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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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April 3, 2001

WRITTEN EX PARTE

ORIGINAL

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;
Action List from Feb. 14 EELs Provisioning
Workshop

Dear Ms. Salas:

On April 3, 2001, I sent the attached document via facsimile to Jodie Donovan-May of the Common Carrier Bureau. The document contains BellSouth's responses to the filing made by ALTS on March 13, 2000 addressing issues raised during the EELs Provisioning Workshop held by the Common Carrier Bureau on February 14, 2001.

In accordance with Section 1.1206(b)(1), I am filing two copies of this notice with you and ask that you include them in the record of CC Docket No. 96-98. If you have any questions concerning this, please call me at 202.463.4113.

Sincerely,

Kathleen B. Levitz

Kathleen B. Levitz

Attachment

cc: Jodie Donovan-May

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List A B C D E

**BellSouth Responses to ALTS Response to Questions From the
EELs Provisioning Workshop February 14, 2001**

BellSouth's response to each ALTS response appears in boldface immediately following that ALTS response.

Information exchange

(A) Specific Items

(1) Pre-ordering

CLECs provide to ILECs:

Are circuit IDs included in billing information that CLECs receive?

Unlike the ILECs serving in one territory, CLECs must work with several ILEC systems nationwide. In some instances, CLECs assign their own circuit IDs in the orders submitted. Other CLECs use the circuit IDs assigned by the ILEC. CLECs that self-assign circuit IDs have to ensure that every order is earmarked for the correct customer conversions throughout several, and in most cases, all ILEC territories.

BST does not maintain an inventory of the CLEC assigned circuit ID in it's data bases. The BST assigned circuit ID is use to trace, bill and maintain the loop in all of BST systems. The CLEC is required to use the BST circuit ID when reporting maintenance trouble, submitting bill inquires and requesting service order activity. The CLEC should maintain a cross reference of the BST circuit ID with their circuit ID in their systems.

Where the CLEC assigns its own IDs, there is a significant problem in tracking the circuits once the ILEC sends the bill. Upon receipt of the CLEC order, the ILEC assigns an ILEC circuit ID with no mapping, or reference, to the CLEC-submitted circuit IDs. The problem is that the whole process is delayed because the CLEC has to determine, via a lengthy process, which circuits have been converted by the ILEC. The result is that a simple bill change becomes a lengthy and confusing process because the ILEC does not reference the CLEC-assigned circuit IDs.

For BST, conversion from ACCESS to UNE EELs is not simply a bill change but involves CKT ID changes in the maintenance, billing and provisioning systems.

Are there other means that CLECs can use to compile the circuit inventory information?

Given that CLECs must work with several ILEC systems nationwide, ALTS believes that the most reasonable approach is for the ILEC to add a simple field in the billing form that includes the CLEC-assigned circuits IDs in addition to the ILEC-assigned circuit IDs. Where the ILEC

already has a field dedicated to CLEC-assigned circuit IDs the ILEC must populate that field with the CLEC-assigned circuit ID.

Upon request, the ILEC could include the CLEC-assigned circuit IDs on the bills. This would resolve much of the confusion and turn a lengthy process into a more efficient one. The goal of EEL conversions is to achieve a timely, and simple, bill change. ALTS is not suggesting that the ILECs create a new system, nor is that a necessary step to achieve the goal of a simple bill change. Rather, ALTS requests that the ILEC add a field in the billing that references the CLEC-assigned circuit IDs.

See above response.

(3) Firm dates

CLECs provide to ILECs:

When do CLECs need FOCs or other type of notification that orders are complete?

To date, the only way the CLEC can determine whether a simple bill change has occurred is to scan the bills. Again, this is a lengthy, and inefficient process.

When working a conversion from the spreadsheet method, BST returns the spreadsheet to the CLEC within 48 hours of service order issuance providing the order numbers and due dates. Using BST's CSOTS program on the WEB the CLECs can track the status of the orders and verify completion.

ALTS recommends that the ILECs generate two confirmations. The first confirmation is an Order Received Confirmation, or an "ORC" within 48 hours of a CLEC-order submission. The second confirmation should be a Bill Change Confirmation, or "BCC," within five days of receiving the ORC. The BCC should also include an itemization of the circuits converted, including a reference to the CLEC-submitted circuit IDs.

Any recommendation of new notices (confirmations) that the CLECs would like to use should be addressed as an issue thru OBF.

ALTS recommends this change in terminology because a Firm Order Commitment historically refers to provisioning. An EEL conversion is a simple billing change that does not include the normal manual processes necessary for converting lines. Thus ALTS recommends that ORC and BCC become the appropriate terms, and steps, for an EEL conversion.

The ILECs should not take any unnecessary steps that lead to delay (e.g., steps that lean toward auditing, or pre-qualifying, the EEL conversions). The ILEC EEL conversion process should include only those steps needed in order to make a simple bill change. This process will prevent the ILEC from performing any audit, or pre-qualification process prior to the conversion.

As already explained, for BST conversions from ACCESS to UNE EELs are not simply bill changes because they require CKT ID changes in BST's maintenance, billing and

BST is allowing the CLEC to provide one certification letter per spreadsheet that covers all circuits listed on spreadsheet.

7. Some ILECs require the name and address of the customer that is being served by the circuit(s) being converted. This is market sensitive data and is not necessary for an EEL conversion. ILECs only need to know the circuit number, which the ILEC generally assigns anyway, and the "A & Z" location CLLI codes. An EEL conversion is a billing change only, therefore the ILEC only needs to know only the basic circuit data.
BST does not require the end user name and address.
8. The ILECs must accurately populate the filed on the bills with the CLEC-assigned circuit ID.
See response to Issue 1 Pre-ordering.
9. An Order Received Confirmation ("ORC") must be sent to CLEC within 48 hours of receipt by the ILEC.
See previous response regarding this confirmation notice. BST does provide an FOC within 48 hours.
10. A Bill Change Confirmation ("BCC") must be received within 5 days of the ORC.
See previous response regarding this confirmation notice. BST provides the CSOTS system on the WEB for CLECs to verify order status including completion.
11. The BCC must include an itemization of the circuits converted, including a reference to the CLEC-assigned circuit IDs.
See previous response regarding this confirmation notice. BST provides the CSOTS system on the WEB for CLECs to verify order status including completion.

New EELs:

Please note, that although this summit, and the work emerging from it, are a good start towards the successful conversion of circuits to UNEs, the Commission must also address new EELs. Ordering new EELs has proven to be problematic. Some ILECs take the position that new EELs require collocation, regardless of the option selected, whereas other ILECs (Verizon and BellSouth/GA) follow the FCC's guidelines that collocation is required only for Options 1 & 2 but not for Option 3.

CLECS should be able to order new EELs via an ASR and should be able to combine the new EEL orders with converted circuits. Also, CLECs should have the ability to place new orders for EELS as a bulk order (depending on the quantity) with the blanket certification and ASR covering a specific spread sheet.

Note: Ameritech takes the position that it is not required under the Telecom Act to offer new EELs.