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December 10, 2001

EX PARTE

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

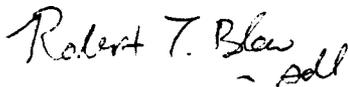
Re: CC Docket No. 01-277

Dear Ms. Salas:

On December 6, 2001, Margaret Greene, Ernest Bush, Jan Funderburg, Bill Stacy, Jonathan Banks, and I, representing BellSouth, met with Commissioner Kevin Martin, and his Legal Advisor, Monica Shah Desai, to discuss issues raised concerning the BellSouth application pending in this docket. The attached documents formed the basis for the presentation.

I am filing two copies of this notice in the docket identified above, as required by Section 1.1206(b)(2) of the Commission's rules, and request that you associate this notice with the record of that proceeding.

Sincerely,



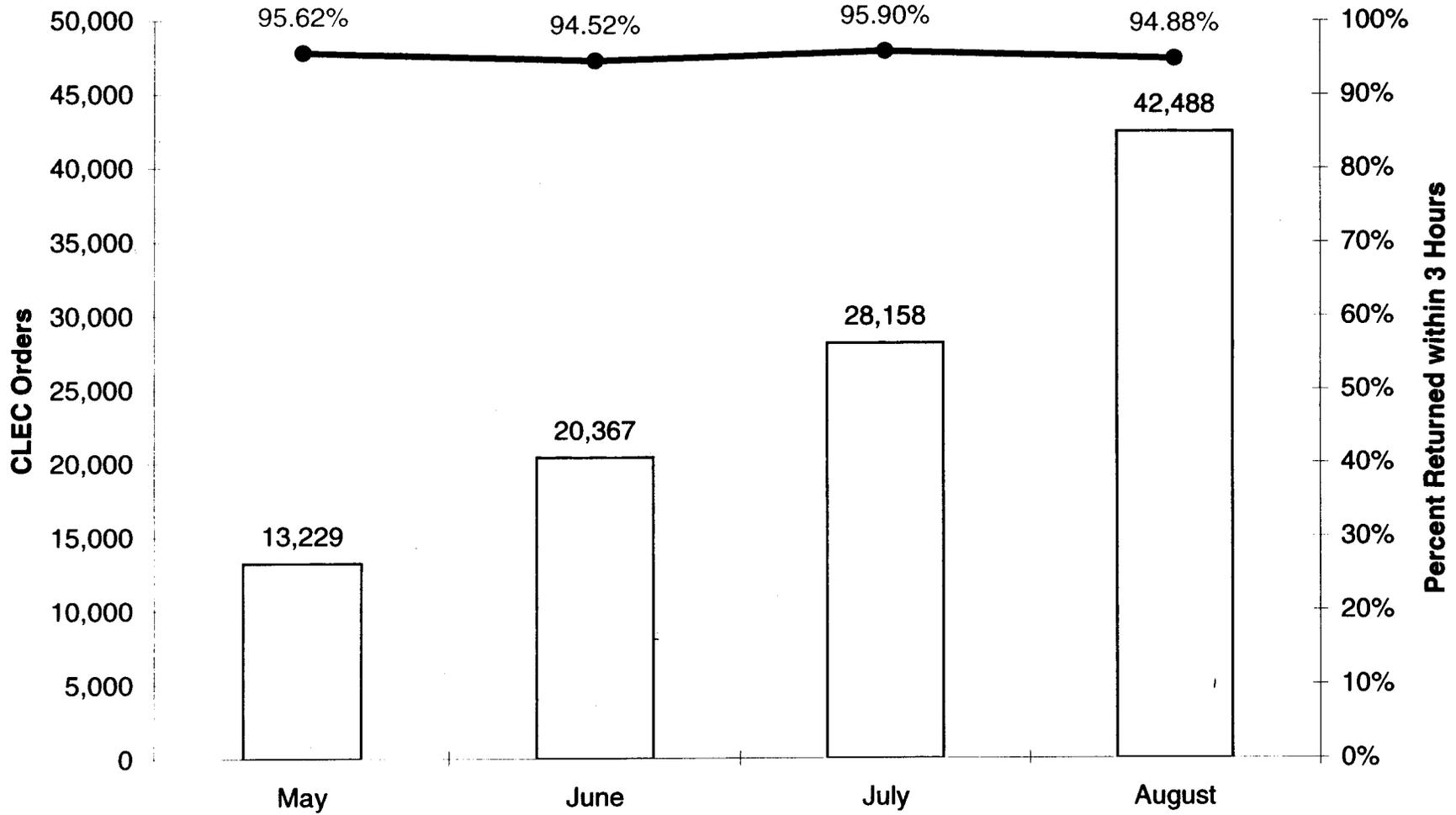
Robert T. Blau

Attachments

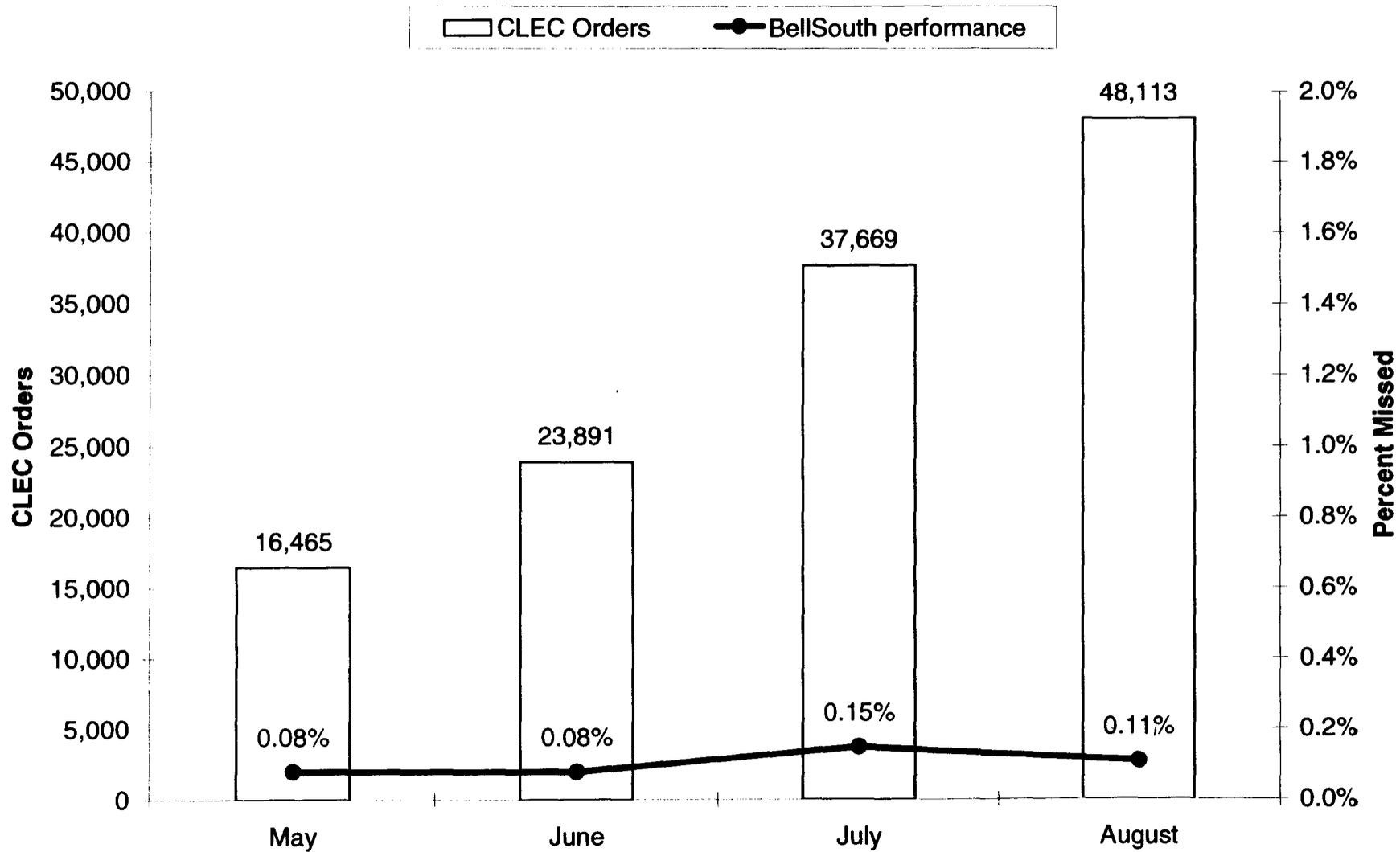
cc: Commissioner Kevin Martin
Monica Shah Desai
Kathy Farroba
Jessica Rosenworcel
Susan Pié
James Davis-Smith

Firm Order Confirmation Timeliness – Mechanized – Loop + Port Combinations – Georgia

