COPY

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Carolyn Tatum Roddy
Attorney, State Regulatory

June 9, 1999

VIA HAND DELIVERY

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue, Room 520
Atlanta, Georgia 30334-5701

RE: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems, Docket No. 8354-U.

Dear Ms. O'Leary:

Enclosed please find for filing an original, eight (8) copies and a 3.5" diskette of the Comments of Sprint Communications Company L.P. in Support of AT&T Motion for Reconsideration of the Commission Order for Third Party Testing.

An extra copy is also included which I would ask that you please date stamp and return to me.

Thank you for your assistance in this matter. Should you have any questions, please feel free to contact me.

Sincerely,

Carolyn Tatum Roddy

Carolyn Tatum Roddy

CTR/hs
Enclosure
Cc: Commissioner David Burgess
Leon Bowles

competitive local exchange carriers ("CLECs") to access and use these systems; and (3) demonstrate that BellSouth's systems are operationally ready and provide an appropriate level of performance. The ability of customers to switch smoothly between competitors in the local market will depend entirely on the adequacy of BellSouth's OSS systems. A customer who has problems switching to a CLEC will likely be unwilling to do so again. Thus, the importance of adequate OSS systems to the development of local competition in Georgia cannot be understated.

Sprint agrees with the Commission that third party testing will ensure that customers will be able to switch local service easily and without service interruptions. As noted by MCI WorldCom, Inc. ("MCI WorldCom) in its Response to AT&T's Motion for Reconsideration, Sprint also applauds the Commission for being a leader in requiring third party testing of BellSouth's OSS and appreciates the fact that BellSouth's Test Plan incorporates a number of features from the successful New York plan. In particular, Sprint supports BellSouth's choice of HP and KPMG as the third parties that will conduct and audit the test. Sprint is confident HP and KPMG will carry out the test fairly and effectively, provided the test is structured properly. This independent third party test, however, must be comprehensive and thorough and anticipate all likely scenarios to be experienced by the CLEC in order to provide the information necessary for it to be the "worthwhile endeavor" anticipated by the Commission. Sprint believes that, without critical revisions to the BellSouth Test Plan, the third party testing will not give the Commission a true picture of BellSouth's OSS and will not drive the enhancements necessary to enable CLECs to compete in the local market and meet customers' needs.

II. PROBLEMS WITH THE PROPOSED BELLSOUTH TEST PLAN

Sprint is currently in the early stages of testing the BellSouth OSS with Telcordia. Phase I testing of basic service resale (migration of orders as specified, and disconnect) has been completed. Phase II testing of more advanced OSS processes is just beginning. Based on our experience with these tests, Sprint has found a number of problems with the Test Plan proposed by BellSouth.

There are significant gaps in the Test Plan which will prevent a clear view of how BellSouth's OSS operates for CLECs, and a need for better definitions or more information in the Test Plan before the test results can be accepted as a comprehensive and accurate assessment of BellSouth's OSS functionality. BellSouth's Test Plan should be amended to address the following matters:

1) Directory Listings should be tested.
2) E911 should be tested.
3) A mixture of various accounts (single line and multi-line; flat and measured service; business and residential; Lifeline, Optional Calling plans, Coin and government) should be tested.
4) Planned and unplanned outages should be tested. The test plan offers limited network testing in these areas. This should be corrected before testing goes forward.
5) Not all order types described under the Ordering and Billing ("OBF") Guidelines are being tested, including Suspend, Partial Migration and Deny. The Test Plan should be amended to provide testing of all OBF order types.

6) The Test Plan should be amended to mirror the testing required before CLECs become operational. The Test Plan should be amended to require the same testing, including application testing, validity testing, and service readiness testing in production, as required of CLECs.

7) The Test Plan offers limited change control procedures. The Test Plan should be amended to add test scenarios for multiple versions of code and unplanned version updates. BellSouth should be testing OSS 99.

8) The Test Plan offers limited Pre-Order functionality. The Test Plan should test functionality for additional information, supplemental information, cross-boundary, restricted accounts, and extended reservation.

9) The Test Plan should be amended to indicate who assigns Severity levels

10) The Test Plan should be amended to indicate who assigns or makes the decision for exit criteria.

11) A test bed is being created for the third party test, but Sprint and other CLECs will not have access to any testing environment for its own testing.

12) The Test Plan should be amended to indicate who is in charge of problem management.

III. PROBLEMS WITH THIRD PARTY TESTING PROCESSES

Sprint has a number of concerns about the process established by the Commission in conducting an independent third party test and agrees with MCI WorldCom that certain changes need to be made. For example, CLECs should be able to submit test scenarios to be processed by the testers. Testers should also be required to use

BellSouth's documentation to build to BellSouth's ordering interfaces. Change Management procedures should be monitored and tested in action rather than based on documentation and interviews. CLEC's should be permitted to comment on the exception report process as well as the exception reports issued during testing. Performance metrics and standards should be determined with CLEC participation and reporting should be subject to an audit.

Finally, Sprint also agrees with MCI WorldCom that a more reasonable testing schedule should be adopted. Though Sprint understands the need to move forward on third party testing in particular and BellSouth's 271 case in general, it must be recognized that OSS is the heart of interconnection and CLEC viability. It is far too crucial to ever be considered a mere administrative ticket-punch. BellSouth counsel announced that they did not intend to offer the detailed testing done in New York, but the Commission can not allow them do a less than comprehensive testing of BellSouth's OSS. Sprint believes that the schedule proposed by MCI WorldCom in its Response is a reasonable one because it provides additional but not excessive time.

IV. CONCLUSION

Sprint urges the Commission to require BellSouth to amend its Test Plan as indicated above. Further, Sprint urges the Commission to reconsider its third party plan to address the problems cited above and to allow additional time for implementation and completion of the Test Plan. The testing of BellSouth's OSS is crucial to determining if CLECs will be able to offer competitive local exchange service and whether BellSouth should be granted relief under Section 271 of the Telecommunications Act of 1996.

Respectfully submitted this 9th day of June, 1999.

SPRINT COMMUNICATIONS COMPANY L.P.

Carolyn Tatum Roddy

Carolyn Tatum Roddy

3100 Cumberland Circle-GAATLNO802

Atlanta, Georgia 30339

404-649-6788

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and exact copy of the within and foregoing Comments of Sprint Communications Company L.P. in Support of AT&T Motion for Reconsideration of the Commission Order for Third Party Testing in Docket No. 8354-U, via United States, first class mail, postage paid and properly addressed to the following:

Leon Bowles
Georgia Public Service Commission
47 Trinity Avenue
Atlanta, GA 30334-5701

David Burgess
Georgia Public Service Commission
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Martha P. McMillin
MCI WorldCom
6 Concourse Parkway, Suite 3200
Atlanta, GA 30328

Cecil L. Davis, Jr.
NEXTLINK Georgia, Inc.
4000 Highlands Parkway
Smyrna, GA 30082

This 9 day of JUNE, 1999.

