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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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Kathleen B. Levitz
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November 7, 2001

WRITTEN EX PARTE-Filed Electronically

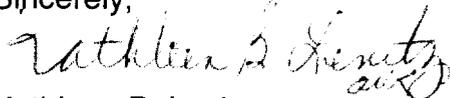
Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: CC Docket No. 01-277

Dear Ms. Salas:

I am providing you with a copy of a letter filed by BellSouth in Georgia Public Service Commission Docket No. 6863-U that I gave to Jessica Rosenworcel on November 6 2001. The document was given to Ms. Rosenworcel at her request. In accordance with Section 1.1206, I am filing two copies of this notice and the letter and request that you place them in the record of the proceeding identified above. Thank you.

Sincerely,



Kathleen B. Levitz

Attachments

cc: Jessica Rosenworcel
Susan Pié
James Davis-Smith
Cynthia Lewis

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URADODE

November 5, 2001

DELIVERED BY HAND

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, Georgia 30334-5701

Re: *BellSouth Telecommunications, Inc.'s Entry into InterLATA Services Pursuant to Section 271 of the Telecommunications Act of 1996*; Docket No. 6863-U

BellSouth Telecommunications, Inc.'s Revised Statement of Generally Available Terms and Conditions Under Section 252(f) of the Telecommunications Act of 1996; Docket No. 7253-U

Investigation into Development of Electronic Interfaces for BellSouth Operational Support Systems; Docket No. 8354-U

Dear Mr. McAlister:

In its October 19, 2001 Order in the above-referenced dockets, the Commission required that BellSouth Telecommunications, Inc. ("BellSouth") "implement by November 3, 2001, migration by Telephone Number and name." This letter is to advise the Commission of BellSouth's progress in complying with this requirement.

Effective November 3, 2001, BellSouth implemented Release 10.2. As part of this Release, BellSouth removed the edits that required the End User Service Address field to be populated on valid activity types for the Unbundled Network Element Platform ("UNE-P") (Req Type M). As a result of this modification, a competing local exchange carrier ("CLEC") seeking to migrate a retail customer to UNE-P is only required to populate the Name and Telephone Number fields on the Local Service Request ("LSR"), and BellSouth's systems will validate the customer's telephone number as it appears on the LSR. [It is BellSouth's understanding that this is the same manner in which other incumbents handle UNE-P migrations.]

However, as part of testing of Release 10.2, BellSouth determined that LSRs would process correctly using this new functionality when only one address is associated with the provided telephone number in BellSouth's Regional Street Address Guide. Based on a review of actual orders, BellSouth estimates that approximately 70% of LSRs will fall into this category. When there are 2 or more addresses associated with the telephone number in RSAG, which will

Mr. Reece McAlister
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occur with approximately 30% of LSRs, the LSR will be rejected or auto clarified back to the CLEC requesting a valid address. BellSouth is in the process of implementing a fix that would allow the processing of LSRs when a working address as well as one or more non-working addresses are reflected in RSAG, which BellSouth expects to be implemented no later than November 17, 2001.

In a Carrier Notification Letter issued on November 2, 2001, BellSouth advised CLECs of the implementation of this enhanced functionality to facilitate UNE-P migrations, but also noted the problems that may be encountered in a UNE-P migration when an LSR is submitted with a Customer Name and Telephone Number and there are one or more non-working addresses associated with that telephone number. BellSouth has encouraged CLECs to continue to populate the End User Service Address field on the LSR until this situation is remedied. BellSouth has addressed this issue with a number of UNE-P providers in Georgia, including, but not limited to, Birch Telecom, Z-Tel, Access Integrated, and MCI WorldCom, and BellSouth has additional meetings scheduled this week with MCI WorldCom to ensure that the enhanced functionality implemented by BellSouth meets fully MCI WorldCom's needs.

By letter dated October 1, 2001, BellSouth advised the Commission that there was a significant possibility that BellSouth would not meet the November 3, 2001 deadline for the implementation of migration by Telephone Number and Name. Although BellSouth has worked diligently to implement the required functionality by the Commission's deadline, BellSouth recognizes that it will be subject to daily fines of \$10,000 until LSRs with one or more non-working addresses in RSAG are processed without being rejected or auto-clarified, which BellSouth expects will be no later than November 17, 2001.

Enclosed for filing please find eighteen (18) copies of this letter, and I would appreciate your returning three (3) extra copies stamped "filed" in the enclosed self-addressed and stamped envelopes.

Very truly yours,

Bennett L. Ross

BLR:nvd
Enclosures

cc: Mr. Leon Bowles
Parties of Record