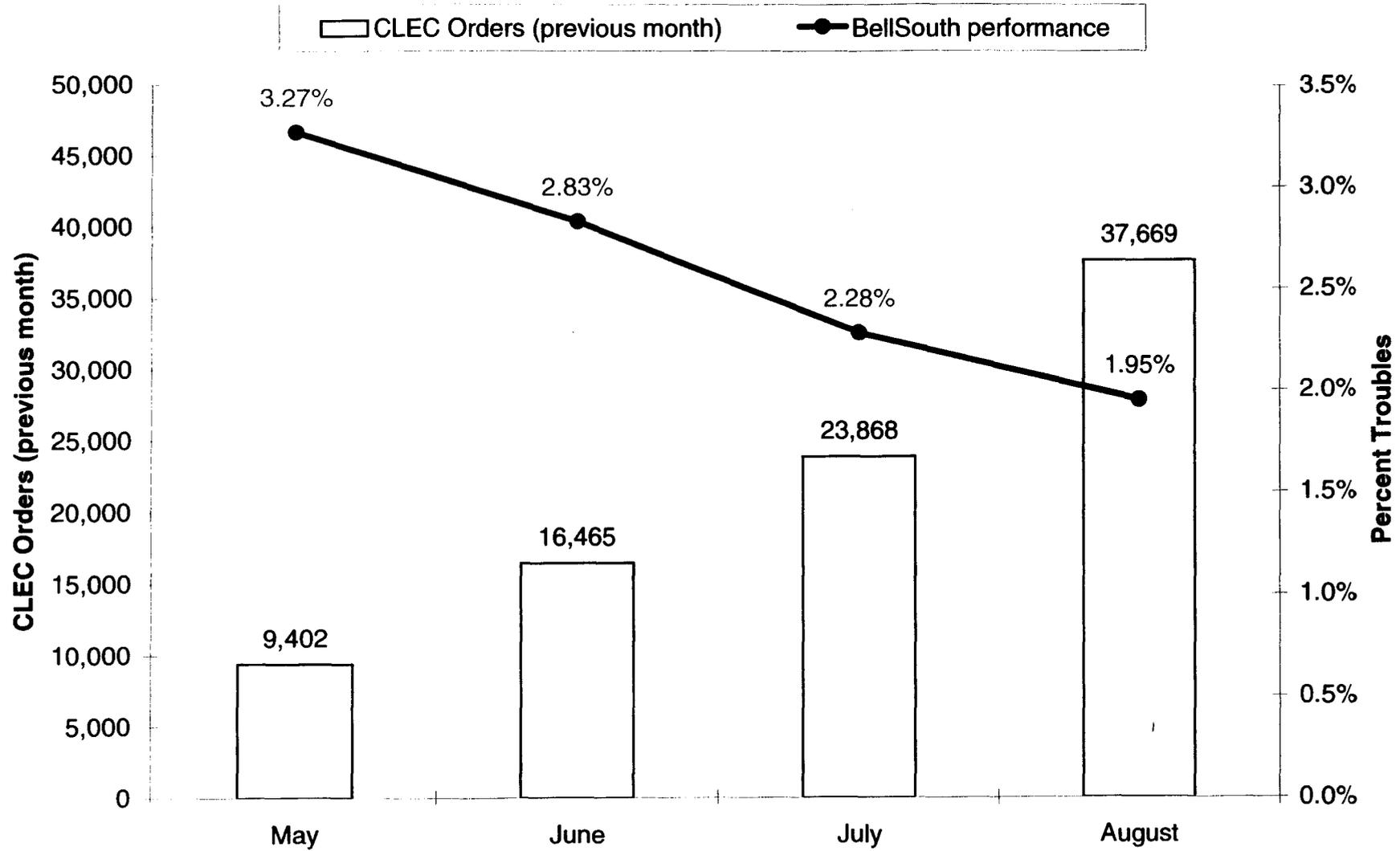
□ CLEC Orders ● BellSouth performance



% Missed Installation Appointments – Loop + Port Combinations/ <10 circuits/ Non-Dispatch – Georgia



% Provisioning Troubles within 30 Days – Loop + Port Combinations/ <10 circuits/ Non-Dispatch – Georgia



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

SBC – Texas

FCC Relied on Datagate – no address parsing functionality. Address information provided as undifferentiated string of alphanumeric characters. FCC Texas Order ¶153

vs.

BellSouth – GA/LA

BellSouth provides parsed address information from its application to application interface – TAG CLECs admit this.

