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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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August 3, 2000

EX PARTE

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

Re: CC Docket No. 98-121

Dear Ms. Salas:

On August 2, 2000, Ernest Bush, Bill Stacy, Jon Banks, Jim Llewellyn, and I representing BellSouth, met with Michelle Carey, Kathy Farroba, Jessica Rosenworcel, John Stanley, Daniel Shiman, Claudia Fox and Chris Libertelli of the Common Carrier Bureau's Policy and Program Planning Division. During this meeting, we discussed how BellSouth proposes to show in a 271 application that it is meeting its obligations to provide "new" unbundled network elements on a nondiscriminatory basis. These UNEs are the line-sharing UNE and the ones that in its *Third Report and Order* in CC Docket No. 96-98 (the UNE Remand Order), the Commission added to the previously existing list of UNEs. The attached documents formed the basis for BellSouth's presentation.

In accordance with Section 1.1206, I am filing two copies of this notice in the proceeding identified above. Please place this notice in the records of both.

Sincerely,



Kathleen B. Levitz
Attachment

cc: Michelle Carey
Kathy Farroba
Jessica Rosenworcel
John Stanley
Daniel Shiman
Claudia Fox
Chris Libertelli

No. of Copies rec'd 012
List A B C D E

BellSouth FCC ex parte
August 2, 2000

Jon Banks

W.N. Stacy

Ernest Bush

Topics

- 319 Remand
 - Legal Obligation
 - Product Set
 - Mechanization Status
 - Metrics
- Line Sharing

BellSouth has concrete and specific legal obligations to provide the new 319 elements

- Georgia SGAT has legal obligation and pricing for each of the new 319 elements
 - Dark fiber loops at II.B.8
 - Sub-loop elements and inside wire at IV.B.
 - Packet Switching at VI.C.
 - Dark fiber transport at II.B.8
 - Call related Databases (CNAM etc.) at X.A.3.e
 - Loop Qualification at II.B.5.a
 - Prices are set out in Attachment A (price list)

BellSouth has concrete and specific legal obligations to provide the new 319 elements (cont.)

- Interconnection Agreements also have legal obligation and pricing for new 319 elements and pricing, e.g., USA Digital Contract
 - Dark fiber loops at Attachment 2, § 2.7
 - Sub-loop elements and inside wire at Att.2 § 2.6
 - Packet Switching at Att. 2, § 3.5
 - Dark fiber transport at Att.2, §6.4
 - Call related Databases (CNAM etc.) at Att.2, § 11, 12
 - Loop Qualification
 - Prices are set out in Attachment 2, App. C

319 - Product Set

- 319 order
- Productization

319 Remand impacts

“Get Ready” work

- Modify loop and subloop UNEs to conform to the order
- Create a new Dark fiber unbundled loop
- Create a “line sharing” UNE
- Create additional testing for xDSL loops
- Provide for collocation of CLEC DSLAMs at SLC Remote Terminal sites
- Create additional unbundled Interoffice transport UNEs up to OC-N.

319 Remand impacts “Get Ready” work

- Create processes for providing manual detailed records of loop makeup for DLECs
- Create a new “Switch to UNE” capability for all currently combined retail and resale products.
- Provide Billing for all new UNE products, and mechanized ordering (if justified by volumes).
- Productize CNAM, 911, E911
- File or Re-file cost studies for new or modified UNE products in all states
- Negotiate CLEC contract amendments to include the new products

319 - Mechanization Status - Completed Products

The mechanization of the ordering processes for the following products has been completed.

Product Category	Feature Description
UNE-P (Bus/Res)	Elimination ProfSvcAgreement & Complete support for dialing parity
UNE-P (PBX)	Elimination ProfSvcAgreement & Complete support for dialing parity; orders will drop for manual handling
Analog Loops	Enabled web-based (LENS) ordering of simple UNE loops
Digital Loops	Enabled web-based (LENS) ordering of simple UNE loops

319 - Committed Products for Release 7.0 (8/17)

Vendor commitments have been made to develop mechanized preordering/ordering capabilities for the following products w/ Release 7.0:

Product Category	OBF Status	ECD	Action Plans
2-wire unbundled Copper Loops	Complete	7/29 Beta Test 8/17 Production	<ul style="list-style-type: none"> • Customer beta testing LMU w/ six CLECs beginning 7/29 • Beta test the Firm Order functionality beginning 2-3 weeks following LMU (8/12) • Release LMU functionality into production by 8/17 • Release Firm Order functionality upon successful completion of beta testing • Complete all product documentation by 8/17
4-Wire Unbundled Copper Loops	Pending		
ADSL	Complete		
2-Wire HDSL	Complete		
4-Wire HDSL	Pending		
Detailed Loop Makeup (LFACS)	Complete		

319 - "In Process" Products for Release 8.0 (11/11)

The following UNE Remand products and follow-on LMU/xDSL features have been tentatively slotted for Release 8.0, currently scheduled for deployment by 11/11/00. The final list of prioritized product mechanization initiatives will be determined via upcoming CCP meetings.

Product Category		OBF Status	ECD	Action Plans
Detailed LMU/xDSL Enhancements		TBD	11/11	Additional LFACS fields to be determined from DLEC collaboratives
DID Combo		Pending	11/11	CCP to prioritize for release
ISDN BRI Combo		Complete		
Subloop Distribution		None		
Network Terminating Wire & Riser		None		
Network Interface Devices		None		
Line Sharing			11/11	

319 - OBF Modifications Summary

The following modifications to existing OBF practices will be required to support BellSouth UNE Remand product definitions. This is a partial list...

OBF Prac #	Status	LSR Fields	Mod Type	Product Category	Action Plan
120	Identified	Pre-Order RESID	Expand Length	Line Sharing	<ul style="list-style-type: none"> • Develop issues drafts by 8/14 from 7/26 LSOG • Submit identified new issues at 11/00 OBF General Session
071	Identified	ACTL LSO SPOT	New Fields	Dedicated Transport	
071	Identified	TOS ACT	Valid Entries	Dedicated Transport	
073	Identified	MUXLOC MUXLSO SECLC SECLSO	New Fields	Dedicated Transport	
073	Identified	SCFA X-Box Cables X-Box Pairs CO Cable IDs CO Chan Prs RESID Loop Mod Type LNA	New Field New Field New Field New Field New Field Mult Iteration New Field New Entries	Loops	
077	Pending (#1739)	IWJK IWJQ JK CODE JK NUM JK POS JR	New Fields	DID Combo PBX Combos	<ul style="list-style-type: none"> • Contribute BST input to existing issue by 11/00 OBF General Session

319 - Metrics

- Metrics with appropriate products disaggregations and standards have been or will shortly be established
 - Product disaggregations include:
 - Resale (Res, Bus, Design, PBX, Centrex, ISDN)
 - UNE (analog loops, loops<DS1, Loops>=DS1, Ports, Ded IOT, UNE-P, Combos-other, xDSL-UL, IDSL, Line Sharing)
 - Interconnection trunks
- Georgia 6/6 Order
- Louisiana Staff Recommendation
- Georgia “Rocket Docket” (DAC-2 Performance Measurements - Benchmarks / Analogs)

319 - Summary

- BellSouth has established their legal obligation to provide the unbundled network elements identified in the 319 remand order
- BellSouth has productized these UNEs, and has mechanized or planned mechanization for the highest volume items in collaboration with the CLECs
- The Georgia, Louisiana, and Florida PSCs have put interim measures and standards in place, and are in the process of adopting permanent measures and standards
- BellSouth has forecast the demand for these UNEs and has staffed their centers and field operations based on those forecasts
- The highest volume products (UNE-P and xDSL) are being tested as part of the Georgia 3rd party test. All products are included in the Florida 3rd party testing.

