Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of Deployment of Wireline Services Offering Advanced Telecommunications Capability	CC Docket No. 98-147

BELLSOUTH REPLY COMMENTS

In the *Advanced Services Order*,[1] the Commission revisited the issue of collocation. One of the areas addressed was the use of an intermediate interconnection arrangement to the incumbent local exchange carrier's ("ILEC") network. The Commission implemented 47 C.F.R. § 51.323(k)(2), which states that "ILECs may not require competitors to use an intermediate interconnection arrangement in lieu of direct connection to the incumbent network, if technically feasible." The Commission stated "such intermediate points of interconnection simply increase collocation costs without a concomitant benefit to incumbents."[2] Accordingly, the Commission implemented the rule to avoid additional costs to the competitors and to ensure that the competitors had a "direct connection" to the ILEC's network similar to how the ILECs' connect their equipment to the network.

In the current proceeding, there is some debate regarding what constitutes a "direct connection" to the ILEC's network. While Verizon's request was to merely seek confirmation

[1] *In the Matters of Deployment of Wireline Services Offering Advanced Telecommunications Capability and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket Nos. 98-147 and 96-98, 14 FCC Rcd. 4761 (1999) ("*Advanced Services Order*").

[2] *Id.* at 4785, ¶ 42.

that a point of termination (POT) bay is not an intermediate interconnection arrangement, the discussion on this issue has necessarily included a discussion of other varieties of demarcation within a central office, and a comparison of those methods to demarcation via a POT bay. Comments submitted by ASCENT, AT&T, Sprint, and Verizon all address the establishment of a demarcation point between the ILEC and the CLEC at the distribution frame. ASCENT and Verizon both indicate that a demarcation point set at an intermediary frame may not constitute direct connection with the ILEC's network as required by 51.323(k)(2).[3] BellSouth believes it beneficial to this proceeding to clarify the use and functions of intermediary distribution frames within a central office and to demonstrate that that they provide a direct connection to BellSouth's network as they are deployed within BellSouth's network.

There are numerous types of distributing frames that can be deployed within a central office. Among those are: a main distributing frame ("MDF") and intermediate distributing frames ("IDF") including a toll main distributing frame ("TMDF"), a toll distributing frame ("TDF"), and a tie pair distributing frame ("TPDF"). Each of these frames, as well as several other types of frames, is utilized throughout the BellSouth network. Use of these frames in the BellSouth network, both at present and prior to the collocation requirements imposed pursuant to Section 251(c)(6) of the Telecommunications Act of 1996 (the "Act"), is a normal practice. The type and number of frames within a central office is dependent upon the size and type of the central office and the type of equipment in that office.

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[3] Verizon and ASCENT makes this assertion in the context of an intermediate distributing frame placed between the POT bay and the main distributing frame. As explained below, while BellSouth does use intermediate distributing frames, it does not require a POT bay and therefore does not configure its network in the manner described.

BellSouth has central offices of varying sizes. BellSouth, like most ILECs, utilizes IDFs for cable management in some of its large multi-floor buildings and for terminating specific types of equipment in central offices equipped with certain types of distributing frame systems. BellSouth considers these IDFs to be part of the central office distributing frame system and integral components of its network. Consequently, when collocated equipment is connected to these IDFs in a BellSouth central office, it is directly connected to BellSouth's network.

In provisioning collocation, BellSouth permits collocation of CLECs' equipment in areas contiguous to space occupied by BellSouth's equipment. Consequently, the CLEC will find itself in the same position as BellSouth does in those central offices where the MDF is at some distance from equipment areas within the central office. Accordingly, BellSouth applies the same principle to the CLECs' equipment as it applies to its own equipment in those areas. As a result, CLECs' equipment may be routed through an IDF – just as BellSouth's equipment is – rather than directly to an MDF. In designating the appropriate demarcation point within a central office, BellSouth will attempt to designate the closest distributing frame (whether it is an IDF or an MDF) to the CLECs' collocated equipment, subject to technical feasibility and space availability. BellSouth believes that this approach not only minimizes the expense incurred by CLECs in interconnecting to BellSouth's network[4], but also provides CLECs with interconnection to BellSouth's network at parity with BellSouth's access to its own network.