See 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.”)

See WorldCom Comments at 25; Lichtenberg, etc. Declaration at ¶20.

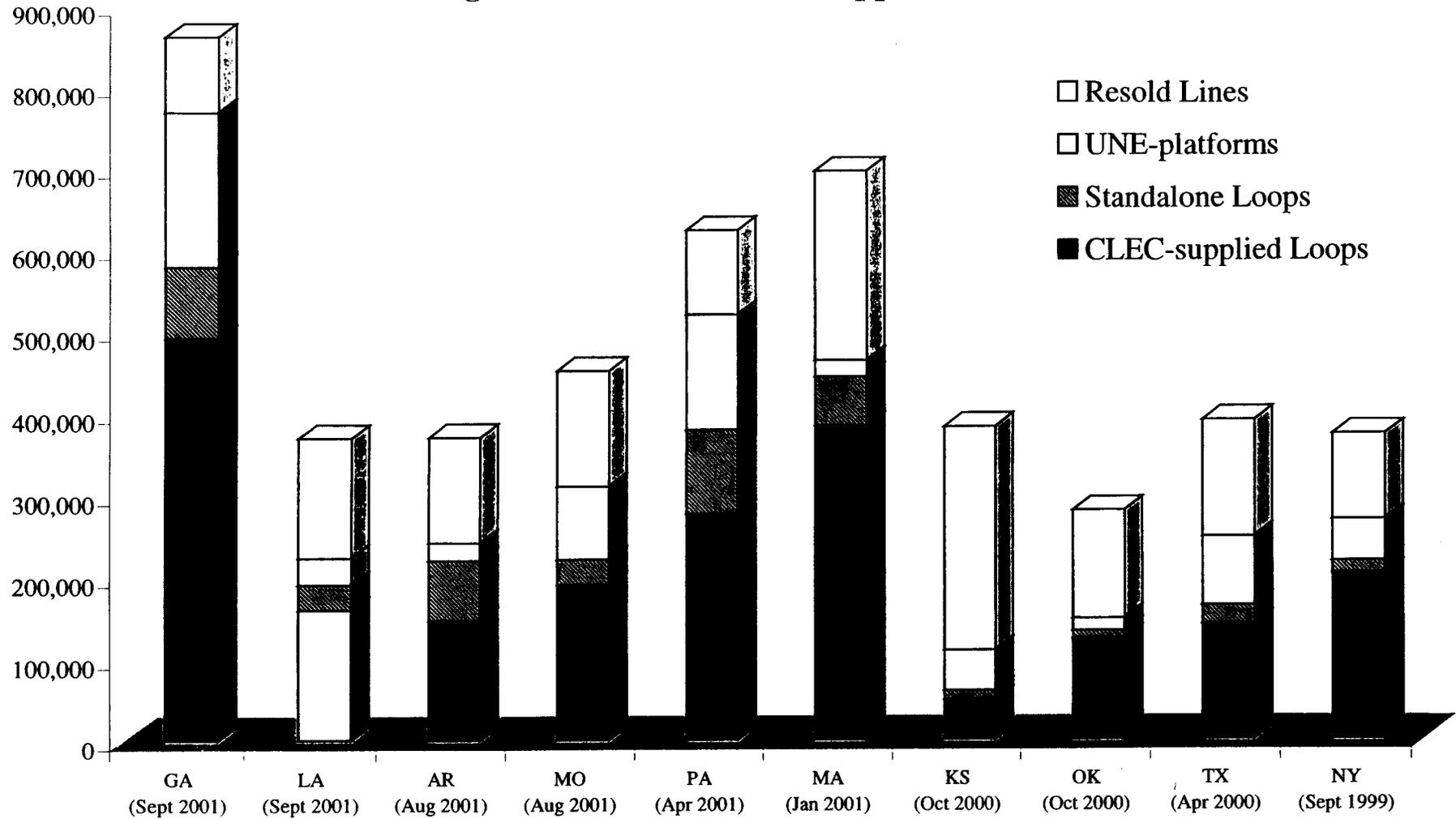
(“WorldCom is able to obtain the service address through BellSouth’s address validation function that dips into the Regional Street Address Guide (“RSGAG”) database. This address is provided in parsed format.”)

“[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.