Line Sharing

- Legal Obligation to provide
- Collaborative process
- Status

BellSouth has a concrete and specific legal obligation to provide line sharing

- SGAT at II.B.9 and Attachment A (pricing)
- Line sharing agreements with Covad, Rhythms, Northpoint and Bluestar cover line sharing and pricing

Line Sharing - Process

- Detailed in Letter to Larry Strickling
 - Collaborative initiated 1-26-2000
 - Working meetings starting 2-2-00
 - Technical & Systems/process subcommittees
 - Active participants - Covad, NorthPoint, Rythms, NewEdge, and Bluestar
 - Pilot
 - BST provided CO splitter
 - 7 Atlanta Offices selected by CLECs
 - March, 2000 start/stop
 - May, 2000 restart and continuation
 - Very low volumes to date

Line Sharing - Process

- Initial Offering
 - BST owned splitters
 - Provided in units of 24 or 96
- Next Offering (ECD 9-6-2000)
 - CLEC owned splitter in Collocation space
- Subsequent offering (Collaborative project underway)
 - CLEC owned splitter in RT
- Current Status
 - 52,736 splitter ports (457 systems) installed in 252 Central offices per CLEC forecast and priorities
 - Additional orders in progress for 15,600 splitter ports (260 systems)
 - 4 pilot and 3 end user orders completed

**"Switched Combo" Products
Product Availability**

Product Information			Productized		Mechanized		OBF	Scope of Work			
ID	Category	Description	As-Is	New	As-Is	New	Stds	New	Mod	Cost	Non
103	UNE-P	UNE-P Business Service	X	X	X	X	Y		X		
104	UNE-P	UNE-P Residential Service	X	X	X	X	Y		X		
105	UNE-P	UNE-P PBX Service	X	X	X	X	Y		X		
106	DID Port + Loop	DID (2-Wire)	X		X				X		
107	DDITS	2-Way PBX Trunk Port + 4-Wire Loop	X							X	
108	DDITS	1-Way Outward PBX Trunk Port + 4-Wire Loop	X							X	
109	DDITS	1-Way Inward PBX Trunk Port w/o DID + 4-Wire Loop	X							X	
110	DDITS	1-Way Inward PBX Trunk Port w/ DID + 4-Wire Loop	X							X	
111	Megalink	Digital PBX Port + Channelized Megalink	X						X		
112	Centrex Combo	Centrex/ESSX Multi Service	X						X		
113	ISDN BRI Combo	2-Wire ISDN BRI Digital Loop + Port Combination	X	X	X	X	Y		X		
114	ISDN BRI Combo	2-Wire ISDN BRI Digital Loop + Port Combination (w/ Transport)	X	X	X	X	Y		X		
115	ISDN PRI Combo	4-Wire ISDN PRI Digital Loop + Port Combination	X	X	X	X			X		
116	ISDN PRI Combo	4-Wire ISDN PRI Digital Loop + Port Combination (w/ Transport)	X	X	X	X			X		

**"UNE" Products
Product Availability**

Product Information			Prod	Mech	OBF	Scope of Work			
ID	Category	Description	New	New	Stds	New	Mod	Cost	Non
96	DCS	0/1 Digital Cross-Connect System	X			X			
97	DCS	1/3 Digital Cross-Connect System	X			X			
98	Channelization	DS-1 Channelization (0/1 Mux)	X			X			
99	Channelization	DS-3 Channelization (1/3 Mux)	X			X			
100	Dark Fiber	Dark Fiber Local Loops	X	X			X		
101	Dark Fiber	Dark Fiber Local Channels	X	X			X		
102	Dark Fiber	Dark Fiber IOF	X	X			X		

**"UNE" Products
Product Availability**

Product Information			Prod	Mech	OBF	Scope of Work			
ID	Category	Description	New	New	Stds	New	Mod	Cost	Non
64	Chann DS-1/3 IOF	Channelized DS-1 IOF	X	X	Y		X		
65	Chan DS-1/3 IOF	Channelized DS-3 IOF	X	X	Y		X		
66	Chan STS IOF	Channelized STS-1 IOF	X	X	Y		X		
67	Optical IOT	Non-Channelized OC-3 IOT	X			X			
68	Optical IOT	Channelized OC-3 IOT	X			X			
69	Optical IOT	Non-Channelized OC-12 IOT	X			X			
70	Optical IOT	Channelized OC-12 IOT	X			X			
71	Optical IOT	Non-Channelized OC-48 IOT	X			X			
72	Optical IOT	Channelized OC-48 IOT	X			X			
73	OC-96/192 IOT	Non-Channelized OC-96 IOT				X			
74	OC-96/192 IOT	Channelized OC-96 IOT				X			
75	OC-96/192 IOT	Non-Channelized OC-192 IOT				X			
76	OC-96/192 IOT	Channelized OC-192 IOT				X			
77	VG & DS-0 LCs	2-Wire VG Local Channel	X			X			
78	VG & DS-0 LCs	4-Wire VG Local Channel	X			X			
79	VG & DS-0 LCs	DS-0 Local Channel	X	X	Y	X			

**"UNE" Products
Product Availability**

Product Information			Prod	Mech	OBF	Scope of Work			
ID	Category	Description	New	New	Stds	New	Mod	Cost	Non
80	Non-Chan DS-1/3 LC	Non-Channelized DS-1 Local Channel	X	X	Y	X			
81	Non-Chan DS-1/3 LC	Non-Channelized DS-3 Local Channel	X	X	Y	X			
82	Non-Chan STS-1/3 LC	Non-Channelized STS-1 Local Channel	X	X	Y	X			
83	Chan DS-1/3 LC	Channelized DS-1 Local Channel	X	X	Y	X			
84	Chan DS-1/3 LC	Channelized DS-3 Local Channel	X	X	Y	X			
85	Chan STS-1/3 LC	Channelized STS-1 Local Channel	X	X	Y	X			
86	Optical LCs	Non-Channelized OC-3 Local Channel	X			X			
87	Optical LCs	Channelized OC-3 Local Channel	X			X			
88	Optical LCs	Non-Channelized OC-12 Local Channel	X			X			
89	Optical LCs	Channelized OC-12 Local Channel	X			X			
90	Optical LCs	Non-Channelized OC-48 Local Channel	X			X			
91	Optical LCs	Channelized OC-48 Local Channel	X			X			
92	OC-96/192 LC	Non-Channelized OC-96 Local Channel				X			
93	OC-96/192 LC	Channelized OC-96 Local Channel				X			
94	OC-96/192 LC	Non-Channelized OC-192 Local Channel				X			
95	OC-96/192 LC	Channelized OC-192 Local Channel				X			

**"UNE" Products
Product Availability**

Product Information			Prod	Mech	OBF	Scope of Work			
ID	Category	Description	New	New	Stds	New	Mod	Cost	Non
32	Digital Loops	4-Wire DS-0 Loop w/ NID	X	X	Y			X	
33	Copper Loops	2-Wire "Short" Copper Loop w/ NID	X	X	Y	X			
34	Copper Loops	2-Wire "Long" Copper Loop w/ NID	X	X	Y	X			
35	Copper Loops	4-Wire "Short" Copper Loop w/ NID	X	X	pending	X			
36	Copper Loops	4-Wire "Long" Copper Loop w/ NID	X	X	pending	X			
37	xDSL Loops	2-Wire ADSL Capable Loop w/ NID	X	X	Y	X			
38	xDSL Loops	2-Wire HDSL Capable Loop w/ NID	X	X	Y	X			
39	xDSL Loops	4-Wire HDSL Capable Loop w/ NID	X	X	pending	X			
40	Unbundled Digital Channel	2-Wire UDC Capable Loop w/ NID	X	X		X			
41	Chan DS-1/3 Loop	Channelized DS-1 Loop w/ NID	X	X	Y			X	
42	Chan DS-1/3 Loop	Channelized DS-3 Loop w/ NID	X	X	Y		X		
43	Chan STS Loop	Channelized STS-1 Loop w/ NID	X	X	Y		X		
44	Non-Chan DS-1/3 Loop	Non-Channelized DS-1 Loop w/ NID	X	X	Y			X	
45	Non-Chan DS-1/3 Loop	Non-Channelized DS-3 Loop w/ NID	X	X	Y		X		
46	Non-Chan STS Loop	Non-Channelized STS-1 Loop w/ NID	X				X		
47	Optical Loops	Non-Channelized OC-3 Local Loop	X			X			

