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BELLSOUTH

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

kathleen.levitz@bellsouth.com
November 21, 2001

Kathleen B. Levitz
Vice President-Federal Regulatory

202 463-4113
Fax 202 463-4198

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

REDACTED FOR PUBLIC INSPECTION

WRITTEN EX PARTE

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

Re: CC Docket No. 01-277 /

Dear Ms. Salas:

This is to inform the Commission that as of the past weekend, competitive local exchange carriers (CLECs) in the BellSouth region no longer need to include an end user's service address on a local service request (LSR) to arrange for that end user to be served through an unbundled network element platform, or UNE-P. I am filing this ex parte in response to a request of the Common Carrier Bureau staff for additional information on the success of BellSouth's effort to introduce this capability. Because BellSouth is requesting confidential treatment for Attachment C to this letter subject to the terms of the Protective Order issued in this docket on October 2, 2001, I am filing two versions of this letter with its attachments. The first, labeled REDACTED FOR PUBLIC INSPECTION, contains a redacted version of Attachment C and the second, labeled CONFIDENTIAL – NOT FOR PUBLIC INSPECTION, contains the unredacted version of Attachment C.

In its October 19, 2001 Order in Docket No. 6863-U, the Georgia Public Service Commission had required that BellSouth "implement by November 3, 2001, migration by Telephone Number and name." On November 3, 2001, BellSouth implemented the update to its EDI software referred to as "Release 10.2." As part of this Release, BellSouth removed the edits that had 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 CLEC seeking to migrate a retail customer to UNE-P needs only to populate the Name and Telephone Number fields on

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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 migration.

As part of its testing of Release 10.2, however, BellSouth had determined that LSRs would process correctly using this new functionality when BellSouth's Regional Street Address Guide (RSAG) associated only one address with the telephone number appearing on the LSR. Based on a review of actual orders, BellSouth estimated that approximately 70% of LSRs would fall into this category. When there were 2 or more addresses associated with the telephone number in RSAG, which BellSouth estimated would occur with approximately 30% of LSRs, the associated LSR would be rejected or auto clarified back to the CLEC with a request for a valid address. 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 might be encountered in a UNE-P migration when an LSR was submitted with a Customer Name and Telephone Number and there were one or more non-working addresses associated with that telephone number. BellSouth encouraged CLECs to continue to populate the End User Service Address field on the LSR until this situation was remedied. BellSouth stated that it was 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 was reflected in RSAG. BellSouth anticipated that implementation to occur no later than November 17, 2001.

I am enclosing as Attachment A the minutes of the Change Control meeting held on November 16, 2001, in which BellSouth and WorldCom discussed the results of BellSouth's internal testing results and WorldCom's testing results for the release correcting the problem identified with release 10.2.

During the weekend of November 17, BellSouth installed the software described above and verified that the problem that had arisen when the telephone number on an LSR for UNE-P conversion had more than one associated address in RSAG no longer occurred. During that meeting, WorldCom indicated that it would be submitting orders on November 17 after the release to ensure that no problems were experienced. See Attachment A, p. 2. Between November 17 and November 19, MCI sent a total of 2245 LSRs for UNE-P conversion. At MCI's request, BellSouth performed an analysis of 26 Purchase Order Numbers, or PONs, receiving "address type" error codes.

That analysis revealed that the release is working as designed and that all of the clarifications returned on the 26 PONs were valid. I am enclosing as Attachment B an e-mail summarizing the results of the analysis that was sent to MCI on November 21 and, as Attachment C, the spreadsheet presenting that analysis, which accompanied the November 21 e-mail.

The analysis places each of the PONs in one of four categories based on the error message MCI received for that PON. 11 PONs received the error message: TN FOR NON WORKING ADDRESS: DUE DATE COULD NOT BE CALCULATED. Of the 11

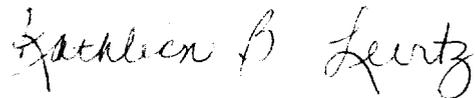
PONs, 8 were associated with telephone numbers that had already been ported to a CLEC and so RSAG correctly showed no working address for the TN. See Attachment C. For three of the PONs, an error in RSAG caused the error message. *Id.*

