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April 22, 2002

WRITTEN EX PARTE

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

Re: CC Docket No. 02-35

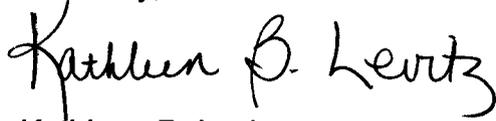
Dear Ms Dortch:

On April 19, 2002, Ian Dillner of the Wireline Competition Bureau asked for information about changes to the CLEC Application Verification Environment, or CAVE, test process proposed by BellSouth. In response to his request I provided him with the following information.

BellSouth met with the CLECs during the Change Control Process (CCP) Process Improvement meeting Thursday, April 11, 2002, and presented a proposal for modifying the testing process that applies to CLECs using CAVE. That proposal, attached to this letter as Attachment A, responded to an earlier CLEC request that BellSouth review the proposed CLEC changes in the "red-line/green-line" version of the testing section of the CCP. The outline of the changes to the test agreements appears on page 3 of the CAVE-CCP-PROPOSAL.PPT document given the CLECs at the April 11 meeting. That PowerPoint presentation is attached to this letter as Attachment B. At the next meeting in early May BellSouth will continue to work with the CLECs on detailed planning related to the proposal, targeting a July 1, 2002 implementation date.

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

Sincerely,

A handwritten signature in black ink that reads "Kathleen B. Levitz". The signature is written in a cursive style with a large initial 'K' and a distinct 'B'.

Kathleen B. Levitz

Attachments

cc: Ian Dillner
Susan Pié
James Davis-Smith

ATTACHMENT A

In lieu of the proposed changes to the BellSouth testing process, we respectfully submit the following for consideration as a replacement to the wording in Section 10.0 of the Change Control Process document.

BellSouth Testing Process:

BellSouth offers a separate systems environment that contains the application-to-application interface and gateway applications for both ordering and pre-ordering. Pre-ordering capabilities are available in LENS and TAG. Ordering capabilities are available via LENS, TAG and EDI.

BellSouth offers CLEC testing for new entrant testing, new release testing as well as regression testing. CLECs are responsible for establishing and maintaining connectivity to the BellSouth CLEC testing environment. Testing response time should generally be similar to those received in production provided that the CLEC uses the same connectivity option that is also used in production.

The BellSouth CLEC test environment offers pre-ordering capability as well as ordering capabilities using the Local Service Request (LSR) process up to and including the service order processor. This process provides the opportunity for a CLEC to conduct comprehensive testing of both pre-ordering and ordering functionality. All BellSouth pre-ordering and ordering capabilities will be made available to CLECs in the CLEC test environment. In the event of known exceptions to this practice, CLECs will be notified.

Pre-ordering functionality is tested by the submission of a specific request type using either LENS or TAG and will be considered successful by the return of the expected and correct response data. Ordering functionality will be tested by the submission of an LSR via LENS, TAG or EDI. This type of testing will be deemed successful through the creation of a service order along with the return of the appropriate confirmation and completion notices associated with that particular order type.

Orders processed in the CLEC test environment will have no impact on the end state of the accounts tested in the simulated environment. Therefore, pre-ordering and ordering functions performed while in the test environment should not appear on Customer Service Records (CSR) for the live accounts. In addition, LSRs cannot be issued to migrate a retail account with the expectation that a subsequent LSR could then be processed against that same account in order to do post migration changes. Post migration changes can be tested only on accounts that have been previously established for that CLEC.

BellSouth will provide a test environment that contains a wide range of data associated with various account types. A BellSouth Test Manager will be assigned to work with a CLEC who wishes to enter into either new entrant or new release testing. The Test Manager will assist the CLEC in the selection of an appropriate set of test scenarios using the current set of test scenarios available on the BellSouth testing website fit their to best fit individual testing needs. A group of accounts will be available for use by all CLECs. Under special circumstances, BellSouth will work with each individual CLEC to establish additional test accounts that will fulfill their individual testing needs.

All addresses and telephone number from production will not be available in the CLEC test environment. Instead, the appropriate addresses and telephone numbers from representative NPAs will be available in the environment for use when conducting pre-order and ordering transactions.

However, the test environment is not intended for CLEC volume testing. The BellSouth CLEC test environment makes available to the CLEC community three types of testing: New Entrant, New Release and Regression testing. Below is a further description of the three types of available testing.

New Entrant testing:

- Performed prior to the initial production submission of LSRs and/or pre-ordering transactions to BellSouth. This process is intended for those CLECs who are not currently in production
- OR
- Allows CLECs to test new functionality/transactions for which they have not previously tested with BellSouth

New Release Testing:

- Allows CLECs to test an impending BellSouth release that affects the interface and/or business rules. This is intended for CLECs who are currently in production with BellSouth using EDI, TAG or LENS.

Regression Testing

- Allows CLECs to test existing functionality when that CLEC has made software and/or hardware changes.
- This type of testing is typically performed in conjunction with testing of new release functionality.
- Regression testing is supported for all releases that are currently available in the test environment.

