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RECEIVED

December 7, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

EX PARTE OR LATE FILED

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:

Responding to a request of Common Carrier Bureau staff made on December 4, 2001, I am filing additional information relating to the performance of a functionality called Telephone Migration, or TN migration, that BellSouth had fully implemented on November 17, 2001. Included in this filing are three attachments. Attachment A is a copy of a series of e-mail communications between the BellSouth Change Control Management team (CCM) and WorldCom. Attachment B is a copy of BellSouth's responses to a set of questions posed by WorldCom and to the latter's request for an analysis of certain rejected PONs. Attachment C is a glossary of terms used in Attachment B. Because BellSouth is requesting confidential treatment for Attachment A 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 A and the second, labeled CONFIDENTIAL – NOT FOR PUBLIC INSPECTION, contains the unredacted version of Attachment A.

In an earlier ex parte letter filed on November 21, 2001, I had described the evidence demonstrating the new functionality's successful implementation. As I explained in that letter, 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

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"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, 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. The CLEC needs only to populate the Name and Telephone Number fields on LSR, and BellSouth's systems will validate the customer's telephone number as it appears on the LSR.

In that letter I also noted that between November 17 and November 19, WorldCom had sent a total of *** LSRs for UNE-P conversion. Of those *** PONS, WorldCom asked BellSouth to analyze *** Purchase Order Numbers, or PONS, for which WorldCom had received "address type" error codes. That analysis had revealed that all of the clarifications returned on the *** PONs were valid. Of those PONs, *** were returned to WorldCom because of incorrect records in BellSouth address databases. As noted in the November 21 letter, however, this represented only .35% of the total WorldCom volume over the three-day period.

On November 29, 2001, the CCM sent an e-mail to all CLECs participating in the Change Management process asking whether there were any outstanding issues associated with TN migration that BellSouth needed to address. The CCM asked CLECs identifying such issues to send e-mails describing them. Prior to that date, with the exception of the WorldCom inquiry noted in my November 21 letter, no CLEC had indicated any concerns about the operation of the TN migration capability. The CCM's December 3 e-mail had requested that the CLECs respond to its e-mail by noon that same day. No CLEC other than WorldCom responded to the CCM e-mail; WorldCom responded on December 4 with a series of three questions. See Attachment A. Subsequently On December 4th, WorldCom sent a set of *** "sample" UNE-P PONs that it asserted were erroneously returned to it between November 24 and November 29. *Id.* WorldCom asserted that these PONs should not have been returned to it because the street address number appearing on each LSR matched BellSouth's address database records and the customer name should not have been edited.

Attachment B is a copy of BellSouth's response to WorldCom's questions and request for analysis. Attachment C is a glossary of terms used in Attachment B. In order to be certain that it was fully responsive to the three questions posed in WorldCom's first e-mail, BellSouth CCM had requested that WorldCom provide some PONs that had prompted those questions or concerns, which WorldCom did on the evening of December 4. The PONs to which the first BST Response in Attachment B alludes are these sample PONs, and not the twelve PONs for which WorldCom had sought analysis of the grounds for rejection.

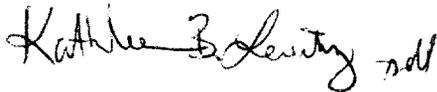
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The requested analysis of the *** sample PONs indicated that each had fallen out for manual handling for reasons other than the address entered on it. The LCSC service rep, however, did incorrectly clarify the LSR back to WorldCom with an address error.

In summary, in the three weeks TN migration has been available to CLECs, every indication is that this capability is functioning successfully. No CLEC other than WorldCom has indicated any problem with TN migration. The total number of UNE-P orders processed using TN migration between November 17 and December 5, 2001 is in excess of 33,600 orders.

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

Handwritten signature of Kathleen B. Levitz in cursive, with the initials 'KBL' written to the right of the signature.

Kathleen B. Levitz

Attachments

cc: Jessica Rosenworcel
Susan Pié
James Davis-Smith

ATTACHMENT A

REDACTED

For Public Inspection

To: Change.Control@bridge.bellsouth.com
Cc: Sherry Lichtenberg (E-mail); Doug Lacy (E-mail); Matthew Walker (E-mail) (E-mail); Mindy Chapman (E-mail); Cedric Cox (E-mail); Amanda Hill (E-mail); patricia.b.woods@wcom.com
Subject: RE: RE: Follow-Up on TN & SANO Validation for UNE-P Migrations

BCCM:

Listed below please find the additional questions from MCI WorldCom regarding TN & SANO Validation for UNE-P Migrations.

Also, we will be available to meet next week on either of the following days:

- * Monday, 12/10 - in the afternoon, anytime after 2:00PM EST
- * Tuesday, 12/11 - in the AM, anytime before 2:00PM EST

First;

MCI has the understanding that the TN / SANO validation is performed against the RSAG. If there is NOT a match, the transaction is rejected. If there is a match, then there is another validation against CSR. If it does NOT match the CSR the transaction is rejected. If it matches the transaction proceeds through the provisioning process and service order generation. MCI has been told, that in the generation of the LSOG service orders that another validation against CSR is performed. This may be done when service order generation is trying to validate features etc. 'G9871 Address/TN invalid, due date could not be calculated'.

Our question is if BST has validated TN and SANO in RSAG and validated it also against CSR, why would MCI receive this reject? If this (assumption) is true, MCI would prefer that this error drop to manual and be worked to completion by the LCSC.

