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BELLSOUTH

EX PARTE OR LATE FILED

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January 17, 2001

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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 S.W., Room TWB-204
Washington, D.C. 20554

Re: CC Docket No. 98-147
CC Docket No. 96-98

Dear Ms. Salas:

On January 16, 2001, I, representing BellSouth Corporation, met with Deena Shettler, legal advisor to Commissioner Tristani, to discuss the terms and conditions under which incumbent local exchange carriers should be required to facilitate line splitting. Tommy Williams, Steve Earnest and Debbie Ogle of BellSouth also participated in the meeting by telephone. The attached document formed the basis for our presentation.

In compliance with the Commission's rules, I am filing two copies of this notice for each of the proceedings identified above and ask that you associate these filings with those proceedings.

Sincerely,



Kathleen B. Levitz

Attachment

cc: Deena Shettler

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**BellSouth Ex Parte
CC Docket No. 98-147**

January 17, 2001

Line Sharing vs. Line Splitting

➤ **Line Sharing**

- Defined by Commission in Third Report and Order (CC Docket No. 98-147)
- Defined as the provision of xDSL-based service by a competitive LEC and voiceband service by an incumbent LEC on the same loop

➤ **Line Splitting**

- Defined by Commission in SBC Texas 271 Order
- Defined as the situation where both the voice and data service are provided by competing carriers over a single loop

➤ **UNE-P**

- Loop and port combination where the ILEC is not the voice provider

Line Splitting

- **BellSouth is willing to facilitate line splitting between a voice CLEC and a data CLEC**
 - Allows CLEC to provide customers bundled voice and data services
 - BellSouth has established a project team for line splitting and is beginning to develop the option

- **Splitter must be owned by one of the CLECs**
 - BellSouth will cross-connect a loop and port to the collocation space of either the voice CLEC or the data CLEC
 - Commission stated in the SBC Texas 271 Order that incumbent LECs have an obligation to permit competing carriers to engage in line splitting over the UNE loop *where the competing carrier purchases the entire loop and provides its own splitter*

Line Splitting

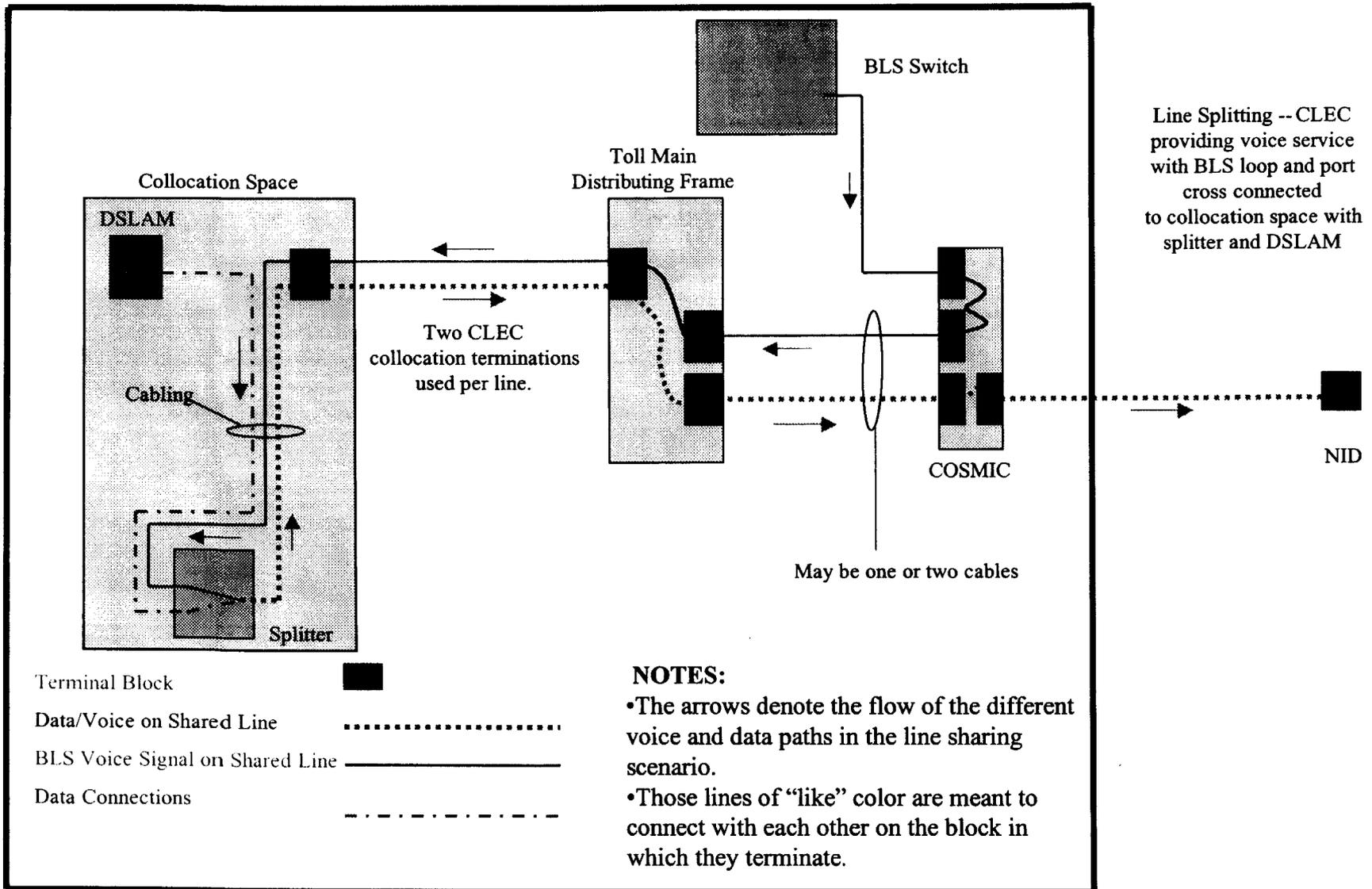
- **BellSouth will have only one customer of record**
 - Only one CLEC should be the point of contact for ordering, maintenance, and repair issues. The UNE loop entitles the CLEC to the entire spectrum

- **Splitter is not part of the loop**
 - Splitters were never part of BellSouth's network. The splitter functionality is provided by the DSLAM for BellSouth's ADSL service
 - There is no requirement to unbundle the DSLAM

- **No longer have a UNE-P once a splitter is installed**
 - UNE-P involves only a loop and port. Converting a customer to UNE-P involves no central office wiring.

CO-Based Line Splitting Functional Block Diagram

8/21/00



CO-Based Line Splitting Functional Block Diagram

8/21/00

