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April 17, 2002

WRITTEN EX PARTE

Ms Marlene R. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: CC Docket No. 02-35

Dear Ms Dortch:

This letter contains responses to specific information requests from the Wireline Competition Bureau staff reviewing BellSouth's pending 271 Application for Georgia and Louisiana.

Analysis of % Provisioning Digital Loop Troubles within 30 Days

The staff asked BellSouth to provide an analysis of performance associated with the submetric "%provisioning troubles within 30 days" for Digital Loop reported in the Georgia and Louisiana December 2001, and January and February 2002 MSS at line B.2.19.19.1.1. The following table presents a complete breakdown of the results for December 2001 through February 2002 including the number of CLECs with orders completing in the month and the number of reports that were closed as not BST reports.

<u>State</u>	<u>Month</u>	<u>CLEC Reports / Completions (%)</u>	<u># of CLECs with Completions</u>	<u>Reports not Attributable to BST</u>
Ga	Dec	16 / 190 (8.42%)	<u>16 CLECs</u> 0 Reports (10 CLECs) 1 Report (2 CLECs) 2 Reports (1 CLEC) 3 Reports (2 CLECs) 6 Reports (1 CLEC)	<u>7 Reports</u> 5 TOK/FOK 1 Information 1 CLEC issue <u>% w/o Reports</u> 9/190 (4.7%)
	Jan	7 / 125 (5.60%)	<u>15 CLECs</u> 0 Reports (9 CLECs) 1 Report (5 CLECs) 2 Reports (1 CLEC)	<u>0 Reports</u>
	Feb	14 / 177 (7.91%)	<u>16 CLECs</u> 0 Reports (10 CLECs) 1 Report (2 CLECs) 2 Reports (1 CLEC) 3 Reports (2 CLECs) 4 Reports (1 CLEC)	<u>4 Reports</u> 2 TOK/FOK 2 Information <u>% w/o Reports</u> 10/177 (5.65%)
Ga	Total	37 / 492 (7.52%)	<u>46 CLECs</u> 0 Reports (29 CLECs) 1 Report (9 CLECs) 2 Reports (3 CLECs) 3 Reports (4 CLECs) 4 Reports (1 CLEC) 6 Reports (1 CLEC)	<u>11 Reports</u> 7 TOK/FOK 3 Information 1 CLEC issue <u>% w/o Reports</u> 26/492 (5.28%)
La	Dec	12 / 151 (7.95%)	<u>11 CLECs</u> 0 Reports (5 CLECs) 1 Report (2 CLECs) 2 Reports (2 CLECs) 3 Reports (2 CLECs)	<u>0 Reports</u>
	Jan	9 / 149 (6.04%)	<u>10 CLECs</u> 0 reports (4 CLECs) 1 Report (3 CLECs) 2 Reports (3 CLECs)	<u>2 Reports</u> 2 TOK/FOK <u>% w/o Reports</u> 7/149 (4.70%)
	Feb	9 / 177 (5.08%)	<u>12 CLECs</u> 0 Reports (8 CLECs) 1 Report (2 CLECs) 3 Reports (1 CLEC) 4 Reports (1 CLEC)	<u>2 Reports</u> 2 TOK/FOK <u>% w/o Reports</u> 7/177 (3.95%)
La	Total	30 / 477 (6.29%)	<u>33 CLECs</u> 0 Reports (17 CLECs) 1 Report (7 CLECs) 2 Reports (5 CLECs) 3 Reports (3 CLECs) 4 Reports (1 CLEC)	<u>4 Reports</u> 4 TOK/FOK <u>% w/o Reports</u> 26/477 (5.45%)

As shown in the above table, the majority of the CLECs in both Georgia and Louisiana received excellent performance for this measure during December 2001 through February 2002. Even though this measure did not meet the retail analogue comparison, the CLECs received approximately 95% actual trouble

free installations during the period. (The 95% is based on removing the TOK/FOK, Information and CLEC caused reports from the calculations.)

The review of the CLEC trouble reports indicates the majority of the reports for which a trouble was found are attributable to facility issues in Louisiana. As stated in the Varner Supplemental Reply Affidavit filed on March 28, 2002, BellSouth in Louisiana has implemented specific action plans to bring the Digital Loops >= DS1 into parity with their retail analogues. First, the Louisiana Service Advocacy Centers (SACs) have heightened the readiness to resolve any and all service order jeopardies. This will ensure that each service order is promptly handled upon receipt and can meet the current service order due date with time to adequately test and turn up the new digital loop. When a jeopardy is issued, some of the time that would otherwise be allocated for testing and turn up of the circuit may be lost in trying to resolve the jeopardy. The tradeoff to meet the customer due date may increase the potential for error. Each district Outside Plant Engineering (OSPE) /SAC work group has been aligned with the Work Management Center (WMC) on assigning/completing specific "defective pair recovery" routines to improve overall facility readiness. This alignment provides a direct relationship between the group assigning the work (WMC) and the group making sure the facilities are ready (SAC). In addition, Bellsouth is providing a "maintenance spare" DS1 circuit (where possible) in service areas with known defective pairs. Finally, "Fix it" crews, dedicated to performing defective pair recovery, are currently addressing digital loops in the state of Louisiana. This effort will reduce the possible need to assign digital loops with marginal transmission capabilities to meet digital loop requests.

In Georgia, the CLEC troubles are approximately half central office problems and half facility. A detailed analysis has identified no systemic issues for the 26 actual troubles (i.e., not TOK/FOK) reported over the three-month period. BellSouth in Georgia has instituted an action plan requiring the appropriate Network supervisor to review all provisioning trouble reports to determine the report's cause and the necessary action to keep it from recurring. This plan will be reviewed and additional steps taken, if necessary to bring this measure for Digital Loops >= DS1 into parity with the retail analogue.