**"UNE" Products
Product Availability**

Product Information			Prod	Mech	OBF	Scope of Work			
ID	Category	Description	New	New	Stds	New	Mod	Cost	Non
48	Optical Loops	Channelized OC-3 Local Loop	X			X			
49	Optical Loops	Non-Channelized OC-12 Local Loop	X			X			
50	Optical Loops	Channelized OC-12 Local Loop	X			X			
51	Optical Loops	Non-Channelized OC-48 Local Loop	X			X			
52	Optical Loops	Channelized OC-48 Local Loop	X			X			
53	OC-96/192 Loops	Non-Channelized OC-96 Local Loop				X			
54	OC-96/192 Loops	Channelized OC-96 Local Loop				X			
55	OC-96/192 Loops	Non-Channelized OC-192 Local Loop				X			
56	OC-96/192 Loops	Channelized OC-192 Local Loop				X			
57	Common Transport	Common/Shared Transport	X	X	N				X
58	VG & DS-0 IOT	2-Wire VG IOF	X						X
59	VG & DS-0 IOT	4-Wire VG IOF	X						X
60	VG & DS-0 IOT	DS-0 IOF	X	X	N				X
61	Non Chan DS-1/3 IOF	Non-Channelized DS-1 IOF	X	X	N		X		
62	Non Chan DS-1/3 IOF	Non-Channelized DS 3 IOF	X	X	N		X		
63	Non-Chan STS IOF	Non-Channelized STS-1 IOF	X	X	N		X		

**"Switched Combo" Products
Product Availability**

Product Information			Productized		Mechanized		OBF	Scope of Work			
ID	Category	Description	As-Is	New	As-Is	New	Stds	New	Mod	Cost	Non
103	UNE-P	UNE-P Business Service	X	X	X	X	Y		X		
104	UNE-P	UNE-P Residential Service	X	X	X	X	Y		X		
105	UNE-P	UNE-P PBX Service	X	X	X	X	Y		X		
106	DID Port + Loop	DID (2-Wire)	X		X				X		
107	DDITS	2-Way PBX Trunk Port + 4-Wire Loop	X							X	
108	DDITS	1-Way Outward PBX Trunk Port + 4-Wire Loop	X							X	
109	DDITS	1-Way Inward PBX Trunk Port w/o DID + 4-Wire Loop	X							X	
110	DDITS	1-Way Inward PBX Trunk Port w/ DID + 4-Wire Loop	X							X	
111	Megalink	Digital PBX Port + Channelized Megalink	X						X		
112	Centrex Combo	Centrex/ESSX Multi Service	X						X		
113	ISDN BRI Combo	2-Wire ISDN BRI Digital Loop + Port Combination	X	X	X	X	Y		X		
114	ISDN BRI Combo	2-Wire ISDN BRI Digital Loop + Port Combination (w/ Transport)	X	X	X	X	Y		X		
115	ISDN PRI Combo	4-Wire ISDN PRI Digital Loop + Port Combination	X	X	X	X			X		
116	ISDN PRI Combo	4-Wire ISDN PRI Digital Loop + Port Combination (w/ Transport)	X	X	X	X			X		

**"UNE" Products
Product Availability**

Product Information			Prod	Mech	OBF	Scope of Work			
ID	Category	Description	New	New	Stds	New	Mod	Cost	Non
17	Subloop Feeder	UDC Subloop Feeder	X	X		X			
18	HiCap Subloop Feeder	DS-3 Subloop Feeder	X	X		X			
19	HiCap Subloop Feeder	OC-3 Subloop Feeder	X	X		X			
20	HiCap Subloop Feeder	OC-12 Subloop Feeder	X	X		X			
20	HiCap Subloop Feeder	OC-48 Subloop Feeder	X	X		X			
21	NTW	Network Terminating Wire	X	X		X			
22	Subloop Concentration	TR008 Subloop Concentration System	X	X		X			
23	Subloop Concentration	TR003 Subloop Concentration System	X	X		X			
24	Loop Concentration	Loop Concentration Remote Channelization System	X	X		X			
25	Loop Mods	Loop Conditioning (<18k feet, load coils)	X	X	Y	X			
26	Loop Mods	Loop Conditioning (>18k feet, load coils)	X	X	Y	X			
27	Loop Mods	Loop Conditioning (bridge tap)	X	X	Y	X			
28	Analog Loops	2-Wire SL-1 VG Loop w/ NID	X	X	Y			X	
29	Analog Loops	4-Wire VG Loop w/ NID	X	X	Y			X	
30	Analog Loops	2-Wire SL-2 VG Loop w/ NID	X	X	Y			X	
31	Digital Loops	2-Wire ISDN Loop w/ NID	X	X	Y			X	

**"UNE" Products
Product Availability**

Product Information			Prod	Mech	OBF	Scope of Work			
ID	Category	Description	New	New	Stds	New	Mod	Cost	Non
1	NIDs	1-2 Line NID	X			X			
2	NIDs	1-6 Line NID	X			X			
3	NIDs	2-Wire NID-to-NID Cross-Connect	X			X			
4	NIDs	4-Wire NID-to-NID Cross-Connect	X			X			
5	Subloop Distribution	2-Wire VG Subloop Distribution w/ NID	X	X		X			
6	Subloop Distribution	4-Wire VG Subloop Distribution w/ NID	X	X		X			
7	Subloop Distribution	2-Wire Copper Subloop Distribution	X	X		X			
8	Subloop Distribution	4-Wire Copper Subloop Distribution	X	X		X			
9	Subloop Distribution	4-Wire VG Subloop Distribution Riser Cable (INC)	X	X		X			
10	Subloop Distribution	2-Wire VG Subloop Distribution Riser Cable (INC)	X	X		X			
11	LoCap Subloop Feeder	2-Wire VG Subloop Feeder	X	X		X			
12	LoCap Subloop Feeder	4-Wire VG Subloop Feeder	X	X		X			
13	LoCap Subloop Feeder	4-Wire DS-0 Subloop Feeder	X	X		X			
14	LoCap Subloop Feeder	2-Wire ISDN-BRI Subloop Feeder	X	X		X			
15	HiCap Subloop Feeder	4-Wire DS-1 Subloop Feeder	X	X		X			
16	Subloop Feeder	Copper Subloop Feeder	X	X		X			

**"LShare LQual" Products
Product Availability**

Product Information			Prod	Mech	OBF	Scope of Work			
ID	Category	Description	New	New	Stds	New	Mod	Cost	Non
137	DSLAM Colo	RT Collocation	X			X			
138	Line Sharing	CO-Based Line Sharing (BST Splitter)	X	X		X			
139	Line Sharing	CO-Based Line Sharing (CLEC Splitter)	X	X		X			
140	Line Sharing	RT-Based Line Sharing	X	X		X			
141	ATM Backhaul	ATM Backhaul	X			X			
142	Loop Makeup	SI - Y/N Response for Non-LFACS Loops	X			X			
143	Loop Makeup	Mechanized Y/N Response		X			X		
144	Loop Makeup	SI for Detailed Loop Make-Up (Phase I)	X			X			
145	Loop Makeup	SI for Detailed Loop Make-Up (Phase II)	X			X			

