



April 29, 2002

By Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: EX PARTE – WC Docket No. 02-35: Application by BellSouth for Authorization to Provide In-Region InterLATA Services in Georgia and Louisiana

Dear Ms. Dortch:

On April 26, 2002, Sherry Lichtenberg, Marc Goldman and I on behalf of WorldCom, Inc., met with Renee Crittendon, Ian Dillner and Dennis Johnson of the Wireline Competition Bureau, and Hillary DeNigro of the Enforcement Bureau to discuss WorldCom's OSS concerns, including change management and testing, line loss reports and progress on single C order implementation, and intraLATA routing issues, related to BellSouth's application in the above listed docket.

In particular, on line loss reports we explained that WorldCom has just discovered what appears to be another significant problem with the BellSouth line losses as posted on the Web GUI and as sent to WorldCom via our NDM feed. On April 26, WorldCom completed an audit of the line losses posted on the web versus those received from BellSouth via NDM. The audit covered the period from March 25, 2002 through April 15. During this period, it now appears that approximately 4300 ANIs appeared on the Web GUI line loss file that were not sent to WorldCom via NDM. Further investigation leads us to believe that most of the ANIs that appear on the Web GUI but not on the NDM report are actually newly migrated lines to WorldCom, not lines of customers WorldCom has lost. In these cases, the line loss date matches the migration date. In addition, WorldCom's spot check has revealed that for many of these ANIs, WorldCom has continued to receive usage data after the ostensible line loss date. An additional 121 ANIs listed as line losses on the Web GUI were not sent to WorldCom via our NDM feed.

Further, we discussed BellSouth's ongoing problem of routing intraLATA calls improperly for many of WorldCom's customers, and provided two letters e-mailed from Sherry Lichtenberg to BellSouth at the meeting, which are attached hereto. We explained at the meeting that BellSouth is not permitted to carry these intraLATA calls under our contracts with BellSouth, which is clearly set forth in the following provisions from our current contracts with BellSouth in Georgia, Florida and North Carolina (and to which BellSouth has agreed for the remaining states in its region):

“3.2.3 IntraLATA Carrier Selection

“3.2.3.1 BellSouth shall provide to MCIIm the capability to order local service, intraLATA, and interLATA services by entering MCIIm Customer's choice of carrier on a single order. BellSouth shall provide MCIIm with the capability to order separate interLATA and intraLATA carriers on a line or trunk basis.

“3.2.3.2 In all cases, BellSouth will route toll calls to the appropriate carrier as designated by MCIIm. BellSouth shall not be the default toll carrier in any circumstances.”

* * * * *

Pursuant to the Commission's rules, I am filing an electronic copy of this letter and request that it be placed in the record of this proceeding.

Sincerely,

Keith L. Seat
Senior Counsel
Federal Advocacy

Attachments

cc (w/att.): Renee Crittendon, Dennis Johnson, Ian Dillner, Hillary DeNigro, Qualex International, Leon Bowles (GPSC), Arnold Chauviere (LPSC), James Davis-Smith (DOJ)

ATTACHMENT 1

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

From: Sherry Lichtenberg [mailto:Sherry.Lichtenberg@wcom.com]

Sent: Wednesday, April 17, 2002 12:58 PM

To: greg.follensbee@bellsouth.com

Cc: Michael Henry (E-mail); Sherry (E-mail)

Subject: BellSouth Expanded Area Calling

Greg Follensbee
BellSouth

Greg,

Thanks for taking the time to discuss the way in which BellSouth handles intralata calling for UNE-P customers. After a year of questions without answers, I am pleased that you are helping us get to the bottom of this problem.

Given the complexity of this issue, let me make sure that I understood your explanation yesterday.

