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BELLSOUTH

BellSouth
Suite 900
1133-21st Street, N.W.
Washington, D.C. 20036-3351

kathleen.levitz@bellsouth.com

Kathleen B. Levitz
Vice President-Federal Regulatory

202 463-4113
Fax 202 463-4198

June 26, 2000

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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 St. SW
Washington, D.C. 20554

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

Dear Ms. Salas:

On June 23, 2000 Robin Lee of Ernst & Young and I, representing BellSouth, met with members of the Commission's Common Carrier to discuss the methodology BellSouth proposed to use to show that blockage on trunks provisioned to competitive local exchange carriers is comparable to that occurring on BellSouth's retail trunks. Participating in the meeting by telephone were BellSouth employees Dave Coon, Gay Dilz, and Ted McDonald. The following Commission staff participated in the discussion: Jake Jennings; Kathy Farroba; Claudia Fox; Daniel Shiman; and Suzon Cameron of the Common Carrier Bureau's Policy and Program Planning Division and Tony Dale of the Bureau's Accounting Safeguards Division. The attached document formed the basis for our discussion.

Because the Commission has been considering issues related to performance measurements and standards in both proceedings identified above, we are filing notice of this ex parte meeting in both dockets, as required by Section

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1.1206(b)(2) of the Commission's rules. Please associate this notice with the record of both dockets.

Sincerely,

Kathleen B Levitz
Kathleen B. Levitz *aux.*

Attachment

cc: Jake Jennings (w/o attachment)
Kathy Farroba (w/o attachment)
Claudia Fox (w/o attachment)
Suzon Cameron (w/o attachment)
Daniel Shiman (w/o attachment)
Tony Dale (w/o attachment)

BellSouth Trunk Group Blocking Performance Report

FCC Ex Parte

June 23, 2000

Executive Summary

Objective

BellSouth has proposed a new trunk group blocking report to more fully represent the comparative performance between BellSouth and Competitive Local Exchange Carrier (CLEC).

In the past BellSouth only presented information related to BST and CLEC trunk groups which exceeded certain blocking level thresholds. This reporting method presented blocking and did not differentiate among trunk groups to ensure comparative data which would have permitted better comparative analysis.

The proposed reporting method is described in this document. This description fully accounts for all trunk groups in BellSouth's operating territories and explains clearly how the proposed method provided direct and clear comparison of blocking levels for all relevant trunk groups.

Comparison of two reports of trunk blocking

Previous Report:

- Reported only trunk group blocking performance exceptions by state
- Exceptions are based upon engineering capacity planning thresholds
- Reported values of a single aggregate blocking value for the cycle reporting period
- Size of trunk groups not considered.

New Report:

- Reporting of blocking for all comparable trunk groups within a state
- Reported values are aggregate CLEC and BellSouth weighted average blocking for time-consistent hourly blocking for twenty-four hours
- Provides a direct comparison of hour by hour aggregate blocking between CLEC and BellSouth trunk groups

