



Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY
February 15, 2001

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

Re: Implementation of the Local Competition Provisions of the
Telecommunications Act of 1996, CC Docket No. 96-98

Dear Ms. Salas,

On February 14, 2001, several members of the Common Carrier Bureau met with representatives from a number of competitive local exchange carriers (CLECs) and the Bell Operating Companies (BOCs) to discuss operational issues associated with the CLECs' ability to convert special access circuits to enhanced extended links (EELs) under the terms of the June 2, 2000 Supplemental Order Clarification. The discussion focused on the ability of the BOCs and the CLECs to identify and implement processes that are necessary for the efficient provisioning of EELs.

Attached is an agenda for the meeting, a list of the attendees and copies of documents provided by Qwest, SBC, BellSouth and Verizon that contain information concerning their provisioning of EELs. These documents were distributed at the meeting.

In accordance with Section 1.1206(b) of the Commissions rules, 47 C.F.R. § 1.1206(b), two copies of this notice are being submitted for filing in CC Docket No. 96-98.

Sincerely,

Jodie Donovan-May
Policy Division
Common Carrier Bureau

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

CCB EELs Provisioning Workshop
February 14, 2001, 9:30 a.m.-12:00 p.m.
Portals, 6th Floor South Conference Room

Tentative Discussion Topics

(1) Ordering

Format for conversion orders

Required information, including circuit identifications and content of local usage certification statement

Need for ILEC/CLEC training and escalation lists

(2) Provisioning times

Reasonable provisioning intervals between order submission and completion, including amount of time required to implement required billing changes

(3) Firm order confirmations (FOCs)

FOCs or other methods to confirm completion of a conversion order

(4) Other provisioning/operational issues raised by the participants

2/14/01

EEL Summit - Sign-In Sheet

<u>Name</u>	<u>Organization</u>
Jonathan Askin	ALTS
Tom NAVIN	FCC
Jodie Donovan-May	FCC
Dorothy Atwood	FCC
Michelle Carey	FCC
Tared Carlson	FCC
Glenn Reynolds	FCC
Melissa Newman	Qwest
JERRY STANSHINE	FCC
Paul Marrangoni	FCC
Cathy Swift	BellSouth
Shelley Walls	BellSouth
STEPHEN V. MURRAY	WINSTAR
STEVE AUGUSTINO	Kelly Doye & Warren for Net2000
ANTHONY HANSEL	NET2000
Daniel Meldazis	Focal Communications
Pam Arluk	Focal Communications
Susan Fox	Verizon
Raphael H. Minge	Verizon
J. Scott Nichols	E.SPIRE
Jamie Butcher	SBC
Brian Noland	SBC
DICK POWELL	XO COMMUNICATIONS
Perry Hooks	Qwest
Glenn Reynolds	FCC
Kathie Lewis	BellSouth
Holly Smith	DWI (Davis, Wright,
Michael Carowitz	Winstar
JONATHAN LEE	ComTel
Hank Hottelvist	WorldCom
Karen Furbish	WorldCom
JAY BENNETT	SBC

<u>Name</u>	<u>Organization</u>
Brian Benison	SBC
JERRY L HAMPTON	SBC
Scott Randolph	Verizon
Lawrence Kitz	Verizon
Gray Phelps	SBC
Jeff Sweeney	SBC
CATHY MASSEY	XO Communications
ROBERT QUINN	AET
Tiki Gaugler	ALTS
Jim Falvey	Esquire
on reel	FCC

~~M... ..~~

on the phone:

Ross Burtrick	Kelley Dye
JT Ambrosio	Partec
Scott Anderson	Broadslate
Mike Duke	KMC
Mike Kent	Fairpoint
Tim Peters	Electric Lightwave



Qwest Communications
Perry Hooks
1801 California St., 21st Floor
Denver, Colorado 80202
(303) 965-4094

EELs Fact Sheet

- Qwest offers “EELs” throughout its “14-state ILEC” territory.
- Since June, 2000, Qwest has installed 35 EELs circuits
- Qwest describes EELs in its “SGAT” contracts and on Qwest’s web site, www.qwest.com
- In order for customers to order EELs, they must:
 1. Have a signed interconnection contract amendment for EELs.
 2. Have submitted a revised product questionnaire and template which details the circuits that a customer wishes to convert to EELs.
 3. Have completed a certification letter which describes under which of the three-prong “significant amount of local traffic” test applies and returned it to their Qwest account manager.