Joe Ramsey
Sprint Communications Company L.P.

ITC DELTACOM

P. O. Box 510 ▸ 1791 O. G. Skinner Drive ▸ West Point, Georgia 31833
706/385-8007 ▸ Fax 706/385-8801
ANDREW M. WALKER
Vice Chairman and
Chief Executive Officer

June 7, 1999

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Chairman Stan Wise
Commissioner Robert Baker
Commissioner David Burgess
Commissioner Bob Durden
Commissioner Lauren "Bubba" McDonald
Georgia Public Service Commission
47 Trinity Avenue
Atlanta, Georgia 30334

Re: Docket No. 8354-U; Third Party OSS Testing

Dear Commissioners:

I am writing this letter for two purposes: first, to commend you and your colleagues on the Commission on the excellent requirement regarding third party testing of BellSouth's Operational Support Systems; and second, to seek the Commission's help to ensure that testing of the BellSouth system is performed in a manner that will guarantee that all Georgia telecommunications consumers are able to share equally in the benefits promised by competition.

Specifically, we propose that the Commission require the Third Party Tester to use ITC^DeltaCom as a real-world test-bed for evaluating the performance of BellSouth's Operational Support Systems. By comparing our results with those of the "lab" or "mock" test, we believe great improvements can be made to the performance of BellSouth's Operational Support Systems.

ITC^DeltaCom is a small, but very active, Competitive Local Exchange Carrier ("CLEC"), headquartered in West Point, Georgia. We are one of the largest purchasers of unbundled network elements ("UNEs") from BellSouth. As a result, an effectively functioning Operational Support System is of vital importance to us. Unfortunately, our experience has been that BellSouth's Operational Support System is performing well below intended levels, and is failing to function at parity with BellSouth's own internal

systems. From our records, we estimate that fully 20% - 25% of our orders are not yet accepted by BellSouth's electronic systems. Considering the 75% - 80% that are submitted electronically, 62% of these are "falling out" for manual handling by BellSouth. This means that BellSouth's electronic systems are still incapable of totally processing approximately 70% of ITC^DeltaCom's orders.

At ITC^DeltaCom we pride ourselves in a long history of providing excellent, responsive, individualized customer service. The poor performance of BellSouth's systems is adversely affecting our business by: (1) causing excessively long times to deliver service to potential customers, (2) causing consumer dissatisfaction with ITC^DeltaCom (not BellSouth), (3) increasing consumer dissatisfaction with the so-called competitive process, and (4) creating distrust of CLECs like ITC^DeltaCom.

Thank you in advance for your attention to this letter. If you have any questions please feel free to contact me directly at 706-385-8007.

Sincerely,

Andrew M. Walker

Andrew M. Walker
Vice Chairman and Chief Executive Officer
ITC^DeltaCom

cc: Leon Bowles, GPSC Staff
Tom Bond, Special Assistant Attorney General
All Parties of Record, Docket No. 8354-U

Commission should ensure that the independent testers evaluate the ability of competitors to receive real-time, electronic information about the physical makeup of xDSL loops including loop length; wire gauge; the presence and number of repeaters, load coils, pair gains, and Digital Added Main Lines ("DAMLs"); the presence of digital loop carrier systems; and the cumulative length of bridge taps. Moreover, the testing should determine whether carriers are able to access this information before deciding whether to order a particular loop. The testing should also evaluate whether, once BellSouth provides this information, competitors can then place their xDSL loop orders via a real-time, electronic interface.

This type of information is necessary because different DSL technologies are technologically dependent upon loops with particular physical characteristics. For example, some types of DSL technologies, such as ADSL, can only be provided over loops of a particular length. For loops that exceed this length, ACI could provide another form of xDSL technology, such as SDSL. Thus, competitors need the information described above to make effective business decisions so that they can provide the best possible service to their customers.

To assist the Commission and the third party testers in identifying the type of information, as well as the need for this data, we have attached a copy of the April 27, 1999 Affidavit of Mr. Eric H. Geis, Secretary and Treasurer of ACI Corp, that ACI submitted to the New York Public Service Commission in connection with Bell Atlantic's Section 271 proceeding.[4] This affidavit provides an explanation of the different types of xDSL technologies (*e.g.*, ADSL, HDSL, SDSL) and explains why advanced service providers need specific loop information to efficiently deploy these technologies to consumers.

ACI looks forward to providing Georgia consumers with the most advanced technological services available. In order to accomplish this result, ACI must have access to the loop qualification information that is integrally tied to the provision of these services and must be able to order xDSL loops electronically. Therefore, ACI urges the Commission to ensure (i) that the specific information described above as well as in the attached affidavit, be included in the third party testing of BellSouth's OSS, and (ii) that BellSouth's OSS be tested to ensure competitors can order xDSL loops via such OSS.

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[4] *Petition of the New York Telephone Company for Approval of its Statement of Generally Available Terms and Conditions Pursuant to Section 252 of the Telecommunications Act of 1996 and Draft Filing of Petition for InterLATA Entry Pursuant to Section 271 of the Telecommunications Act of 1996*, Case 97-C-0 271, Affidavit of Eric H. Geis on Behalf of ACI Corp., April 27, 1999.

As always, if you have any questions or comments regarding this issue, please do not hesitate to contact the undersigned.

Respectfully submitted,

By: _____
Charles A. Hudak, Esq.
Gerry, Friend & Sapronov, LLP
Three Ravinia Drive, Suite 1450
Atlanta, Georgia 30346
(770) 399-9500

By: Elise P.W. Kiely (w/permission)
Elise P.W. Kiely, Esq.
Jeremy D. Marcus, Esq.
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1615 M Street, N.W.
Suite 700
Washington, D.C. 20036
(202) 955-6300

CAH/jh
Enc.

cc: ACI Corp. (with enclosure)
All Interested Parties (with enclosure)

Before the
STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

In re:	)	
	)	
Petition of New York Telephone Company	)	
for Approval of its Statement of Generally	)	
Available Terms and Conditions Pursuant to	)	Case 97-C-0271
Section 252 of the Telecommunications Act	)	
of 1996 and Draft Filing of Petition for	)	
InterLATA Entry Pursuant to Section 271	)	
of the Telecommunications Act of 1996	)	

AFFIDAVIT OF ERIC H. GEIS
on Behalf of ACI Corp.

I, Eric H. Geis, being first duly sworn upon oath, do hereby depose and state as follows:

1. I am the Secretary and Treasurer of ACI Corp. ("ACI"), a wholly owned subsidiary of Rhythms NetConnections Inc. My business address is 7337 S. Revere Parkway, Englewood, CO 80111. I am responsible for the deployment of ACI's data network in New York and the rest of the country.

2. I have twenty-five years of operating experience in telecommunications, working for regulated telephone companies, as well as for manufacturers and suppliers providing products and services to the telecommunications industry. I am a founder of ACI, and have been an officer since its founding in 1997. I am also on the Board of Directors for another competitive local exchange carrier ("CLEC"), Net2000, based in McLean, Virginia. My qualifications and business experiences are attached to my testimony as Attachment EHG-1.