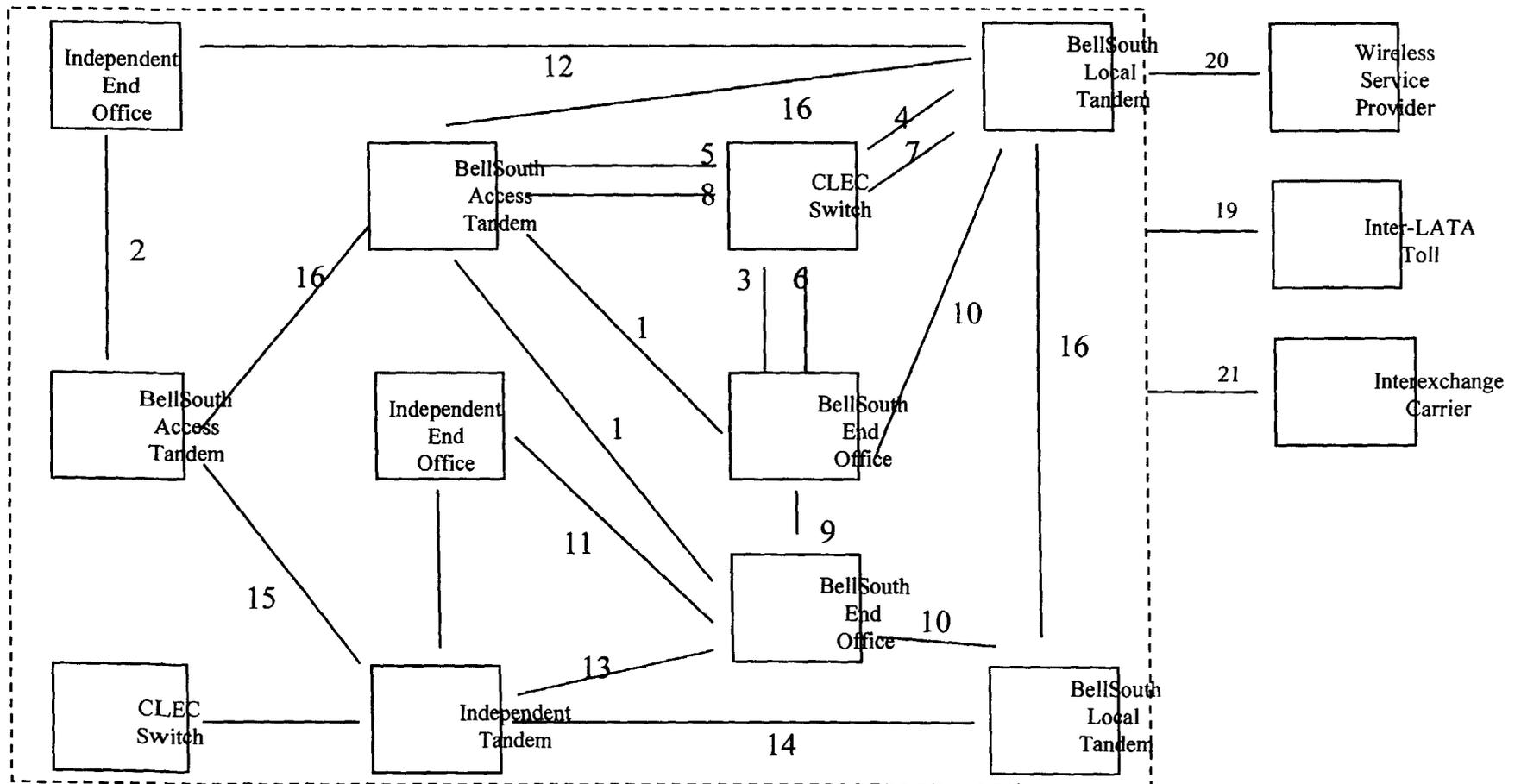
The Proposed Report

Network Topology Review

- BellSouth has performed an analysis of the traffic bearing trunk groups to assess which trunk groups exhibit blocking and which of these should be used to demonstrate comparative performance in the network.
- The following slides describe the range of functional trunk groups which bear customer traffic. These slides provide a clear basis for categorizing and selecting trunk groups to be used in analyzing performance.

Network Topology.