BellSouth
Suite 900
1133-21st Street, N.W.
Washington, D.C. 20036-3351

kathleen.levitz@bellsouth.com

February 12, 2001

Kathleen B. Levitz
Vice President-Federal Regulatory

202 463-4113
Fax 202 463-4198

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. 96-98

Dear Ms. Salas:

Attached are copies of three documents that I sent by facsimile to Tom Navin of the Commission's Common Carrier Bureau on February 12, 2001. The documents are:

- A copy of the spreadsheet BellSouth has developed for converting qualifying special access circuits to UNE loop and transport combinations; and line-by-line instructions for its completion;
- A description of the process BellSouth uses for converting a CLEC's qualifying special access circuits to UNE loop and transport combinations when the CLEC has used the spreadsheet; and
- A copy of the letter of self-certification that the CLEC submits with the spreadsheet.

BellSouth is submitting these documents at the Bureau staff's request.

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

Sincerely,



Kathleen B. Levitz

Attachments

cc: Thomas Navin
Jodie Donovan-May
Michele Carey
Dorothy Attwood
Glenn Reynolds

Special Access Switch As Is Conversions

SPA to EEL/NSC

Requests will be received to convert existing tariff network elements to combinations of unbundled network elements. One type of request will be to convert special access (SPA) currently billed out of the FCC tariff to telric pricing at contract rates.

SPA to EEL/NSC request may be received via a Local Service Conversion Request spreadsheet. This is BellSouth's preferred method for these types of conversions. The Local Service Conversion spreadsheet process is only applicable to Carrier Access Billed circuits. An LSR may be submitted for an individual conversion request or for other type of tariff network elements. These are switch-as-is conversions only. The Customer will not be able to change the design or any other aspect of the circuit. The basic class of service and billable USOCs will be changed to reflect the combination of the unbundled network elements

SPA to EEL/NSC Conversion Flow

- Customer would like to convert special access transport (SPA) to combinations of loop and transport unbundled network elements (EEL/NSC).
- The customer will contact their Account Team to advise of their intent to convert.
- The Account team will provide a Local Service Conversion Request form with guidelines and line by line instructions, along with a form letter for self-certification. (Will be available soon via the WEB)
- The account team will receive the required information on the conversion request form, along with the self-certification letters from the customer. The letters will include the circuit and under which option the circuit is to be converted. Individual request to convert will also be submitted to the account team with the certification letter.
- The account team will determine and notify the customer of any circuits that may not qualify for conversion. The account team will forward a valid copy of the local service conversion request to the LCSC project management.
- LCSC project management will coordinate the request with the associated BST departments. The scope of each request is per state, per service level (see note). The request will be handled as a project. The LCSC project manager will negotiate dates and an overall project due date based on quantity. After the service orders have been issued the project manager will return the completed request to the account team and to the customer. Service order numbers and due dates will be detailed on the returned request.

Note: An EEL/NSC may include 2 service levels when multiplexing is included. Two spreadsheets are required for both service levels. Separate programming will be required. These requests should be handled as a single project. Circuits that include multiplexing do not qualify for conversions unless the connecting facility assignment (CFA) also converts as part of the combination or already exist as part of an EEL or NSC combination.