Second;

When the RSAG validation match the LSR, and then validation against CSR finds multiple addresses in CSR, we believe MCI is receiving the following reject 'G9881 CANNOT DETERMINE ADDRESS; TN WORKING AT MORE THAN ONE ADDRESS'. Is this assumption correct? If so, MCI believes this should also drop to manual and be worked to completion by the LCSC.

Third;

MCI has been told by the account team (ERT), that the RSAG is the database of record for addresses. It is maintained by postal and community updates,

where as the CSR is only updated when the customer is adding or changing features. If this is true, why would the CSR be used for any address validation, in the front end (TN/SANO validation) or in the backend when building the service order?

Thank you,

Tyra Hush
MCI WorldCom
(703) 918-6683

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

From: List.Manager@bridge.bellsouth.com
[mailto:List.Manager@bridge.bellsouth.com] On Behalf Of
Change.Control@bridge.bellsouth.com
Sent: Monday, December 03, 2001 4:08 PM
To: Alan.Flanigan@twtelecom.com; alee@epicus.com; alejandro@amexcomm.com;
amanda.hill@wcom.com; Annette.Cook@espire.net; annettey@Lightyearcom.com;
apatel3@telcordia.com; Lynn.Arthur@BellSouth.com;
avincent@communitytelephone.com; bbil@4pra.com; BellSouth@quintessent.net;
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bseigler@att.com; BStowe@City.marietta.GA.US; bszafran@covad.com;
bwellman@idstelcom.com; c-david.burley@wcom.com; c-Lorraine.Watson@wcom.com;
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Subject: ID: RE: Follow-Up on TN & SANO Validation for UNE-P Migrations

<< File: SEND.txt >> << Message: RE: Follow-Up on TN & SANO Validation for
UNE-P Migrations (11.7 KB) >>

ATTACHMENT B

WorldCom Question:

First;

MCI has the understanding that the TN / SANO validation is performed against the RSAG. If there is NOT a match, the transaction is rejected. If there is a match, then there is another validation against CSR. If it does NOT match the CSR the transaction is rejected. If it matches the transaction proceeds through the provisioning process and service order generation. MCI has been told, that in the generation of the LSOG service orders that another validation against CSR is performed. This may be done when service order generation is trying to validate features etc. 'G9871 Address/TN invalid, due date could not be calculated'.

Our question is if BST has validated TN and SANO in RSAG and validated it also against CSR, why would MCI receive this reject? If this (assumption) is true, MCI would prefer that this error drop to manual and be worked to completion by the LCSC.

BST Response:

The TN vs Address transaction flow is as follows:

If present and valid, the full address will be used to calculate a due date. If an address is not valid or not present on the order, the LSR is scanned for the presence of an ATN, EATN or LEATN, which is then used to calculate the due date. If successful, the transaction will proceed. If not, an auto-clarification will be sent back to the CLEC. The successful LSR will proceed and encounter the agreed to "SANO validation", which ensures that the correct end-user account is being processed. Again, if present, BellSouth will compare the TN and SANO provided on the LSR to the TN and SANO on the CSR and in RSAG. If a match is found, the order will continue processing. If not, an auto-clarification message will be returned to the CLEC. Reasons for which the order would auto-clarify could include the ATN provided is invalid, there are multiple working addresses or no working addresses for the requested ATN.

All of the PONs provided by WorldCom were clarified because the ATN on the LSR was invalid. Either the account was final, TN not found or it was a voice mail transfer number.

WorldCom Question:

Second;

When the RSAG validation match the LSR, and then validation against CSR finds multiple addresses in CSR, we believe MCI is receiving the following reject 'G9881 CANNOT DETERMINE ADDRESS; TN WORKING AT MORE THAN ONE ADDRESS'. Is this assumption correct? If so, MCI believes this should also drop to manual and be worked to completion by the LCSC.

BST Response:

WorldCom's statement is almost correct. In the rare instance where multiple working addresses are found for a particular telephone number, BellSouth will auto-clarify the LSR

back to WorldCom. WorldCom must determine the correct address for which the order is being placed, BellSouth cannot make that decision for WorldCom. Based on this, we will continue to send the order back to WorldCom to be corrected.

WorldCom Question:

Third;

MCI has been told by the account team (ERT), that the RSAG is the database of record for addresses. It is maintained by postal and community updates, where as the CSR is only updated when the customer is adding or changing features. If this is true, why would the CSR be used for any address validation, in the front end (TN/SANO validation) or in the backend when building the service order?

BST Response

If the address is provided, CRIS is queried to validate that the TN and SANO provided on the LSR matches the TN and SANO on the CSR. This ensures that the correct end-user account is being processed.

WorldCom Question:

Below is a sample of GA PONs that have returned with an invalid manual reject. The sample is from 11/24 through 11/29. These are invalid because the SANO matched the CSR and RSAG, and the customer name should not have been edited.

BST Response:

The orders provided with WorldCom's question dropped to the LCSC for manual handling for reasons other than address. However, the LCSC service rep did incorrectly clarify the LSR back to WorldCom with an address error. This issue has been referred to the LCSC Management and retraining on the current rules is taking place.

ATTACHMENT C

Glossary of Terms used in Attachment B

ATN	=	Account Telephone Number ¹
EATN	=	Existing Account Telephone Number ¹
LEATN	=	Line Existing Account Telephone Number ¹
SANO	=	Street Address Number
"account was final"	=	account is no longer active in BellSouth's systems ²
"voice mail transfer number"	=	telephone number used to access voice mail box; such a number cannot be used to gain access to customer service records.

¹ CLECs may use each of these account numbers on LSRs to indicate which account they are processing (i.e., migrating from or to).

² For example, all services and facilities disconnected.