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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

EX PARTE OR LATE FILED

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

**Kathleen B. Levitz**  
Vice President-Federal Regulatory

July 30, 1999

EX PARTE

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

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

Dear Ms. Salas:

On July 29, 1999 Venetta Bridges, Jerry Moore, and I, representing BellSouth, spoke by telephone with staff of the Common Carrier Bureau's Policy and Program Planning Division. Division staff participating in the meeting included Claudia Pabo; John Stanley; Eric Einhorn; and Daniel Shiman. The purpose of the meeting was to review in more detail the BellSouth financial incentives, or VSEEMs, proposal filed at the FCC in a notice of ex parte filed in CC Docket No. 98-56 and CC Docket No. 98-121 on June 18, 1999. In response to staff questions, Ms. Bridges explained that BellSouth was still attempting to identify retail service analogs for every measure in the VSEEMs proposal. She clarified that measures on the VSEEMs list map back to BellSouth's Service Quality Measurements (SQM), and the same parity standard will apply for either VSEEMs or SQM purposes. The BellSouth representatives also shared with the staff the dates and agenda for the next Louisiana Public Service Commission workshops in that commission's Docket No. U22252-Subdocket C.

In accordance with Section 1.1206 (b)(2), I am filing two copies of this notice in the proceeding identified above and ask that you place this notice in the record of that proceeding.

Sincerely,



Kathleen B. Levitz  
Vice President - Federal Regulatory

cc: Claudia Pabo  
John Stanley  
Eric Einhorn  
Daniel Shiman

**Kathleen B. Levitz**  
Vice President-Federal Regulatory

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WRITTEN EX PARTE

Mr, Jake Jennings  
Policy and Program Planning Division  
Common Carrier Bureau  
Federal Communications Commission  
Room 5-C260  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Re: CC Docket No. 96-98

Dear Mr. Jennings:

On July 22, 1999, representatives of BellSouth held a conference call with you and other FCC staff to discuss issues relating to the Commission's UNE Remand proceeding. During that meeting, the FCC staff asked the BellSouth representatives whether a BellSouth operator can always redirect misdirected 911 calls (*i.e.*, calls in which the caller dials "0" instead of "911") to the Public Safety Access Point (PSAP), and, if so, whether this was an ability that CLECs using third-party operator service providers did not possess. We hope that the FCC staff finds the attached information to answer these questions fully. If after reviewing the attached information, any of you have any questions, please call me at 202.463.4113.

In accordance with Section 1.1206(b)(1), 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 of CC Docket No. 96-98.

Sincerely,



Kathleen B. Levitz

Attachment

cc: Claudia Fox  
Anthony Mastando  
Sanford Williams

**Staff Request: If 911 service is available in an area, can BST operators always redirect misdirected 911 calls (i.e., where calling party dials 0- rather than 911) to Public Safety Access Points (PSAPs)?**

**BellSouth Response:** When an end user dials 0- (instead of 911) and requests an emergency agency, the BellSouth operator can connect that end user to a PSAP. The operator handles this call as the operator would handle any other call for which an end user is requesting dialing assistance. When the call arrives at the operator position, just as on any other 0- call, the end user originating ANI (automatic number identification) is the only information available to the operator. That information is not sufficient for the operator to know which PSAP the end user needs. Connecting the end user to the appropriate PSAP depends upon the end user providing the locality from which he is calling and the emergency agency he needs (e.g., the Atlanta police). Based upon end user provided information, the operator looks up the 10 digit administrative number of the appropriate emergency agency. BellSouth manually maintains a paper list of these numbers by locality for this purpose. Telephone numbers for emergency agencies are listed in telephone directories.

The operator will dial the 10 digit administrative number of the emergency agency or PSAP for the end user at no cost. Normally, to be certain the correct connection is made the operator will remain on the line until the call is answered by the PSAP. If the end user was mistaken about the locality, the PSAP attendant usually will refer the end user to the correct PSAP locality. The BellSouth operator will look up that number, dial it, and remain on the line until the connection is made.

If the customer does not know which agency he wants or is unable to provide a locality, the customer will be connected to a PSAP based upon originating NPA-NXX. The NPA-NXX is not sufficient for the operator to be certain the correct PSAP is being called. In this case the operator will stay on the line until satisfied that the correct agency has been reached or until referred to another locality.

All of these calls are handled on the Public Switched Telephone Network, not a dedicated 911 facility. The calls are transported on the same trunk groups as if the end user had dialed 0+ the PSAP 10 digit number.

Connection to the appropriate emergency agency is done by questioning the end user, and the PSAP attendant. It is a manual process performed by Operator Services personnel.

**Staff Request:** CLECs have said third party OS Providers' service is not as good as ILEC service because the third party OS providers' operators cannot shunt misdirected 911 calls to the PSAPs as ILEC operators can. Do ILEC operators accomplish this by a dedicated link (e.g., T-1) from the operator location to the PSAP? If so, how can CLECs or other OS Providers obtain such links?

**BellSouth Response:** A BellSouth operator handles a connection to a PSAP only when the end user dials 0-. There are no dedicated "links" from the operator location to the PSAP. When an end user dials "0-" in order to be connected to an emergency agency, the BellSouth operator asks the end user to identify the agency to which he wishes to be connected and its associated location. Using the information provided by the end user, the BellSouth operator will look up the 10-digit administrative number of that PSAP, dial that number, and wait for the connection. The call is routed over the Public Switched Network just like any other operator assisted call. There is no reason why other providers of operator services cannot do the same thing.

**Note:** There has been extensive publicity regarding 911 access to emergency agencies. As already widespread public knowledge of 911 service grows, the number of such calls reaching operators should continue to diminish.