



BELLSOUTH
ORIGINAL

Kathleen B. Levitz
Vice President-Federal Regulatory

October 8, 1999

EX PARTE OR LATE FILED

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WRITTEN EX PARTE

RECEIVED

OCT - 8 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

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

Dear Ms. Salas:

This is to give notice that on October 8, 1999 I sent the attached written ex parte to: Lawrence Strickling, Chief of the Common Carrier Bureau and Robert Atkinson, Carol Matthey, Jake Jennings, Andrea Kearney, and Bill Agee of his staff.

In accordance with Section 1.1206(b)(1), I am filing two copies of this notice in the docket identified above. If you have any questions concerning this, please call me.

Sincerely,

Kathleen B. Levitz

Attachment

cc: Lawrence Strickling
Robert Atkinson
Carol Matthey
Jake Jennings
Andrea Kearney
Bill Agee

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Vice President-Federal Regulatory

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WRITTEN EX PARTE

Lawrence E. Strickling, Chief
Common Carrier Bureau
Federal Communications Commission
Room 5-C450
445 12th St. S.W.
Washington, D.C. 20554

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

Dear Mr. Strickling:

During our meeting last Friday, October 1, 1999, you asked BellSouth to prepare a written comparison of the key elements of independent, third-party testing of BellSouth's OSS currently underway in Georgia and those of the independent, third-party test to be undertaken in Florida. Attached is the comparison you requested. If after reviewing it you have any questions, please call me at 202.463.4113.

In accordance with the requirement of Section 1.1206(b)(1), I am filing with the Secretary of the Commission two copies of this written ex parte presentation for inclusion in the records of both CC Docket No. 98-121 and CC Docket No. 98-56.

Sincerely,



Kathleen B. Levitz

Attachment

cc: Robert Atkinson
Carol Matthey
Jake Jennings
Andrea Kearney
Bill Agee

**KEY ELEMENTS OF INDEPENDENT, THIRD-PARTY OSS TESTING
COMPARISON OF GEORGIA TEST TO FLORIDA TEST**

FLORIDA	GEORGIA
Role of Third Party:	
Develop the Test Plan	Yes
Conduct the test	Yes
Monitor results	Yes
Report on the test	Yes
Clarify complex facts for accurate decision-making by state and federal regulatory agencies	Yes
Chose KPMG to develop, implement, monitor and report on test.	Same
Build Interfaces to Test Documentation	
Third party to build necessary OSS interfaces to determine whether the ILEC's documentation is sufficient to permit CLECs to develop their OSS in order to enter the market.	Yes
Tests for system flow-through and non-flow through capabilities	Yes – part of OSS functional test. In addition, GPSC ordered full audit of Percent Flow-Through Service Requests performance measurement data submitted by BellSouth in its monthly performance data filing
Tests full range of interfaces a CLEC Might use to exchange data with ILEC	Interfaces to be tested are Telecommunications Access Gateway ("TAG") pre-Ordering, TAG ordering and EDI ordering, ECTA and TAFI maintenance ; and ODUF, ADUF, CRIS and CABS billing
Assess ILEC's interface backup and restoration process	No
Tests the systems interface certification process	Yes
Third party to test and review supporting documentation for OSS system development	Yes
Test adequacy of ILEC's documentation for business rules and order development	Yes
Change Management:	
Evaluate change management processes by reviewing actual notices, such as	Yes – the process and all releases through the end of the test will be tested – includes

modifications to business rules, to ensure the BOC is complying with established procedures.	releases under Change Control (parts of releases 4.0, 4.1, 4.2, 5.0, 5.1, 5.4)
Performance Measurement Validation:	
Prior to testing, a performance measurement system must be validated, and the test results must be measured against pre-established performance standards.	Yes
Open Process:	
CLECs should be given full access to materials provided to Third Party Vendor	No
CLECs should monitor test to ensure that Third Party is not receiving assistance and cooperation the CLECs will not be able to enjoy	Periodic reports will be filed with the PSC. CLECs will have the opportunity to review and comment.
Test all Functionalities:	Functional testing: for UNEs; will test ability to carry an order all the way through provisioning. Will test some resale for vol. test prep. Volume testing: for Resale and UNEs; will test capacity of our systems to the point of Firm Order Confirmation ("FOC")
Pre-Ordering:	Yes
Address validation	Yes
CSR availability	Yes
Numbering Resource Availability	Yes
Due date interval and availability	Yes
Editing capabilities	Yes
Systems integration capabilities	Yes
Telephone number verification	Yes
Current PIC status verification	Yes
Facilities availability	Yes
Ordering (including integration of pre-ordering and ordering)	Yes
Simple and complex orders	Focus on: (1) UNE analog loops, with and without number portability; (2) UNE Switch Ports; (3) UNE Business and Residence Loop/Port combinations; and (4)

	INP and LNP.
Order status reports	Yes
Editing capabilities	Yes
Integration with other systems	Yes
Provisioning	Yes
Sizeable quantity of orders	Yes
Maintenance and repair	Yes
Electronic bonding interface	Yes
OSS interface availability	Yes
Average OSS response interval	Yes
Average answer time – repair	Yes
Missed repair appointments	Yes
Customer trouble report rate	Yes
Maintenance average duration	Yes
Percent repeat troubles (w/in 30 days)	Yes
Out of service more than 24 hours	Yes
Billing	Yes
Invoice accuracy	Yes
Invoice timeliness	Yes
Usage data delivery accuracy	Yes
Usage data delivery timeliness and completeness	Yes
Ability to capture usage data for all calls including local and access	Yes
Audit of BOC's end-user billing, Wholesale billing	UNE related billing
Relationship Management and Infrastructure (RMI)	
CLEC Training	Yes
Help desks	Yes (LCSC and UNE Center)
Interface change control	Yes
Network design and collocation requests	No
Forecasting of CLEC demands for network resources and facilities	Yes
Stress Test	
Volume stress test appropriate to the	Tests at both normal and peak volumes.

market to cover multiple days	Volume data to be developed by service and order type for: Resold Services, Unbundled Network Elements (including combinations of elements), Pre-Ordering transactions, and Trouble reports.
Test Scenarios	
Full Range of Orders	Functional testing of UNEs; volume testing of UNEs and Resale.
Realistic Mix of Orders	Yes
Submission of Orders	
Track LSRs based on BOC provided documentation	Yes
Test Bed:	
Provide sufficiently large quantity	Yes
Ensure sample is not "clean" data	Yes
Test accounts created in ILEC's production systems, in actual central offices spread across the State, not in a separate test system	Volume data will be developed from actual transaction data, CLEC forecasts, and case studies of market share changes in related markets. Two test families: (1) testing system – not connected to central offices; (2) production system – connected to actual central offices
"Blind" Testing	
Orders should be submitted to the BOC without it knowing when they will arrive	Yes
Military Style Testing	
Test until you pass	Yes
XDSL OSS Capabilities:	
Access to loop qualification	No
BOC bandwidth management information	No
"Regression" Testing after Problems Found	
BOC must demonstrate resolution of problems	Yes