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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.bls.com

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th S.W., Room TWB-204
Washington, D.C. 20554

Re: CC Docket No. 98-147

Dear Ms. Salas:

On September 8, 1999, Bill McNamara, Steve Earnest, Mary Jean Dennis, Debbie Ogle, and I, representing BellSouth Corporation, met with members of the staff of the Commission's Common Carrier Bureau and Office of Engineering and Technology to discuss issues related to line sharing and spectrum management. Members of the Common Carrier Bureau staff attending at least part of the discussion were Margaret Egler, Vincent Palladini and Michael Jacobs of the Policy and Program Planning Division. OET staff members attending the discussion were Douglas Sicker; and Paul Marrangoni. The attached document formed the basis for the BellSouth presentation.

In compliance with the Commission's rules, I am filing two copies of this notice and ask that you associate this notification with the proceeding identified above.

Sincerely,



Kathleen B. Levitz

Attachment

cc: Margaret Egler
Michael Jacobs
Vincent Palladini
Paul Marrangoni
Douglas Sicker

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List ABCDE

BellSouth Ex Parte
Line Sharing and Spectrum
Management
September 8, 1999

BellSouth's Position in its Filed Comments

- Commission's Notice is premature
- Spectrum unbundling is not needed
- Spectrum unbundling raises serious technical, operational, and pricing issues

Line Sharing Concerns

- Operational Issues
 - Operational systems to be modified
 - Costs required to make modifications
- Technical Issues
 - Agreement on pass bands
 - Isolation provided by splitters
- Potential impact on network evolution

Line Sharing - Splitters

- Splitters are necessary for proper separation between voice services and data services
- Splitters are necessary to allow ILEC to disconnect data services which significantly degrade voice services (after notice has been given)
- General support at recent debate before FCC for ILEC ownership and control of splitters
- CLEC ownership of splitters greatly increases OSS effort and eliminates ILEC's ability to properly police data services
- Need splitter at central office and on network side of demarcation point

Line Sharing - Near Term

- Situations where line sharing is not a near-term option
 - Loops without ILEC voice service
 - DAML-equipped lines
 - Some Centrex lines
 - DLC derived lines
 - Fiber in the loop
 - ISDN-equipped loops
 - Where loop conditioning degrades voice service
 - Where xDSL interferes with voice services in any manner

Spectrum Management

- BellSouth's Position on Spectrum Management
 - The “test and see” approach for new technology is inadequate
 - T1E1 should be the forum to develop future power density masks
 - Spectral density mask-based approach is better than calculation-based approach for defining spectral compatibility
 - Strongly oppose vesting any forum with authority to develop practices for deciding the placement of new facilities or technologies

Conclusion

- At a minimum, the Commission should:
 - not adopt spectrum unbundling
 - not allow interpositioning of CLEC between ILEC and customers
 - seek comment on impact of pending UNE Remand Order