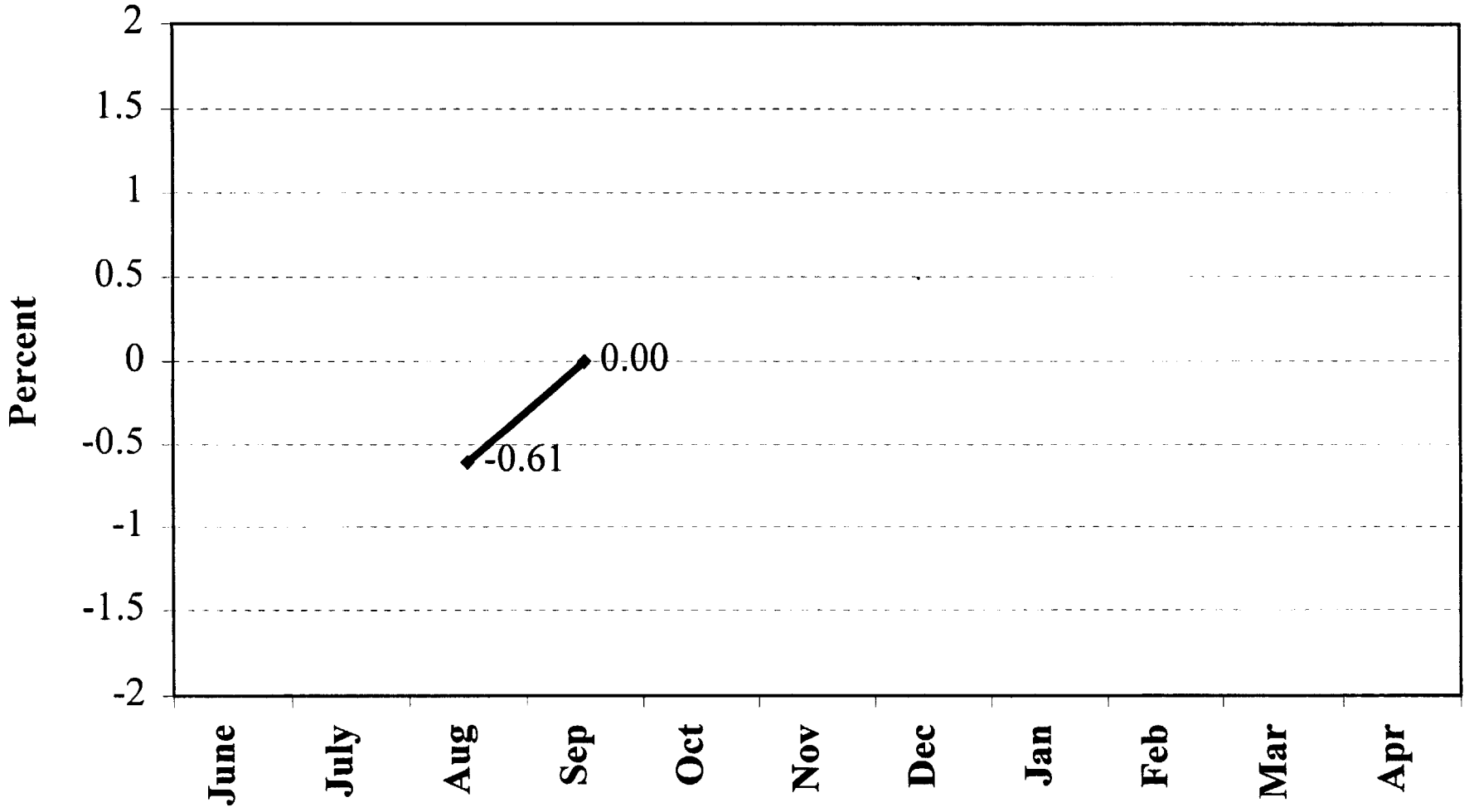
August 1998

Thru

December 1998

Order Completion Interval

Mean Differences Adjusted to CLEC by Month



August 1998
Order Completion Interval Web Report -- Aggregate CLEC

This table displays aggregate CLEC information as downloaded from the August monthly web report, https://clec.bellsouth.com, as of XXXXXXX. For definitions, see YYY.