- Provide CLECs with real-time electronic access to all necessary loop operations support systems and databases to ensure that CLECs can provide service to end users using the appropriate DSL technology without regard to BA-NY's DSL service deployment.

6. BA-NY's JSA for the first time in these 271 proceedings addresses DSL issues. After reviewing the JSA, I have numerous concerns about ACI's ability to fully deploy DSL service to New York customers in a manner that will maximize the availability of these services to a broad range of customers served by a variety of loop types. My concerns fall into three general areas: the ability to provision all necessary DSL technologies, the ability of BA-NY to unilaterally restrict DSL deployment through imposition of unnecessary spectrum management guidelines, and the inability of data CLECs to obtain necessary loop make-up data for provisioning DSL services. I will address each of these concerns briefly.

7. First, BA-NY's description of DSL availability indicates that it is severely limiting the ability of data CLECs—such as ACI—to deploy DSL technologies over unbundled loops. Specifically, while BA-NY claims it makes loops available for DSL services generally, its description appears to limit loop availability to only one type of DSL, asymmetric DSL or "ADSL." Perhaps not coincidentally, this is the same type of DSL that BA-NY intends to deploy in New York. As I will describe, there are numerous standard other DSL technologies that have been successfully deployed by CLECs across the country, such as HDSL, IDSL and SDSL (which I describe more fully below). The JSA never even mentions these other types of DSL. The ability to deploy these DSL services is dependent upon the ability to obtain "clean" copper loops on reasonable terms and conditions. Although BA-NY claims it will "condition" loops at the CLEC's request, such conditioning is presently only available on an ICB basis. The time entailed in obtaining a "clean" loop is therefore likely to be unreasonably extended. The only loops that BA-NY intends to make readily available for DSL are designed to meet the simplified

DESCRIPTION OF ACI'S BUSINESS

10. ACI received approval to operate as a competitive local exchange carrier from the New York Commission on May 20, 1998. ACI's approval entitles ACI to provide voice and high-speed data services in New York.

11. ACI is a nationwide provider of high-performance, high-speed data services, primarily using digital subscriber line ("DSL") technology for high-speed local access to and from the end users' desktops. ACI plans to provide highly reliable data networking solutions at a reasonable cost to residential and business consumers in New York and elsewhere. ACI does not focus solely on the Internet service provider market, but instead intends to provide broad market coverage—including suburban areas as well as metro areas—offering a full range of services. ACI's services will be used for: (1) the networking of remote locations for, among other things, telecommuting or work-at-home applications; (2) dedicated access to the Internet; and (3) dedicated "always-on" access to intranet-type networking solutions. ACI has begun to deploy its data networking services in New York markets.

12. In order to provide DSL service, ACI is dependent on the ILECs for three primary components. First, ACI must lease "clean" copper loops that are unfettered with any interfering loop equipment such as load coils and repeaters. Second, ACI needs to be able to collocate and maintain equipment at the central office end of the loop. Third, ACI often requires timely provision of unbundled transport facilities from the ILEC because competitive interoffice transport alternatives are unavailable. Collocation and transport issues will be discussed in the Affidavit of Paul Bannwart, and my Affidavit will focus on loop issues pertinent to xDSL services.

DESCRIPTION OF DSL TECHNOLOGIES

15. In New York, as it has in other jurisdictions, ACI intends to provide customers with high-speed data services using a variety of DSL technologies. The "x" in "xDSL" is a variable, meant to encompass the various types of DSL technologies, and is used when speaking generally about DSL. However, from its JSA, it appears that BA-NY's restriction of DSL-capable loops to ADSL loops could seriously deter the deployment of other types of high-speed data networking services in New York. Significantly, BA-NY, while speaking generally about "xDSL" offerings, offers only to provide loops for one form of DSL technology, ADSL. In order to understand why CLECs should be able to deploy various types of DSL, the Commission must appreciate the significant differences in the types of DSL that are presently being deployed around the country. As I will describe below, these differences enable data carriers to provide a variety of services to a broader range of New York consumers.

16. DSL uses an ordinary existing copper loop to provide high-bandwidth digital transmission capabilities between the end user's premises and the ILEC central office. By "high-bandwidth," I mean the amount of information that can be carried on a circuit, usually expressed as bits per second ("bps"), thousands of bits per second ("Kbps"), or millions of bits per second ("Mbps"). DSL technologies provide a variety of bandwidths, in some cases exceeding 7 Mbps in one direction, but more commonly are deployed to provide between 128 kbps and 1.5 Mbps of data throughput. In contrast, an analog voice-grade "plain old telephone service," or "POTS" circuit provides very limited throughput. Voice traffic occupies a narrow frequency spectrum, and analog modems are only able to achieve somewhere close to 56 kbps (and then only under ideal line conditions). DSL technologies, on the other hand, allow service

briefly explain the technical parameters of the various types of xDSL technologies successfully being deployed by ACI in other jurisdictions.

21. ADSL was originally developed to support the delivery of entertainment video, or "video dial tone," services over existing copper loops. Such video services require much higher bandwidth in the "downstream" direction (toward the customer premises) than they do in the "upstream" direction (toward the central office), because the video signals being transmitted to the customer's premises require a large amount of bandwidth, and the upstream signal was assumed to be a voice or non-video data signal requiring much less bandwidth. Thus, the need for bandwidth was deemed to be asymmetrical; that is, a high-bandwidth signal in the downstream direction and a lower bandwidth signal in the upstream direction.

22. Even though most (if not all) ILECs have not deployed video dial tone services based on ADSL, this asymmetrical DSL technology has found a new use: Internet access. Internet access tends to display asymmetrical traffic patterns similar to video dial tone services. Most of the traffic flows toward the end user, as graphics-intensive web pages and data files are downloaded. The upstream traffic consists of a few keystrokes and occasional uploads of e-mail and data files.

23. ADSL is designed to achieve a downstream transmission rate of 1.5 Mbps for loops of up to 18,000 feet in length, and a downstream transmission rate of 7 Mbps for loops of up to 6,000 feet in length, assuming 2-wire loops of 24-gauge copper. The downstream and upstream data signals are transmitted using separate frequencies, and both data streams use frequencies above the frequencies used to transmit voice signals.

24. RADSL is a type of ADSL. As is the case with other types of ADSL, the downstream and upstream data transmission rates of RADSL are asymmetrical (though it is also

includes the frequencies used to transmit voice signals. As a result, HDSL-equipped loops cannot be used for simultaneous analog POTS service.