Overview

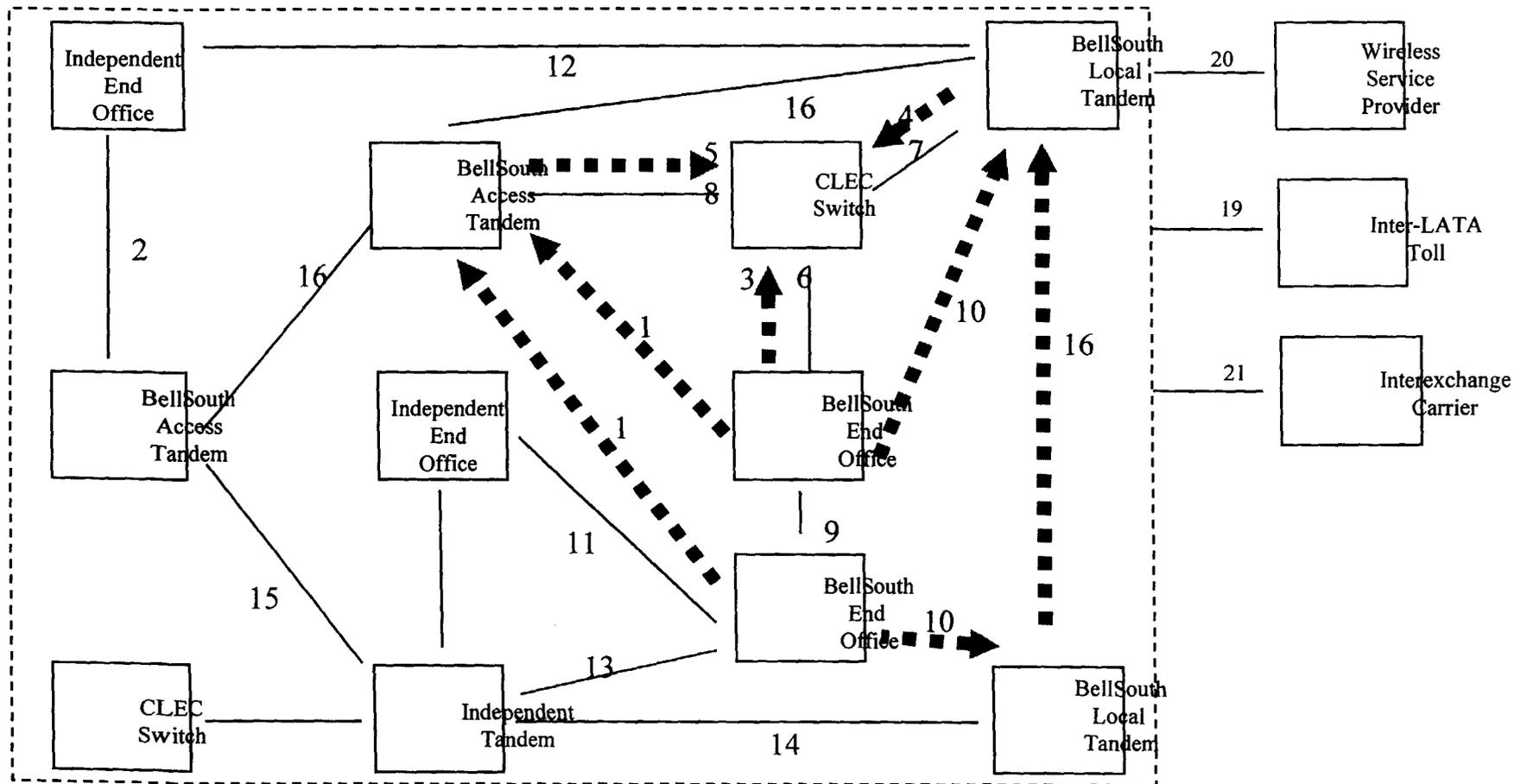


Trunk Group Categories

Category	Adminstrator	Point A	Point B
1	BellSouth	BellSouth End Office	BellSouth Access Tandem
2	BellSouth	BellSouth Access Tandem	Independent End Office
3	BellSouth	BellSouth End Office	CLEC Switch
4	BellSouth	BellSouth Local Tandem	CLEC Switch
5	BellSouth	BellSouth Access Tandem	CLEC Switch
6	CLEC	BellSouth End Office	CLEC Switch
7	CLEC	BellSouth Local Tandem	CLEC Switch
8	CLEC	BellSouth Access Tandem	CLEC Switch
9	BellSouth	BellSouth End Office	BellSouth End Office
10	BellSouth	BellSouth End Office	BellSouth Local Tandem
11	BellSouth	BellSouth End Office	Independent End Office
12	BellSouth	BellSouth Local Tandem	Independent End Office
13	BellSouth	BellSouth End Office	Independent Tandem
14	BellSouth	BellSouth Local Tandem	Independent Tandem
15	BellSouth	BellSouth Access Tandem	Indeependent Tandem
16	BellSouth	BellSouth Tandem	BellSouth Tandem
17	CLEC	CLEC Switch	CLEC Switch
18	CLEC	Independent End Office	CLEC Switch
19	BellSouth	BellSouth Tandem	Inter-LATA Tandem
20	BellSouth	BellSouth Tandem	Wireless Service Provider
21	BellSouth	BST Tandem	IXC Tandem

Network Topology.