CLEC - Dispatched

	0	1	2	3	4	5	5+	Total	AVG INTV(DAY)
Resale Res < 10	27	102	274	124	201	80	213	1,021	4.09
Resale Res >= 10	0	2	1	1	0	1	3	8	5.00
Resale Bus < 10	10	9	16	223	11	9	37	315	3.81
Resale Bus >= 10	0	0	0	1	2	1	2	6	5.83
	0-5	6-10	11-15	16-20	21-25	26-30	30+	Total	AVG INTV(DAY)
Resale Spec < 10	5	7	9	9	9	11	7	57	19.70
Resale Spec >= 10	0	0	0	2	0	0	1	3	23.33
UNE Design < 10	12	19	12	10	3	1	0	57	10.86
UNE Design >= 10	1	0	0	0	0	0	0	1	2.00
UNE Non-Design < 10	16	16	3	6	0	1	3	45	10.18
UNE Non-Design >= 10	0	0	0	0	0	0	0	0	0.00

CLEC - Non-Dispatched

	0	1	2	3	4	5	5+	Total	AVG INTV(DAY)
Resale Res < 10	6,236	3,469	1,263	1,106	862	391	581	13,908	1.38
Resale Res >= 10	0	0	0	0	0	0	0	0	0.00
Resale Bus < 10	478	207	126	93	97	60	134	1,195	1.93
Resale Bus >= 10	0	0	1	1	1	0	2	5	4.20
	0-5	6-10	11-15	16-20	21-25	26-30	30+	Total	AVG INTV(DAY)
Resale Spec < 10	71	15	0	1	0	1	0	88	3.91
Resale Spec >= 10	0	0	0	0	0	0	0	0	0.00
UNE Design < 10	0	0	0	0	0	0	0	0	0.00
UNE Design >= 10	0	0	0	0	0	0	0	0	0.00
UNE Non-Design < 10	7	0	1	0	1	0	0	9	4.67
UNE Non-Design >= 10	0	0	0	0	0	0	0	0	0.00

August 1998
Order Completion Interval Web Report -- BellSouth

This table displays BellSouth information as downloaded from the August monthly web reports, https://clec.bellsouth.com, as of XXXXXXX. For definitions, see YYY.

ILEC - Dispatched

	0	1	2	3	4	5	5+	Total	AVG INTV(DAY)
Retail Res < 10	438	1,134	4,109	2,241	3,089	2,410	5,659	19,080	5.38
Retail Res >= 10	2	6	32	16	24	11	32	123	4.69
Retail Bus < 10	323	514	1,207	581	921	653	2,196	6,395	7.37
Retail Bus >= 10	1	5	14	17	11	9	89	146	15.29
	0-5	6-10	11-15	16-20	21-25	26-30	30+	Total	AVG INTV(DAY)
Retail Spec < 10	242	404	430	254	270	122	497	2,219	23.00
Retail Spec >= 10	0	1	1	0	1	0	2	5	31.80

ILEC - Non-Dispatched

	0	1	2	3	4	5	5+	Total	AVG INTV(DAY)
Retail Res < 10	201,456	83,206	16,116	23,492	9,996	5,759	5,583	345,608	0.92
Retail Res >= 10	0	0	0	0	0	0	0	0	0.00
Retail Bus < 10	34,888	5,357	7,529	2,354	2,669	453	994	54,244	1.05
Retail Bus >= 10	25	17	4	14	7	2	24	93	7.27
	0-5	6-10	11-15	16-20	21-25	26-30	30+	Total	AVG INTV(DAY)
Retail Spec < 10	18	10	17	4	3	1	10	63	19.14
Retail Spec >= 10	0	0	0	0	0	0	0	0	0.00

August 1998
Order Completion Interval Web Report Verification

This section reports whether there are any inconsistencies between the data reported on the web and calculations done during our processing.
Does not include matching the CLEC UNE data, all of which are excluded here.