28. IDSL is a symmetrical DSL configuration. IDSL uses the same coding and parameters as ISDN, a digital data technology that has been in use by BA-NY and other ILECs for quite a while. As a result, IDSL can be deployed on copper or copper/fiber loop plant configurations. IDSL supports a data transmission rate of 128 kbps in each direction, on 2-wire loops of up to 26,000 feet in length, assuming loops of 24-gauge copper. As is the case with SDSL and HDSL, IDSL transmits the downstream and upstream data signals using the same frequencies. The data signals use a frequency bandwidth that includes the frequencies used to transmit voice signals. As a result, IDSL-equipped loops cannot be used for simultaneous analog POTS service.

29. Initially, ACI plans to deploy ADSL (including RADSL), SDSL, and IDSL in New York. Although the particular type of DSL technology to be used is a function of a number of variables, ACI will typically use RADSL on shorter clean copper loops, SDSL on clean copper loops of intermediate length, and IDSL on long loops or on loops that are carried on fiber DLC systems.

30. ACI has deployed these xDSL types successfully in other states. In the California territory of Pacific Bell, ACI has widely deployed RADSL, SDSL and IDSL. ACI has also deployed these three types of xDSL in Illinois, Massachusetts, and Pennsylvania, and will shortly deploy them in New York and several additional states.

ALL DSL VARIETIES MUST BE AVAILABLE IN NEW YORK

31. From a marketing and customer service standpoint, it is critically important that ACI have the ability to offer this variety of DSL-based services. Although ADSL

those loops that meet the requirements of "BA-NY's initial equipment choices and service configuration" (JSA ¶ 206); likewise, the systems and processes BA-NY is developing are to "support its commercial ADSL service offering." (JSA ¶ 204)

33. Accordingly, I recommend that the Commission require BA-NY to provision all loop types that are capable of supporting each of the types of xDSL described above. ACI believes the Commission must order BA-NY to go beyond the proposals outlined in ¶¶ 203-214 of its JSA, which is not only frustratingly vague in connection with xDSL services, but suggests that BA-NY may only be willing and able to provide ADSL-capable loops up to 12 kft to CLECs. This unilateral restriction will unnecessarily prohibit ACI from rather than the full range of xDSL services described above. Instead, the Commission should require BA-NY to provide "clean copper loops" to carriers for provision of high-speed data services using all types of DSL, including ADSL, RADSL, SDSL and HDSL. CLECs should retain the right to decide which xDSL services they wish to provision, and should have access to all loops capable of providing those xDSL services.

34. An underlying presumption in BA-NY's discussion of it xDSL offering, is that it will decide when and what services can be deployed over the unbundled loop. Therefore, BA-NY only offers ADSL loops (JSA ¶ 205), provides pre-qualification loop data on the technical parameters of its service choice (JSA ¶ 206) and seeks to impose unilateral spectrum management guidelines on CLEC's use of the loop to provide DSL services. (JSA ¶ 204) ACI should not be arbitrarily limited in the DSL services it can provide by BA-NY's unilateral determinations of loop capabilities. Because ACI will provision the DSL-based service to the end-user, ACI—not BA-NY—must make the business decisions regarding the type of DSL service offered to the end user to meet customer needs. ACI is directly accountable to the

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COMMUNICATIONS

June 9, 1999

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VIA HAND DELIVERY

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue, S.W.
Atlanta, Georgia 30334

Re: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems ("OSS"); Docket No. 8354-U

Dear Ms. O'Leary:

Intermedia Communications Inc. ("Intermedia") submits this letter in response to the June 1, 1999 Motion for Reconsideration of the Commission's Order for Third Party Testing filed by AT&T Communications for the Southern States ("AT&T") in the above-captioned docket. Intermedia supports the Commission's decision to order independent, third party testing of BellSouth's OSS. Such testing is critical to the new entrants' ability to provision competitive local services in Georgia. However, BellSouth's proposed Test Plan does not go far enough. Specifically, the plan does not allow for the testing of OSS for "complex services" or combinations of unbundled network elements ("UNEs"). Complex services include both resold services such as PBX trunks, frame relay, and DIDs as well as UNEs such as DS1, DS0, and xDSL loops.

The ability of BellSouth's OSS to handle complex services and UNE combinations is particularly critical to competing carriers who provide advanced data services and voice over data, such as Intermedia. Intermedia is one of the country's largest and fastest growing integrated communications providers (ICPs), providing a full range of local and long distance voice and data services to business and government end users, long distance carriers, information service providers, resellers and wireless carriers.

Since the inception of this docket in late 1997, Intermedia has been an active participant providing both written comments and testimony before the Commission. It has been Intermedia's position from the beginning that BellSouth's OSS must address the pre-ordering, ordering, provisioning, billing, and maintenance of complex services as well as simple resale and certain UNEs. BellSouth's proposed Test Plan does not address the pre-ordering, ordering, provisioning, billing, and maintenance of complex services, nor does it address the testing of OSSs for UNE combinations. Intermedia therefore urges the Commission to modify the Test Plan to include testing of complex services and UNE combinations to ensure the Test Plan is comprehensive and complete.

If the Commission declines to expand the scope of the Test Plan to include complex services and UNE combinations during the initial phase, Intermedia suggests that a second phase of the Test Plan be added for that purpose. Without testing of complex services and UNE combinations, an entire segment of competitors, competitors active in Georgia's local market today, will be ignored. This testing must occur so that BellSouth can demonstrate that it provides nondiscriminatory access to its OSS.

Thank you for your attention to this matter. If you have any questions or comments regarding this letter, please do not hesitate to contact me at (813) 829-2072.

Sincerely,

for Julia O. Strow
Assistant Vice President
Regulatory and External Affairs

c: Chairman Stan Wise
Commissioner Robert B. Baker, Jr.
Commissioner David L. Burgess
Commissioner Bob Durden
Commissioner Lauren "Bubba" McDonald, Jr.
Mr. Leon Bowles

IMATION

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Investigation into Development of Electronic Interfaces/BellSouth

Docket # 8354-U

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VIA HAND DELIVERY

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue, S.W.
Atlanta, Georgia 30334

Re: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems ("OSS"); Docket No. 8354-U

Dear Ms. O'Leary:

ACI Corp. ("ACI"), through its attorneys, submits this letter in response to the Georgia Public Service Commission's (the "Commission") May 20, 1999 Order[1] and BellSouth Telecommunications, Inc.'s ("BellSouth") June 1, 1999 OSS test plan[2] filed in the above-captioned proceeding. ACI is an advanced service provider intending to roll out a host of digital subscriber line ("xDSL") services to Georgia consumers in 1999. As a new entrant to the Georgia telecommunications market, ACI is encouraged that the Commission has ordered independent, third party testing of BellSouth's OSS, a critical functionality to the provision of competitive services in Georgia. As part of such testing, ACI respectfully requests that the Commission ensure that the pre-ordering, ordering and provisioning of xDSL services are thoroughly evaluated.

