

Bell Atlantic
1300 I Street N.W.
Suite 400 West
Washington, DC 20005
202 336-7824 Fax 202 336-7922
E-Mail: Dolores.A.May@BellAtlantic.com

Dee May
Director
Federal Regulatory Affairs
RECEIVED
DEC 10 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY



December 10, 1999

EX PARTE OR LATE FILED

Ex Parte

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CC Docket No. 99-295: In the Matter of Application of Bell Atlantic Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in New York

Dear Ms. Salas,

Today, Bell Atlantic met with Ms. D. Attwood-Chairman Kennard's office, Mr. L. Strickling-Common Carrier Bureau and Ms. K. Brown-Chief of Staff. The subject of the meeting was Bell Atlantic-New York's long distance application. Representing Bell Atlantic were Mr. T. Tauke, Mr. D. Evans, Mr. M. Glover, Mr. E. Young and Mr. J. Ward. Material presented by Bell Atlantic in the meeting is attached.

As outlined in the Public Notice (DA-99-2014) issued by the FCC on September 29, 1999, the 20 page ex parte limit does not apply to this ex parte since Bell Atlantic is filing information presented during the meeting.

Please feel free to contact me with any questions.

Sincerely,

- cc: A. Kearney
- D. Attwood
- K. Brown
- L. Strickling

No. of Copies rec'd 041
List ABCDE



DSL Parity

Completion Intervals

<i>Month</i>	<i>ADSL</i>	<i>Special Services</i>
Aug	7.21	8.62
Sept	7.88	9.61
Oct	8.81	9.94

- Unbundled ADSL loops and retail ADSL service are not good analogues
- Unbundled ADSL loops are more difficult to provision than retail ADSL service
 - Retail ADSL service provisioned only on working lines with dial tone; ADSL loops cannot be working lines
 - Retail ADSL service does not involve a dispatch; ADSL loops do involve a dispatch
- The most analogous service to ADSL is special circuits
- Comparison to most closely analogous service shows parity
 - Both DSL loops and special circuits are provisioned on spare copper facilities
 - Both DSL loops and special circuits involve a dispatch
- Even comparing ADSL loops to retail ADSL service shows rough parity despite greater difficulty of provisioning ADSL loops



DSL Performance

- 89 percent of DSL loop orders fall into one of the following three categories:
 - 33 percent of provisioned on time
 - 40 percent cannot be provisioned because customer not ready / no access
 - 16 percent cannot be provisioned because loop facilities are not available
- The remaining orders fall into the following two categories:
 - 10 percent are not completed because of a wiring problem in the central office. Some of the wiring problems are the CLECs' and some are Bell Atlantic's
 - Less than one percent of current orders are missed because of Bell Atlantic not dispatching a technician
- Over 95 percent of order confirmations are currently on time (November data)

* - Data from December 1 - 9, 1999



Customer Not Ready / No Access

- Reasons for No Access
 - Customer not at premises
 - Customer cancels order
 - Customer ordered service from two CLECs
 - Bell Atlantic technician can't get access to terminal box
 - Customer home, but did not make access arrangements with landlord
- Percentage of Customer not ready / no access vary by CLEC (some CLECs nearly 3 times higher than others)
- Cooperative process established a New York collaborative
 - When access is not available at the premises, Bell Atlantic technician calls CLEC from the field and CLEC attempts to contact the customer



Scalability

- Dedicated Workforce in place
 - Bell Atlantic has added 151 technicians to install DSL loops in November 1999.
 - The added force reduced Bell Atlantic's missed dispatch rate from 12 percent to nearly zero
- CLEC use of loop qualification database reduces work required to process orders
 - 90 percent of central offices where CLECs are collocated are now in the loop qualification database
 - CLECs have agreed to use the loop qualification database



Parity Plus

- Bell Atlantic will provide DSL loops to CLECs where it won't provide retail ADSL service
 - Bell Atlantic does not provide retail ADSL service on loops longer than 12,000 feet (moving to 15,000); CLECs can get copper loops of any length
 - Bell Atlantic does not condition loops for its retail ADSL service; CLECs can obtain conditioning on any copper loop
 - Bell Atlantic does not rearrange loop facilities for its retail ADSL service; Bell Atlantic will swap Digital Loop Carrier and copper loops between two customers to make a DSL loop available for a CLEC
- Bell Atlantic provides more information about loops to CLECs than it uses for its retail ADSL service
 - Bell Atlantic's loop qualification database provides loop lengths on all unloaded loops even though Bell Atlantic does not use this information for its retail ADSL service
 - Bell Atlantic searches its paper loop facilities records to provide loop make-up information to CLECs, but does not do the same for its retail ADSL service