Verify CLEC Web Reports

Matched	Did Not Match
84	0

Verify ILEC Web Reports

Matched	Did Not Match
83	2

CLEC Inconsistencies

Disp	Resid	Circ	Categ	Web Report	Raw Data

ILEC Inconsistencies

Disp	Resid	Circ	Categ	Web Report	Raw Data
3	1	1	0	.	1
2	1	1	0	201,456	201,455

Explanation (as needed)

August 1998
Order Completion Interval Filtering Information

This table displays information about the size of the database files and the cases that were removed from the analysis.

Unfiltered Total	**23,422**
Total Removed Prior to Web Reporting *(e.g. not NTCP orders, not resale and not UNE)*	**6,704**
Total Reported on Web Report	**16,718**
Additional Records Removed	**547**
Missing Appointment code is 'S'	483
General Class Service = 'O'	0
UNE Cases	112
Extreme Values Removed	**10**
No Matching Classification Removals	**38**
FILTERED TOTAL	**16,123**

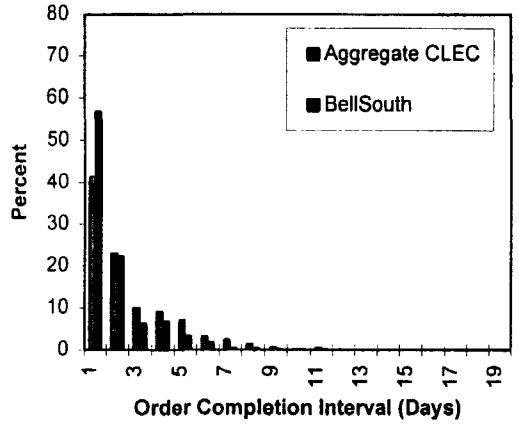
Unfiltered Total	**489,946**
Total Removed Prior to Web Reporting *(e.g. not NTCP orders, not resale and not UNE)*	**61,970**
Total Reported on Web Report	**427,976**
Additional Records Removed	**24,620**
Missing Appointment code is 'S'	8,028
General Class Service = 'O'	16,607
Extreme Values Removed	**920**
No Matching Classification Removals	**30,107**
FILTERED TOTAL	**372,329**

Note: It is possible that an observation may be included in more than one of the following exclusion categories.

August 1998
Order Completion Interval -- Descriptive Page

Filtered

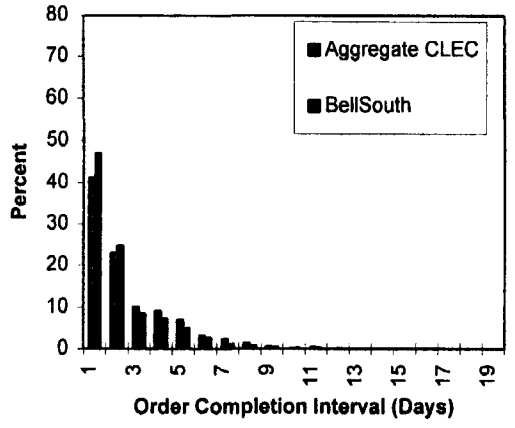
Graphical



Numerical		
Service Provider	Mean	Standard Deviation
BST	0.99	1.85
CLEC	1.60	2.13
Difference	-0.61	

Adjusted to CLEC

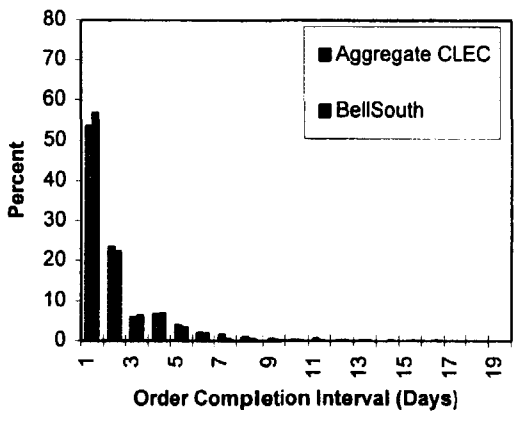
Graphical



Numerical		
Service Provider	Mean	Standard Deviation
BST	1.40	2.36
CLEC	1.60	2.13
Difference	-0.20	