**Local Service Conversion Request
Special Access to UNE**

Field	Description
CLEC	Competitive Local Exchange Customer Name
DATE	Date CLEC sends conversion request to BellSouth
OCDD	The Overall completion Due Date that LCSC Project Manager assigns to request.
STATE	The state in which the circuits to be converted are located. One request per State per service level.
CCNA	Common Carrier Name
CC	CLEC's 4 digit company code
INT Name	CLEC Initiator's Name
INT Tel	CLEC Initiator's Telephone Number
Fax or email	CLEC Initiator's FAX or Email Address
Project ID	The Project Identification assigned by LCSC Project Manager for tracking service orders.
Project Manager	LCSC Project Manager's Name
PM Tel	LCSC Project Manager's Telephone Number
Svc Rep	LCSC Service Representative's Name
SR Tel	LCSC Service Representative's Contact
Circuit Count	Total number of circuits on request (Optional)
BCS	The LCSC Service Representative will assign the new Basic Class of Service for the new service.
ACTL	Access Customer Terminal Location
CA/PR or CFA	Identifies the Collocated Cable ID or the MUX Location of a connected higher speed facility. Maybe in a Connecting Facility Assignment or Cable and Pair format, depending on service level..
EU SWC	The serving wire center of the End User
Existing BAN	The existing Carrier Access Billed Account Number. Only the 10 digit account number required. Ex: 404N101111
PON	CLEC's Purchase Order Number
RPON	CLEC's Related Purchase Order Number
New BAN	New Billing Account Number (Optional) CLEC may request NEW if desired. Refer to Account Team for details.
Exist ECCKT	Circuit Identifier of existing circuit. CLEC MUST provide. The BOC format required is for CLS, ex: ##.HCFS.123456.SB
New ECCKT	Circuit Identifier of new circuit. LCSC service representative will assign ECCKT in same CLS format with a UNE modifier.
BST DD	Due Date of individual ECCKT conversion. LCSC Project manager will assign.
C-Order	Change order for Network.*
R1-Order	Record order to remove SPA billing*
R2-Order	Record order to add UNE contract billing*
Rmks	Miscellaneous remarks to circuit status or order status.

* BellSouth will assign dates and all order numbers. The conversion request will be completed and returned within 48 hours of **order issuance date**.

Conversion of BellSouth Special Access to Unbundled Network
Elements

The Competitive Local Exchange Company (CLEC) signing below does hereby self-certify in accordance with Section 5.3.7.1 of the Interconnection Agreement that the requested facilities named for conversion in the attachment meet one of the options below defining significant local exchange traffic.

Option 1

CLEC is exclusive provider of local exchange service to end-user. Loop-transport combinations must terminate in CLEC's collocation space in at least one BellSouth Central Office (CO). BellSouth will not connect loop-transport combinations to BellSouth's tariffed services

Option 2

CLEC provides local exchange and exchange access service to end user's premises. CLEC handles at least one third of end user's local traffic (measured as a percent of total end user customer local dial-tone lines).

For DS1 circuits and above. At least 50% of the activated channels on the loop portion of the loop-transport combination have at least 5% local voice traffic individually; and the entire loop facility has at least 10% local voice traffic. When a loop-transport combination includes multiplexing (e.g., DS1 to DS3), each DS1 circuit must meet the above criteria. Loop-transport combinations must terminate in CLEC's collocation space in at least one BellSouth CO. BellSouth will not connect loop-transport combinations to BellSouth's tariffed services.

Option 3

At least 50% of activated channels on a circuit are used to provide originating & terminating local dial-tone service. At least 50% of traffic on each of the above-referenced local dial-tone channels is local voice traffic

The entire loop facility has at least 33% local voice traffic. When a loop-transport combination includes multiplexing (e.g., DS1 to DS3), each DS1 circuit must meet the above criteria. BellSouth will not connect loop-transport combinations to BellSouth's tariffed services. Collocation is not required. CLEC does not need to provide a defined portion of end user's local service but the active channels on any loop-transport combination, and the entire facility, must carry the amount of local exchange traffic specified in this option.

