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April 21, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th Street S.W.
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Written Ex Parte in CC Docket No. 97-121,
CC Docket No. 97-137, CC Docket No. 97-208,
CC Docket No. 98-121, CC Docket No. 98-56, and
RM 9474

Dear Ms. Salas:

Attached is a copy of a written ex parte made today to Tom Power, Legal Advisor to Chairman Kennard.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, I am filing two copies of this notice and that written ex parte presentation in each of the dockets listed above and ask that you please place both in the record of that proceeding.

Sincerely,



Kathleen B. Levitz

Attachment

cc:	Michael Pryor	Jake Jennings	Andrea Kearney
	Tom Power	Jonathan Reel	Claudia Fox
	Daniel Shiman		David Kirschner

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Mr. Tom Power
Office of the Chairman
Federal Communications Commission
The Portals
445 12th St. S.W.
Washington, D.C. 20554

Re: Written Ex Parte in CC Docket No. 97-121,
CC Docket No. 97-137, CC Docket No. 97-208,
CC Docket No. 98-121, CC Docket No. 98-56, and
RM 9474

Dear Mr. Power:

On February 23, 1999, counsel for the Competitive Telecommunications Association/America's Carriers Telecommunications Association (CompTel) filed a notice of ex parte communication in the dockets listed above. The notice included a list of concerns and difficulties CompTel's members had experienced in securing non-discriminatory access to interconnection and network elements. Among the issues CompTel raised were: non-discriminatory access to operations support systems (OSS); the need for comprehensive training, and the delays and errors ITC DeltaCom experienced with BellSouth's provisioning of Unbundled Network Elements (UNEs).

After reviewing the CompTel filing, BellSouth has prepared the attached response. The response addresses the problems raised by CompTel, but, more important, describes the improved processes and communications that characterize BellSouth's dealings with ITC DeltaCom since the period covered by the CompTel filing. If after reviewing this attachment you have any additional questions, please do not hesitate to call me at 202.463.4113.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, I am also filing two copies of this written ex parte presentation in each docket identified above.

Sincerely,



Kathleen B. Levitz

Attachment

cc: Andrea Kearney
Jonathan Reel

Jake Jennings
Daniel Shiman
David Kirschner

Michael Pryor
Claudia Fox

**BellSouth's Response to CompTel 2-23-99 Ex parte
CC Docket No. 98-121**

CompTel details a number of concerns and difficulties experienced by its members in securing non-discriminatory access to interconnection and network elements from incumbent local exchange carriers. Among these issues are: non-discriminatory access to operations support systems (OSS), the need for comprehensive training, and problems experienced by ITC DeltaCom with BellSouth in delays and errors in provisioning Unbundled Network Elements (UNE).

BellSouth has negotiated in good faith and executed over six hundred interconnection agreements providing for nondiscriminatory access to all network elements as described by the provisions of the Act. An integral part of implementing these agreements is BellSouth's ability to offer access to its OSS and to provide the training necessary to competitive local exchange carriers (CLECs) which affords these CLECs a meaningful opportunity to compete.

To support the position, as stated above, BellSouth will address the three areas of concern as follows.

Non-discriminatory access to Operations Support Systems

BellSouth provides access to its OSS through a variety of electronic interfaces. These interfaces afford the CLEC non-discriminatory access to the same ordering and provisioning systems that BellSouth provides for itself. BellSouth provides OSS that deliver full pre-ordering, ordering, and maintenance support. Electronic interfaces for pre-ordering and ordering are provided to CLECs via the BellSouth-developed Local Exchange Navigation System (LENS) and Telecommunications Access Gateway (TAG). The Electronic Data Interchange (EDI) interface, which meets the national standards defined by the Telecommunications Industry Forum (TCIF), is an electronic interface for ordering. Access to maintenance OSS is provided by the Trouble Analysis Facilitation Interface (TAFI), the same interface BellSouth uses to support its own retail customers. TAFI provides the CLEC with the same features and functionalities that BellSouth uses for trouble reporting for all non-designed services. Electronic trouble reporting for designed services is provided by the Electronic Communications Trouble Administration (ECTA) gateway. ECTA meets the standards established by the TCIF and complies with ANSI ASC X12 requirements.

In addition, BellSouth works with the CLECs to prioritize new features and functionalities through an electronic interface change control process. This process allows the CLECs that use the interfaces to request and prioritize new features and functionalities for the electronic interfaces described above.

Better and more comprehensive training of CLECs is required.

BellSouth provides a wide range of training support for CLECs including both formal and informal training as well as providing dedicated support groups that assist the CLEC in doing business with BellSouth.

Formal training includes classes in all pre-ordering, ordering, provisioning, and maintenance processes and the OSS offered which support these processes. Nine formal training classes offered in Atlanta and Birmingham provide the CLEC with the tools necessary to do business with BellSouth. In addition BellSouth provides CLECs with on-line, Web-based information and training aids for pre-ordering, ordering, provisioning, and maintenance. The CLEC is also provided information dealing with tariffs, USOCs and FIDS, changes to the BellSouth Network, upcoming changes to the offered OSS features and system availability.

