

ORIGINAL

BELLSOUTH

Kathleen B. Levitz
Vice President-Federal Regulatory

Suite 900
1133-21st Street, N.W.
Washington, D.C. 20036-3351
202 463-4113
Fax: 202 463-4198
klevitz@bsc.bls.com

July 27, 1999

EX PARTE OR LATE FILED

RECEIVED

JUL 27 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

Re: Written Ex Parte in CC Docket No. 98-121 and
CC Docket No. 98-56

Dear Ms. Salas:

This is to inform you that BellSouth Corporation has made a written ex parte to William Agee, a senior attorney in the Common Carrier Bureau's Policy and Program Planning Division. That ex parte consists of a copy of [First] BellSouth OSS Testing Evaluation Status Report filed by KPMG with the Georgia Public Service Commission on July 22, 1999.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, we are filing two copies of this notice and that written ex parte presentation in the two dockets identified above. Please associate this notification with the record in that proceeding.

Sincerely,



Kathleen B. Levitz
Vice President-Federal Regulatory

Attachment

cc: William Agee

BELLSOUTH

Kathleen B. Levitz
Vice President-Federal Regulatory

Suite 900
1133-21st Street, N.W.
Washington, D.C. 20036-3351
202 463-4113
Fax: 202 463-4198
Internet: levitz.kathleen@bsc.bis.com

July 27, 1999

Mr. William Agee
Policy and Program Planning Division
Common Carrier Bureau
Room 5-C231
Federal Communications Commission
The Portals
445 12th St. S.W.
Washington, D.C. 20554

Re: Written Ex Parte in CC Docket No. 98-121 and
CC Docket No. 98-56

Dear Mr. Agee:

Attached is a copy of the [First] BellSouth OSS Testing Evaluation Status Report filed by KPMG with the Georgia Public Service Commission on July 22, 1999. I am sending this report to you in response to your request for this information. If you have any questions after reviewing the report, please call me at 202.463.4113.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, I am filing two copies of this written ex parte presentation with the Secretary of the Commission and requesting that it be associated with the record in both the dockets identified above.

Sincerely,



Kathleen B. Levitz
Vice President - Federal Regulatory

Attachment



**BellSouth OSS Testing Evaluation
Status Report
July 22, 1999**

1.0 Document Objective

In this document, KPMG provides a summary status report on developments related to the BellSouth 271 Testing Project. A brief overview of key developments is provided in section 2.0. A more detailed report on other test items is provided in the table in section 4.0. Each item presented in the table in section 4.0 includes a reference number that will identify the item in future status reports.

2.0 Key Developments

- **Master Test Plan (MTP)**
HP, BellSouth, KPMG, and the Commission have held several discussions to refine the content of the MTP. HP is currently incorporating comments from the most recent meetings and will file a revised draft MTP with the Commission during the week of July 26.
- **Roles and Responsibilities of the Commission, BellSouth, HP, and KPMG**
At the request of the Commission, a conference call was held to clarify roles and responsibilities of all testing parties on Tuesday, July 20, 1999. Topics discussed during the call included:
 - Process for approval of test entrance criteria
 - Process for development and approval of test evaluation criteria and performance standards
 - Process and responsibilities for conducting evaluation of test results
 - Clarification of test manager (HP) and audit (KPMG) roles by the Commission.
- **Connectivity**
 - As of July 20, BellSouth completed installation of two T-1 circuits at the HP test facility.
- **Training**
Training has been held or is scheduled for HP and KPMG as follows:
 - Advisory Team Overview held July 1-2 in Atlanta
 - EDI-PC training held July 9 in Birmingham, AL
 - TAG training held July 13-14 in Atlanta
 - Performance metrics overview training held July 14 in Atlanta
 - UNE training scheduled for July 27-28 in Atlanta
- **Mission Critical Element Meeting**
HP hosted an all-day meeting that included BellSouth and KPMG representatives to discuss mission-critical test elements on June 19, 1999.