Conversion of BellSouth Special Access to Unbundled Network
Elements

Date: _____

Company: _____

Company
Address: _____

Signature: _____

Typed Signature: _____

Conversion of BellSouth Special Access to Unbundled Network
Elements
Attachment

W. Scott Randolph
Director - Regulatory Affairs



Verizon Communications
1850 M Street, NW
Suite 1200
Washington, DC 20036

Phone: 202 463-5293
Fax: 202 463-5239
srandolph@verizon.com

January 12, 2001

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

**Ex Parte: Implementation of the Local Competition Provisions in the
Telecommunications Act of 1996 - CC Docket No. 96-98**

Dear Ms. Salas,

On January 12, 2001, the attached letter was provided to Jodie Donovan-May of the Common Carrier Bureau. Copies were also provided to Dorothy Attwood, Glenn Reynolds and Michelle Carey.

Pursuant to Section 1.1206(a)(1) of the Commission's rules, and original and one copy of this letter are being submitted to the Office of the Secretary. Please associate this notification with the record in the proceeding indicated above.

If you have any questions regarding this matter, please call me at (202) 463-5293.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Scott Randolph".

W. Scott Randolph

W. Scott Randolph
Director - Regulatory Affairs



Verizon Communications
1850 M Street, NW
Suite 1200
Washington, DC 20036

Phone: 202 463-5293
Fax: 202 463-5239
srandolph@verizon.com

January 12, 2001

Ms. Jodie Donovan-May
Federal Communications Commission
Common Carrier Bureau
445 Twelfth Street, S.W.
5-C313
Washington, DC 20554

**Re: Implementation of the Local Competition Provisions in the
Telecommunications Act of 1996 - CC Docket No. 96-98**

ALTS *Ex Parte* Statement of December 22, 2000

Dear Ms. Donovan-May,

This letter responds to ALTS' December 22, 2000, written *ex parte* statement identifying alleged problems certain CLECs are having in converting special access services to combinations of unbundled network elements (sometimes referred to as enhanced extended links, or "EELs"). This letter was filed in anticipation of a possible meeting at the Commission between ILEC and CLEC representatives regarding operational issues related to such conversions. Notwithstanding ALTS' unsubstantiated accusations of "foot dragging, gamesmanship, and intransigence," Verizon has lived up to its promise to provide these conversions.

Since the release of the Commission's *Supplemental Clarification Order*, Verizon has been working closely with a number of CLECs to convert circuits that meet the conditions specified in the FCC's orders. Verizon has worked to ensure that CLECs understand Verizon's order processes and requirements and has assisted CLECs in submitting requests for conversions. Verizon has found that most of the delays in implementing these requests stem from the fact that the orders have significant errors or omissions, such as having no certification statement that the circuits meet the Commission's "significant local traffic" standard or identifying circuits that either don't exist or, on the face of the application clearly do not qualify for conversion under the Commission's requirements.

Verizon believes that individual meetings with those CLECs from which it has pending conversion requests would be more productive than a large-scale joint ILEC/CLEC meeting at the FCC. The latter is likely to evolve into a "gripe" session that

does not advance the ball. Nevertheless, Verizon is willing to participate if the Commission decides to proceed with the meeting. In order to insure productive results, we believe the primary participants should be representatives from individual companies that have direct responsibility for coordinating conversion requests. Further, discussion should be limited to issues directly related to the ordering and provisioning of conversions from special access services to UNE combinations under the Commission's current criteria.

Many of the issues raised in the ALTS statement, however, are not operational issues that arise under the current rules but are attempts to re-argue policy decisions the Commission has previously made. For example, many of ALTS' criticisms are that the CLECs should be allowed to "commingle" access services and UNEs. Yet, in paragraph 28 of the *Supplemental Order Clarification*, the FCC specifically denied requests that it eliminate the prohibition on commingling, citing concerns that permitting it would lead to the use of UNEs by IXC's solely to bypass special access services. There is certainly no basis to criticize the ILECs for obeying the Commission's stated policies.

