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OFFICE OF THE SECRETARY

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

January 26, 2001

WRITTEN EX PARTE

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

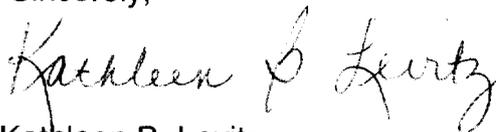
Re: CC Docket No. 98-147
CC Docket No. 96-98

Dear Ms. Salas:

Attached is a copy of documents that BellSouth sent on January 25, 2001, via e-mail, to William Dever and Jessica Rosenworcel of the Common Carrier Bureau's Policy and Program Planning Division. These documents describe steps that BellSouth has taken to facilitate the speedy introduction of line sharing in its region.

In accordance with Section 1.1206(b)(1), I am filing two copies of this notice with you for both dockets identified above and ask that you place those copies in the records of each of those dockets. If you have any questions concerning this, please call me at 202.463.4113.

Sincerely,



Kathleen B. Levitz

Attachment

cc: William Dever (w/o attachment)
Jessica Rosenworcel (w/o attachment)

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BellSouth

Recent Steps To Improve Line Sharing Provisioning

This report summarizes progress that BellSouth made since the December 6, 2000 Line Sharing Round Table in Washington, D.C. BellSouth continues to work within the BellSouth/DLEC Line Sharing Collaborative to improve both BellSouth's and DLEC's processes for line sharing. The participants at these meetings agreed that these steps would improve line sharing provisioning.

Help Desk

BellSouth dedicated a project manager who is providing a "help desk" function to coordinate BellSouth's efforts to resolve individual provisioning problems, region-wide. This is a temporary process until line sharing provisioning is handled "business as usual". This help desk resource is to be used when regular processes, including established escalation processes, are not adequate. This resource provides overall coordination of provisioning problems and gives DLECs one person to call, when regular processes are not adequate.

Streaker Card Testing

In December BellSouth began conducting streaker card testing of every CO where line sharing splitters are installed. A streaker card test checks the continuity between the splitter and BellSouth's frame. This test will indicate if there is a continuity problem between the splitter and the frame. This could be a cabling problem in the shared, voice, or data signals from the splitter to the frame, a poorly seated card, or other problems. Improperly installed splitters are proving to be a major source of the line sharing provisioning problems.

Some problems are corrected immediately when found by the test personnel. Generally, when a problem is found with the splitter installation, the installation vendor is notified in writing that the problem must be corrected within 5 days. BellSouth requires a positive response from the contractor when the installation has been corrected.

As of January 24, 2001 streaker card testing was completed in 161 of the 471 COs where splitters are located. BellSouth committed to complete streaker card testing in all COs with splitters by the end of February 2001. BellSouth committed to complete streaker card testing of the COs prioritized by DLECs by February 8, 2001. BellSouth provides a report to the collaborative by CO, indicating if that CO has been inspected and, if so, if troubles were found or if the CO is ready for line sharing end user orders. BellSouth also provided the collaborative with the streaker card schedule.

BST/DLEC Joint Meet Procedures

In BellSouth's December 22, 2000 report, we describe a process called Trouble Report Bulk Loading. Working within the collaborative, this process evolved into the Joint Meet Procedures. This process may be finalized at the next collaborative but it is in use now by DLECs and BellSouth, in draft mode. This is a temporary procedure until lines sharing provisioning becomes business as usual.

The Joint Meet Process is intended to resolve line sharing troubles in particularly problematic COs. When an office has been streaked and there are at least 5 (exceptions have already been made for fewer troubles) trouble tickets, for which BellSouth reports "no trouble found", a request may be submitted to the Help Desk for a joint meet of the BellSouth and DLEC techs in the CO.

CLEC Dispatch Before Splitter Is Installed

Several CLECs indicated at the December 6 Round Table they were experiencing a problem of dispatching only to find the ILEC had not installed the splitter. BellSouth previously developed and introduced their "DLEC TAFI", specifically for line sharing DLECs. DLEC TAFI allows CLECs access to BellSouth's TAFI system where DLECs may report troubles, check status of troubles, establish vendor meets, etc. DLEC TAFI also allows DLECs to run mechanized loop testing (MLT) on loops they share with BellSouth. In December 2000 BellSouth enhanced their MLT to show the "splitter signature" for ANSI T1.413-1998 compliant splitters. The splitters that BellSouth is deploying are ANSI T1.413 compliant. CLECs can run an MLT prior to dispatch and avoid dispatches when the splitter is not installed.

Verification That The Data Portion of Loop Is Wired

There was much discussion at the December 6, 2000 Line Sharing Round Table Meeting concerning ILECs performing "sync tests" for CLECs. BellSouth believes it is important to verify that all wiring is correct, including the data portion. BellSouth recently completed work with a supplier who developed a test set that will help to verify that the data portion is wired correctly.

This device is called a Line Sharing Verification Transmitter (LSVT). The LSVT testing continuity of the data portion of the loop by inserting a 100 kHz "data-like" signal, modulated with a wavering 1 kHz tone, at the MDF protection frame. (This test is unobtrusive to the voice customer.) This signal travels over the CO wiring and, at the CLEC cable and pair frame appearance, a butt set is used in conjunction with a small demodulator box to hear the wavering 1 kHz tone. If this tone is heard, the CLEC's data signal is correctly wired to the splitter in the LS circuit.

BellSouth began ordering LSVT in December 2000 and plans to have an LSVT in every central office equipped for line sharing. Procedures are being modified that include the LSVT as a part of the standard installation and maintenance procedures for end user line sharing service. BellSouth has begun using the new test with the manufacturer's instructions.

COSMOS/SWITCH Report

BellSouth recently began providing the COSMOS/SWITCH Report to line sharing DLECs to improve line sharing provisioning. This new report is an extract from BellSouth's cable inventory system. The COSMOS/SWITCH Report allows DLECs to view their BellSouth cable pair assignments. The DLEC can then determine if their cable assignments records match the assignments on the BellSouth work order and take

appropriate action when errors are found. The DLEC can also view the status of the work order. The COSMOS/SWITCH Report is available from all COs now.

BellSouth has made significant progress in improving their provisioning of line sharing and continues to work closely with DLECs in the line sharing collaborative to continue to improve.