**BellSouth OSS Testing Evaluation
Status Report
July 22, 1999**

Topics discussed included:

- Identification of key project management and functional contacts at HP, BellSouth, and KPMG
 - Processes for communication among test parties
 - Test entrance and exit criteria and dependencies
- Status Meetings
Bi-weekly status calls between BellSouth, HP, and KPMG have been scheduled every Tuesday and Thursday at 2:00 EDT.

3.0 Key Upcoming Activities

- HP will provide an initial project plan with targeted dates for the completion of test activities on July 23.
- HP will provide a revised MTP to the Commission during the week of July 26.
- HP will provide a date on which the test evaluation criteria will be completed on July 26.
- BellSouth will provide UNE training on July 27-28 in Atlanta. HP is negotiating dates for TAFI and Billing training.
- KPMG will provide a document describing representative audit activities to the test parties by July 28.



**BellSouth OSS Testing Evaluation
Status Report
July 22, 1999**

4.0 Specific Item Status

Ref	Item	Status	Issues	Next Step/Resolution
I-1	Master Test Plan (MTP) revisions	<ul style="list-style-type: none">• Ownership of MTP transferred to HP. Initial revisions based on KPMG, BellSouth and Commission comments have been incorporated. Further revisions have been discussed and HP is incorporating. HP anticipates filing a revised MTP with the Commission during the week of July 26.	<ul style="list-style-type: none">• Evaluation criteria and performance measures not fully defined. Commission approved performance measures can serve to identify evaluation measures and standards for some transactional tests.	<ul style="list-style-type: none">• Meeting between BellSouth, HP, and KPMG scheduled to develop evaluation criteria and define performance measures for transactional and procedural tests.
			<ul style="list-style-type: none">• Test issues identified as requiring further definition or information as of this date include:<ul style="list-style-type: none">– Specific knowledge of BellSouth systems and processes required to determine if MTP aligns to actual BellSouth practice in each test area– Identification of system components to be included in the scalability evaluation	<ul style="list-style-type: none">• BellSouth will provide additional information on business processes and system behavior. HP and KPMG will make revisions to the test design based on this information as related to the test objectives.
I-2	Test bed development	<ul style="list-style-type: none">• BellSouth has proposed to HP a list of scenarios that are candidates for provisioning.• HP is analyzing scenarios to determine the number of lines that need to be provisioned.	<ul style="list-style-type: none">• Ability to conduct extensive tests (provisioning, billing, and maintenance & repair) on provisioned lines needs to be ensured. Factors to be considered in determining the number of provisioned accounts/lines are statistical significance of test target and results, as well as product, geographic, CO, and switch type diversity.	<ul style="list-style-type: none">• HP will propose a provisioning strategy.
I-3	T-1 connectivity	<ul style="list-style-type: none">• Two T-1s have been installed and have electronic connectivity.	<ul style="list-style-type: none">• No major issues	<ul style="list-style-type: none">• Completed

**BellSouth OSS Testing Evaluation
Status Report
July 22, 1999**

Ref	Item	Status	Issues	Next Step Resolution
I-4	Interconnection agreement	<ul style="list-style-type: none"> BellSouth attorneys have indicated that HP is not required to sign an interconnection agreement. 	<ul style="list-style-type: none"> No major issues 	<ul style="list-style-type: none"> Completed
I-5	Virtual CLEC collocation	<ul style="list-style-type: none"> BellSouth has identified an internal team to develop plans for a collocation arrangement to allow for provisioning of facilities to the virtual CLEC. Three central offices are being wired to provide the appearance of collocation of virtual CLEC facilities. The wiring is being implemented in such a way that BellSouth technicians will not know that the facilities are for a virtual CLEC. Due to time issues, implementation of the plan has begun. 	<ul style="list-style-type: none"> Specific provisioning recommendations have not been made by HP; additional central offices may need to be wired. 	<ul style="list-style-type: none"> BellSouth to provide additional detail on collocation proposal to HP and KPMG.
I-6	EDI functional testing	<ul style="list-style-type: none"> Pre-requisites to functional testing: Four pre-test phases need to be completed prior to the initiation of functional testing. These phases are connectivity, syntax, end-to-end, and SRT (system readiness testing). HP has not begun EDI connectivity testing. 	<ul style="list-style-type: none"> No major issues 	<ul style="list-style-type: none"> HP scheduling connectivity testing for Wednesday, July 28.
		<ul style="list-style-type: none"> Pre-Testing Dates: BellSouth procedure dictates that dates for the last 3 testing phases be set after connectivity testing has been completed. A conference call on 7/21/99 to determine testing dates was cancelled by HP. 	<ul style="list-style-type: none"> Connectivity testing must be completed to initiate subsequent stages of process 	<ul style="list-style-type: none"> HP has rescheduled a conference call with BellSouth to discuss setting dates for pre-test activities.
		<ul style="list-style-type: none"> HP has submitted the required forecast forms in order to establish trading partner ID setup. 	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Completed