**"NSC" Products
Product Availability**

Product Information			Productized		Mechanized		OBF Stds	Scope of Work			
ID	Category	Description	As-Is	New	As-Is	New		New	Mod	Cost	Non
133	GA NSCs	DS-1 LC + DS-3 IOT	X	X	X	X		X			
134	MCImetro NSCs	DS1 Loop + DS3 IOT + 3/1 Mux	X	X	X	X		X			
135	CABS NSCs	CABS-to-CRIS NSCs	X	X	X	X		X			
136	CRIS NSCs	CRIS-to-CABS NSCs	X	X	X	X		X			

**"Signaling" Products
Product Availability**

Product Information			SH	Prod	Mech	Scope of Work			
ID	Category	Description	As-Is	As-Is	As-Is	New	Mod	Cost	Non
156	CCS7 Signaling	56kbps Signaling Connection	X	X					X
157	CCS7 Signaling	Signaling Termination (STP Port)	X	X					X
158	CCS7 Signaling	ISUP (Call Setup) Message	X	X					X
159	CCS7 Signaling	TCAP (Database Query) Message	X	X					X
160	CCS7 Signaling	Signaling Usage Surrogate	X	X					X
161	CCS7 Signaling	Point Code Establishment or Change	X	X					X

**"Databases" Products
Product Availability**

Product Information			Prod	Mech	OBF	Scope of Work			
ID	Category	Description	As-Is	As-Is	Stds	New	Mod	Cost	Non
146	8XX Database	8XX Access 10-Digit Screening	X					X	
147	LIDB	Line Information Database Access	X					X	
148	AIN Toolkit	AIN Toolkit Service	X					X	
149	AIN SMS Access	AIN SMS Access Service	X					X	
150	CNAM	CNAM (UNE-P features)	X				X		
151	CNAM	CNAM Storage & Query (Facilities)	X				X		
152	INP	Remote Call Forwarding	X						X
153	INP	Direct Inward Dialing	X						X
154	LNP	Local Number Portability	X	X					X
155	911	911 Database	X						X

**"Other" Products
Product Availability**

Product Information			SH	Prod	Mech	OBP	Scope of Work			
ID	Category	Description	As-Is	As-Is	As-Is	Stds	New	Mod	Cost	Non
175	UNE-P	Coin Service	X	X				X		
176	UNE-P	Fx/FCO	X	X				X		
177	Customized Routing	Line Class Code Solution	X	X	X			X		
178	Customized Routing	AIN-Based SCR + Dedicated Transport	X	X	X			X		
179	Customized Routing	Originating Line Number Screening	X	X	X			X		
180	E911	Wireless E911 Database	X	X						X
181	Daily Usage Files	Access Daily Usage File (ADUF)	X	X						X
182	Daily Usage Files	OLEC Daily Usage File (ODUF)	X	X						X
183	Daily Usage Files	Enhanced Optional Daily Usage File (EODUF)	X	X						X

**"Ports" Products
Product Availability**

Product Information			SH	Prod	Mech	OBF	Scope of Work			
ID	Category	Description	New	New	New	Stds	New	Mod	Cost	Non
162	Analog Line Ports	2-Wire Analog Port (Bus/Res)	X		??					X
163	Analog Line Ports	2-Wire Analog Port (PBX)	X							X
164	Analog Line Ports	4-Wire Analog VG Port	X							X
165	Analog Line Ports	4-Wire Analog Line Port (Coin)	X							X
166	Analog Trunk Ports	2-Wire DID Trunk Port	X							X
167	Analog Trunk Ports	4-Wire DID Trunk Port	X							X
168	Centrex Ports	2-Wire Centrex Port (ESSX & MultiServ)	X							X
169	ISDN Line Port	2-Wire ISDN Line Port	X							X
170	ISDN Trunk Port	4-Wire ISDN Trunk Port	X							X
171	Local Switching	EO Interoffice Trunk Port - Shared	X							X
172	Local Switching	EO Interoffice Trunk Port - Dedicated	X							X
173	Tandem Switching	Tandem Interoffice Trunk Port - Shared	X							X
174	Tandem Switching	Tandem Interoffice Trunk Port - Dedicated	X							X

**"NSC" Products
Product Availability**

Product Information			Productized		Mechanized		QBF Stds	Scope of Work			
ID	Category	Description	As-Is	New	As-Is	New		New	Mod	Cost	Non
117	EELs	DS-1 IOF + 1/0 mux + 2-wire VG Loop	X	X	X	X	N	X			
118	EELs	DS-1 IOF + 1/0 mux + 4-wire VG Loop	X	X	X	X	N	X			
119	EELs	DS-1 IOF + 1/0 mux + 2-wire ISDN Loop	X	X	X	X	N	X			
120	EELs	DS-1 IOF + 1/0 mux + 4-wire 56kbps Loop	X	X	X	X	N	X			
121	EELs	DS-1 IOF + 1/0 mux + 4-wire 64kbps Loop	X	X	X	X	N	X			
122	EELs	DS-1 IOF + DS-1 Loop	X	X	X	X	N	X			
123	EELs	DS-3 IOF + DS-3 Loop	X	X	X	X	N	X			
124	EELs	STS-1 IOF + STS-1 Loop	X	X	X	X	N	X			
125	EELs	DS-3 IOF + 3/1 mux + DS-1 Loop	X	X	X	X	N	X			
126	EELs	STS-1 IOF + 3/1 mux + DS-1 Loop	X	X	X	X	N	X			
127	EELs	2-Wire VG IOF + 2-Wire VG Loop	X	X	X	X	N	X			
128	EELs	4-Wire VG IOF + 4-Wire VG Loop	X	X	X	X	N	X			
129	EELs	4-Wire 56 kbps IOF + 4-Wire 56 kbps Loop	X	X	X	X	N	X			
130	EELs	4-Wire 64 kbps IOF + 4-Wire 64 kbps Loop	X	X	X	X	N	X			
131	GA NSCs	2-Wire VG LC + DS-1 IOT	X	X	X	X		X			
132	GA NSCs	4-Wire VG LC + DS-1 IOT	X	X	X	X		X			

**"Switched Combo" Products
Product Availability**

Performance Measurements - Benchmarks / Analogs		
Category	Measures & Sub-Metrics	Benchmark / Analogue
	UNE - Loop w LNP	
	% Reject Service Request	Diagnostic
	UNE - LNP (Standalone)	
	UNE - Loop w LNP	
	Average Reject Interval Electronic	97% in 1 hr
	UNE - LNP (Standalone)	
	UNE - Loop w LNP	
	Average Reject Interval Manual and Partial Electronic	85% < 24 hrs
	UNE - LNP (Standalone)	
	UNE - Loop w LNP	
	TSOC (& CO OFFERED)	Retail Res & Bus - Dispatch
	UNE - LNP (Standalone)	
	UNE - Loop w LNP	
	% Flow Through	TBD
Customer	Coordinated Customer Conversions – UNE Loops w NP	95% <= 15 min
Coordinated	Coordinated Customer Conversions – UNE Loops w/o NP	95% <= 15 min
Conversions	Hot Cut Timeliness Report	95% +/- 15 min of schedule cut
	% Installation Troubles within 7 Days - Hot Cuts	<= 5%
Collocation +	% of Due Dates Missed (Virtual & Physical)	<=10% com dates
+A contract	Average Response Time (Virtual & Physical)	V = 20 days P = 30 days
with each		
CLEC		
required.	Average Arrangement Time (Virtual & Physical) (Calendar Days)	V Ord = 90 days V ExOrd = 120 days P Ord = 120 days P ExOrd = 180 days

