REPLY DECLARATION
OF
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ATTACHMENT 1

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October 25, 2001

VIA ELECTRONIC FILING

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

Re: EX PARTE -- CC Docket No. 01-277

Dear Ms. Salas:

On October 22, 2001, BellSouth provided the attached presentation on Flow Through data to the Department of Justice as requested. Please contact us should the Commission be interested in discussing this presentation.

I am filing notice of this ex parte meeting in the docket identified above, as required by Section 1.1206(b)(2) of the Commission's rules. Please associate this notice with the record of that proceeding.

Sincerely,

Jon Banks

Attachment

cc: Jessica Rosenworcel
Susan Pié
James Davis-Smith (Department of Justice)
Cynthia Lewis (Department of Justice)

Flow-Through Ex Parte

October 22, 2001

BellSouth's Flow-Through report has been adjusted in June, July, and August to provide more accurate results.

- Re-statement
  - A Due Date calculation feature implemented in June had the unintended impact of mischaracterizing certain partially mechanized transactions as "planned manual fallout" resulting in the re-filing of June, July, and August results.
- Scheduled Enhancements
  - In July, BellSouth attempted to improve a metric calculation script associated with the treatment of "Dummy FOCs". An initial coding error is being revised to correctly reflect July and August results.
  - In August, BellSouth attempted to improve a second metric calculation script associated with the treatment of post-FOC service orders (TSIGNOUT) that require manual handling to pass downstream edits. That adjustment is being removed from August data.
- Pending Enhancements
  - BellSouth identified that xDSL orders are not being fed from the Corporate Gateway (CoG) into the Flow-Through report. A mechanized means to include the orders is currently under investigation.

Flow-Through reports can be compared by examining the adjustments and the results.

Flow-Through Results Summary (combined Residence, Business, and UNE)

Date Filed	Data Month	Version	Manual P worst case	Dummy FOC	TSIGNOUT	FT % CLEC Error Excluded
7/31/2001	June	Original				88.16%
10/2/2001	June	Stacy Affidavit *	X			82.70%
10/15/2001	June	Re-filed *	X			82.84%
8/31/2001	July	Original		X		87.38%
10/2/2001	July	Stacy Affidavit *	X	X		81.35%
10/15/2001	July	Re-filed *	X	X		81.31%
10/23/2001	July	Second Re-filing	X	X (Revised)		77.39%
10/1/2001	August	Original	X	X	X	91.50%
10/9/2001	August	Re-filed	X	X	X	92.44%
10/23/2001	August	Second Re-filing	X	X (Revised)		87.42%

* Stacy Affidavit and Re-filed results do not match exactly due to the formers inclusion of KPMG test orders.

Re-statement: Planned Manual Fallout

- On the June through August Flow-Through reports, certain flow-through eligible Loop+Port Combination Non-Dispatch LSRs received a Due Date calculation error, fell out for manual handling, and were improperly reflected as planned manual fallout.
- June and July results were first re-calculated (for combined Residence, Business, and UNE) and included in WNS' FCC Affidavit (10/2/01).
  - For the orders impacted, this uses a "worst case" scenario countingLSRs clarified back by Service Reps as CLEC Caused Fallout and all other impactedLSRs as BellSouth Caused Fallout.
  - This re-calculation inadvertently included KPMG test orders.
- June, July, and August results were re-calculated (for separate Residence, Business, and UNE) and were re-filed (10/15/01).
  - For the orders impacted, this uses the same "worst case" scenario used in WNS' Affidavit.
  - This re-calculation properly excludes KPMG test orders.

Scheduled Enhancement: Dummy FOCs

- Dummy FOCs occur when a "Supp" is placed to cancel an existing LSR prior to returning a FOC on the original LSR. Unlike actual FOCs, Dummy FOCs do not result in creation of a Service Order and only act to inform CLECs that their cancellation has been received.
- BellSouth conducted an analysis and concluded that Dummy FOCs should not be counted as Total System Fallout in the Flow-Through report.
- A script change was implemented in July to attempt to account for these orders.
- The script has been corrected causing Issued SOs to increase and BellSouth Caused Fallout to decrease.

Scheduled Enhancement: TSIGNOUT

- Some LSRs pass all ordering system edits, receive a FOC, and are issued a service order, but then fail downstream edits required to provision service and fall into a TSIGNOUT queue for manual processing by the LCSC.
- These LSRs can be counted as "Issued SOs" according to the definition of Flow-Through in the SQM.
- A script change was attempted in August to account for these LSRs.
- The script change was inaccurate and has now been removed from August data.

Pending Enhancement: xDSL

- BellSouth does not yet include xDSL LSRs in the Flow Through Report.
- A preliminary analysis indicates Flow-Through results of approximately 75% based on August GA data.
- Given the relatively low volume of xDSL LSRs submitted by the CLECs, BellSouth estimates that the inclusion of these transactions will have minimal impact on UNE Flow-Through transactions.
- xDSL LSRs are processed on a separate technology platform (CoG/DOM/SOG) and technical solutions to provide Flow-Through results are currently under investigation.
- Plan to manually include xDSL LSRs in September Flow-Through results.

Flow-Through results can also be examined in a manner consistent with the benchmarks.

Flow-Through Results Summary (CLEC Error Excluded Calculation)

Date Filed	Data Month	Version	Residence 95% Benchmark	Business 90% Benchmark	UNE 85% Benchmark	Aggregate (R+B+U)
7/31/2001	June	Original	92.21%	57.26%	78.33%	88.16%
10/2/2001	June	Stacy Affidavit *	n/a	n/a	n/a	82.70%
10/15/2001	June	Re-filed *	87.52%	57.11%	70.70%	82.84%
8/31/2001	July	Original	87.09%	69.92%	90.00%	87.38%
10/2/2001	July	Stacy Affidavit *	n/a	n/a	n/a	81.35%
10/15/2001	July	Re-filed *	82.81%	69.90%	78.36%	81.31%
10/23/2001	July	Second Re-filing	81.70%	60.99%	67.36%	77.39%
10/1/2001	August	Original	91.21%	80.72%	93.13%	91.50%
10/9/2001	August	Re-filed	92.32%	80.78%	93.75%	92.44%
10/23/2001	August	Second Re-filing	90.86%	72.14%	80.82%	87.42%

* Stacy Affidavit and Re-filed results do not match exactly due to the formers inclusion of KPMG test orders.

Summary: Key CLEC Performance

- In June BellSouth served over 250 CLECs. The highest volume CLECs are receiving excellent performance as demonstrated in their Flow-Through results.

Top Volume CLEC (Combined)

CLEC	Flow-Through
CLEC A	90.87%
CLEC B	57.27%
CLEC C	96.09%
CLEC D	79.24%
CLEC E	64.32%
CLEC F	84.23%
CLEC G	95.78%
CLEC H	93.94%
CLEC I	76.71%
CLEC J	82.74%
Total	**82.29%**

Top Volume CLEC (Residence)

CLEC	Flow-Through
CLEC A	90.87%
CLEC B	57.27%
CLEC C	96.51%
CLEC D	84.23%
CLEC E	95.78%
Total	**85.07%**

Top Volume CLEC (Business)

CLEC	Flow-Through
CLEC A	53.98%
CLEC B	44.55%
CLEC C	59.23%
CLEC D	50.20%
CLEC E	60.05%
CLEC F	56.51%
Total	**52.84%**

Top Volume CLEC (UNE)

CLEC	Flow-Through
CLEC A	79.12%
CLEC B	64.18%
CLEC C	78.55%
CLEC D	71.50%
CLEC E	62.14%
Total	**72.32%**