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BellSouth Corporation  
Legal Department - Suite 4300  
150 Peachtree Street  
Atlanta, Georgia 30375-0001  
Facsimile: 404-614-4054

March 7, 2001

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St. S.W.  
TW-A235  
Washington, D.C. 20554

Re: *Ex Parte* - CC Docket No. 98-147 and 96-98

Dear Ms. Salas:

BellSouth writes this letter to clarify a point made in its comments filed February 27, 2001 in the above referenced dockets.<sup>1</sup> On page four of its comments, BellSouth is responding to the Commission's request for comments on "whether a requesting carrier may physically or virtually collocate its line cards at the remote terminal by installing it in the incumbent's DLC for the purposes of line sharing."<sup>2</sup> As BellSouth discussed in its comments, none of its DLC architectures allow for the simple plugging of line cards into its DLCs to be used by a competitive local exchange carrier ("CLEC") for provisioning advanced services. Allowing collocation of line cards in a DLC would require the implementation of a network superior to the network BellSouth currently provides for itself and therefore the Commission should not require BellSouth to permit collocation of line cards.<sup>3</sup> BellSouth's argument in the alternative is, however, that if the Commission does require the collocation of line cards in the DLC, the Commission should allow BellSouth to satisfy this obligation through virtual collocation as

<sup>1</sup> *In the Matter of Deployment of Wireline Services Offering Advanced Telecommunications Capability and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket Nos. 98-147 and 96-98, Third Report and Order on Reconsideration in CC Docket No. 98-147, Fourth Report and Order on Reconsideration in CC Docket No. 96-98, Third Further Notice of Proposed Ruling in CC Docket No. 98-147 and Sixth Further Notice of Proposed Rulemaking in CC Docket No. 96-98, FCC 01-26, released January 10, 2001 ("Notice").*

<sup>2</sup> Notice ¶ 56.

<sup>3</sup> See BellSouth's Comments at 5 - 7.

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opposed to physical collocation because of the security reasons set forth in BellSouth's comments.<sup>4</sup>

BellSouth's comments, however, may not be clear on this last point. The relevant sentence on page four now states:

"Where BellSouth has deployed a DLC network architecture that will allow a CLEC to use line cards, BellSouth is willing to negotiate a virtual collocation arrangement with the CLEC."

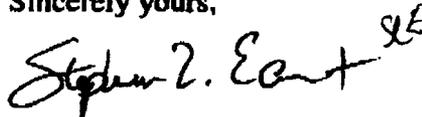
In lieu of this sentence, BellSouth should have stated:

"Accordingly, the Commission should not require collocation of line cards. However, if the Commission does require collocation of line cards where BellSouth has deployed a DLC network architecture that will allow a CLEC to use line cards, BellSouth urges the Commission to adopt virtual collocation arrangements with the CLEC."

BellSouth apologizes for any confusion or inconvenience the statement in the comments may have caused. BellSouth is serving this letter on all parties who filed comments in this proceeding so that they have this clarification as they draft their reply comments.

Should you have any question please contact me at 404-335-0711.

Sincerely yours,

Handwritten signature of Stephen L. Earnest, with the initials "SE" written above the signature.

Stephen L. Earnest  
Attorney for BellSouth

SLE:lb

cc: Johanna Mike  
Kathy Farroba  
Aaron Goldberger  
Dennis Johnson  
Rodney McDonald  
Jessica Rosenworcel  
Staci Pies  
David Ward  
Elizabeth Yockus

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<sup>4</sup> See BellSouth's Comments at 4.