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Federal Communications Commission
Washington, D.C. 20554

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November 2, 2000

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

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Deployment of Wireline Services Offering Advanced Telecommunications Capability, CC Docket No. 98-147; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98; Application by Verizon New England, Inc. for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in the State of Massachusetts, CC Docket No. 00-176; Application by SBC Communications, Inc. for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in the States of Kansas and Oklahoma, CC Docket No. 00-217

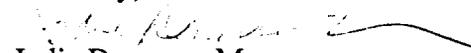
Dear Ms. Salas,

On October 31, 2000, members of the Common Carrier Bureau and the Office of Engineering and Technology met with representatives of Covad, Rhythms NetConnections, BellSouth, Qwest, SBC and Verizon to discuss operational issues associated with the implementation of line sharing on a nationwide basis.

A copy of the agenda for the meeting that contains the specific subjects that the parties discussed and a list of the attendees are attached. Also attached are documents prepared by Covad and Rhythms that were distributed at the meeting. The Covad document discusses certain line sharing implementation issues. The Rhythms document contains line sharing performance data for the Bell Operating Companies. Please note that although the Rhythms document is marked "Proprietary and Confidential," Rhythms has informed the Common Carrier Bureau staff that the document may be placed in the public record.

In accordance with Section 1.1206(b) of the Commission's rules, 47 C.F.R. § 1.1206(b), two copies of this notice are being submitted for filing in each of the above-captioned proceedings.

Sincerely,


Jodie Donovan-May
Policy Division
Common Carrier Bureau

Proposed Agenda
Line Sharing Workshop
October 31, 2000
9:00 a.m.-5:00 p.m. / 5th Floor North Conference Room

1. Central Office Issues

Installation and roll-out of new splitters and ADSL equipment

- Standardizing Channel Facility Assignment (CFA) information
- Inventory accuracy for CLEC CFAs and ILEC splitters; updating relevant databases such as TIRKS and LFACs
- Installation and wiring of ILEC and CLEC splitters
- Collocation re-cabling/ collocation augment requirements
- Notification procedures for determining completion of ILEC provisioning work
- Training of ILEC Central Office personnel

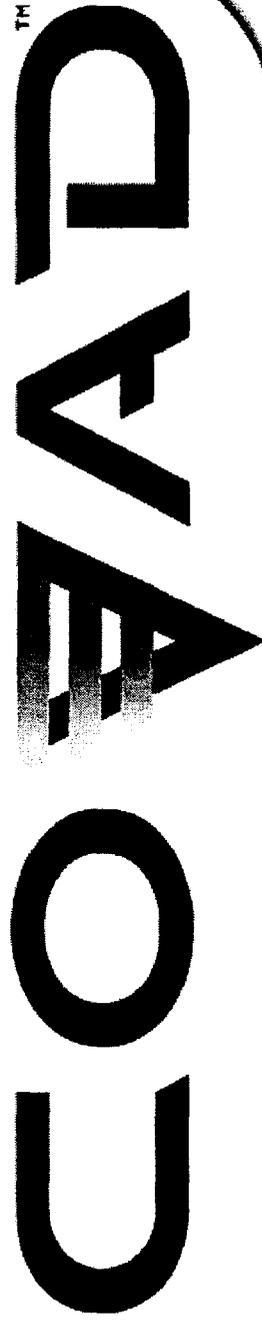
2. Industry Preparation to Order and Provision Line Sharing

Internal ILEC rep/personnel training; internal CLEC rep/personnel training; clear documentation/procedures; access to information

- Pre-ordering issues
 - Access to loop make-up information
- Ordering issues
 - Changes to OSS interface
 - Delivery of timely order processing notifications
 - Changes to order forms
- Points of contact/escalation procedures
- Training on all changes to OSS systems and forms, as well as new provisioning procedures of internal ILEC rep/personnel and training of internal CLEC rep/personnel
- Clear documentation/procedures for line sharing

FCC OCT. 31 LINE SHARING MTG.

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Mike Zulevic	Covad	303-884-5657	mzulevic@covad.com

The logo for COA (California Office of Air Resources) is displayed in a large, bold, black font. The letters 'C', 'O', and 'A' are stacked vertically, with the 'A' being significantly larger than the 'C' and 'O'. A small 'TM' trademark symbol is located to the right of the 'A'. The logo is set against a white background that is part of a larger graphic element consisting of a black bar on the left and a white rounded rectangle on the right.

COATM

**FCC Linesharing
Summit
October 31, 2000**

Prepared by:
Linesharing
Implementation Team

Contact Information - Covad attendees

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Confirm Splitter in Place

Problem:

- Splitters are not installed or wired correctly, we are therefore unable to provision orders
- Inventory and data management issues (associated w/Splitter location, provisioning requirements) vary among ILECs and are not consistent w/other inventoried devices. ILEC and CLECs are not effectively identifying if the splitter is in place and cabled correctly.

Background:

- Splitters typically installed and maintained by the ILEC. ILEC provides linesharing CFA. Each ILEC managing inventory differently. Each is requiring different inventorying methodology and different information to be transferred from CLEC to ILEC at order entry.