The Commission has already determined that the third party testing will generally address "the five OSS functions of pre-ordering, ordering, provisioning, maintenance and repair and billing functions supported by an incumbent [local exchange carrier's] databases and information."[3] As part of the pre-ordering and ordering processes, ACI urges the Commission to ensure that the third party testing of BellSouth's OSS include an analysis of the specific information and data provided by BellSouth about its outside loop plant. Specifically, the

[1] *Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems*, Order on Petition for Third Party Testing, Docket No. 8354-U (May 20, 1999) [hereinafter "Order"].
[2] *Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems*, BellSouth Telecommunications, Inc.'s Master Test Plan and Flow-Through Audit Plan, Docket No. 8354-U (June 1, 1999).
[3] Order at 4.

whole or in part on fiber systems are not "clean copper" loops. Indeed, for ADSL, both BA-NY and ACI will have to use a "clean" (no load coils, no repeaters, minimal bridged taps, and no DLC systems) 2-wire copper loop from the customer premises to a BA-NY central office.

37. The presence of load coils, bridged taps, repeaters, and DLC systems on a loop preclude or impair the use of xDSL on the loop. Each of these devices or technologies allows analog POTS signals to be transmitted over the loop in question. Indeed, devices such as load coils and repeaters have been deployed historically in the loop plant to extend the useful reach of a loop to be used for POTS services. Absent such devices, the POTS voice signal would become too attenuated, or faint, on very long loops. However, these same devices and technologies preclude or degrade xDSL signals on a copper loop. I discuss each of these below and demonstrate that it is not only "technically feasible" to "clean up" the copper, but also that it is not overly difficult to do so.

LOAD COILS

38. Load coils are devices placed on a copper loop at regular intervals if the loop exceeds a certain length, typically 18,000 feet. Telecommunications signals attenuate, or lose strength, due to the resistance of the copper in the loop; the greater the loop length, the more the attenuation and the weaker the signal received at the customer's premises. Also, attenuation is greater at higher frequencies than at lower frequencies, reducing the quality of the voice signal. Load coils modify the electrical characteristics of a copper loop to overcome the attenuation distortion associated with long loops. None of the xDSL technologies discussed above can be deployed on loops equipped with load coils. The load coils are not compatible with the higher transmission frequencies employed by xDSL technologies.

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to derive two voice-grade POTS circuits from a single copper pair. The presence of DAMLs precludes the use of a loop to support most xDSL technologies.

42. Bridged taps create additional degradation for xDSL signals. Bridged taps are used to extend the telephone cable to additional homes so that vacant loops will be available to fulfill customer requests. Any portion of the loop that extends to a customer premises other than that of the requesting customer, and thus is not in the direct talking path to the central office, is called a bridged tap. Bridged taps reduce the amount of the signal that reaches the customer premises, and the effect varies, depending on the bridged-tap length and the frequency spectrum of the xDSL.

43. xDSL technology can be deployed on a loop equipped with bridged taps, so long as bridged taps are not excessive in length. The total cumulative length of bridged taps on a loop must generally be less than 2,500 feet. Short bridged taps of 200-300 feet located near customer premises can also create problems because of a "tuned resonance" effect. In order to remove bridged taps, as is the case with load coils, a technician must be dispatched to the field to remove the bridged taps.

REPEATERS

44. A repeater is used to boost the signal strength to avoid attenuation on long loops. BA-NY's legacy copper loop plant contains different kinds of repeaters for different types of existing services. Repeaters for analog POTS loops are located in the central office, but are only used on very long loops (in fact, such loops will likely be too long to use for any xDSL-based service). Analog POTS repeaters are used to boost the voice signal and the DC voltage of a POTS circuit. Other types of loops, such as loops used to provide T-1 service, may have repeaters located in the outside loop plant (such repeaters, of course, have little if any relevance to the provisioning of 2-wire xDSL-capable loops). Repeaters must be removed before loops can be used for ADSL, RADSL, SDSL, or HDSL. Analog POTS repeaters located in central offices

loop carried by the parallel copper feeder facilities, which can be used to provide xDSL services to the customer premises in question.

48. BA-NY has agreed to "rearrange the existing customer's service to either a copper pair or stand alone universal digital loop carrier ("UDLC") facilities." (JSA ¶ 196) Rearrangement onto UDLC does not resolve the technical issue for use with DSL technologies. The Commission should clarify that when a carrier requests it, BA-NY will rearrange to a copper facility if possible.

49. A second approach to work around the presence of fiber in the feeder plant is to place xDSL equipment at the feeder distribution interface in the field. Such equipment is known as a Digital Subscriber Line Access Multiplexer ("DSLAM"). For xDSL services, the basic requirement is that DSLAMs are placed at the end of the copper loop facility, wherever the copper ends. That copper loop can run all the way to the main distribution frame ("MDF") in the central office, in the case of an all-copper loop, or at the feeder distribution interface ("FDI"), in the case of a fiber-based DLC system. Feeder distribution interfaces for fiber-based feeder systems are normally located in controlled environmental vaults ("CEVs") or other enclosures that house the associated fiber, multiplexing and cross connect equipment. These same locations can be used to house DSLAMs. I note that the presence of fiber in the loop constrains the provision of xDSL services equally for BA-NY and ACI. That is, they both need to put DSLAMs in the feeder distribution interface location in order to provide xDSL-based services if there is no available copper feeder plant for the loop(s) in question. The placement of DSLAMs at these locations is technically feasible.

50. BA-NY's assertion that "access to remote terminals . . . is a request for sub-loop unbundling" is therefore troubling. First, because ACI would collocate its DSLAM in

loops that BA-NY provisions to itself are technically no different than those it provisions to CLECs offering DSL services. Thus, there is no technical reason why BA-NY cannot offer CLECs "clean copper loops for CLEC provision of DSL services.

53. Accordingly, clean loops should be provided to CLECs without unnecessary delay or expense. If ACI must wait for BA-NY to "condition a loop," *e.g.*, remove load coils, bridged taps or repeaters, in situations which are technically unnecessary, the provisioning time for that loop will naturally increase. ACI thus will be delayed in its ability to offer services to the end user. In addition, ACI will be also have to expend financial resources for BA-NY to perform services to a loop that are not necessary.

LOOP QUALIFICATION INFORMATION REQUIREMENTS OF DSL PROVIDERS

54. BA-NY's discussion regarding CLEC access to loop qualification information raises several serious concerns. (JSA ¶¶ 206-208) The pre-qualification loop database referenced by BA is a very high-level screen for BA-NY's own DSL services and fails to provide CLECs with any meaningful access to the necessary loop information in BA-NY's existing databases such as LFACS or TIRKS. In order to meet the requirements established by the FCC and this Commission for access to operations support systems ("OSS"), BA-NY should provide CLECs with mediated (read only) access to loop OSS and associated databases.