CLECs also complain about the imposition of termination liabilities once the special access service is converted to a UNE. However, in order to convert special access services to unbundled element combinations, the CLECs must cancel their tariffed services. Those tariffs specify the termination liability, and ILECs are not at liberty to waive the filed rates. Moreover, carriers that subscribed to term plans have paid considerably lower rates for these services -- much less than they would have if they had taken month-to-month service. The only reason the CLECs were eligible for those lower rates was their agreement to continue to use those special access services for the full term of the plan. The tariffed termination liabilities are designed to make the ILECs whole if a customer cancels those services prematurely, as the CLECs are doing here by replacing them with unbundled network elements.

Finally, ALTS cites issues that are currently in litigation in restricted complaint proceedings at the FCC. Discussion of these items in an open forum is not only improper, but it is prohibited by the Commission's rules. Such is the case with ALTS' comments regarding Verizon's services provided to Net2000. See *Net2000 v. Verizon*, File No. EB-00-MD-018.

With respect to the remaining two CLECs that cite problems in converting circuits with Verizon, WinStar claims that Verizon should have converted circuits that violate the Commission's commingling prohibition, and XO complains about the assessment of termination liability charges. These are both issues that should not be the subject of a joint workshop to address operational concerns. ALTS repeats WinStar's claims that ordering conversions with Verizon has been difficult and that it ceased pursuing the ordering of UNE combinations with Verizon since September. However, the problems stemmed from WinStar's failure to provide orders in a form that can be processed.

January 9, 2001
Page 3

Verizon has had numerous conference calls and meetings with WinStar before and after September to address ordering issues and it is our understanding that WinStar now has all the information it needs to properly place orders with Verizon.

XO also cites problems with the ordering of new UNE combinations. However, in New Jersey a number of XO orders had incorrect codes and when questioned by the service representative, XO cancelled the orders. Subsequently, Verizon provided training documentation, correct NC/NCI codes, and escalation lists to XO to assist them in placing orders. To date, these orders have not been resubmitted.

Again, Verizon is willing to participate in a FCC-led joint meeting regarding ordering and provisioning issues with converting special access circuits to UNE combinations. However, such discussions can be productive only if they are focused on the obligations of both parties as they exist under the FCC's current rules.

If you have any questions regarding this matter, please call me at (202) 463-5293.

Sincerely,



W. Scott Randolph
Director – Regulatory Affairs

cc: Michelle Carey
Glen Reynolds
Dorothy Attwood

Brian J. Benison
Associate Director
Federal Regulatory

SBC Telecommunications, Inc.
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Phone 202 326-8847
Fax 202 408-4809
Email: bbeniso@corp.sbc.com



February 13, 2001

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
TW-A325-Lobby
Washington, DC 20554

RE: **Ex Parte Presentation**, *CC Docket 96-98 (Implementation of the Local
Competition Provisions of the Telecommunications Act of 1996)*

Dear Ms. Salas:

On February 13, 2001, the attached letter was provided to Jodie Donovan-May, Attorney Advisor of the Policy and Program Planning Division of the Common Carrier Bureau. Copies were also provided to Dorothy Attwood, Glenn Reynolds and Michelle Carey.

Pursuant to Section 1.1206(a)(1) of the Commission's Rules, an original and one copy of this letter are being submitted to the Office of the Secretary.

Please contact me at (202) 326-8847 should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "B. J. Benison". The signature is written in a cursive, flowing style.

Attachment

cc: Dorothy Attwood
Glenn Reynolds
Michelle Carey
Jodie Donovan-May

Brian J. Benison
Associate Director
Federal Regulatory

SBC Telecommunications, Inc.
1401 I Street, N.W., Suite 1100
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February 13, 2001

Jodie Donovan-May
Policy and Program Planning Division
Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW
TW-A325-Lobby
Washington, DC 20554

RE: **Ex Parte Presentation**, *CC Docket 96-98 (Implementation of the Local Competition Provisions of the Telecommunications Act of 1996)*

Dear Ms. Donovan-May,

The Association for Local Telecommunications Services (ALTS) filed an ex parte letter on December 22, 2000 (ALTS letter) that raised several concerns regarding the process for conversion of special access circuits to unbundled network elements. Specifically, the ALTS letter argued that SBC's process fails to meet the standard established in the Commission's Supplemental Order, and increases the possibility of a disconnection during the conversion process. ALTS also argues that CLEC's should be absolved of their tariff obligation to pay termination charges when special access circuits are converted to UNE's.