Terminating at CLEC end offices



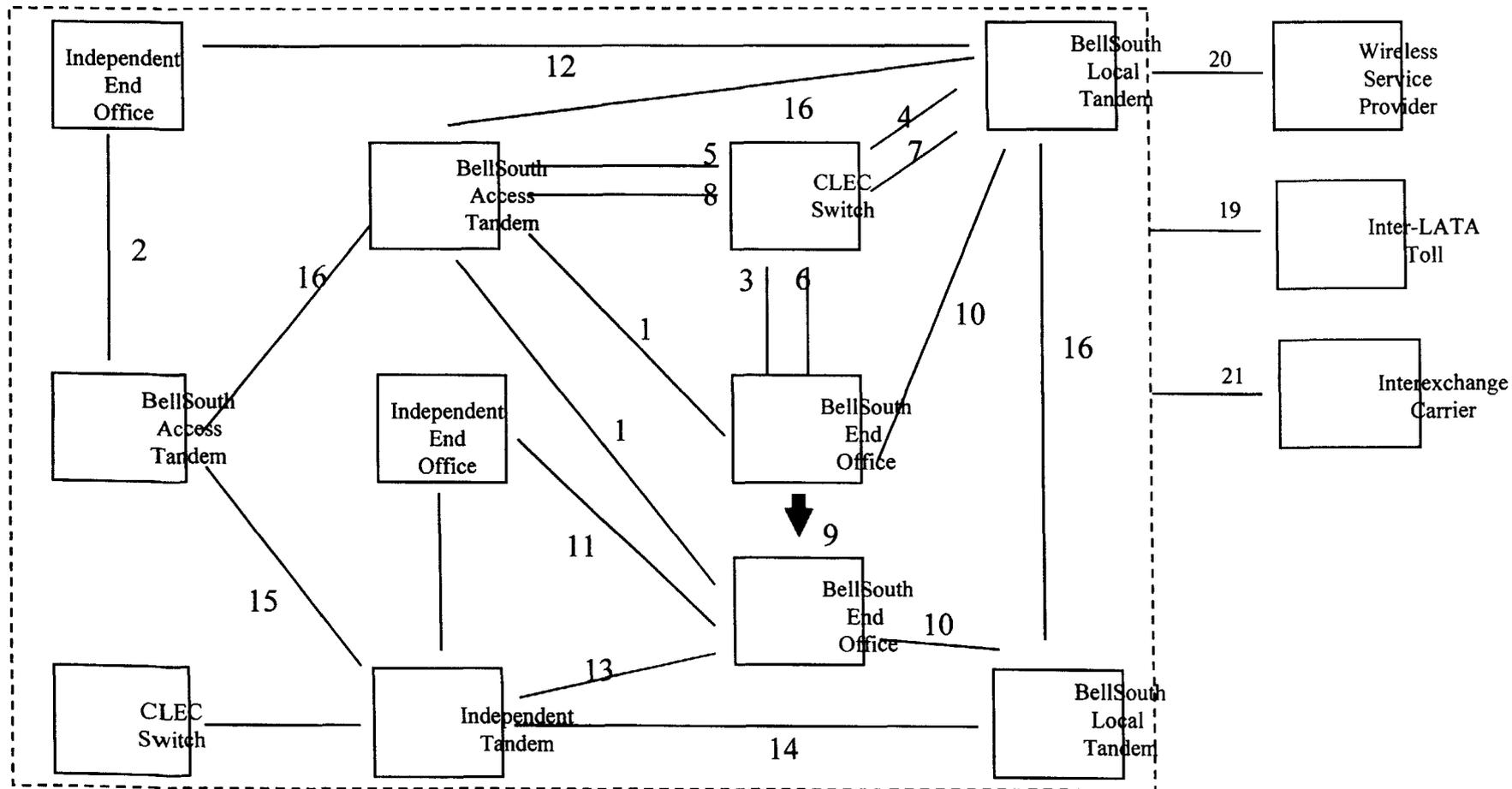
Trunk Group Categories Selected for Blocking

For Traffic Terminating at CLEC End offices

- Category 1 (BellSouth End-Office to BellSouth Access Tandem)
- Category 3 (BellSouth End-Office to CLEC Switch)
- Category 4 (BellSouth Local Tandem to CLEC Switch)
- Category 5 (BellSouth Access Tandem to CLEC Switch)
- Category 10 (BellSouth end Office to BellSouth Local Tandem)
- Category 16 (Inter-Tandem Trunk Groups carry all traffic equally)

Network Topology.