BellSouth further provides internal dedicated support teams to assist the CLECs in doing business with BellSouth.

Problems Experienced by ITC DeltaCom.

BellSouth considers ITC DeltaCom, and all CLECs with which it does business, as valued customers. BellSouth is committed to working with its CLEC customers to provide near seamless conversion processes to support their business goals and provide their end user customers with a high quality telecommunications service.

Unfortunately, BellSouth is unable to respond to the individual problems ITC DeltaCom lists in the CompTel ex parte. BellSouth's customer in each case was DeltaCom and therefore, BellSouth would need individual DeltaCom purchase order numbers in order to perform the analysis needed to determine why each problem arose.

Even though BellSouth cannot address each problem without further details such as the purchase order number, it is possible to evaluate the level of service being provided to CLECs in general, and ITC DeltaCom in particular, by examining to the Service Quality Measurements (SQM) BellSouth publishes each month.

CompTel's Ex Parte includes a so-called Summary of BellSouth Problems. These include pending facilities, no wiring in central office, no engineering or incorrect engineering, work load, run cuts early, lost orders and failure to meet requested dates. Each of these problems would ultimately result in a missed installation appointment. Of the specific problems listed, nearly all are related to installation, most are associated with UNE Loops and appear to involve physical work requiring a dispatch. The following table lists the percent Missed Appointments for UNE Loops requiring a dispatch in January and February.

	Less than 10 circuits		More than 10 circuits	
	Total Missed Appts	Caused by CLEC / End User	Total Missed Appts	Caused by CLEC / End User
All CLECs Feb	28.2	22.0	44.4	38.9
All CLECs Jan	36.8	29.7	60.0	40.0

Using the first line as an example, for those orders having fewer than 10 circuits, a total of 28.2% of the installation appointment dates were missed in the month of February. However 22.0% of the installation appointments were missed due to either CLEC or End User reasons. This would include such causes as no access provided for the BellSouth technician or the end-customer was not ready for the service. BellSouth caused 6.2% (28.2 – 22.0) of the installation appointments to be missed due to such causes as pending facilities, no wiring in the central office, and the other causes listed above.

In summary, the vast majority of missed installation appointments were caused by circumstances beyond the control of BellSouth. While this analysis is for all CLECs in the BellSouth region, a specific analysis of missed installation appointments for ITC DeltaCom produces the same conclusions. (ITC DeltaCom's specific numbers are proprietary and are not provided in this document.)

Because BellSouth does not know the specific orders purportedly cited by CompTel, it can not reconcile the above analysis, showing less than a fourth of missed appointments caused by BellSouth, with the specific cases cited by ITC DeltaCom. Possible explanations include 1) The ITC DeltaCom list represents the 6.2% of the BellSouth caused missed appointments; 2) There are other circumstances contributing to the missed appointment beyond the control of BellSouth.

Among the specific problems cited by DeltaCom are several assertions that the cutover was delayed an hour or so because a technician was not available. BellSouth installation times are typically not for a specific hour. This is to allow the technician some flexibility in responding to repair calls and to handle installations that take longer than expected. This flexibility was formalized in BellSouth's Interconnection Agreement with DeltaCom which specifies a 3 hour window for installation.

Process Improvements

Much dialogue and effort between DeltaCom and BellSouth has occurred since the targeted period outlined in DeltaCom's summary. It is this on-going dialogue and joint effort by BellSouth and DeltaCom that this response will detail.

Since mid December the BellSouth account team has chaired a UNE conversion action plan committee composed of BellSouth and DeltaCom operations experts and executives. This committee has met at least monthly to resolve nine major areas of concern presented by DeltaCom. To date, three of these concerns have been jointly closed. The remaining issues are being worked by assigned committees within BellSouth and will remain open

issues of this team and will be discussed on a monthly basis until satisfactory conclusion has been realized. A quarterly meeting is also held to address non-conversion issues that DeltaCom brings to BellSouth. To date forty of forty-four such issues have been jointly resolved and closed.

In addition to the above, the BellSouth account team provides bi-monthly root cause feedback to written correspondence from ITC DeltaCom. Further supporting these efforts, BellSouth has assigned a dedicated manager to coordinate each UNE conversion with ITC DeltaCom to resolve delays and to ensure the provisioning processes of BellSouth and DeltaCom will support a successful conversion for the end user. Additionally, a BellSouth operations expert performs a daily analysis of each conversion occurrence from the preceding day. The results of the analysis for each UNE conversion are communicated on a daily basis to an operations expert of DeltaCom. All root cause analysis and process changes, if necessary, are therefore handled on a near real-time basis. These exhaustive efforts are in addition to existing processes that support the conversion of BellSouth customers to DeltaCom.

BellSouth is committed, as evidenced by the extraordinary measures described above, to providing our carrier customers with the same high quality service and value as provided to BellSouth's retail customers. We are convinced that we are making a successful transition from a retail-only environment to a wholesale-retail environment.