Each of the six PONS in the second category received the following error message: G9475 "Act= ALLOWED ONLY ON SAME LOCNUM SERVICE ADDRESS." For four of these PONs, errors in CRIS caused the clarification, while RSAG caused one PON clarification. See Attachment C. For the last PON in this category, MCI had entered an incorrect Account Telephone Number, or ATN. *Id.* The seven PONs in the third category received the error message: "G7250 "LSR HOUSENUMBER INCORRECT". Each of these PONs was returned to MCI for clarification because MCI had entered an incorrect house number. See *id.* The two PONs in the last category received the error message: G9871 "ADDRESS/TN INVALID, DUE DATE COULD NOT BE CALCULATED". Each of these PONs was returned to MCI because it did not contain a correct ATN. See *id.*

As indicated above, our review did reveal a few incorrect records in RSAG, and the Customer Record Information System, or CRIS, that will require correction so that affected LSRs can flow through. See Attachment B. The number of PONs affected by these incorrect records, however, was very small, 0.35% of the total MCI volume over the three-day period. *Id.* Recognizing the impact of these discrepancies, however, BellSouth is working to correct these records as quickly as possible. We note that *these* inaccurate records in RSAG and CRIS were not caused by and are unrelated to the implementation of the UNE-P ordering capability and affect BellSouth's retail operations in the same way they affect MCI's.

In accordance with Section 1.1206, I am filing two copies of this notice and request that you place it in the record of CC Docket No. 01-277. Please call me if you have any questions about these documents.

Sincerely,



Kathleen B. Levitz

Attachments

cc: Jessica Rosenworcel
Susan Pié
James Davis-Smith

November 16, 2001

CR0133 & CR0371 TN & House Number Validation**MEETING MINUTES**

| MEETING NAME | MINUTES PREPARED BY | DATE PREPARED |
|---|---|---------------|
| CR0133 & CR0371 TN & House Number Validation | Cheryl Storey – Change Management Team | 11/19/01 |

Participants/Attendees

| PARTICIPANT | COMPANY |
|--------------------|-----------|
| Cheryl Storey | BST - CCP |
| Valerie Cottingham | BST - CCP |
| Pam Shifflet | WorldCom |
| Micki Jones | WorldCom |
| Doug Lacey | WorldCom |
| Sherry Lichtenberg | WorldCom |
| Graham Watkins | KPMG |
| Venkat Subramanian | BST |

| PARTICIPANT | COMPANY |
|-----------------|----------|
| Sandy Tonjes | WorldCom |
| Fred Brigham | WorldCom |
| Jill Williamson | BST |
| Vanessa Thomas | BST |
| Pat Woods | WorldCom |
| Rick Whisamore | WorldCom |
| Brenda Thomas | BST |
| Sakina Jihad | WorldCom |

Meeting Information History

| DATE | START TIME | END TIME |
|-------------|-------------|-------------|
| 11/16/01 | 3:00 PM EDT | 4:00 PM EDT |
| Conf Bridge | | |

MEETING PURPOSE

- Discuss WorldCom's testing results on TN and House Number Validation for REQ TYP M.

November 16, 2001

**CR0133 & CR0371 TN & House Number Validation
MEETING MINUTES**

MEETING MINUTES

| Agenda Items | Discussion |
|-------------------------------------|--|
| <p>1. Introduction</p> | <p>Valerie Cottingham (BST-Change Management Team) stated that the purpose of this meeting was to discuss WorldCom's testing results on TN and House Number validation for REQ TYP M.</p> |
| <p>2. Results of Testing</p> | <p>Jill Williamson (BST-Information Technology Delivery) reported that WorldCom submitted four test orders, REQ TYP M, ACT=V.</p> <ul style="list-style-type: none"> • Three of the four orders had multiple addresses (one working and 1 non-working address). • Two of the above three received FOCs on the first attempt. • One clarification was generated; however this was expected. The clarification was associated with ADSL not allowed with existing service. • The fourth order had a single working address. An FOC was received on this LSR. <p>Jill stated that the test was successful. The interfaces operated as BellSouth expected.</p> <p>Sherry Lichtenberg (WorldCom) questioned the documented business rules regarding the edit against the CSR; if this a new edit as a result of the change. Jill replied this is a new edit with the change this weekend to ensure the correct record is migrated. Sherry questioned what type of reject would the CLEC receive if the CSR and RSAG information does not match. Jill indicated there is a match conducted somewhere between the CSR and RSAG but committed to investigate this issue and provide a response by Monday, November 19.</p> |
| <p>3. Summary</p> | <p>Fred Brigham (WorldCom) indicated he was satisfied with the test responses. Sherry also indicated she was satisfied with the test and provided concurrence for the deployment of this enhancement this weekend.</p> <p>WorldCom questioned BellSouth's internal testing results. Jill stated internal testing went well; approximately 1800 orders with no problems.</p> <p>Jill confirmed with WorldCom that they would be submitting orders on Saturday after the release to ensure no problems are experienced.</p> <p>A tentative conference call has been scheduled for Tuesday, November 20 at 4:00 PM ET to review any issues/problems that may have occurred after the release. WorldCom will advise Change Control Monday afternoon if the call is needed on Tuesday. Change Control will advise the CLEC community accordingly.</p> |

