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December 5, 2001

REDACTED FOR PUBLIC INSPECTION

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:

On December 4, 2001, Ernest Bush, Bob Blau, Jonathan Banks, Glenn Reynolds and I, representing BellSouth, met with Dorothy Attwood, Chief of the Commission's Common Carrier Bureau, and members of her staff, including Jeffrey Carlisle, Chris Libertelli, Michelle Carey, Kathy Farroba and Jessica Rosenworcel. During that meeting we discussed issues raised concerning the BellSouth application pending in this docket. In particular we discussed the status of the KPMG metric audit in Georgia, due date calculation, the BellSouth change control process, and issues related to CLECs' ability to integrate their electronic pre-ordering and ordering interfaces. BellSouth representatives summarized information contained in our November 29 ex parte related to the subjects of due date calculation and the change control process. The two documents attached reflect the substance of our discussion on the last topic. We are filing one of these documents as Confidential and request that it be treated as subject to the Protective Order in this proceeding.

In accordance with Commission rules, I am enclosing one original copy of this letter with the pages from the confidential exhibit. I am also enclosing two copies of this letter with that exhibit redacted for public inspection. Inquiries about access to the confidential material submitted with this letter should be directed to

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Laura Brennan, Kellogg, Huber, Hansen, Todd & Evans, 1615 M Street, N.W.,
Suite 400, Washington, D.C., 20036, 202.367.7821.

Please call me if you have any questions about these documents.

Sincerely,

A handwritten signature in cursive script that reads "Kathleen B. Levitz".

Kathleen B. Levitz

Attachments

cc: Dorothy Attwood
Jeffrey Carlisle
Chris Libertelli
Michelle Carey
Kathy Farroba
Jessica Rosenworcel
Susan Pié
James Davis-Smith

Comparison of Parsing SBC-Texas vs. BellSouth-GA/LA

| SBC – Texas | vs. | BellSouth – GA/LA |
|--|------------|--|
| <p>FCC Relied on Datagate – no address parsing functionality. Address information provided as undifferentiated string of alphanumeric characters. FCC Texas Order ¶153</p> | | <p>BellSouth provides parsed address information from its application to application interface – TAG CLECs admit this.</p> <p><i>See</i> AT&T, Bradbury Declaration ¶30. (“address information obtained from BellSouth’s Regional Street Address Guide (“RSAG”) is already parsed and can be transferred electronically by CLECs into the address fields of CSR.”)</p> <p><i>See</i> WorldCom Comments at 25; Lichtenberg, etc. Declaration at ¶20. (“WorldCom is able to obtain the service address through BellSouth’s address validation function that dips into the Regional Street Address Guide (“RSGAG”) database. This address is provided in parsed format.”)</p> <p>“[A] BOC that provides address information in a parsed format would not need to make this complicated showing.” FCC Texas Order ¶153. BellSouth provides address information in a parsed format.</p> <p>Successful integration of address information from RSAG for one large CLEC means that, for over 99% of its UNE-P conversion orders, it can electronically transfer at least 7 out of the 8 fields of information it needs from BellSouth from pre-ordering to the LSR. The other field of information, the main listed name, can be obtained in fielded format from CSR and easily parsed using the information provided by BellSouth. See Attachment 1.</p> |

| | |
|---|--|
| <p>SBC provided specific information about the format for the address field and listed address field on the CSR in their Universal Service Order Practice Manual. Ham Supplemental Affidavit, ¶18.</p> | <p>BellSouth has developed and provided CLECs with a CSR Job Aid that provides details on the format for the entire CSR, not just the address field and listed address field. In addition, BellSouth has provided detailed mapping instructions that maps pre-order fields to LSR from order fields for address, telephone number, appointment availability, service availability, and due date availability information. <i>See Stacy, Exhibits 53 & 54.</i> No CLEC has indicated that they have attempted integration using these instructions but been unsuccessful.</p> |
| <p>In the Texas case, two CLECs filed two-page ex parte letters indicating they had successfully integrated portions of pre-ordering and ordering.</p> | <p>Two CLECs, DeltaCom and GoComm have indicated that they have successfully integrated pre-ordering and ordering functions. In addition, WorldCom and AT&T have stated that they have integrated the address validation function from the RSAG pre-ordering database to the ordering LSR.</p> |
| <p>SBC relied on Telecordia review that found that documentation and other information provided by SBC enabled it to mechanically integrate address information received in pre-ordering inquiry into ordering process. FCC Texas Order ¶154.</p> | <p>BellSouth relies on successful KPMG review of the degree to which a CLEC can develop automated integrated transactions, including any inconsistencies in field names and format between pre-order and order forms. KPMG, MTP at V-13.</p> |