Performance Measurements - Benchmarks / Analogs		
Category	Measures & Sub-Metrics	Benchmark / Analogue
Operator Services (Toll)	Average Speed to Answer	Parity by Design
	% Answered in "X" Seconds	Parity by Design
Directory Assistance	Average Speed to Answer	Parity by Design
	% Answered in "X" Seconds	Parity by Design
E911	Timeliness	Parity by Design
	Accuracy	Parity by Design
	Mean Interval	Parity by Design
Trunk Group Performance (Blockage)	Trunk Group Service Report (Percent Trunk Blockage) SUMMARY	Parity w retail
	Trunk Group Service Report (Percent Trunk Blockage) DETAIL	Parity w retail
	Trunk Group Performance Report	Any 2 hour period in 24 hours where CLEC blockage exceeds BST blockage by more than 0.5% = a miss using trunk groups 1, 3, 4, 5, 10, 16 for CLECs and 9 for BST.
LNP	Average Disconnect Timeliness Interval	95% < 24 hrs
	% Missed Installation Appointments	
	UNE - LNP (Standalone)	Retail Res & Bus - Dispatch
	UNE - Loop w LNP	Retail Res & Bus - Dispatch
	FOC Electronic	95% < 3 hrs
	UNE - LNP (Standalone)	
	UNE - Loop w LNP	
FOC Manual and Partial Electronic		
UNE - LNP (Standalone)	85% < 36 hrs	

Performance Measurements - Benchmarks / Analogs		
Category	Measures & Sub-Metrics	Benchmark / Analogue
	Resale Business	Parity w retail
	Resale Design	Parity w retail
	Resale PBX	Parity w retail
	Resale Centrex	Parity w retail
	Resale ISDN	Parity w retail
	UNE Loop Non-Design	Retail Res & Bus - Dispatch
	UNE Loop Design Voice/Data	Retail Design - Dispatch
	UNE Loop Design >= DS1 (Includes HDSL)	Retail DS1 - Dispatch
	UNE - Switching (ports)	Retail POTS
	UNE - Unbundled Interoffice Transport - Dedicated	Retail DS1 / DS3 - Interoffice
	UNE - Combo (loop + port)	Retail Res & Bus
	UNE - Combo (other)	Retail Res, Bus & Design - Dispatch
	UNE - xDSL - UL (ADSL, UCL)	Retail DS1 - Dispatch
	UNE - ISDN - UL	Retail ISDN - BRI - Dispatch
	UNE - Line Sharing	Tariffed ADSL Provided to Retail
	Local Interconnection Trunks	Parity w retail
	OSS Interface Availability	99.5%
	OSS Response Interval and %	
	TAFI (Front End)	Parity w retail
	CRIS, DLETH, DLR, OSPCM, LMOS, LMOSUP, MARCH, Predictor, SOCS, LNP	Parity by Design
	Average Answer Time – Repair Center	Parity w retail
Billing	Invoice Accuracy	Parity w retail
	Mean Time To Deliver Invoices	
	(CABS)	Parity w retail
	(CRIS)	Parity w retail
	Usage Data Delivery Accuracy	Parity w retail
	Usage Data Delivery Timeliness	Parity w retail
	Usage Data Delivery Completeness	Parity w retail
	Mean Time to Deliver Usage	Parity w retail

Performance Measurements - Benchmarks / Analogs		
Category	Measures & Sub-Metrics	Benchmark / Analogue
	Resale Centrex	Parity w retail
	Resale ISDN	Parity w retail
	UNE Loop Non-Design	Retail Res & Bus - Dispatch
	UNE Loop Design Voice/Data	Retail Design - Dispatch
	UNE Loop Design >= DS1 (Includes HDSL)	Retail DS1 - Dispatch
	UNE - Switching (ports)	Retail POTS
	UNE - Unbundled Interoffice Transport - Dedicated	Retail DS1 / DS3 - Interoffice
	UNE - Combo (loop + port)	Retail Res & Bus
	UNE - Combo (other)	Retail Res, Bus & Design - Dispatch
	UNE - xDSL - UL (ADSL, UCL)	Retail DS1 - Dispatch
	UNE - ISDN - UL	Retail ISDN - BRI - Dispatch
	UNE - Line Sharing	Tariffed ADSL Provided to Retail
	Local Interconnection Trunks	Parity w retail
	% Repeat Troubles within 30 Days	
	Resale Residence	Parity w retail
	Resale Business	Parity w retail
	Resale Design	Parity w retail
	Resale PBX	Parity w retail
	Resale Centrex	Parity w retail
	Resale ISDN	Parity w retail
	UNE Loop Non-Design	Retail Res & Bus - Dispatch
	UNE Loop Design Voice/Data	Retail Design - Dispatch
	UNE Loop Design >= DS1 (Includes HDSL)	Retail DS1 - Dispatch
	UNE - Switching (ports)	Retail POTS
	UNE - Unbundled Interoffice Transport - Dedicated	Retail DS1 / DS3 - Interoffice
	UNE - Combo (loop + port)	Retail Res & Bus
	UNE - Combo (other)	Retail Res, Bus & Design - Dispatch
	UNE - xDSL - UL (ADSL, UCL)	Retail DS1 - Dispatch
	UNE - ISDN - UL	Retail ISDN - BRI - Dispatch
	UNE - Line Sharing	Tariffed ADSL Provided to Retail
	Local Interconnection Trunks	Parity w retail
	Out of Service > 24hrs	
	Resale Residence	Parity w retail

Performance Measurements - Benchmarks / Analogs		
Category	Measures & Sub-Metrics	Benchmark / Analogue
	UNE Loop Design Voice/Data	Retail Design - Dispatch
	UNE Loop Design >= DS1 (Includes HDSL)	Retail DS1 - Dispatch
	UNE - Switching (ports)	Retail POTS
	UNE - Unbundled Interoffice Transport - Dedicated	Retail DS1 / DS3 - Interoffice
	UNE - Combo (loop + port)	Retail Res & Bus
	UNE - Combo (other)	Retail Res, Bus & Design - Dispatch
	UNE - xDSL - UL (ADSL, UCL)	Retail DS1 - Dispatch
	UNE - ISDN - UL	Retail ISDN - BRI - Dispatch
	UNE - Line Sharing	Tariffed ADSL Provided to Retail
	Local Interconnection Trunks	Parity w retail
	Percent Missed Repair Appointments	
	Resale Residence	Parity w retail
	Resale Business	Parity w retail
	Resale Design	Parity w retail
	Resale PBX	Parity w retail
	Resale Centrex	Parity w retail
	Resale ISDN	Parity w retail
	UNE Loop Non-Design	Retail Res & Bus - Dispatch
	UNE Loop Design Voice/Data	Retail Design - Dispatch
	UNE Loop Design >= DS1 (Includes HDSL)	Retail DS1 - Dispatch
	UNE - Switching (ports)	Retail POTS
	UNE - Unbundled Interoffice Transport - Dedicated	Retail DS1 / DS3 - Interoffice
	UNE - Combo (loop + port)	Retail Res & Bus
	UNE - Combo (other)	Retail Res, Bus & Design - Dispatch
	UNE - xDSL - UL (ADSL, UCL)	Retail DS1 - Dispatch
	UNE - ISDN - UL	Retail ISDN - BRI - Dispatch
	UNE - Line Sharing	Tariffed ADSL Provided to Retail
	Local Interconnection Trunks	Parity w retail
	Maintenance Average Duration	
	Resale Residence	Parity w retail
	Resale Business	Parity w retail
	Resale Design	Parity w retail
	Resale PBX	Parity w retail