Proposed Solution:

- Certification that splitter installation is complete including all test records. Document that the cabling was tested between each splitter port and its corresponding cross-connect block (implement by 11-20-00).
- Certification that all CO Technicians have been trained in linesharing installation and testing (implement by 11-20-00).
- Contact: Mike Zulevic

Test Access

Problem

- CLEC is unable to confirm cross connects are complete
- CLEC is unable to confirm that proper circuit is terminated to correct termination points on the splitter

Background

- Given voice and data pass through a common device, both the CLEC and ILEC need test access to confirm service

Proposed Solution

- Physical test access to the splitter or physical access to the frame appearance of the splitter (implement by 11-20-00)
- Ability to engage assistance of CO technicians for trouble resolution when our technicians are at the CO (implement by 11-01-00)
- Access to ILEC ANI testing (need access codes) (implement by 11-01-00)
- Access to ILEC MLT tests (implement by 11-21-00)

- Contact: Mike Zulevic

Linesharing Collocation Augment Intervals

Problem:

- Takes as long as 3-4 months to add linesharing capacity
- For linesharing, no need for power, space beyond a linecard shelf and related cabling.

Background:

- Linesharing augment intervals established based on adding traditional UNE space, equipment, power.

Proposed Solution:

- 30 calendar day interval for splitter and DSO tie cable augments
- 7 calendar day interval for redesignation of existing DSO tie cable for linesharing use
- Unrestricted use of existing DSO capacity for linesharing
- Explore more cost effective deployment, splitter location
- Availability of shorter FCC/PUC intervals and terms and conditions without having to renegotiate IAS

- Contact: Mike Zulevic

Service Order Completion

Problem:

- CLECs are not receiving positive confirmation of Service Order Completion (SOC) from the ILEC (**Time from LSR Placement to Service Order Completion Currently Averages 20.8 Days**)
- ILEC is auto-completing LS orders. Therefore, notification is not indicative of actual work being completed.

Background:

- Need confirmation that the ILEC SOC is complete
 - Currently test UNE loops (stand alone) to determine that the loop is in place--this initiates a CLEC dispatch.
 - Since a linesharing order already has a loop, a test is not applicable--therefore the ILEC needs to confirm that they have completed the x-connects to the splitter.
 - Covad is currently submitting Missed SOC lists to ILECs.

SOC Proposed Solutions

- Immediately Implement **Test and Acceptance Process** to verify and report accurate completion of cross connect or failures/jeopardies that arise per work order on the expected work completion date. (See attached Test and Acceptance Process document)
- Immediate implementation of SOC notification process by any ILEC currently not communicating SOC to CLEC. SOC delivery mechanism to be the following: Electronic Data Interface (EDI), Graphical User Interface (GUI), Spreadsheet Format (.xls). Furthermore, this information should be received on a per order basis or in batch at a minimum of once per day.
- Communication of SOC should be triggered from the actual completion of work in the central office and not from a system that autopopulates this information based on the expected work completion date.
- Missed SOC list reviewed by ILEC and returned with response within 24 hours (complete notification or jeopardy notification and resolution date)
- Automatic escalation for missed SOC or no completion notification.
- CLECs and ILEC to implement **Technician Ride-Along** to ensure compliance and completion of lineshared work orders in Central Offices currently pending 5 orders or more.
 - Implement by November 20, 2000

Failure at Install - No X-connect

Problem:

- Covad is experiencing a high percentage of installation failures due to the ILEC failing to complete the cross connect in the Central Office (**For All ILECs, 33% of all Covad Installs Currently Fail Due to No Cross-Connect in the Central Office**)

Background:

- Technician not dispatched by CLEC until positive confirmation of SOC (typically day 20 vs. 5 day agreement).
- Still 33% of service is failing due to x-connect not complete.
- No clear resolution path to troubles.

Proposed Solution (Implement by November 20, 2000 - John Moham / Aman Brar):

- At time of failed installation due to lack of cross connect in the Central Office, CLECs must be able to immediately take the following resolution steps with the ILEC:
 - Contact ILEC for assistance of the Central Office technician
 - ILEC Central Office technician should verify that the cross connect has been completed properly to the given telephone number and also verify continuity between the CLEC DSLAM, the POTS Splitter, and the MDF.
 - If Covad Communications is still unable to sync at the customer's premise, then Covad Communications will immediately request a joint meeting at the given Central Office
 - See page 4 of addendum, **Failed Cross Connect Resolution Process**

ILEC Trouble Tickets

Problem:

- ILECs do not have proper procedures in place to effectively communicate status/resolution of trouble tickets for lineshared orders

Background:

- CLECs opening multiple ILEC trouble tickets on each order to get SOC completed.
- Customers remain out of service until multiple Trouble Tickets are resolved (or never gaining service at all).