Comparison of SBC and BellSouth Pre-ordering data "parsing"
(Address and Customer Service Record)

| | SBC (At the time of TX approval) | BellSouth |
|--------------------------------|---|---|
| Address Data | Fielded Data - Datagate | Fully Parsed data - TAG Address Validation Query |
| Example(s) | Datagate SA 175 E Houston St, San Antonio, TX 78205 | HOUSE-NUM [675] STREET-DIR [W] STREET-NAME1 [PEACHTREE] THROUGHFARE [ST] STREET-SUFFIX [NE] CITY [ATL] STATE [GA] ZIP-CODE [30375] |
| Customer Service Record | Fielded Data - Datagate with instructions on parsing for address field and listed address field | Fielded data - TAG CSR Retrieval query with instructions on parsing all sections of the CSR, not just address information (CSR Job Aid) |
| Example | LN Gilliam, Mike SA 175 E Houston St, San Antonio, TX ZIP 78205 | LN Stacy, William N. SA 675 W PEACHTREE ST, NE, ATL, GA DZIP 30375 |

Comparison of SBC and BellSouth Pre-ordering data "parsing"
(Address and Customer Service Record)

| Function / Support | | | Comments |
|---------------------------------------|------------------|-----|--|
| | SBC TX 271 | BLS | |
| RSAG Address Validation | | | <ul style="list-style-type: none"> BLS provides Parsed Service addresses via the TAG Address Validation Query |
| "Parsed Service Address info | | ✓ | |
| CSR Inquiry Response | | | <ul style="list-style-type: none"> BLS & SBC both provide a "fielded text-based response to CSR inquiries At the time of the TX 271 approval, SBC did not provide parsed service addresses in the CSR response (only CAI - Concatenated Address Information) |
| "Fielded Text Response | ✓ | ✓ | |
| Concatenated Address Information | ✓ | ✓ | |
| "Parsed" Address Information | | | |
| Fully "Parsed" CSR | | | |
| CLEC Documentation | | | <ul style="list-style-type: none"> SBC provided instructions for parsing service address and listed address. BST provides instruction for parsing all CSR fields, not limited to address. |
| CSR FID Definitions | ✓ | ✓ | |
| CSR Field Characteristics | ✓ | ✓ | |
| Pre-Order to LSR firm Order Field Map | ✓ | ✓ | |

Attachment 1

WorldCom Clearly Has Capability to Fully Integrate Over % Of Its UNE-P Orders

1. In her affidavit, Ms. Lichtenberg alleges that " MCI is able to obtain parsed address information through the service address function in TAG, a separate transaction from CSR retrieval and place that directly into an order. *But MCI must type all additional information onto its orders.* MCI representatives look at the CSR and, because it is not parsed, re-type such information as the customer's name onto the orders." (Reply Affidavit, ¶31)(emphasis added). The purpose of this document is to show how much of this additional information WorldCom could get from BellSouth through additional parsing capability versus how much of this additional information is provided by WorldCom.

2. WorldCom's largest volume of conversion orders (%) consists of a :

3. On these LSRs, there are potentially fields of data that WorldCom can get from BellSouth in a parsed format to automatically populate an LSR. The information in the remaining fields is provided by WorldCom. of the fields of data are provided to WorldCom through the service address function that WorldCom has admittedly integrated. The remaining field, which is the main directory listing name, is provided in the CSR in a fielded format. It is extremely simple to parse this field and automatically populate an LSR by using the CSR Job Aid (section 3.4.3) and the pre-order to firm order mapping matrix, which are Exhibits 53 and 54 to the Stacy Affidavit.

As illustration, are attached (confidential) that show, among other things, 1) the fields required for the order, 2) , 3) , 4) the form of the BellSouth-supplied data (parsed or fielded), and 5) job aid instructions for parsing the fielded data. An analysis of the data is set forth below:

| | | |
|---|--|--|
| LSR identifier Tel Number (ATN) | | |
| Total number of required fields | | |
| Parsed Fields from BellSouth's TAG Address Validation Query | | |
| Fielded data from BellSouth's TAG Customer Service Record Retrieval Query | | |
| WorldCom Supplied Data | | |

4. These LSRs reveal that % of the data on the LSR *originates* with WorldCom and does not come from BellSouth's pre-ordering systems. A total of % of the data supplied by BellSouth is in parsed format, and the % remaining is in fielded format.