55. BA-NY essentially proposes a two-tiered approach to information data: first, CLECs could access a database specifically designed for BA-NY's roll out of its limited ADSL offering. (JSA ¶ 206) Second, CLECs could access the same loop information manually under certain unspecified circumstances. (JSA ¶ 207) Perhaps the greatest concern arises from the apparently limited nature of the loop data BA-NY proposes to provide. Specifically, BA-NY's description clearly indicates that its loop database is structured specifically to support its

own DSL offering. Thus, while it is extremely helpful to BA-NY's retail operations to have a database that indicates which loops can support which *BA-NY services*, this information is of very little use to CLECs with different, and broader, service parameters. BA-NY does not provide loop data designed to support CLEC-specific offerings, which vary substantially from BA-NY's offerings. Indeed, it does not appear that BA-NY provides access to data sufficient even to allow CLECs to make their own service judgments. Rather the only information provided by BA-NY, is whether a loop meets the service characteristics BA-NY has identified for its retail offerings. For these reasons, BA-NY's claim that it is providing loop data at parity is hollow and masks their competitive advantage.

56. ACI must have access to existing BA-NY electronic, automated operations support systems and databases that allow rapid and efficient access to pre-ordering information about the technical make-up of a potential customer's loop, and to on-line ordering and maintenance systems. Thus, ACI will need specific information and data about BA-NY's outside plant during the pre-ordering and ordering process to make effective business decisions so that we can provision the best possible service to our customers. As I will explain more fully below, ACI requires real-time, fully electronic information about the physical makeup of the loop including loop length, wire gauge, presence and numbers of repeaters, load coils and bridged taps and existence of digital loop carrier. BA-NY's loop qualification database does not meet this need. As described in its JSA, it appears that the only information BA-NY will provide to data CLECs via the pre-qualification database is whether a loop is suitable for BA-NY's deployment of ADSL. (JSA ¶ 213)

57. Access to information tailored to BA-NY's limited ADSL retail offering is insufficient for ACI because ACI plans to deploy a variety of xDSL technologies, depending

game is complete, precious time elapses and ACI could lose a potential customer. If ACI's potential customers are forced to wait several days before learning whether they can get service from ACI, and what services are available, the customers will likely not choose ACI, but will instead go with a carrier that has the information required to make a quick judgement, such as BA-NY.

60. The availability of loop make-up information for the initial contact with potential customers is critical to ACI's ability to win new customers and enable ACI to compete on an equal footing with Bell Atlantic, which is presently offering ADSL services in its region and intends a large scale roll-out in New York starting in June. As an example, I am familiar with the recent experience of two customers who ordered DSL from Pacific Bell, using an electronic ordering system. Those customers were able to complete the entire process of pre-ordering and ordering, including obtaining loop make-up information, placing the order, receiving a price quote and due date, in less than 14 minutes, start to finish. It goes without saying that the ability to verify loop make-up and complete the order while the customer is still on the line obviously has a significant sales impact.

61. ACI strongly support electronic access to loop make-up and other pre-ordering information. Electronic access allows CLECs greater flexibility in structuring their workforce, because on-line systems could be used 24-hours per day to research the suitability of customer loops to support DSL. Electronic systems can also support much greater volumes of inquiries than will manual systems. In addition, ILECs may have internal electronic pre-ordering and ordering systems available, thereby giving them an advantage in serving customers over competitors such as ACI. Time is of the essence in providing pre-ordering information, because

64. Such limited loop information fails to comport with the FCC's March *Advanced Services Order*. The FCC specifically required ILECs to "disclose to requesting carriers information with respect to the number of loops using advanced services technology within the binder and the type of technologies deployed on those loops."[8] This requirement builds on the earlier FCC requirement to provide competing carriers with the information necessary to formulate an accurate order for a customer, including "access to the information such systems contain."[9]

65. The Commission should require BA-NY to provide real-time access to its loop makeup information. If BA-NY does not currently have such a system in place, it should be required to develop the system within six months. Further, until BA-NY has a mechanized system in place, BA-NY should provide manual access to loop makeup information, and the information should be provided to ACI within 3-5 days of ACI's request, but in no event longer than the analogous loop make-up information interval applicable to BA-NY's retail DSL-based services.

NEED FOR COORDINATION AND STANDARDS

66. There are several engineering issues associated with deploying xDSL technologies on copper loops, including attenuation, crosstalk, transmission power, and loop length. A description of these issues is attached as EHG-5. As discussed below, however, these issues are all presently managed through design standards.

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[8] *Advanced Services Order* ¶ 73.
[9] *Local Competition Order* ¶ 518; *Advanced Services MO&O* ¶ 56 n.103.

69. The FCC's March *Advanced Services Order* properly distinguishes between spectrum compatibility and spectrum management. "Spectrum compatibility" concerns the range of technologies that can be deployed in the loop plant, while "spectrum management" concerns the deployment of services on a specific loop.[11] The FCC defines "spectrum compatibility" as "the ability of various loop technologies to reside and operate in close proximity while not significantly degrading each other's performance."[12] In contrast, "spectrum management" is defined to include "binder/cable administration as well as the broader issue of deployment practices (*e.g.*, the rules for testing and implementing xDSL-based and other advanced services)."[13] With regard to spectrum management, the FCC renounced the current practice of ILEC-specific measures that "vary from provider to provider and from state to state, thereby requiring competitive LECs to conform to different specification in each areas," in favor of "uniform spectrum management procedures."[14]

70. The FCC has recognized that standards should be set on a national basis, via industry consensus and not by individual ILECs.[15] The Telecommunications Act of 1996 opened up a new range of service choices to customers. National standards reached by industry consensus are needed to preserve this choice.[16] Internal requirements specified by an ILEC could be nothing more than anticompetitive protectionism based on business decisions as opposed to technical need. Indeed, the FCC was "persuaded by the record that allowing

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adjacent binder T-1.

[11] *See Advanced Services Order* note 151.

[12] *Id.* ¶ 61 (footnote omitted). "Proximity" is defined by the FCC as "in the same or adjacent binder groups." *Id.*

[13] *Id.* ¶71 (footnote omitted).

[14] *Id.*

[15] *Id.* ¶ 63.

[16] *Id.*

specifically concludes "that incumbent LECs should not unilaterally determine what technologies LECs, both competitive LECs and incumbent LECs may deploy."[20]

75. Whether technologies are standardized or not has little bearing on how the technologies can be deployed. Rather, the purpose of the spectrum management standard in T1E1.4 is to manage the deployment of the various technologies in the market place. Any technology, whether standardized or not, should meet the spectrum management standard.

76. In its JSA, BA-NY properly looks to national standards to guide the deployment of various xDSL technologies in a manner that will lead to compatibility among new and "legacy" (existing) services. (JSA ¶ 204) However, the Affiants go on to state that BA-NY specific spectrum management guidelines "enable BA-NY to accelerate the roll out of . . . ADSL compatible unbundled loops." (JSA ¶ 204). This second statement does not necessarily follow from the first and indeed, ignores the FCC's recent decision addressing spectrum management for DSL services.

77. First and foremost, BA-NY presumes that it can and should implement "interim" technical spectrum management guidelines "pending adoption of industry standards." (JSA ¶ 204) It would be inconsistent with the consensus national standards approach, to allow any single entity, whether it would be an ILEC or a CLEC, to establish a binding technical publication, even on an interim basis. Furthermore, there is no need for separate BA-NY Guidelines because completion of the draft spectrum management is expected in June, 1999.