Proposed Solution (Implement by Nov. 20, 2000 - John Moham / Aman Brar):

- ILECs must exhibit and implement a method and procedure specifying how they will handle and communicate the resolution of trouble tickets opened for lineshared orders.
- This procedure should be very specific to the resolution of trouble tickets for lineshared orders, detailing the issues that the ILEC should focus on to close the trouble ticket within 24 hours.
- Contact: John Moham/Aman Brar

Loop Qualification

Problem:

- Data currently returned via loop qualification query through ILEC provided tool does not contain all data elements necessary to assess whether the existing circuit can be provisioned with ADSL service
- Missing data returned from loop qualification query
- Incorrect data returned from loop qualification query
- CLEC is limited to ILEC loop quality indicator (Y or N, green light / red light) when placing the loop order, and is unable to make an independent decision regarding the quality of the loop
- Qualification tools are often down (not functioning).

Background:

- The working telephone number already exists, and accurate loop make up information should be made readily available for the existing circuit.
- CLEC's offer different services than ILEC
- Contact: John Moham/Aman Brar

Loop Qualifications-Proposed Solutions

Proposed Solution (Implement by Jan. 1, 2001- John Moham / Aman Brar):

- ILEC loop qualification query should return (at a minimum the following data based off of the actual circuit design for the given telephone number):
 - Total Loop Length
 - Equivalent 26 Gauge Loop Length
 - Total Bridge Tap Length
 - Total Number of Bridge Taps
 - Loop Medium (Copper, Fiber, etc.)
 - Presence of Pair Gain and/or DLC
 - Presence of DAML
- Provide bulk loop qualification information on a wire center by wire center basis with monthly updates
- Missing information should be provided to CLECs without CLECs incurring any additional costs
- ILEC to provide database integrity % and action plan to increase to 100% accuracy

Pre-order and Order Placement: Business Rules

Problem:

- Pre-ordering, loop qualification, and ordering procedures are currently based on end user address information, resulting in orders being held up due to mismatched end user address information in the ILEC system/database (AVE vs. Avenue)

Background:

- Order placement for UNEs dependent on confirming end users address
- For linesharing---the phone # / circuit to be shared already exists - all queries should be based off of the telephone number

Proposed Solution (Implement by Jan. 1, 2001 - John Moham / Aman Brar):

- Pre-ordering, loop qualification, and ordering procedures should be solely based off of the existing working telephone number, resulting in increased order handling efficiency, throughput, and cycle time for both the ILEC and Covad Communications

Rhythms NetConnections: FCC Line Sharing Workshop
ILEC Performance Data

October 31, 2000

Table of Performance by ILEC Service Agreements

Line Delivery Intervals calculated as inclusive of FOC interval

ILEC	% of FOC dates delivered past due	Of past due FOCs average # of days past due	% of delayed orders	Of circuits delivered past SLA due date average # of days past due	% of past due orders that remain unfilled at 10/25/2000
Ameritech	21.43%	4.89	83.33%	9.06	83.33%
GTE	55.88%	11.95	66.18%	11.33	7.35%
Bell Atlantic South	61.70%	6.12	86.84%	11.15	51.32%
Bell Atlantic North	51.18%	9.78	78.13%	10.56	34.38%
Southwestern Bell	80.00%	6.25	100.00%	13.63	100.00%
PacBell	27.12%	8.06	50.46%	9.16	52.29%
US West	43.40%	10.09	58.82%	10.57	9.80%

Line Delivery Intervals calculated as separate intervals of FOC

ILEC	% of FOC dates delivered past due	Of past due FOCs average # of days past due	% of delayed orders	Of circuits delivered past SLA due date average # of days past due	% of past due orders that remain unfilled at 10/25/2000
Ameritech	21.43%	4.89	80.49%	8.42	83.33%
GTE	55.88%	11.95	61.76%	10.93	7.35%
Bell Atlantic South	61.70%	6.12	75.00%	11.44	51.32%
Bell Atlantic North	51.18%	9.78	70.06%	10.59	34.38%
Southwestern Bell	80.00%	6.25	87.50%	14.14	100.00%
PacBell	27.12%	8.06	51.89%	8.16	52.29%
US West	43.40%	10.09	44.00%	9.86	9.80%

Line Delivery Performance by ILEC/State

Line Delivery Intervals calculated as inclusive of FOC interval

ILEC	% of FOC dates delivered past due	Original due FOCs average # of days past due	% of delayed orders	Of circuits delivered past SLA due date average # of days past due
NY	51.32%	10.44	78.62%	11.08
CO	41.86%	11.72	57.14%	11.83
CA Pac Bell	27.12%	8.06	50.46%	9.16
CA GTE	56.06%	12.24	56.57%	11.48

Line Delivery Intervals calculated as separate intervals of FOC

ILEC	% of FOC dates delivered past due	Original due FOCs average # of days past due	% of delayed orders	Of circuits delivered past SLA due date average # of days past due
NY	51.32%	10.44	70.63%	11.12
CO	41.86%	11.72	46.34%	10.84
CA Pac Bell	27.12%	8.06	51.89%	8.16
CA GTE	56.06%	12.24	62.12%	11.10