5. There are a total of fields required on these LSRs. Of these, are available from BellSouth in fully parsed format, and is available on fielded format. *Data for of the fields must be supplied by WorldCom.* Leaving the Commission with the implication that WorldCom must type all additional information onto its orders because of some deficiency in BellSouth's OSS is disingenuous, at best.

| FORM | FIELD | | DATA SUBMITTED BY | DATA PROVIDED BY BST PRE-ORDER OSS | SOURCE | PARSED (Y/N) | CSR JOB AID |
|------|-------------|---|-------------------|---------------------------------------|----------|-----------------|-----------------|
| LSR | | | | | | | |
| | CC | | | | CLEC | | |
| | PON | | | | CLEC | | |
| | VER | | | | CLEC | | |
| | ATN | | | | CLEC | | |
| | SC | | | | CLEC | | |
| | DDD | | | | CLEC | | |
| | REQTYP | | | | CLEC | | |
| | ACT | | | | CLEC | | |
| | TOS | | | | CLEC | | |
| | PORTTYP | | | | CLEC | | |
| | LSO | | | | TAG-AVR | Y | LSO-NPA-TTA |
| | CIC | | | | CLEC | | |
| | CCNA | | | | CLEC | | |
| | INIT | | | | CLEC | | |
| | TELNO | | | | CLEC | | |
| | FAXNO | | | | CLEC | | |
| | IMPCON | | | | CLEC | | |
| | TEL | | | | CLEC | | |
| | BAN1 | | | | CLEC | | |
| EU | | | | | | | |
| | EATN | | | | CLEC | | |
| | LCON | | | | CLEC | | |
| | TEL NO-LCON | | | | CLEC | | |
| | NAME | | | | TAG-CSRR | N | 3.4.3 List Sect |
| | SANO | | | | TAG-AVR | Y | HOUSE-NUM |
| | SASN | | | | TAG-AVR | Y | STREET-NAME1 |
| | SATH | | | | TAG-AVR | Y | THOROUGHFARE |
| | CITY | | | | TAG-AVR | Y | CITY |
| | STATE | | | | TAG-AVR | Y | STATE |
| | ZIPCODE | | | | TAG-AVR | Y | ZIP-CODE |
| | ERL | | | | CLEC | | |
| P/L | | | | | | | |
| | PQTY | | | | CLEC | | |
| | LNUM | | | | CLEC | | |
| | LNA | | | | CLEC | | |
| | TNS | | | | CLEC | | |
| | FPI | | | | CLEC | | |
| | LPIC | | | | CLEC | | |
| | PIC | | | | CLEC | | |
| | TCOPT | | | | CLEC | | |
| | FA/USOC | N | | | CLEC | | |
| | | N | | | CLEC | | |
| | | N | | | CLEC | | |
| | | N | | | CLEC | | |

Legend:

TAG-AVR = TAG Addresss Validation Query

TAG - CSRR = TAG Customer Service Record Retrieval

| FORM | FIELD | | DATA SUBMITTED BY | DATA PROVIDED BY BST PRE-ORDER OSS | SOURCE | PARSED (Y/N) | CSR JOB AID |
|------|-------------|---|-------------------|---------------------------------------|----------|-----------------|-----------------|
| LSR | | | | | | | |
| | CC | | | | CLEC | | |
| | PON | | | | CLEC | | |
| | VER | | | | CLEC | | |
| | ATN | | | | CLEC | | |
| | SC | | | | CLEC | | |
| | DDD | | | | CLEC | | |
| | REQTYP | | | | CLEC | | |
| | ACT | | | | CLEC | | |
| | TOS | | | | CLEC | | |
| | PORTTYP | | | | CLEC | | |
| | LSO | | | | TAG-AVR | Y | LSO-NPA-TTA |
| | CIC | | | | CLEC | | |
| | CCNA | | | | CLEC | | |
| | INIT | | | | CLEC | | |
| | TELNO | | | | CLEC | | |
| | FAXNO | | | | CLEC | | |
| | IMPCON | | | | CLEC | | |
| | TEL | | | | CLEC | | |
| | BAN1 | | | | CLEC | | |
| EU | | | | | | | |
| | EATN | | | | CLEC | | |
| | LCON | | | | CLEC | | |
| | TEL NO-LCON | | | | CLEC | | |
| | NAME | | | | TAG-CSRR | N | 3.4.3 List Sect |
| | SANO | | | | TAG-AVR | Y | HOUSE-NUM |
| | SASN | | | | TAG-AVR | Y | STREET-NAME1 |
| | SATH | | | | TAG-AVR | Y | THOROUGHFARE |
| | CITY | | | | TAG-AVR | Y | CITY |
| | STATE | | | | TAG-AVR | Y | STATE |
| | ZIPCODE | | | | TAG-AVR | Y | ZIP-CODE |
| | ERL | | | | CLEC | | |
| P/L | | | | | | | |
| | PQTY | | | | CLEC | | |
| | LNUM | | | | CLEC | | |
| | LNA | | | | CLEC | | |
| | TNS | | | | CLEC | | |
| | FPI | | | | CLEC | | |
| | PIC | | | | CLEC | | |
| | LPIC | | | | CLEC | | |
| | BA | | | | CLEC | | |
| | BLOCK | | | | CLEC | | |
| | TCOPT | | | | CLEC | | |
| | FA/USOC | N | | | CLEC | | |

Legend:

TAG-AVR = TAG Addresss Validation Query

TAG - CSRR = TAG Customer Service Record Retrieval