Performance Measurements - Benchmarks / Analogs		
Category	Measures & Sub-Metrics	Benchmark / Analogue
	UNE - Combo (loop + port)	Retail Res & Bus
	UNE - Combo (other)	Retail Res, Bus & Design - Dispatch
	UNE - xDSL - UL (ADSL, UCL)	Retail DS1 - Dispatch
	UNE - ISDN - UL	Retail ISDN - BRI - Dispatch
	UNE - Line Sharing	Tariffed ADSL Provided to Retail
	Local Interconnection Trunks	Parity w retail
	Total Service Order Cycle Time	
	Resale Residence	Parity w retail
	Resale Business	Parity w retail
	Resale Design	Parity w retail
	Resale PBX	Parity w retail
	Resale Centrex	Parity w retail
	Resale ISDN	Parity w retail
	UNE Loop Non-Design	Retail Res & Bus - Dispatch
	UNE Loop Design	Retail Design - Dispatch
	UNE Other Non-Design	Retail Res & Bus - Dispatch
	UNE Other Design	Retail Design - Dispatch
	UNE - Switching (ports)	Retail POTS
	UNE - Unbundled Interoffice Transport - Dedicated	Retail DS1 / DS3 - Interoffice
	UNE - Combo (loop + port)	Retail Res & Bus
	UNE - Combo (other)	Retail Res, Bus & Design - Dispatch
	UNE - xDSL - UL (ADSL, UCL) (Include Service Inquiry)	Retail DS1 - Dispatch
	UNE - ISDN - UL (Include Service Inquiry)	Retail ISDN - BRI - Dispatch
	UNE - Line Sharing	Tariffed ADSL Provided to Retail
Maintenance	Customer Trouble Report Rate	
	Resale Residence	Parity w retail
	Resale Business	Parity w retail
	Resale Design	Parity w retail
	Resale PBX	Parity w retail
	Resale Centrex	Parity w retail
	Resale ISDN	Parity w retail
	UNE Loop Non-Design	Retail Res & Bus - Dispatch

Performance Measurements - Benchmarks / Analogs		
Category	Measures & Sub-Metrics	Benchmark / Analogue
	UNE - ISDN - UL	Retail ISDN - BRI - Dispatch
	UNE - Line Sharing	Tariffed ADSL Provided to Retail
	Local Interconnection Trunks	Parity w retail
	Average Completion Notice Interval – (Electronic)	
	Resale Residence	Parity w retail
	Resale Business	Parity w retail
	Resale Design	Parity w retail
	Resale PBX	Parity w retail
	Resale Centrex	Parity w retail
	Resale ISDN	Parity w retail
	UNE Loop Non-Design	Retail Res & Bus - Dispatch
	UNE Loop Design	Retail Design - Dispatch
	UNE Other Non-Design	Retail Res & Bus - Dispatch
	UNE Other Design	Retail Design - Dispatch
	UNE - Switching (ports)	Retail POTS
	UNE - Unbundled Interoffice Transport - Dedicated	Retail DS1 / DS3 - Interoffice
	UNE - Combo (loop + port)	Retail Res & Bus
	UNE - Combo (other)	Retail Res, Bus & Design - Dispatch
	UNE - xDSL - UL (ADSL, UCL)	Retail DS1 - Dispatch
	UNE - ISDN - UL	Retail ISDN - BRI - Dispatch
	UNE - Line Sharing	Tariffed ADSL Provided to Retail
	% Provisioning Troubles within 30 Days	
	Resale Residence	Parity w retail
	Resale Business	Parity w retail
	Resale Design	Parity w retail
	Resale PBX	Parity w retail
	Resale Centrex	Parity w retail
	Resale ISDN	Parity w retail
	UNE - Analog Loop	Retail Res & Bus - Dispatch
	UNE - Digital Loop < DS1	Retail Design - Dispatch
	UNE - Digital Loop >= DS1 (Includes HDSL)	Retail DS1 - Dispatch
	UNE - Switching (ports)	Retail POTS
	UNE - Unbundled Interoffice Transport - Dedicated	Retail DS1 / DS3 - Interoffice

Performance Measurements - Benchmarks / Analogs		
Category	Measures & Sub-Metrics	Benchmark / Analogue
	% Missed Installation Appointments	
	Resale Residence	Parity w retail
	Resale Business	Parity w retail
	Resale Design	Parity w retail
	Resale PBX	Parity w retail
	Resale Centrex	Parity w retail
	Resale ISDN	Parity w retail
	UNE - Analog Loop	Retail Res & Bus - Dispatch
	UNE - Digital Loop < DS1	Retail Design - Dispatch
	UNE - Digital Loop >= DS1 (Includes HDSL)	Retail DS1 - Dispatch
	UNE - Switching (ports)	Retail POTS
	UNE - Unbundled Interoffice Transport - Dedicated	Retail DS1 / DS3 - Interoffice
	UNE - Combo (loop + port)	Retail Res & Bus
	UNE - Combo (other)	Retail Res, Bus & Design - Dispatch
	UNE - xDSL - UL (ADSL, UCL)	Retail DS1 - Dispatch
	UNE - ISDN - UL	Retail ISDN - BRI - Dispatch
	UNE - Line Sharing	Tariffed ADSL Provided to Retail
	Local Interconnection Trunks	Parity w retail
	Order Completion Interval	
	Resale Residence	Parity w retail
	Resale Business	Parity w retail
	Resale Design	Parity w retail
	Resale PBX	Parity w retail
	Resale Centrex	Parity w retail
	Resale ISDN	Parity w retail
	UNE - Analog Loop	Retail Res & Bus - Dispatch
	UNE - Digital Loop < DS1	Retail Design - Dispatch
	UNE - Digital Loop >= DS1 (Includes HDSL)	Retail DS1 - Dispatch
	UNE - Switching (ports)	Retail POTS
	UNE - Unbundled Interoffice Transport - Dedicated	Retail DS1 / DS3 - Interoffice
	UNE - Combo (loop + port)	Retail Res & Bus
	UNE - Combo (other)	Retail Res, Bus & Design - Dispatch
	UNE - xDSL - UL (ADSL, UCL)	Retail DS1 - Dispatch

Performance Measurements - Benchmarks / Analogs		
Category	Measures & Sub-Metrics	Benchmark / Analogue
	Resale PBX	Parity w retail
	Resale Centrex	Parity w retail
	Resale ISDN	Parity w retail
	UNE - Analog Loop	Retail Res & Bus - Dispatch
	UNE - Digital Loop < DS1	Retail Design - Dispatch
	UNE - Digital Loop >= DS1 (Includes HDSL)	Retail DS1 - Dispatch
	UNE - Switching (ports)	Retail POTS
	UNE - Unbundled Interoffice Transport - Dedicated	Retail DS1 / DS3 - Interoffice
	UNE - Combo (loop + port)	Retail Res & Bus
	UNE - Combo (other)	Retail Res, Bus & Design - Dispatch
	UNE - xDSL - UL (ADSL, UCL)	Retail DS1 - Dispatch
	UNE - ISDN - UL	Retail ISDN - BRI - Dispatch
	UNE - Line Sharing	Tariffed ADSL Provided to Retail
	Local Interconnection Trunks	Parity w retail
	Average Jeopardy Notice Interval (Electronic)	95%>= 48 hrs
	% of Orders given jeopardy notice (Electronic)	
	Resale Residence	Parity w retail
	Resale Business	Parity w retail
	Resale Design	Parity w retail
	Resale PBX	Parity w retail
	Resale Centrex	Parity w retail
	Resale ISDN	Parity w retail
	UNE Loop Non-Design	Retail Res & Bus
	UNE Loop Design	Retail Design
	UNE - Switching (ports)	Retail POTS
	UNE - Unbundled Interoffice Transport - Dedicated	Retail DS1 / DS3 - Interoffice
	UNE - Combo (loop + port)	Retail Res & Bus
	UNE - Combo (other)	Retail Res, Bus & Design
	UNE - Other - Non-Design	Retail Res & Bus
	UNE - Other - Design	Retail Design
	UNE - xDSL - UL (ADSL, UCL)	Retail DS1
	UNE - ISDN - UL	Retail ISDN - BRI
	UNE - Line Sharing	Tariffed ADSL Provided to Retail