78. I also note that a BA-NY guideline is not required in order to qualify loops for xDSL service and to manage the loop plant. The national spectrum management standard I reference above will specify not only power and frequency for each spectrum management

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in T1E1.4. With this recent development, there is an expectation of building consensus among ILECs, CLECs and the vendors who serve both groups of carriers.

is to ensure that the performance of the affected technology will not be overly reduced by the technology being restricted.

82. However, this Commission must realize that Binder Group Management for xDSL technologies has no technical justification, except for Alternate Mark Inversion ("AMI") T-1s. Binder group management has been used for AMI T-1a for years. This is for a very simple reason: AMI T-1s are an extremely interfering technology, and could only be deployed successfully if they were carefully deployed to manage that interference. The upstream and downstream T-1 signals impact each other so severely that they are required to be in non-adjacent binder groups. This means that there must be at least one binder between the binder containing the upstream signal and the binder containing the downstream signals. This method of management has worked well with T-1s because bundles of 25 pairs at a time are generally used. The loops in the 25-pair bundle are spliced in and out of an apparatus case that holds repeaters, every 3000 feet or so along the length of the loop, depending on loop gauge. This provides a natural barrier to other technologies being installed in the same binder. The industry has learned a hard lesson from AMI T-1s, and has progressed a great deal since the days of AMI T-1s. For this reason, the FCC concluded that ILECs should "to the fullest extent possible" work to remove AMI T-1s.[22]

83. Except for AMI T-1s, use of binder group management for xDSL technologies is unnecessary. All high-bandwidth xDSL technologies developed since the deployment of AMI T-1s have been intentionally designed to coexist harmoniously with other data and POTS services, *without* a need for the special treatment required by AMI T-1s. Therefore, neither ISDN/IDSL, HDSL, ADSL or SDSL requires spectrum management. ISDN was designed to be deployed throughout the existing loop plant for all ILECs. The legacy loop

compatibility, with the exception of T-1 Carrier. Therefore, to the extent that BA-NY intends to impose Binder Group Management on CLECs through its undefined "spectrum management guidelines" such guidelines are not only unnecessary and anticompetitive, but inconsistent with the position Bell Atlantic has taken in industry standards forums.

"HARMFUL" INTERFERENCE

85. I am puzzled and troubled by references in the BA-NY JSA suggesting that its spectrum management guidelines are necessary to "ensure the integrity of the network for all carriers." (JSA ¶ 204). BA-NY also obliquely refers to "unresolved technical issues" and the fact that "much work remains to be completed" with respect to xDSL services. (JSA ¶ 203) It uses these vague inaccuracies to support its subsequent assertion that its unidentified "guidelines" are necessary to "address one of the many of the technical issues that needed to be addressed prior to the roll out of xDSL technology based services." (JSA ¶ 204) These statements inappropriately invite the conclusion that DSL poses some possibility of "harm" to the public switched telephone network ("PSTN"). As discussed above and in EHG-5, the engineering issues associated with provision of xDSL services are appropriately addressed by industry standards. Therefore, I wish to dispel any notion the Commission may have of a risk of "harm" to the network that could justify additional guidelines as suggested by BA-NY.

86. "Switched" traffic, as included in the term PSTN, refers to voice grade POTS. That is, the traffic that is being referred to is the *switched* traffic that transits BA-NY's and other carriers' switches and the network of circuits between such switches. xDSL-based data traffic, however, whether carried by CLECs or BA-NY, is *not* switched at the BA-NY end office. Instead, it is split off from circuit-switched traffic at the CLEC or BA-NY DSLAM in the central office before it reaches the switch, and is carried on separate trunk groups via a separate

89. xDSL services require precisely the same loop that supports traditional voice telephony. There is no technical difference between the clean copper loops required for voice and those necessary for DSL service. Thus, no basis exists for a difference in price between these facilities. Therefore, BA-NY UNE loop rates for xDSL-based services should not be greater than the UNE loop rate for two-wire analog loops, which is a voice grade copper loop. These rates should be uniform and governed by TELRIC cost-based pricing principles, including loop deaveraging. All BA-NY UNE loops rates must comply with TELRIC cost-based principles.

90. Likewise, any charges for "conditioning" loops must be based on forward-looking TELRIC costs. Since forward looking DSL loops would be "clean" copper, charges associated with "conditioning" would be nominal. Accordingly, any appropriate charges for removal of interfering equipment must be charged on a nonrecurring basis. In addition, CLECs must not be charged for removal of nonstandard equipment that BA-NY may have placed on the line.

COPPER LOOP PROVISIONING INTERVALS

91. ACI soon will be competing with BA-NY in the DSL market. Therefore, in order to meet the expectations of our customers, ACI must be able to obtain and provision copper loops from BA-NY at least as quickly as they are provided to BA-NY's retail arm. Since copper loops provisioned for DSL are technically indistinguishable from other UNE loops, BA-NY should be required to provision those loops within the standard interval for UNE loops. According to the CLEC handbook, analog loops are provisioned within five (5) business days. However, if BA-NY is able to shorten the due date interval for loops supporting its DSL retail

[25] *Advanced Services Order* ¶ 66; *see also id.* at n. 166.

whichever is shorter. Further, BA-NY's performance in provisioning xDSL loops, whether "conditioned" or not, should be reported in its performance measurements.

I hereby swear, under penalty of perjury, that the foregoing is true and correct, to the best of my knowledge and belief.

/s/ Eric H. Geis

Eric H. Geis
ACI Corp.
7337 South Revere Parkway
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Dated: April 27, 1999

FRANK B. STRICKLAND

DIRECT DIAL (404) 253-7702
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June 9, 1999

VIA HAND DELIVERY

The Honorable Stan Wise, Chairman
The Honorable Robert B. Baker, Commissioner
The Honorable David Burgess, Commissioner
The Honorable Bob Durden, Commissioner
The Honorable Lauren "Bubba" McDonald, Commissioner
Georgia Public Service Commission
47 Trinity Avenue, S.W.
Atlanta, Georgia 30334-5701

Re: BellSouth OSS Testing Plan, GPSC Docket No. 8354-U
WS&B File No. 2994-09

Dear Gentlemen:

We understand that members of the Commission will consider a motion for reconsideration pertaining to BellSouth's plan for third-party testing of its operational support systems ("OSS"), filed June 1, 1999, in the above-referenced matter. We submit the following comments on behalf of e.spire Communications, Inc., which are not intended to be comprehensive but rather point out specific areas of particular concern.

e.spire supports the testing of additional unbundled network elements in the upcoming OSS testing. Specifically, e.spire will only gain from such testing if it includes DS-1 digital loops, the testing of combinations, and the testing of xDSL loop provisioning. It is only by deploying these UNEs that e.spire can compete with BellSouth and in the future.

e.spire is a facilities-based provider of voice and data services in Atlanta and Columbus, Georgia. e.spire has 36 operational fiber optic networks, 22 voice switches and 66 data switches nationwide. As a data-oriented CLEC, e.spire is particularly dependent upon certain services it purchases from BellSouth. e.spire utilizes DS-1 digital unbundled loops to provision its flagship Platinum product. e.spire makes only limited use of 2-wire analog loops. In addition to the Georgia Public Service Commission

prohibitive nonrecurring charges associated with BellSouth 2-wire analog loops, such loops are of limited utility to e.spire because e.spire is increasingly selling integrated voice and data services, which can only be provisioned over DS-1 digital loops.