For % Provisioning Troubles within 30 days, the retail analogue for UNE Digital Loops >= DS1 is Retail Digital Loops >= DS1. There are a very small number of troubles currently being reported for the retail analogue in this sub-metric.

PONS Analysis

In an *ex parte* presentation on March 25, 2002, Network Telephone asserted that certain Network Telephone Purchase Order Numbers (PONS) were not found in BellSouth's Performance Measurement Analysis Platform (PMAP) raw data files for December 2001 and January 2002. Attached is a written response to these allegations that BellSouth served directly on Network Telephone on April 16, 2002. At the request of the Staff, BellSouth is including this information in the record of this proceeding. As the response explains, three PONS identified by Network Telephone were not reflected in the raw data files for OCI and TSOCT because of a minor SOCS feed issue that will be corrected with May data. The fact that this is a rare occurrence, as stated in BellSouth's response, is confirmed by our analysis of data for all CLECs and BellSouth retail regionwide for the months of January and February 2002. That analysis revealed that less than 0.5% of all CLEC orders and less than 0.1% of BellSouth retail orders are affected.

Volume of UNE DS-0 and High Capacity Digital Loops in GA and LA

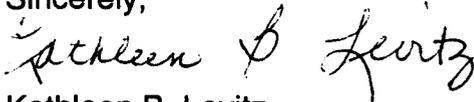
The staff requested that BellSouth provide the number of DS0 and DS1 and higher digital loops that it was providing as UNEs in Georgia and in Louisiana.

The table appearing below contains the requested information as of February 2002.

Product description	GA	LA
UNE Digital Loops < DS1	8834	3500
UNE Digital Loops >= DS1	3145	3154

In accordance with Section 1.1206, I am filing two copies of this notice and the accompanying attachments and request that you please place them in the record of the proceeding identified above.

Sincerely,



Kathleen B. Levitz

Attachments

cc: Renee Crittenden
Ian Dillner
Aaron Goldberger
Daniel Shiman
Dennis Johnson
Susan Pié
James Davis-Smith



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April 16, 2002

Mr. Kyle Kopytchak
Network Telephone
815 South Palafox Street
Pensacola, FL 32501

Dear Mr. Kopytchak:

This is in response to your e-mail of March 26, 2002, regarding allegations that certain Network Telephone Purchase Order Numbers (PONs) were not found in BellSouth's Performance Measurement Analysis Platform (PMAP) raw data files for December 2001 and January 2002. I have listed each category as shown in the Excel spreadsheet attached to your e-mail with a corresponding BellSouth response:

- 1) **Network Telephone Category - December Local Exchange Navigation System (LENS) with no raw data:** PONs not in Firm Order Confirmation (FOC), Order Completion Interval (OCI), Total Service Order Cycle Time (TSOCT) or % Reject raw data files for December 2001.

BellSouth Response: PONs are in the FOC, OCI and TSOCT raw data files for December 2001. These PONs also appear in the raw data file for the denominator of % Rejects. PONs would not appear in the raw data file for the numerator of % Rejects because a FOC was returned.

- 2) **Network Telephone Category - December LENS and FOC:** PONs completed in LENS and within the FOC PMAP raw data, however, not in OCI, TSOCT and/or % Rejects for December 2001.

BellSouth Response: Of the list of 236 PONs provided by Network Telephone, 172 of the PONs were duplicate PON numbers. The remaining 64 PONs were the only December PONs that could produce a service order that would be provisioned. All 64 of these PONs were included in the December 2001 Percent Rejected Service Requests raw data file for the denominator. Fifty-nine of these PONs are not in either the OCI or TSOCT raw data files because they are either Disconnect (D) or Deny Service (Y) type LSRs, which are properly excluded from the OCI and TSOCT measures in accordance with the SQM. The remaining 5 PONs were completed in January and appear in the January raw data file for OCI and TSOCT.

- 3) **Network Telephone Category – January LENS only:** PONs not in any raw data files for January 2002.

BellSouth Response: The PONs listed in the spreadsheet are in the FOC, Reject denominator, OCI and TSOCT raw data files for January 2002.

- 4) **Network Telephone Category – January LENS and FOC:** PONS in PMAP FOC raw data and not in OCI, TSOCT or % Reject raw data. This list of PONs was also included in the ex parte filing made by Network Telephone on March 26, 2002, with the Federal Communications Commission.

BellSouth Response: Of the list of 50 PONs provided by Network Telephone, 27 of the PONs were duplicate PON numbers. The remaining 23 were the only PONs that could produce a service order that would be provisioned. All 23 of these PONs were included in the January 2002 Percent Rejected Service Requests raw data file for the denominator. Twenty of these PONs are not in either the OCI or TSOCT raw data files because they are either Disconnect (D) or Record/Administrative (R) type LSRs, which are properly excluded from the OCI and TSOCT measures in accordance with the SQM. BellSouth's investigation of the remaining three PONs determined that they were not in the OCI or TSOCT raw data files because these orders did not appear in the SOCS feed used to calculate those measures. In certain rare situations on both BellSouth retail and CLEC orders, SOCS may generate duplicate service order numbers in the same month. When this rare situation occurs, only the most recent service order appears in the measurement feed. This does not affect the provisioning of CLEC or BellSouth orders. This minor issue should be resolved with May 2002 data.

If you have additional questions regarding this matter, please contact the CLEC Interface Group. Otherwise, I will consider this matter closed.

Sincerely,



Philip Porter
Manager
CLEC Interface Group

Certificate of Service

I hereby certify that I have served by first class mail, postage pre-paid, on April 17, 2002, a copy of the foregoing written ex parte upon all the parties to CC Docket No. 01-277 and CC Docket No. 02-35



Althea Kennedy