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>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</i> Stacy, Exhibits 53 & 54. 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>

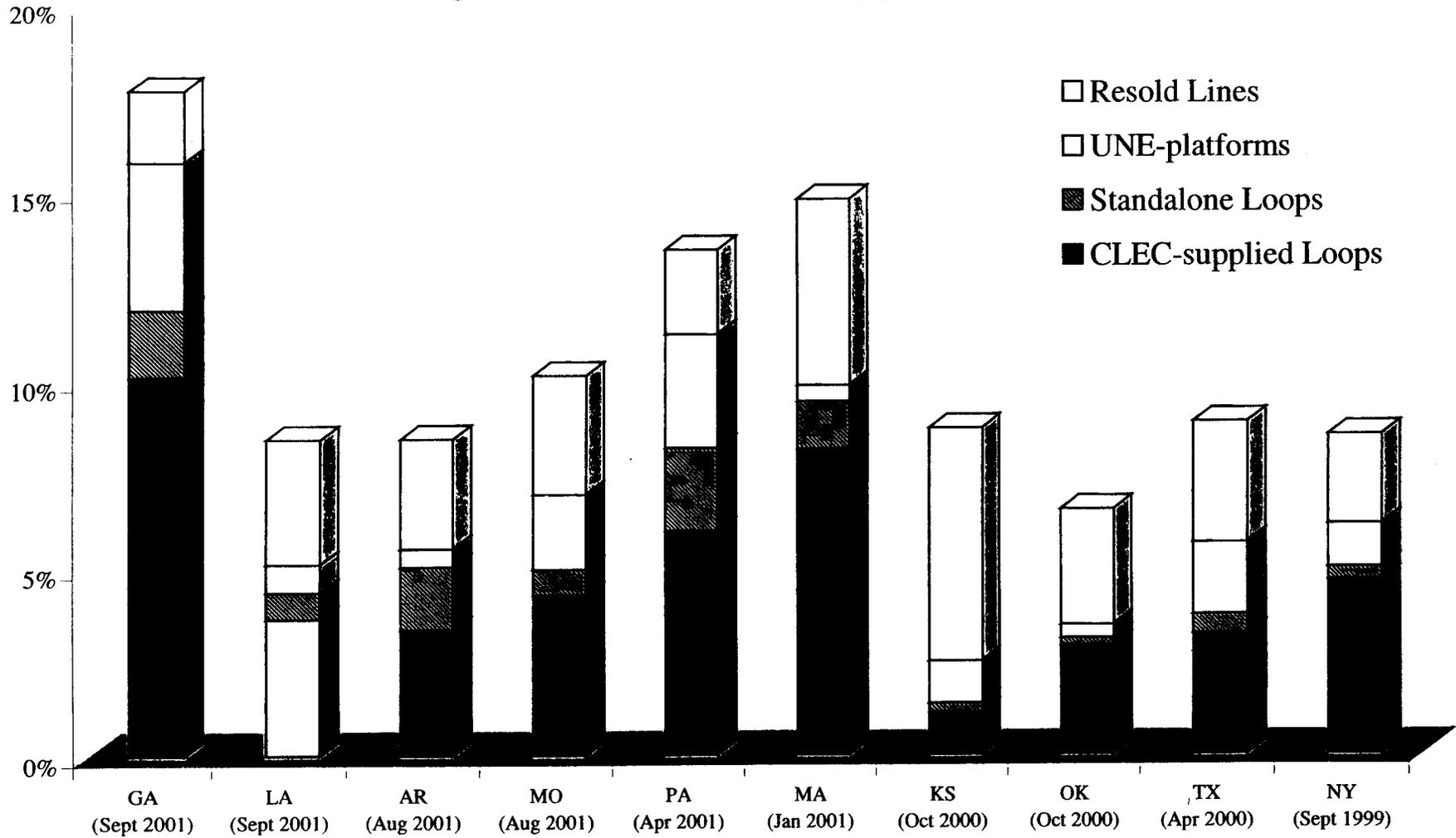
Total Lines Comparison Georgia & Louisiana vs. 271-Approved States



Note: Competitive numbers have been adjusted in relation to the number of BOC switched access lines in each state at the time of application as compared with Georgia.

Sources: GA: Stockdale Reply Aff., Exhs. 2 & 3; LA: Stockdale Reply Aff., Exhs. 6 & 7; AR: J.G. Smith Aff., Att. A; MO: Tebeau Aff., Att. A; PA: Taylor Decl., Att. 1; MA: Supplemental Brief, Ex. 1; KS: Smith-Johnson Aff., Att. 1; OK: Smith-Johnson Aff., Att. 1; TX: Habeeb Supplemental Aff., Att. 1; NY: Taylor Decl., Att. A.