As for combinations, e.spire would like to see testing of loop/transport and loop/transport/multiplexing combinations, and extended loop orders. It is critical to note that BellSouth and every other RBOC have successfully resisted providing combinations to CLECs for over three and a half years since the passage of the Telecommunications Act through an exhaustive legal campaign that culminated in the Supreme Court requiring that combinations be provided. e.spire has hope that the FCC will reiterate that loops, transport, and multiplexing are unbundled network elements, and will classify extended loops as unbundled network elements. BellSouth will then have no argument whatsoever at its disposal to prevent it from providing combinations of these elements and extended loops. At that time, the Georgia Commission should have assurances, through the upcoming tests, that BellSouth has OSS that are fully capable of handling these combinations, and extended loop orders.

Finally, e.spire currently has an agreement with COVAD whereby e.spire resells COVAD's DSL services. It is therefore critical to e.spire and other data-oriented CLECs that it be able to purchase DSL loops on a seamless basis. As BellSouth accelerates its own rollout of DSL service, it becomes increasingly critical that these loops become a part of the upcoming tests.

Thank you for your attention to this matter.

Sincerely,

Frank B. Strickland

Tiane L. Sommer

Attorneys for e.spire Communications, Inc.

TLS/jms

cc: Helen O'Leary, Esquire, Executive Secretary (20 copies for filing)
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June 9, 1999

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Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue, Room 520
Atlanta, Georgia 30334

Re: Investigation into Development of Electronic Interfaces for BellSouth's Operational Support Systems; Docket No. 8354-U

Dear Ms. O'Leary:

Enclosed please find the original, twenty-five copies as well as an electronic version of BellSouth Telecommunications, Inc.'s Reply to AT&T's Motion for Reconsideration of the Commission's Order for Third Party Testing in the above-referenced docket. I would appreciate your filing same and returning the two extra copies stamped "filed" in the enclosed self-addressed stamped envelope.

Thank you for your assistance in this regard.

Sincerely,

Lisa S Foshee

Lisa Spooner Foshee

Enclosures

cc: Parties of Record

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In re:	)	
	)	Docket No. 8354-U
Investigation Into Development of	)	
Electronic Interfaces for BellSouth's	)	
Operational Support Systems	)	

BELLSOUTH TELECOMMUNICATIONS, INC.'S REPLY TO
AT&T'S MOTION FOR RECONSIDERATION OF THE
COMMISSION'S ORDER FOR THIRD PARTY TESTING

BellSouth Telecommunications, Inc. ("BellSouth") objects to AT&T's Motion for Reconsideration of the Commission's Order for Third Party Testing. AT&T did not cite one single legal or factual ground upon which the Order should be reconsidered. Rather, AT&T simply argued that the Commission's failure to adopt AT&T's proposal in its entirety was wrong. AT&T's displeasure with the Order, without any other support, hardly constitutes grounds for reconsideration of the Order.

Ironically, the Order that AT&T wants reconsidered reflects the numerous AT&T requests regarding third party testing that the Commission has *granted*. For example, in the December 22, 1998 pleading, AT&T argued that the Commission *must* institute third party testing of BellSouth's OSS. (*Petition*, at 3-4). The Commission granted this request in the Order, over BellSouth's objection. Second, AT&T argued that BellSouth should be required to absorb all costs associated with third party testing. (*Petition*, at 13)("[t]hird party testing will help BellSouth meet its legal obligations and its evidentiary burden and thus BellSouth should bear these costs.") The Commission granted this request also. (AT&T Motion, at 2). Finally, AT&T requested that the third party testers be endorsed by the Commission. (*Petition*, at 6). The Commission explicitly granted this

request in the Order by stating that "BellSouth shall file a detailed test plan ... the Commission shall review, and if appropriate, modify this plan to ensure compliance with its order." (Order, at 4).

Despite the Commission's adoption of all of these AT&T proposals, AT&T is still not satisfied. In fact, AT&T is now contradicting itself and complaining about things it originally requested. For example, in its Motion AT&T argued that Georgia "could benefit from experience gained from the testing conducted on Bell Atlantic in New York." (*Petition*, at 4). Now, despite the fact that BellSouth's proposed test plan is modeled after New York, AT&T complains that BellSouth cannot "author an independent third party testing plan that will meet the objectives envisioned by this Commission." (Motion, at 3).

In short, AT&T's objections to the Order are not credible. While AT&T tries to couch its arguments in terms of BellSouth's "bad faith" and inability to devise an appropriate plan, AT&T's real position is that anything less than full compliance with AT&T's proposed plan will be inadequate. AT&T's "their way or the highway" approach is simply not grounds for reconsideration of the Order.[1] AT&T's uncompromising position that its plan is the only appropriate approach, and the contradictions in its pleadings, demonstrate that this Motion is nothing more than the next step in AT&T's longstanding attempt to delay BellSouth's entry into long distance.

BellSouth has worked diligently to submit a Master Test Plan that complies with both the letter and the spirit of the Commission's OSS Order. The Plan covers each of

the topics set forth in the Order. The Plan is thorough, fair and appropriate. To the extent that the Commission has any questions about the Plan, BellSouth will work with the Commission to ensure that the Plan meets all of the Commission's goals and requirements. AT&T has not raised any specific issues with the Plan, nor could it, that would constitute grounds for reconsideration of the Order. Rather, AT&T simply argued that because it wasn't AT&T's plan, it wasn't the right plan. The Commission should not condone such tactics.

For the aforestated reasons, BellSouth respectfully requests that the Commission deny AT&T's Motion for Reconsideration of the Commission Order for Third Party Testing.

This 9th day of June, 1999.

BELLSOUTH TELECOMMUNICATIONS, INC.

Lisa Spooner Foshee

Fred McCallum, Jr.
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[1] AT&T's position is clear: "*only then* [when the Commission adopts AT&T's plan] can this Commission and all CLECs be assured that the test will proceed in an unbiased manner with test objectives that will better assure that competition will develop." (Motion, at 4)(emphasis added)

CERTIFICATE OF SERVICE
Docket No. 8354-U

This is to certify that I have this day served a copy of BellSouth Telecommunications, Inc.'s Reply to AT&T's Motion for Reconsideration of the Commission's Order for Third Party Testing upon known parties of record, as follows:

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