Adjusted to ILEC

Graphical

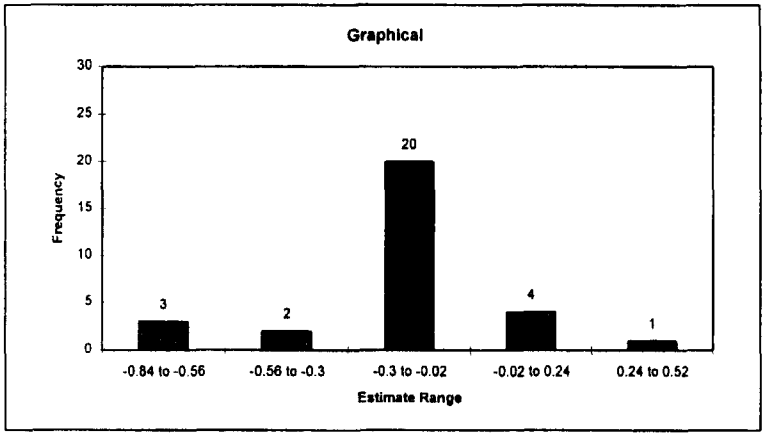


Numerical		
Service Provider	Mean	Standard Deviation
BST	0.99	1.85
CLEC	1.14	1.94
Difference	-0.15	

August 1998
Order Completion Interval -- Decision Page

Frequency Distributions of Replicate Estimates

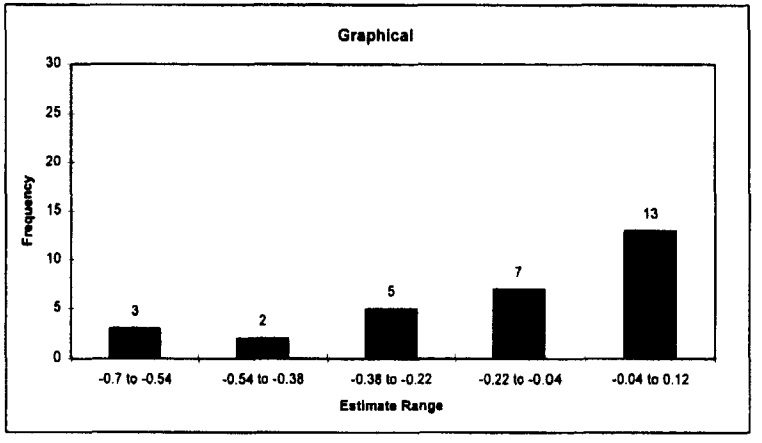
Adjusted to CLEC



Tests		
Testing Method	Test Statistic	P-value (percent)
LCUG	-9.85	0.00
POOL	-10.33	0.00
REPL	-4.46	0.00
REPL ADJ	-4.11	0.00
JACK	-4.03	0.00
JACK ADJ	-3.72	0.00

Note that the adjustment factor used is: **0.921682**

Adjusted to ILEC



Tests		
Testing Method	Test Statistic	P-value (percent)
LCUG	-6.49	0.00
POOL	-6.32	0.00
REPL	-3.53	0.00
REPL ADJ	-3.71	0.00
JACK	-3.44	0.00
JACK ADJ	-3.61	0.00

Note that the adjustment factor used is: **1.050574**

Decision Portion :

SUMMARY, Jack_Jackknife on the difference of two tests

Variable	N	Mean	Std Error	T	Prob>|T|
PSE_LCUG	30	-15.6618700	3.0831743	-5.0797875	0.0001
PSE_JACK	30	-25.3141543	0.4622903	-54.7581355	0.0001
TESTDIFF	30	9.6522842	3.4814007	2.7725290	0.0096