Terminating at BST end offices



Trunk Group Categories Selected for Blocking

For Traffic Terminating at BellSouth End-offices

- Category 9 (BellSouth End-Office to BellSouth End-Office)

Summary of Traffic Bearing Trunk Groups

CLEC Traffic	BST Traffic	Category	Administrator	Description
R	NR	1	BellSouth	BellSouth End Office to BellSouth Access Tandem
NR	NR	2	BellSouth	Traffic from ICO is not relevant to CLEC/BST comparison
R	NR	3	BellSouth	BellSouth End Office to CLEC Switch
R	NR	4	BellSouth	BellSouth Local Tandem to CLEC Switch
R	NR	5	BellSouth	BellSouth Access Tandem to CLEC Switch
NR	NR	6	CLEC	CLEC Administered Trunk Groups are not considered in comparison
NR	NR	7	CLEC	CLEC Administered Trunk Groups are not considered in comparison
NR	NR	8	CLEC	CLEC Administered Trunk Groups are not considered in comparison
NR	R	9	BellSouth	BellSouth End Office to BellSouth End Office
R	NR	10	BellSouth	BellSouth End Office to BellSouth Local Tandem
NR	NR	11	BellSouth	Traffic from ICO is not relevant to CLEC/BST comparison
NR	NR	12	BellSouth	Traffic from ICO is not relevant to CLEC/BST comparison
NR	NR	13	BellSouth	Traffic from ICO is not relevant to CLEC/BST comparison
NR	NR	14	BellSouth	Traffic from ICO is not relevant to CLEC/BST comparison
NR	NR	15	BellSouth	Traffic from ICO is not relevant to CLEC/BST comparison
R	NR	16	BellSouth	Inter-Tandem Trunk Groups Carry all traffic and treat all traffic equally
NR	NR	17	CLEC	CLEC Transient Trunk Groups are administered by CLECs for their own exclusive use.
NR	NR	18	CLEC	Trunk Groups Between CLECs and ICOs are responsibility of connected parties
NR	NR	19	BellSouth	Inter-LATA Toll Trunk Groups treat all traffic equally
NR	NR	20	BellSouth	Wireless Service Provider Trunk Groups are not considered in comparison
NR	NR	21	BellSouth	Interexchange Carrier Trunk Groups treat all traffic equally

R – Reported in the trunk blocking calculations for comparison of CLEC and BST trunk groups.

NR – Excluded or not reported in the trunk blocking calculations due to not relevant to CLEC/BST comparison.

Calculations - overview

- Determine all trunk routes to CLEC where blocking is possible.
- For each hour, sum up call attempts and calls blocked:
 - By trunk group
 - By trunk group category (I. E. 1,3,4,5,10,16)
- Perform similar calculations for BST
- Compare CLEC to BST

Data Calculations

Monthly Average Blocking for a Trunk Group

- **Data Calculation for Individual Trunk Groups**

- Monthly average blocking values are calculated for each trunk group for each of the 24 time periods across a reporting cycle.
- The new reporting cycle covers both business and non-business days in an entire calendar month.

- For each hour of the day:

- Each day's raw data are summed across all valid measurement days in a reporting cycle for blocked and attempted calls.
- The sum of the blocked calls is divided by the total number of calls attempted in a month period.
- The result is the monthly average blocking for each trunk group.

Data Calculations

Example of Calculation of Monthly Average Blocking for Trunk Group A

Example Hour 8 AM in April																
Date	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	Total
Blocked Calls	0	1	0	0	3	0	0	0	1	0	0	6	2	0	0	13
Attempted Calls	100	300	100	200	500	150	100	100	250	100	200	800	300	100	100	3400
Date	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	Total
Blocked Calls	1	0	0	1	0	0	1	0	0	0	0	0	0	1	0	4
Attempted Calls	300	100	200	400	150	100	300	100	200	200	150	100	100	300	100	2800