November 16, 2001

CR0133 & CR0371 TN & House Number Validation

MEETING MINUTES

| Agenda Items | Discussion |
|----------------------------------|---|
| 4. Review of Action Items | <p>ACTION ITEM: (BellSouth) (CLOSED) Provide what type of reject will be sent if the information on the CSR and RSAG does not match.</p> <p><i>Status:</i> The SANO on the LSR is validated against both the CSR and RSAG. If the SANO on the LSR matches the CSR, but not RSAG (or vice versa), the LSR will error when it gets to LESOG with G7250 - LSR House Number Incorrect.</p> |

Levitz, Kathleen

From: Williamson, Jill R
Sent: Wednesday, November 21, 2001 10:35 AM
To: Tate, Linda; Mccallum, Fred; Stacy, William; Ross, Bennett; Bush, Ernest L; Martin, Pete; Levitz, Kathleen
Subject: FW: MCI/Worldcom PON Investigation
Importance: High

-----Original Message-----

From: Williamson, Jill R
Sent: Wednesday, November 21, 2001 10:35 AM
To: 'Patricia Woods'
Cc: 'Sherry.Lichtenberg@wcom.com'
Subject: MCI/Worldcom PON Investigation
Importance: High

Pat,

We believe that the release implemented on November 17, 2001 achieved the desired outcome, which was to minimize the number of errors caused by address validation. MCI sent in a total of 2,245 LSRs between November 17-19, of which .02% were clarified with some type of address error. This is far better than the 25-30% MCI claims to have seen prior to this release. Based on this, the release can be considered successful. Attached is the analysis performed on the 26 PONS with "address type" error codes that you requested we investigate.

In summary, we found that the release implemented on November 17, 2001, is working as designed and that all of the clarifications returned on these PONS are valid. However, we did uncover a couple of incorrect records in Regional Service Address Guide (RSAG) or CRIS, which will need to be corrected in order for the affected LSRs to flow through. In these instances, I've made the request to have the records changed and will notify you when the correction has been made. The number of PONS impacted by the data discrepancy is very small, .0035% of your volume; however, we do recognize the impact and are working to correct the data as quickly as possible. As a side note, inaccurate records in RSAG and CRIS affect BellSouth's retail operations in the same way they affect MCI.

Because the LSRs clarified due to MCI/Worldcom errors could have been avoided by using some of the tools provided by BellSouth, I'd like to make some recommendations on steps to take in the future to avoid such issues.

69897 "TN FOR NON WORKING ADDRESS: DUE DATE COULD NOT BE CALCULATED"

The RSAG record clearly shows whether or not the telephone number (TN) has a working address. All of the TNs for LSRs receiving this error showed the address as non-working. Additionally, most of these were shown as non-working because the customer had already been ported out to another carrier. The customer should be communicating its current provider name to MCI Worldcom, who in turn, must contact the CLEC which owns the customer to obtain the customer service record (CSR). Should you attempt to pull a BellSouth CSR for a client who has been ported out, the response will be "BellSouth is not authorized to provide information for this account".

67250 "LSR HOUSENUMBER INCORRECT"

If you choose to include the end user address on your LSR, BellSouth will use the house number (SANO field) to ensure that the customer you intend to migrate is the one being processed. To ensure that the house number is correct, you must access RSAG to determine the correct house number for that customer. For all of the LSRs clarified with this message, the SANO on the LSR did not match the SANO in RSAG.

G9871 "ADDRESS/TN INVALID, DUE DATE COULD NOT BE CALCULATED"

When migrating a customer to MCI/Worldcom, the end user's CSR should be accessed and reviewed to ensure that the correct account number (ATN) is being placed on the LSR. The ATN must be a working number and cannot be a WTN embedded in the end users account.

If you have any questions regarding any of the information provided above, please let me know.