Performance Measurements - Benchmarks / Analogs		
Category	Measures & Sub-Metrics	Benchmark / Analogue
Pre-Ordering	Percent Response Received within "X" seconds	
	Average Response Time – Customer Service Record [LENS - hal/cris TAG - crsecsr/crseinit]	Parity + 4 sec
	Average Response Time – Due Date Avail [DSAP]	Parity + 4 sec
	Average Response Time – Address Validation [RSAG - tn / address]	Parity + 4 sec
	Average Response Time – Product and Service Availability [TAG LENS - coffi/usoc psims/orb]	Parity + 4 sec
	Average Response Time – Tel. No Availability and Reservation [ATLAS]	Parity + 4 sec
	Service Inquiry with Firm Order (Manual)	95% in 7 bus days (inc FOC)
	Loop Makeup Inquiry (Manual)	95% in 7 bus days
	Loop Makeup Inquiry (Electronic)	85% < 4 hrs
	OSS Interface Availability (all systems)	99.5%
General	% Change Management Notices sent on Time	95% on time
	% Change Management Notice - Delay 8 plus days	0% > 8 days
Ordering	% Functional Acknowledgements returned on time	EDI 75% in 90 min TAG 95% in 30 min
	Percent Flow-Through Service Request	90%
	Resale Residence	90%
	Resale Business	80%
	UNE	80%
	Percent Rejected Service Request (Electronic / Partial Electronic / Manual)	Diagnostic
	Reject Interval (Electronic)	95% in 1 hr
	Reject Interval (Partial Electronic / Manual)	85% < 24 hr
	Reject Interval (Interconnection Trunks)	4 days
	Firm Order Confirmation Timeliness (Electronic)	95% < 3 hrs
	Firm Order Confirmation Timeliness (Partial Electronic / Manual)	85% < 36 hrs
	Firm Order Confirmation Timeliness (Interconnection Trunks)	24 days
	Speed of Answer in Ordering Center	Parity w retail
Provisioning	Mean Held Order Interval	
	Resale Residence	Parity w retail
	Resale Business	Parity w retail
	Resale Design	Parity w retail

BELLSOUTH

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Vice President-Federal Regulatory

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June 20, 2000

WRITTEN EX PARTE

STAMP and RETURN

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

RECEIVED

JUN 20 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket No. 98-147

Dear Ms. Salas:

Attached is a copy of the report that BellSouth has sent to Lawrence Strickling, Chief of the Commission's Common Carrier Bureau, in response to his request that we describe the steps BellSouth has taken to begin offering line sharing to requesting CLECs no later than the June 6, 2000 deadline. Copies have also been sent to the following Commission staff: Michelle Carey; Margaret Egler; Johanna Mikes; and William Kehoe.

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
Michelle Carey
Margaret Egler
Johanna Mikes
William Kehoe

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Vice President-Federal Regulatory

202 463-4113
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June 20, 2000

Mr. Lawrence E. Strickling
Chief, Common Carrier Bureau
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Report on Line Sharing

Dear Mr. Strickling:

On December 9, 1999, the Commission released the *Line Sharing Order*¹ that requires incumbent local exchanges carriers ("ILEC") to provide competitive local exchange carriers ("CLEC") access to the high frequency portion of the local loop as an unbundled network element ("UNE").² Pursuant to implementation requirements of the *Line Sharing Order*, you have requested BellSouth Corporation ("BellSouth") to report the steps BellSouth has taken "to ensure that its facilities are prepared to respond to requests for access to the high frequency portion of loop." You requested that the report should include a description of any agreements BellSouth has entered with CLECs to provide this high frequency UNE, including tests, if any, that BellSouth has conducted with requesting carriers. You also ask that BellSouth name an individual as point of contact in the event additional information is requested. In accordance with your request, BellSouth provides the following report.

Preliminary Effort

1. As a first step toward complying with the *Line Sharing Order*, BellSouth invited interested CLECs to a meeting in Atlanta on January 26, 2000. Twenty-seven individuals representing twelve CLECs attended the meeting. BellSouth presented its proposed line sharing offering, including interim rates, subject to true up, as well as a line sharing contract. During

¹ *In the Matter of Deployment of Wireline Services Offering Advanced Telecommunications Capability*, CC Docket No. 98-147 and *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, *Third Report and Order in CC Docket No. 98-47* and *Fourth Report and Order in CC Docket No. 96-98*, 14 FCC Rcd 20912 (1999) ("*Line Sharing Order*").

² A CLEC's access to the high frequency portion of the loop is referred to as line sharing throughout the *Line Sharing Order* and this report.

that meeting, participants agreed to form several working teams that would develop, test, and refine the procedures for CLECs and BellSouth to use to successfully implement line sharing. This resulted in a series of working-level meetings, the first of which was held on February 2, 2000. The participants jointly decided to have two sub-committees: a technical sub-committee; and a systems/process sub-committee. Each sub-committee would meet one day each week. The technical sub-committee worked on technical issues, such as systems/network architecture and testing. The systems/process sub-committee focused on the pre-ordering, ordering, provisioning, maintenance, and billing issues. Each committee listed and prioritized issues and action items. The sub-committees addressed and resolved issues necessary to developing the architecture and operations plans for the line sharing product. Beginning April 12, 2000, the two sub-committees were consolidated into one committee, with that committee conducting its meetings on one full day each week.

2. The purpose of these CLEC/BellSouth line sharing meetings was to jointly develop procedures and operations plans to implement line sharing. There have been six active participants in this joint CLEC/BellSouth meetings. They are BellSouth, Covad, NorthPoint, Rhythms, NewEdge, and BlueStar. In addition, there are other less active participants in the meetings, including AT&T and Sprint.

Development of a Pilot Program

3. As a part of this joint effort, BellSouth proposed, and the cooperative group agreed, to conduct a collaborative line sharing pilot test. The primary objective of the pilot was to refine BellSouth and CLEC line sharing procedures so that BellSouth and CLECs could successfully implement line sharing on June 6, 2000. The specific pilot objectives included BellSouth helping CLECs determine if end user lines are capable of line sharing, CLECs submitting end user orders, and BellSouth provisioning the upper spectrum of the line for the CLECs to provide data service over the line. All parties worked cooperatively to identify and resolve key ordering, provisioning, maintenance, and repair procedures.

4. The group concluded that Atlanta would be the best location for the pilot. BellSouth offered to equip as many as six Atlanta central offices with splitters for the test pilot. BellSouth offered the CLECs the opportunity to select the central offices. When the CLECs selected seven offices, BellSouth agreed to equip all seven offices. Covad, NorthPoint, and Rhythms participated in the Atlanta Line Sharing Pilot with BellSouth. BellSouth and the CLECs conducted their line sharing pilot in the following Atlanta central offices: Marietta; Roswell; Buckhead; Peachtree Place; Duluth; Sandy Springs; and Chamblee. These pilot sites were selected and prioritized by the CLECs, according to their importance. BellSouth installed splitters in the seven pilot central offices.

5. The CLECs and BellSouth jointly defined the scope of the pilot. The first objective was to provision line sharing for existing BellSouth retail POTS end users. Next the

teams performed in-depth analysis of maintenance flows, attempting to determine all possible subsequent activities, and evaluated their impact on Line Sharing. Testing and evaluation continues on an ongoing basis during the pilot.