**BellSouth OSS Testing Evaluation
Status Report
July 22, 1999**

Ref	Item	Status	Issues	Next Step Resolution
		<ul style="list-style-type: none"> • Interface Development: HP has indicated the desire to be prepared to use both EDI PC and EDI via a LAN-to-LAN connection. Currently, HP has installed the EDI PC software and has the infrastructure for LAN-to-LAN EDI set up on an HP UNIX platform. HP has inquired whether EDI PC via a direct connection is possible. BellSouth indicated that such a connection is supported by their systems, and they currently have trading partners using this option. 	<ul style="list-style-type: none"> • Feasibility of EDI-PC direct connection that would allow for collection of all performance metrics is in question 	<ul style="list-style-type: none"> • HP will research the availability of EDI direct connect software with Harbinger. If the connection is feasible, HP will research their ability to track the required performance metrics via this setup.
I-7	TAG functional testing	<ul style="list-style-type: none"> • Pre-requisites for functional testing: Four pre-test phases need to be completed prior to the initiation of functional testing. These phases are connectivity, application testing, validity testing, and SRT. HP has completed the first phase of establishing TAG connectivity. • Application/Interface development: The HP client application for TAG needs to be developed prior to the initiation of application testing. HP has not yet indicated an estimated date for the completion of this program. 	<ul style="list-style-type: none"> • No major issues 	<ul style="list-style-type: none"> • HP needs to complete BellSouth exit criteria for connectivity testing.



**BellSouth OSS Testing Evaluation
Status Report
July 22, 1999**

Ref	Item	Status	Issues	Next Step/Resolution
I-8	Billing functional testing	<ul style="list-style-type: none">• HP is currently considering the option of submitting test LSRs via EDI-PC to be billed in order to advance the start date of the test and allow for completion of two billing cycles. Final determination has not been made.	<ul style="list-style-type: none">• No major issues	<ul style="list-style-type: none">• HP to provide final determination on possible use of EDI-PC for submitting LSRs to be billed.
		<ul style="list-style-type: none">• Q-Accounts have been provided to HP by BellSouth.	<ul style="list-style-type: none">• No major issues	<ul style="list-style-type: none">• Completed
		<ul style="list-style-type: none">• Billing training is currently being scheduled for HP (dates not yet known).	<ul style="list-style-type: none">• Billing training is not currently offered on an ongoing basis to CLECs. Based on CLEC demand, BellSouth is in the process of developing the training to be instituted as a regular course offering.	<ul style="list-style-type: none">• BellSouth to provide dates for training.
I-9	M&R functional testing	<ul style="list-style-type: none">• Application/interface development: For TAFI (dial-up interface), HP has provided information required for issuance of SecurIDs by BellSouth. For ECTA (machine-to-machine interface), HP will not build their own interface. BellSouth will provide an available test machine to HP.	<ul style="list-style-type: none">• TAFI training has not been scheduled. Discussions on ECTA processes and functionality have not been scheduled.	<ul style="list-style-type: none">• BellSouth to provide dates for TAFI training and an opportunity to discuss ECTA processes and functionality.
		<ul style="list-style-type: none">• ECTA joint implementation agreement (JIA) documentation has been provided to HP. HP has requested application programming interface (API) documentation.	<ul style="list-style-type: none">• No major issues	<ul style="list-style-type: none">• BellSouth to provide ECTA API documentation