CLEC Market Share Georgia & Louisiana vs. 271-Approved States



Sources: GA: Stockdale Reply Aff., Exhs. 2 & 3; LA: Stockdale Reply Aff., Exhs. 6 & 7; AR: J.G. Smith Aff., Att. A; MO: Tebeau Aff., Att. A; PA: Taylor Decl., Att. 1; MA: Supplemental Brief, Ex. 1; KS: Smith-Johnson Aff., Att. 1; OK: Smith-Johnson Aff., Att. 1; TX: Habeeb Supplemental Aff., Att. 1; NY: Taylor Decl., Att. A.

BellSouth's 271 Application for Georgia and Louisiana

December 6, 2001

Performance Is Excellent

- **BellSouth has invested in systems and people to allow CLECs to succeed.**
 - OSS investment
 - LCSC staffing and training
- **BellSouth has scaled its investments to meet growing CLEC demand with no deterioration in performance.**
 - Example: UNE-P ordering and provisioning
- **Results for Key Performance Measures**
 - July through September
 - Georgia: 86% at parity or benchmark.
 - Louisiana: 87% at parity or benchmark.
- **Hot Cut and Collocation Performance**

Pricing Issues

- **None exist!**

Performance Data is Stable and Solid

- Very few sub-metrics were restated in the May - September reports.
 - Georgia: 3.9%
 - Louisiana: .5%
- An even smaller number of these changes were “significant” (change in parity or benchmark outcome).
 - Georgia: .8%
 - Louisiana: .06%
- Both Georgia and Louisiana concluded data was sufficiently reliable.
- Only one metric, Flow Through, has been changed since the October 2nd filing of the application.

Performance Data Will Be Reviewed Constantly

- **Measurement systems will continue to evolve.**
- **Measurements will continue to evolve.**
- **State commissions will continue to insist on reviews and audits to assure themselves that reporting is accurate.**
- **The fact that the Georgia KPMG metric review will not finish until March, 2002 should not be a concern.**
 - **Vast bulk of two phases have been completed.**
 - **Georgia Commission has confidence in the process.**
- **FCC can have confidence in data as a result of this review process.**

CLECs Can Integrate Pre-ordering and Ordering Functionality

- **BellSouth provides more support for integration than SBC did in Texas at time of its application approval.**
- **KPMG concluded that CLECs can develop automated integrated transactions.**
- **Georgia and Louisiana commissions have concluded that BellSouth provides with all the requirements necessary for integration.**
- **CLECs and vendors have integrated.**
- **BellSouth is required to provide parsed CSR by 1/5/02.**
- **BellSouth provides telephone numbering ordering of UNE-P migration.**

BellSouth's 271 Application for Georgia and Louisiana Should Be Approved

- **BellSouth has followed the template laid out by the New York and Texas orders.**
- **There are no pricing issues in either state.**
- **There are no significant performance issues in either state.**
- **Significant competition exists in both Louisiana and, especially, in Georgia.**
 - **Georgia has more competition than any other approved state at time of application.**
 - **Louisiana is about average in the degree of competition in states that have been approved.**
 - **CLECs are making significant use of every entry method: facilities based, UNE-P, standalone loops and resale.**
 - **Robust competition proves that OSS is working, performance is non-discriminatory and prices are reasonable.**

BellSouth's 271 Application for Georgia and Louisiana Should Be Approved

- **Georgia and Louisiana meet the checklist requirements.**
 - **No requirements need to be relaxed or loopholes found.**
- **Both state commissions are committed to on-going supervision (example: SEEM Plans).**
- **Both Georgia and Louisiana unanimously support this application.**
- **A second filing would create unnecessary delay and cause consumers and BellSouth needless economic penalties.**

Back-Up

- **Key Performance Measures**
 - **Pre-ordering**
 - **Response Time and Response Interval**
 - **Interface Availability**
 - **Loop Make-Up Response Time**
 - **Ordering**
 - **Acknowledgement Timeliness**
 - **FOC Timeliness**
 - **Reject Interval**
 - **Avg. Jeopardy Notice Interval**
 - **Flow Through**

Back-Up

- **Key Performance Measures**
 - **Provisioning**
 - Missed Installation Appointments
 - Average Order Completion Interval
 - **Maintenance and Repair**
 - Interface Availability
 - Response Interval
 - Missed Repair Appointments
 - Maintenance Average Duration
 - % Repeat Troubles within 30 Days
 - **Billing**
 - Invoice Accuracy