The "Testing Environment" section of the Change Control Document is intended to provide a high level overview of the BellSouth CLEC testing process. Comprehensive

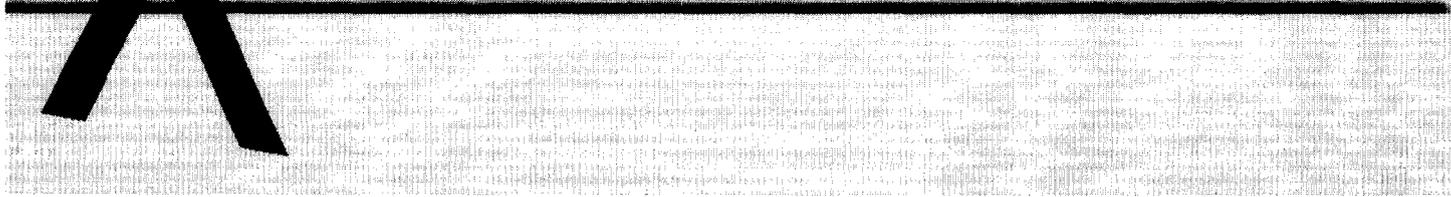


Draft Proposal for Section 10.0 of CCP Document

and detailed methods and procedures for the BellSouth CLEC testing process can be found in the "BellSouth Testing Practices and Procedures". All documentation needed for testing with BellSouth can be location on the BellSouth Testing website at:

http://www.*****

ATTACHMENT B

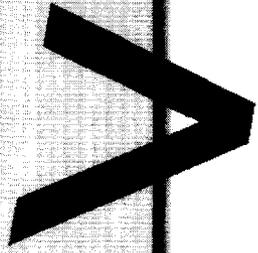


BellSouth Testing Process

Proposed Changes

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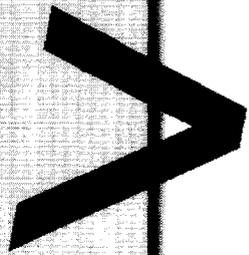


BellSouth Testing Process

- **Establishing a Testing Profile**
 - Establish a secure web-based profile
- **Test Environment Availability**
 - Provide pre-release testing
 - CAVE access provided for a release until it is necessary to prepare CAVE for next release.

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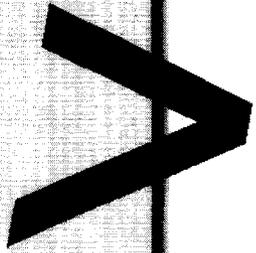


BellSouth Testing Process

- **Creating a Test Plan**
 - Formal Test Agreement will be discontinued
 - Majority of the process will now be done on-line
 - A BellSouth Test Manager will work with each CLEC who desires to test with BellSouth.

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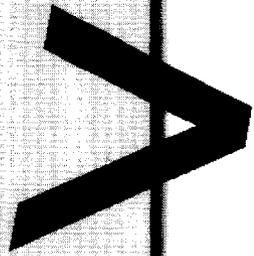


BellSouth Testing Process

- **Published Test Case Volumes**
 - Establish a BellSouth Test Case Catalog (BTCC)
 - Provide a broad scope of order and pre-order scenarios
 - Will include English scenario description, detail of field by field values and definitions, etc.

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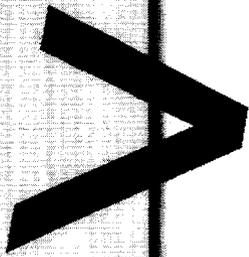


BellSouth Testing Process

- **Regression Testing**
 - Allows CLECs to test existing functionality when CLEC has made software and/or hardware changes for new releases
 - Supported for all releases currently available in the test environment

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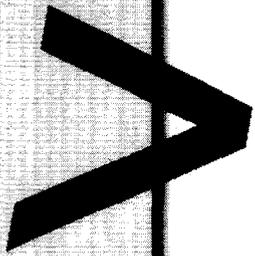


BellSouth Testing Process

- **Defect Management Process**
 - CLECs will advise BellSouth Test Manager when a defect is found.
 - Test Manager will validate defect
 - BellSouth will provide a bulletin to the CLEC community

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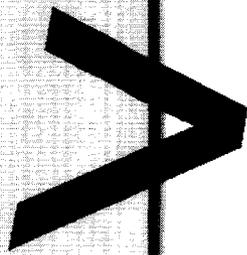


BellSouth Testing Process

- **Production Implementation Decision**
 - Provide status reports during CLEC pre-release testing
 - Reports will address CLEC discovered defects, possible workaround and correction status
 - BellSouth will host a final status call at end of CLEC test period to obtain CLEC go/no go recommendation for the release
 - CLECs will participate in the go/no go decision making process by providing their final recommendation for the release based upon their testing results

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BellSouth Testing Process

- **Targeted** Initial Implementation Date 7/1/02
- May necessitate a phased approach
- Propose small sub-team of 3 to 5 CLECs work with BellSouth to meet as needed during development period

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