The Monthly Average Blocking for Hour 8 for Trunk Group A in April is:

$$\frac{13+4}{3400+2800} = .274\%$$

Data Calculations

Monthly Blocking for a Trunk Category

- **Data Calculations for Category Monthly Blocking Data**
 - The objective is to compare blocking across trunk groups which terminate traffic at CLEC points of presence (POP) versus Bell South switches
 - A monthly blocking value is calculated for each hour of the day across all trunk groups assigned to a Category.
 - The Categories are BellSouth affecting and CLEC affecting trunk groups.
 - The assignment of the trunk group categories is:
 - BellSouth -- 9
 - CLEC -- 1, 3, 4, 5, 10, and 16
 - For each hour of the day:
 - Each trunk group's monthly total blocked and attempted calls are aggregated separately over all trunk groups within each assigned Category.
 - The group total blocked calls is divided by the group total call attempts to calculate an aggregate monthly blocking for each assigned Category.
 - The result is an aggregate monthly average blocking value for each of the 24 hours by Category.
 - CLEC Categories 1,3,4,5,10 and 16 are summed and compared to BellSouth Category 9.

Data Calculations

Example of Monthly Blocking for a Trunk Category

For Hour 8 AM in April					
	CLEC			BellSouth	
Trunk Group	Total Blocked	Total Attempted		Total Blocked	Total Attempted
A	17	6,200		15	3,400
B	0	560		0	480
C	0	1,500		0	1,500
D	8	2,000		4	1,800
E	2	680		9	5,000
F	0	5,000		0	2,400
Total	27	15,940		28	14,580

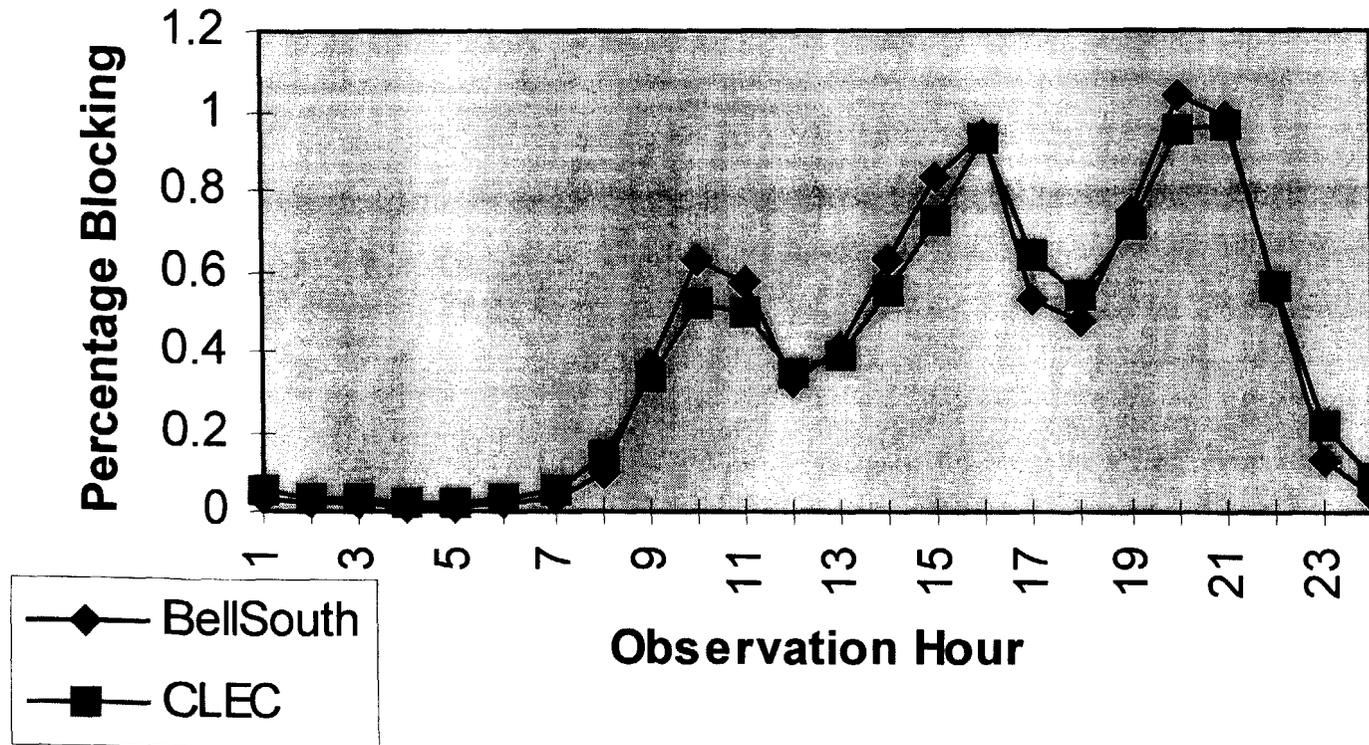
Aggregate Monthly Blocking Calculated for Hour 8 is:

$$27/15,940 = .169\% \quad \text{for CLEC}$$

$$28/14,580 = .192\% \quad \text{for BellSouth}$$

Trunk blocking.