6. At each step, BellSouth and the other participants made pilot decisions jointly and shared pilot results with their respective internal implementation organizations responsible for development of the necessary processes and operating support systems ("OSS") enhancements. BellSouth built its processes and work flows based upon both the decisions made in committee meetings and the early findings of the pilot testing, as needed, in order to be ready for the June commercial implementation.

7. In the CLEC/BellSouth meetings, all parties raised various issues and identified items that each hoped would make the pilot more successful. BellSouth used the information gained through the line sharing pilot directly in the development of the commercial line sharing product.

Line Sharing Pilot Summary

8. BellSouth began accepting end user line sharing orders in mid March 2000 for the Marietta Main central office. BellSouth temporarily suspended the pilot due to unanticipated operational difficulties in late March but resumed the pilot in early May after the difficulties were addressed. Between May 2000 and June 2000, seven end user orders for line sharing were issued. The first orders were completed May 2000. The participants of the pilot subsequently decided to extend the pilot beyond the commercial availability date. BellSouth installed three voice lines at one of their locations and ordered xDSL service from each of the three participating CLECs. This established a friendly environment for testing various scenarios, such as changes to another CLEC and voice disconnects. This pilot is still underway.

9. As a final step in the pilot, both BellSouth and other pilot participants intend to review the key findings of the line sharing pilot's processes and procedures. Participants anticipate that this post mortem will be a key component of the pilot. BellSouth continues to incorporate into the line sharing commercial offering information gained from the pilot.

Network Architectures

10. For the commercial offering beginning June 6, 2000, BellSouth offered splitters in increments of a full shelf, 96 line units, or in increments of one fourth of a shelf, 24 line units. BellSouth purchases, installs, inventories, leases, and maintains the splitters. In this arrangement, BellSouth installs a splitter in its equipment space.

11. BellSouth believes it was necessary to minimize the allowable configurations first offered to simplify the initial implementation to insure its ability to meet the requirements of the

Line Sharing Order. BellSouth believes the initial architecture, which allows CLECs the choice of leasing the splitter from BellSouth under the two identified options (increments of 96 line units or 24 line units) is reasonable, flexible, and avoids overly complicated and error-prone process management.

12. Each group of 24 or 96 splitters is uniquely assigned to a specific CLEC. BellSouth provisions all necessary cross-connects to enable the service. Once the splitter is installed and inventoried, a CLEC order to provision line sharing for an end user indicates the splitter assignment and pair to be used for the high frequency portion of the loop (or the data portion). BellSouth runs cross-connects for the incoming line (voice and data), outgoing analog voice, and the necessary jumpers to connect to the splitter. BellSouth runs cross-connects from the splitter to the CLEC's termination point on the frame to provision the high frequency portion of the loop (data).

13. Several CLECs requested the additional option of owning the splitter and placing it in their collocation space. This option, however, requires different operational plans and OSS changes from the options that BellSouth originally offers that will complicate the ordering, provisioning, and repair work processes. For example, the local service request (LSR) would be different for each. The cable inventory in the system and required pair assignment information would be different, requiring dual work processes and OSS interfaces to be maintained. In any given central office, training would be more complicated as a technician would need to know for every order, whether the splitter is in the CLEC cage, in BellSouth's area, full or partial shelf, etc. Only by delaying the CLEC owned splitter option until after the June 6, 2000 commercial offering could BellSouth insure that it could offer line sharing by the ordered date of June 6.

14. BellSouth agreed to investigate an option where the CLEC owned the splitter and to attempt to work through the operational issues in the collaborative meetings, after the successful commercial offering beginning June 6. These discussions have now begun in the collaborative meetings and a special session to discuss this arrangement is scheduled for June 28. Pending resolution of several operational issues, BellSouth expects to offer this additional option prior to September 6, 2000.

Splitter Deployment and Allocation

15. CLECs began to order splitter systems on March 26, 2000, in Georgia and in other states on April 6, 2000. This enabled CLECs to begin providing end user line sharing service on June 6, 2000.

16. The requirement that all ILECs implement line sharing by June 6, 2000 caused an industry wide shortage of splitters. Moreover, the installation technicians needed to install the splitters were limited. Anticipating these shortages, BellSouth had the CLEC participants in the pilot program submit forecasts of splitter needs by central office. The CLEC participants also

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prioritized the central offices for splitter deployment. Additionally, BellSouth encouraged the development of rules to be used to allocate the available splitters. These rules were memorialized in a document called "Rules for Splitter Allocation."

17. BellSouth and the other participants developed the priority for deploying splitters based on the Rule for Splitter Allocation, the CLECs' central office priority list, and the splitter orders received from CLECs. Consequently, while not every central office had splitters deployed by June 6, the central offices deemed most critical by the CLECs had splitters and BellSouth was working effectively with the CLECs to allocate splitters fairly among those CLECs that submitted orders.

18. The CLECs desired Georgia central offices to be implemented first. Splitters were ordered in 54 Georgia central offices. By June 6, 2000, splitters had been installed and were operational in 50, or 93%, central offices. Three other splitters will be installed and operational by July 6, 2000. BellSouth anticipates installing the remaining splitter by August 10, 2000. The majority of these installations could not be completed earlier because of central office space issues.

19. BellSouth now has deployed an allotment of splitters for each CLEC that submitted a splitter order. BellSouth continues to work with the CLECs to complete the installations of splitters and to eliminate the backlog of splitter orders.

20. On June 6, 2000, BellSouth began accepting end user line sharing orders from CLECs that had splitters in place.

Line Sharing Agreements

21. BellSouth has reached agreement with Covad, NewEdge, InterLoop, NorthPoint, and Rhythms for the ordering and provisioning of line sharing in the BellSouth region. Many of the general provisions and operational terms and conditions were worked out in the weekly collaborative meetings. Specific language for each CLEC was negotiated to satisfy the specific needs of that CLEC. These agreements contain interim rates, subject to true up following completion of the individual state regulatory bodies' rate proceedings. These agreements with interim rates helped line sharing begin by June 6, 2000.

22. In general, the terms and conditions that BellSouth developed for line sharing reflect the methods, practices, and architectures that were discussed during the collaborations and refined as a result of the line sharing pilot. The terms are also consistent with BellSouth's current xDSL provisioning standards, e.g. the loop pre-qualification, loop qualification, ordering, and provisioning. BellSouth plans to use existing processes and procedures related to the current xDSL-capable loop offering as much as possible to reduce the amount of change in work flows for all involved parties.

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23. Consistent with the *Line Sharing Order*, BellSouth's proposed offering of the high frequency portion of the loop is available to a single requesting carrier, on loops that carry BellSouth's POTS, to the extent that the xDSL technology deployed by the requesting carrier does not interfere with the analog voiceband transmissions. It is BellSouth's intent to offer line sharing wherever the CLECs deploy any version of xDSL that is presumed acceptable for shared-line deployment in accordance with Commission rules and will not significantly degrade analog voice service. The offer meets the prerequisite that an ILEC be providing voiceband services on the loop before a CLEC may obtain access to "the high frequency portion of the loop," which, consistent with the *Line Sharing Order*, is defined as the frequency above the voice band on the copper loop facility that is being used to carry analog voice band transmissions.

Conclusion

We believe that the above discussion demonstrates BellSouth's full compliance with the *Line Sharing Order*. BellSouth's line sharing implementation plans incorporate the network architectures and work processes identified in the line sharing collaborative meetings and allowed for full commercial rollout of line sharing on June 6, 2000 compliance date.

I will serve as the point of contact should you need any further information on this subject. You may contact me by phone at 202-463-4113, or by mail at 1133 21st Street NW, Suite 900, Washington, DC 20036.

Very truly yours,


Kathleen B. Levitz

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