1. BellSouth offers its retail customers several calling plans. These are measured service, flat rate service, and "extended local" service, as noted in your local tariffs. Customers with measured and flat rate service can select their intralata carrier. Customers with "extended local service" pay an additional flat rate for this service and have their intralata (local toll) calls carried by BellSouth.
2. When a retail customer with measured service or flat rate service that does not include the "extended local" plan migrates to UNE-P, their intralata (local toll) calls will be carried by the carrier requested on the local service request (e.g., MCI, AT&T, etc.). The calls will be routed to the carrier's POP and will proceed on the carrier's network. Call records will not appear on the daily usage feed, since these calls will not traverse the BellSouth network.
3. When a retail customer with "extended local" calling migrates to UNE-P, that customer continues to have the "extended local plan," regardless of the intralata PIC placed on the local service request submitted by the UNE-P carrier. These customers continue to have their calls carried on the BellSouth network. The UNE-P carrier receives these call records on the daily usage feed. The UNE-P carrier is charged for these calls as they would be for local calls within the measured rate service area.
4. Due to the differences in calling areas for the local and extended local calling areas, BellSouth developed its UNE-P local switching product to mirror the calling area the customer had previously, similar to the way in which resale is provisioned. This design would impact any carrier that had its own intralata network.
5. BellSouth believes that this issue impacts only Georgia.
6. BellSouth intends to fix this problem in June or July of this year to

allow UNE-P CLECs to order either local or "extended local" switching for their customers. This will allow intralata (local toll) calls to follow the customer's PIC choice. This fix will be handled through the normal change management process.

We also discussed some action items regarding this issue.

1. BellSouth will review the call records provided by MCI to numerous BellSouth employees over the past year in order to explain exactly why each example was routed on the BellSouth network rather than carried on the network chosen by the customer for intralata calls.
2. BellSouth will provide the description of this routing provided to CLECs, including the URL and page references from the BellSouth CLEC handbook and the various ordering and programming guides.
3. BellSouth will provide the Change Request number, release documentation, and implementation schedule for the change to allow CLECs to order UNE-P without the extended calling area. You will provide a detailed explanation of what is being changed, a date and release number for the change, and the on which this change will be available for testing in the CAVE test environment. We would also like to know where this change appears on the change management prioritization list.
4. MCI is reviewing its Florida call records and will send any intralata records that appear on the daily usage feed to you for investigation.
5. BellSouth will credit MCI for both the revenue lost due to this routing issue and for the wholesale charges incurred for routing calls PIC'd to MCI or another intralata carrier over the BellSouth network.

Hopefully, you can also answer two last questions.

If a BellSouth retail customer with extended local calling wants to migrate to MCI, drop the extended plan, and select MCI as his intralata carrier, what would he have to do? Would he need to call BellSouth to change from "extended local" to measured service and then migrate once that transaction was completed?

Where does the customer's calling plan (measured, flat rate, extended local) appear on the customer's CSR? Is this part of the information provided on the parsed CSR?

Thanks again for speaking with me yesterday. I look forward to receiving the answers to my questions by 4/24/02.

Sherry Lichtenberg

ATTACHMENT 2

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

From: Sherry Lichtenberg [mailto:Sherry.Lichtenberg@wcom.com]
Sent: Monday, April 22, 2002 11:06 AM
To: greg.follensbee@bellsouth.com
Cc: Sherry (E-mail)
Subject: Intralata call routing problems in FL

April 22, 2002

Mr. Greg Follensbee
BellSouth

Subject: Call Routing Problems in Florida

Greg,

During our discussion last week regarding the incorrect routing of intralata calls in Georgia, you stated that the "expanded calling area" issue was limited to Georgia. Our research shows that this is not the case.

The attached file provides examples of inter and intralata calls that BellSouth appears to have carried over its network in Florida rather than following the customer's preferred carrier choice (PIC). These calls should not have been sent to MCI on the daily usage feed but should have been routed to the MCI POP to be carried on the MCI network.

Please provide us with a root cause analysis for each of the incorrectly routed calls shown on the spreadsheet. In addition, please provide written answers to the following questions:

1. If a Florida BellSouth retail customer with the BellSouth enhanced calling area plan migrates to a CLEC using UNE-P, does their previous calling area remain intact?
2. If a CLEC's order in Florida includes a request to migrate a BellSouth retail customer with an enhanced calling plan to UNE-P with a change of intralata PIC, will BellSouth provision the service as ordered?
3. Several of the calls on the spreadsheet show traffic between different LATAs in Florida, including calls between BellSouth and Sprint territories. Please explain in detail how these interlata calls were routed and why/how the call records were sent to MCI via the daily usage feed.
4. Since these are customer impacting problems, I would like your written answers to these questions no later than Monday, April 29, 2002.

Sherry Lichtenberg
MCI WorldCom