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BELLSOUTH

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August 16, 2000

EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th St. SW
Washington, D.C. 20554

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OFFICE OF THE SECRETARY

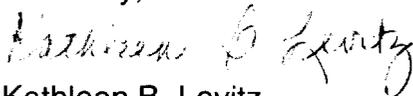
Re: CC Docket No. 96-98

Dear Ms. Salas:

This is to inform you that on August 15, 2000 Steve Klimacek, Tommy Williams, Randy Sanders, Jonathan Banks, and I, representing BellSouth, met with Commission staff to discuss BellSouth's policies on line-splitting. The Commission staff participating in the discussion included Jake Jennings, Kathy Farroba, John Stanley, Jon Reel, and Jessica Rosenworcel of the Common Carrier Bureau's Policy and Program Planning Division and Andrea Kearney and Jim Carr of the Office of General Counsel. The attached document formed the basis for our discussion.

We are filing notice of this ex parte meeting in the docket identified above, as required by Section 1.1206(b)(2) of the Commission's rules. Please associate this notice with the record of that proceeding.

Sincerely,



Kathleen B. Levitz

Attachment

cc: Jake Jennings (w/o attachment)
Kathy Farroba (w/o attachment)
John Stanley (w/o attachment)
Jessica Rosenworcel (w/o attachment)
Jon Reel (w/o attachment)
Andrea Kearney (w/o attachment)
Jim Carr (w/o attachment)

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BellSouth Ex Parte

Line Splitting and UNE-P

August 15, 2000

Line Splitting and UNE-P

1. Line Splitting

- ❖ Paragraph 324 of the FCC's Order authorizing SBC to provide in-region InterLATA service defines line splitting as a situation where the voice and data service are being provided by competing carrier(s) -- other than the incumbent LEC -- over a single loop.
- ❖ In paragraph 325 of that Order the FCC further stated that incumbent LECs have an obligation to permit line splitting where the competing carrier purchases the entire loop and provides its own splitter. In paragraph 327 the FCC further stated that the incumbent LEC is not required to furnish the splitter.
- ❖ BellSouth is prepared to permit CLECs to do line splitting as long as competitive carriers provide their own splitter.
- ❖ Line splitting operational procedures must be developed.

2. UNE-P

- ❖ UNE-P is a combination of a loop and a port.
- ❖ To access the high frequency spectrum on a loop, a data provider must use a splitter. A splitter, however, is not part of a loop. Consequently, if a splitter is on a loop or is to be attached to a loop, a loop and port will lose its status as a UNE-P.
- ❖ Line Splitting on UNE-P is thus a misnomer.
- ❖ BellSouth will accommodate line splitting with a loop and port that is delivered to a collocation space.

3. Steps Necessary to Implement Line Splitting

A. Interconnection Agreements

- ❖ The voice provider will need an interconnection agreement that authorizes it to buy loops and ports.
- ❖ The voice provider, the data provider, or both the voice and data providers will need a collocation agreement and will also need authorization to order cross-connects.

B. Splitter Ownership

- ❖ BellSouth's proposed architecture is for the CLEC to own the splitter.

C. OSS Ordering and Provisioning Systems

- ❖ BellSouth envisions that in the near future a minimum of two service requests will be required. Modifications of BellSouth's OSS's will be necessary.

D. Agency Issues

- ❖ BellSouth proposes a single customer of record for line splitting.
- ❖ BellSouth does not wish to be in the middle of disputes between a competing voice and data provider.

4. Collocation Issues

- ❖ BellSouth allows CLECs to sublease collocation space without any additional charges, unless the guest CLEC requires additional power or floor space.
- ❖ The guest CLEC's use of subleased collocation space must be consistent with the contractual obligations that exist between BellSouth and the host CLEC.
- ❖ BellSouth will permit CLECs to sublease a virtual collocation space. BellSouth proposes to have the host CLEC as its only point of contact.
- ❖ BellSouth currently provides in-office wiring between a shared collocation space and BellSouth-provided network elements.

5. Pricing

	<u>Monthly</u>	<u>Non-recurring</u>
❖ Georgia, Zone 1		
❖ UNE-P (Conversion as-is only)	\$12.59	\$ 2.01
❖ Loop (No IDLC)	\$14.21	\$42.54
❖ Port	\$ <u>1.85</u>	<u>\$17.16</u>
❖ Total loop and port	\$16.06	\$59.70
❖ Collocation must be purchased in addition		