Jill Williamson
Director - BTSI
Phone: 404-927-4790
Ipager: jillwilliamson



MCI error
clarification.doc

| LSR/PON | Error Message | PONs ATN | NOTES |
|---------|--|----------|---|
| | TN FOR NON WORKING ADDRESS; DUE DATE COULD NOT BE CALCULATED | | RSAG shows no working address for this TN – Status N. The line is working in BOCRIS. BellSouth Service Rep will need to correct the RSAG record. |
| | “ | | RSAG shows no working address for this TN - Status N. This is a ported TN. |
| | “ | | RSAG shows no working addresses for this TN – Status N. The line is working in BOCRIS. BellSouth Service Rep will need to correct the RSAG record. |
| | “ | | RSAG shows no working address for this TN – Status N. This is a ported TN. |
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| | “ | | RSAG shows no working address for this TN – Status N. This is a ported TN. |
| | “ | | RSAG shows no working address for this TN – Status N. This is a ported TN. |
| | G9475 "ACT= ALLOWED ONLY ON SAME LOCNUM SERVICE ADDRESS" | | The Service Address (SA) on the Account TN did not exist on the CSR. BellSouth Service Rep will need to add SA to CSR. |
| | “ | | The Service Address (SA) on the Account TN did not exist on the CSR. BellSouth Service Rep will need to add SA to CSR. |
| | “ | | The SA data on the EU form (117 Landing Ln) does not match the SA data on the CSR (6212 Landing Ln). It appears that the CSR SA is incorrect and should be 117 Landing Ln. BellSouth Service Rep will need to correct SA on CSR. |

| LSR/PON | Error Message | PONs ATN | NOTES |
|---------|---|----------|--|
| | “ | | The SA data in RSAG (4025 MCGINNIS FERRY RD NW Unit 720, Suwanee, GA). does not match the CSR SA (6138 EAGLES REST TR NE, SGR HL, GA). Appears RSAG was never updated to new address 6138 MCGINNIS FERRY RD NW UNIT 720, Suwanee, GA for this TN. BellSouth Service Rep will need to correct address in RSAG. |
| | “ | | The Account TN (ATN=770-227-4807) listed for this PON was not a valid ATN. Should send LSR referencing 770-227-0903, which is a valid ATN. MCI needs to resend LSR with correct ATN. |
| | “ | | The Service Address on the Account TN did not exist on the CSR. BellSouth Service Rep will need to add SA on CSR. |
| | G7250 "LSR HOUSENUMBER INCORRECT" | | The house number for this request was incorrect. The house number submitted was "@". The house number in RSAG has "700". MCI needs to resend LSR with correct ATN. |
| | “ | | The house number for this request was incorrect. The House Number submitted was "238-B". The house number in our address system is "238" and the suffix is "B". MCI needs to resend LSR with correct ATN. |
| | “ | | The house number requested on the LSR did not match the house number for the TN requested. The house number of "500" was on the LSR but the House Number for this TN # was "1421". MCI needs to resend LSR with correct house number. |
| | “ | | The house number requested on the LSR did not match the house number for the TN requested. The house number of "1941125" was on the LSR but the House Number for this TN # was "125". MCI needs to resend LSR with correct house number. |
| | “ | | The house number requested on the LSR did not match the house number for the TN requested. The house number of "2736" was on the LSR but the House Number for this TN # was "1240". This could be a situation where the TN is incorrect because the Address and TN have nothing in common. MCI needs to resend LSR with correct house number. |
| | “ | | The house number requested on the LSR did not match the house number for the TN requested. The house number of "4152" was on the LSR but the House Number for this TN # was "5052". MCI needs to resend LSR with correct house number. |

| LSR/PON | Error Message | PONs ATN | NOTES |
|---------|---|----------|--|
| | “ | | The house number requested on the LSR did not match the house number for the TN requested. The house number of “49000” was on the LSR but the House Number for this TN # was “4900”. MCI needs to resend LSR with correct house number. |
| | G9871 "ADDRESS/TN INVALID, DUE DATE COULD NOT BE CALCULATED" | | The ATN on the LSR was not valid in our systems so we could not calculate a due date. The Account Telephone number (ATN) for this LSR was “770 599-3491” but it was populated with the line TN # that was requested to be changed (770 599-3082). MCI needs to resend the LSR with the correct ATN. |
| | “ | | The ATN and the Address on the LSR was not valid in our systems so we could not calculate a due date. The TN “770 774-0509” requested does not exist. MCI needs to resend the LSR with the correct ATN |
| | | | |