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[4] As AT&T points out, BellSouth requires the CLEC to provide the connection between its collocated equipment and the BellSouth network (IDF or MDF, as the case may be) since this connection does not otherwise exist. If BellSouth required demarcation at the MDF in every case, regardless of the presence of an IDF, the CLECs would be required to cable much greater lengths, not only adding to the CLECs expense but also resulting in premature congestion of cable support structure within the central office due to the unnecessarily duplicative cabling of multiple CLECs.

BellSouth does not currently require use of a POT bay by CLEC. BellSouth believes that permitting the CLEC to connect to the distributing frame (whether that distributing frame is an MDF, IDF, or other distributing frame used by BellSouth), comports with the Commission's requirement that the ILEC permit the CLEC to directly connect to the ILEC's network.

Finally, AT&T's comments state:

> [t]he plain fact is that the competitive marketplace demands prompt, reliable provision of service. The collocation and interconnection procedures used today by ILECs – whether with POT bays or direct cabling from the collocation cage to the MDF – do not enable CLECs to meet those needs. As a result, the incumbents receive an unwarranted competitive advantage. CLECs need quicker installation times and end-to-end testing...[5]

Since BellSouth is permitting CLECs to connect their equipment to its network in exactly the same fashion that BellSouth connects its own equipment to its own network, BellSouth does not see what competitive advantage BellSouth would be gaining. Contrary to AT&T's assertion, AT&T is getting exactly what it sought when it requested that the Commission declare that ILECs cannot require the use of a POT bay.[6] Moreover, since the CLEC is responsible for cabling between its equipment and the distributing frame, the CLEC directly controls the installation time associated with that cabling and the end-to-end testing of that facility. This approach also negates AT&T's allegations with respect to the reliability of the ILEC-certified contractors performing on behalf of the ILEC, since the CLEC will perform this work through an ILEC-certified contractor of its choosing and with whom it has privity of contract -- if AT&T is

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[5] AT&T Comments at page 7.

[6] *See* Comments filed by AT&T in CC Docket 98-147 on September 25, 1998 at 82 ("Not only do these POT bays replicate the function that is already performed by the ILEC's Main Distribution Frame, but they cause a further inefficiency in the use of equipment. ... The Commission could immediately improve the efficiency of collocation by declaring that the ILECs cannot require the use of POT bays in the future.").

not happy with the performance of that contractor, then it may choose another since AT&T, and not the ILEC, has the direct contractual relationship with the contractor. AT&T's comments attempt to have the Commission expand the scope of work AT&T is allowed to perform within ILECs' central offices. AT&T is apparently now seeking the right to place and remove cross connections on ILECs' distributing frames such that AT&T's technicians may place, remove and, rearrange any cross connections even those affecting the services provided by ILECs to their own retail customers as well as to services provided by other CLECs collocated in ILECs' central offices. Nothing in the Act supports AT&T's notion that it has the right to connect or disconnect other service providers' service so that AT&T may provide its own customers with quicker installation times.

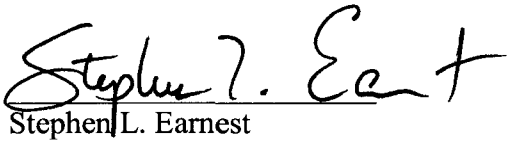
CONCLUSION

The Commission's rule requires ILECs to allow CLECs a direct connection to the ILECs network if technically feasible. BellSouth's network sometimes utilizes IDFs, however, any connection to an IDF in BellSouth's network, as configured, constitutes a direct connection to the network. Indeed, BellSouth utilizes IDFs to connect its own equipment to the network in the

same way. BellSouth therefore complies with its obligations pursuant to the Commission's rules.

Respectfully submitted,

BELLSOUTH CORPORATION
By its Attorneys



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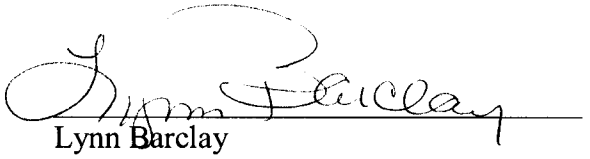
CERTIFICATE OF SERVICE

I do hereby certify that I have this 2nd day of April , 2002 served the parties of record to this action with a copy of the foregoing **BELLSOUTH REPLY COMMENTS** via Electronic Mail and U.S. Mail addressed to the parties listed on the attached service list.



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