August 1998
Order Completion Interval -- Document Page

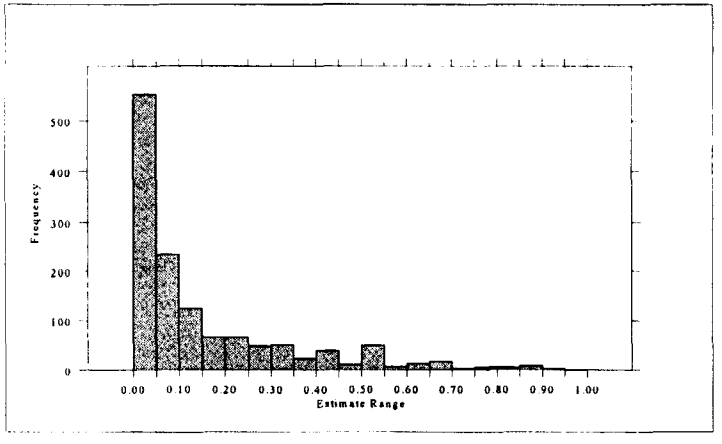
Adjusted to CLEC

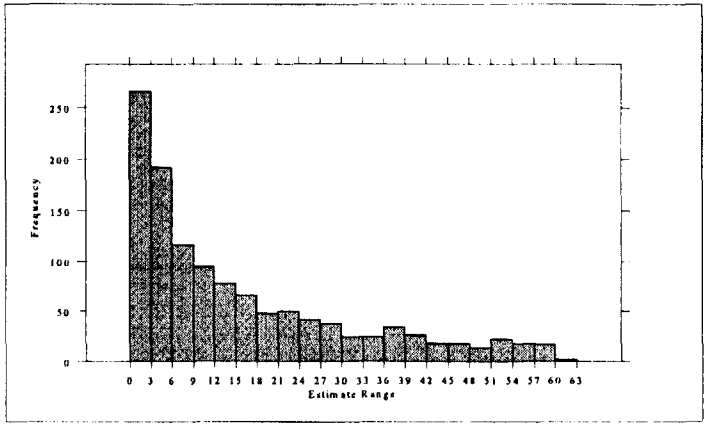
Numerical	
CLEC Cases	16,123
Adjusted Total ILEC Cases	16,123

Adjusted to ILEC

Numerical	
Adjusted Total CLEC Cases	372,329
ILEC Cases	372,329

Distribution of Weights





August 1998
Order Completion Interval Extreme Values

CLEC			ILEC		
# of Records	16,171	Cutoff	# of Records	403,356	Cutoff
Extreme Values	10	24	Extreme Values	920	24
Subtotal	**16,161**		**Subtotal**	**402,436**	

CLEC Extreme Values Removed

Wire Center	Time	Dispatch	Residence	Circuits	Order Type	Order Interval
BTRGLAOH	2	1	1	1	N	46
MINDLAMA	1	1	1	1	N	26
MNFDLAMA	2	1	1	1	T	34
NWORLAMA	2	2	3	1	C	26
NWORLAMA	2	1	3	1	N	26
NWORLAMA	2	1	3	1	N	26
NWORLAMA	1	1	3	1	N	28
NWORLAMA	1	1	3	1	C	28
NWORLAMA	1	1	3	1	C	28
DNSPLAMA	1	1	1	1	N	27

Frequency of Extreme Values Removed from ILEC file (Top 10)

Wire Center	Time	Dispatch	Residence	Circuits	Order Type	Frequency
NWORLAMA	2	1	3	1	N	76
BTRGLASB	2	1	3	1	C	54
NWORLAMA	1	1	3	1	N	46
BTRGLASB	1	1	3	1	C	33
NWORLAMC	2	1	3	1	C	28
NWORLAMA	2	1	3	1	C	25
NWORLAMA	1	1	3	1	C	23
NWORLAMC	1	1	3	1	C	21
BTRGLAOH	1	2	1	1	N	15
AAAAA504	1	2	1	1	N	10