SBC is firm in its belief that the established process is in full compliance with the Commission's regulations; however, SBC modified this process in an effort to accommodate the concerns expressed by the CLEC industry. As explained in its Accessible Letter (see attached), SBC has implemented a streamlined process for these conversions. This process, like its predecessor, is carefully managed to prevent the loss of service by the customer. This process was available in all Southwestern Bell areas as of February 1, 2001 and will be implemented throughout the remaining SBC regions as of March 1, 2001. CLEC's can find additional information concerning SBC's procedures on its CLEC Online website at <https://elec.sbc.com/>.

As to ALTS expressed desire to limit the obligation of CLECs to pay termination charges when converting these circuits, these charges are designed to make ILECs whole when the use of discounted services are terminated prematurely. The CLECs knew of the termination liability when they subscribed to these services and received the benefit of a considerably lower rate than they would have on a month to month program. The Commission has only, rarely abrogated conflicts through "fresh look" requirements. In those rare situations, the Commission acted to open markets that previously had been

closed to competition¹. No such circumstance exists here. There is no reason to absolve CLECs of obligations they willingly undertook in order to receive the benefit of a discounted rate.

If you have any questions regarding this matter, or desire any further information, please call me at (202) 326-8847.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Q. B.", with a stylized flourish at the end.

Attachment

¹ For example, when 800 numbers became portable, the Commission allowed customers a limited period of time to terminate their contracts for 800 service with AT&T.

“(ORDERING AND PROVISIONING) Revision of the Ordering Process for Special Access to Unbundled Network Element Conversions – Arkansas, Kansas, Missouri, Oklahoma, Texas”

Date: February 1, 2001

Number: **CLEC01-021**

Contact: Account Manager

Category: UNE

The purpose of this Accessible Letter is to inform you of the updated ordering process for *Special Access to Unbundled Network Element Conversions*. Effective February 1, 2001, Southwestern Bell Telephone Company (SWBT) will implement a new process. On March 1, 2001, the remaining SBC states will follow suit.

The detailed outline of the entire procedure may be found on CLEC Online (<https://clec.sbc.com/>) in the CLEC Handbook, under the document of “Reconfiguring Special Access Service Arrangements to Combinations of Unbundled Network Elements (UNEs). Please review the Ordering Requirements. An overview of the updated process is set forth below:

- To initiate the conversion process, a Telecommunications Carrier (TC)/Competitive Local Exchange Carrier (CLEC) must send the Account Manager a correctly completed certification letter that lists each circuit to be converted and the option from the FCC’s *Supplemental Order Clarification* under which each circuit qualifies.
- SBC will handle all reconfigurations of Special Access arrangements to UNEs as projects. Critical dates and due dates for all projects will be negotiated.
- After the due dates are established the TC/CLEC must issue a Local Service Request (LSR) to the Local Service Center (LSC or an Access Service Request (ASR) for a Multiplexed DS1/DS3. The TC/CLEC must:

-Include the Special Access Circuit(s) to be converted in the Remarks Section of the LSR

-Include RPON of Multiplexed DS1/DS3 in the Remarks Section

-Include Project Name – AC2U

-In the **SWBT Region ONLY**, populate the CHC and DFDT on the LSR

The above overview is just a brief description of the revisions made to the original ordering process that was posted on CLEC Online. LSR and ASR examples will be posted for further clarification as well.

Because of the additional manual work required under the new process, SBC will implement a standard FCC tariff Special Access service order charge (rate will vary per region) that will be added to the non-recurring and recurring charges for the UNE Loop and UDT combination.

Please forward questions to your SBC Account Management representative.