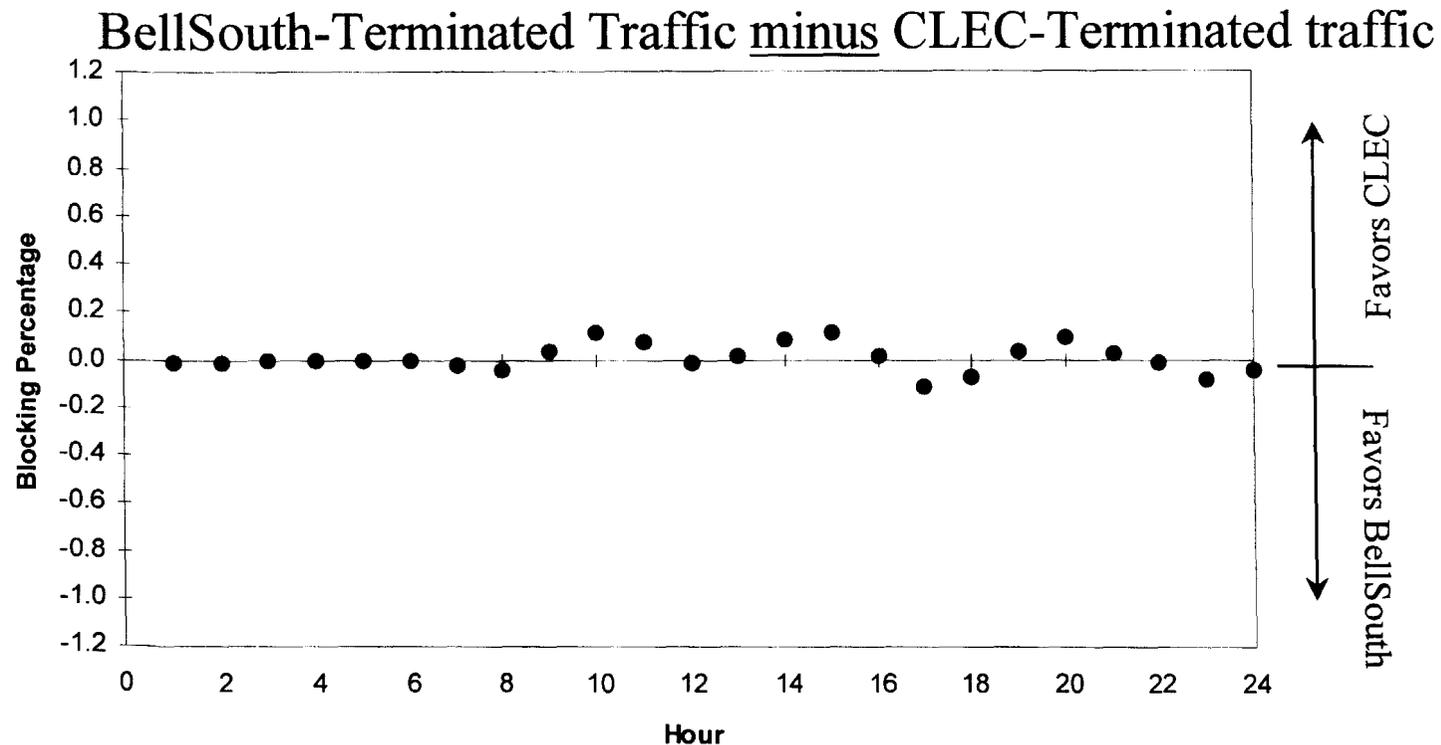
(Representative data)



Average percent of blocking during each observation hour over the monthly reporting cycle

Differential of Trunk Blocking

(Representative data)



The points below the zero line indicate where CLEC blocking is higher than BellSouth's.