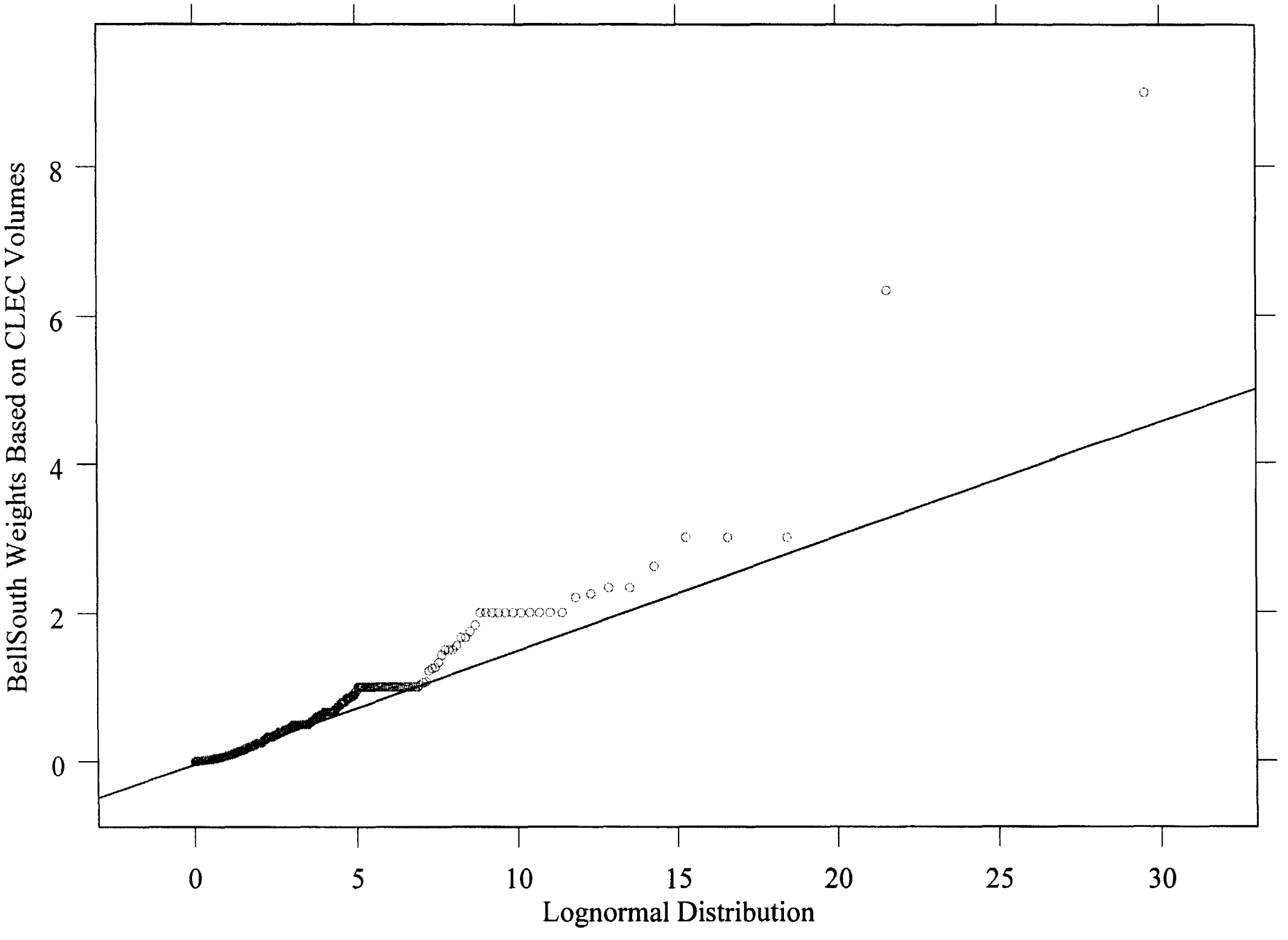
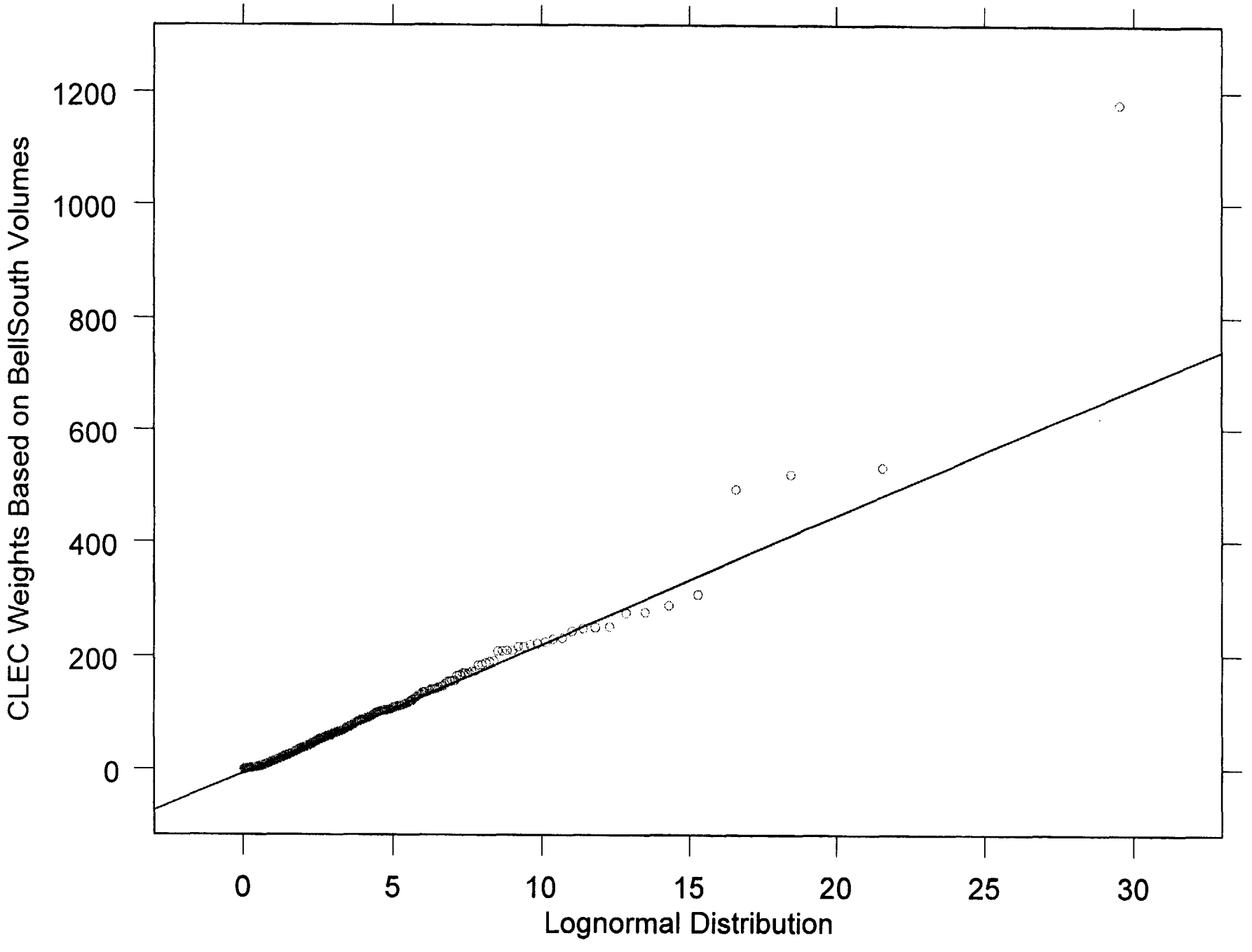
August 1998
Order Completion Interval Weighting Report

CLEC		ILEC	
# of Records	16,161	# of Records	402,436
Missing Classificatio	38	Missing Classificati	30,107
Subtotal	**16,123**	**Subtotal**	**372,329**

CLEC Categories with No matching ILEC (First 10)

Wire Center	Time	Dispatch	Residence	Circuits	Order Type	CLEC Count
ARCDLAMA	2	1	1	1	T	1
BTRGLABS	2	1	2	1	N	1
BTRGLAIS	2	1	1	2	N	1
BTRGLASB	2	1	2	2	T	1
BUSHLAMA	2	1	1	2	N	1
CNVNLAMA	2	1	1	1	T	1
DRPGLAMA	1	2	1	1	N	1
HMNDLAMA	2	1	1	2	N	1
KTCHLAMA	1	2	1	1	N	2
KTCHLAMA	2	1	1	1	N	1

Lognormal Q-Q Plot



Lognormal Q-Q Plot