

**BellSouth Corporation**  
Suite 900  
1133-21st Street, NW  
Washington, DC 20036-3351

glenn.reynolds@bellsouth.com

**Glenn T. Reynolds**  
Vice President -  
Federal Regulatory

202 463 4112  
Fax 202 463 4142

May 3, 2002

EX PARTE

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> St. SW  
Washington, D.C. 20554

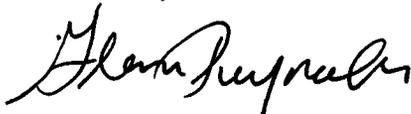
Re: CC Docket No. 02-35

Dear Ms. Dortch:

This is to inform you that on May 1, 2002, the following people representing BellSouth participated in an ex parte meeting with Commissioner Kathleen Abernathy and Matt Brill pertaining to the above docket: Margaret Greene, Ernest Bush, Jan Funderburg, and Bob Blau. During this meeting, BellSouth urged the Commission to approve its application for long-distance relief in Georgia and Louisiana. The attached documents formed the basis for this ex parte presentation.

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

Sincerely,



Glenn T. Reynolds

cc: Commissioner Abernathy  
Matthew Brill  
Susan Pie  
James Davis-Smith (Department of Justice)

**BellSouth 271 Application**  
**Georgia / Louisiana**

**May 1, 2002**

- BellSouth has successfully resolved each of the Wireline Competition Bureau's concerns about BellSouth's previous application.
  - Integration
  - Manual Service Order Processing
  - Service Order Accuracy
  - Change Control
  - “Double” Firm Order Confirmations
  - Performance Data Reliability
- BellSouth's local market is open. CLECs have captured significant market share in both Georgia and Louisiana.
- BellSouth's Supplemental Application for Long Distance Authority in Georgia and Louisiana should be approved.

## Integration

- BellSouth has shown that CLECs can use BellSouth's unparsed responses to pre-order queries to populate their "back office" systems and to create Local Service Requests.
  - Four parties have confirmed integration using unparsed data.
  - KPMG confirmed that it successfully tested integration using unparsed data.
  - BellSouth has made expert consultants available to CLECs, at no charge, to assist them in intergration using unparsed data.
  - GPSC and LPSC have concluded that CLECs can intergrate successfully.
- BellSouth successfully deployed telephone number ordering for UNE platform ("TN ordering for UNE-P"), reducing address related errors.
- BellSouth successfully implemented its parsed customer service record capability in January 2002.
  - Parsed CSR has been successfully tested by multiple parties.
  - GPSC has confirmed that "the parsed CSR functionality implemented by BellSouth works in the manner intended."
  - Telcordia's test conclusion: Telcordia was able to electronically submit a CSR query, receive and display the parsed CSR response, use a sub-set of pre-order response data to automatically pre-populate an order and receive a valid firm order conformation and completion notice from BellSouth.

## Manual Service Order Processing

- BellSouth receives fewer orders manually than was the case with other BOCs at time of approval.
  - Example: At time of Texas application, 43% of CLEC orders were submitted manually as compared to 10% for BellSouth.
- Manual order reject rates are low and continue to improve.
  - Example: Residential Resale – September: 13.98% December: 11.55%.
  - Example: UNE-P – September: 19.38% December: 14.33%.
- BellSouth's Flow Through rates are comparable to other BOCs at time of approval.
- DoJ did not reiterate its prior concern about manual handling in the Supplemental Application and noted that reject rates have dropped.

## Service Order Accuracy

- BellSouth's Service Order Accuracy has continued to improve.
- BellSouth has been working with individual CLECs to improve accuracy results.
  - Example: Birch Telecom since November 2001.
- BellSouth has voluntarily included Service Order Accuracy in performance penalty plans in both Georgia and Louisiana.
- DoJ noted that BellSouth has made “extraordinary” and “intensive” efforts to improve Service Order Accuracy results.
- Performance data confirms improvement. Of 6 products categories that accounted for 98% of orders from October thru January, BellSouth:
  - Met benchmark for 5 categories 3 out of the 4 months.
  - Met benchmark for 6<sup>th</sup> category 2 out of the 4 months.
- Overall manual service order accuracy was approximately 97% for November thru January.

# Change Control

- BellSouth has demonstrated a pattern of compliance with the current Change Control Process (CCP).
  - During the 4<sup>th</sup> quarter, 2001, BellSouth handled (accepted or rejected) 95% of submitted change requests within the specified 10 day period.
  - BellSouth consistently corrects defects within CCP specified timeframes.
  - BellSouth routinely delivers release Draft User Requirements, Final User Requirements, Final Specifications and Business Rules within CCP timeframes.
- Overall Performance (June, 1999 – March, 2002):
  - Change requests received and not subsequently cancelled: 490.
  - Implemented: 338.
  - Scheduled for implementation: 55.
  - Awaiting CLEC prioritization: 50.
  - Awaiting implementation scheduling: 7

# Change Control

- Within last three months BellSouth has implemented:
  - Parsed CSR
  - Mechanized line splitting
  - New Install with No Prior Service at Location
  - Electronic ordering of UDC loops
  - Single C order process
  - Add Ability to Create New Listings in LENS
- BellSouth will implement top 15 CLEC change requests in 2002; 8 will be implemented within first six months.
- CCP Improvements:
  - IT presence at CCP meetings
  - SMEs available upon request
  - Provision of additional enhancement scheduling information and coding matrix.
  - Provision of complete release implementation documentation for year.
  - Extended CAVE testing window and added LENS to CAVE.

## Change Control

- On-going modification to CCP
  - Both the GPSC and LPSC are examining CCP.
  - GPSC is in midst of comprehensive review of CCP with participation by CLECs and BellSouth:
    - January 30 CLEC coalition filed “redline” version of current CCP document with proposed changes highlighted.
    - February 15 BellSouth filed “greenline” version with agreement to specific changes and alternative language around which BellSouth hopes a consensus can be reached.
    - Parties will meet again in early May to discuss.
    - If agreement is not reached on remaining differences, matter will go the GPSC for resolution.

## “Double” Firm Order Confirmations (FOCs)

- All known Due Date Calculator system errors have been eliminated.
- Consequently, “work around” that was employed to issue a second FOC to provide correct due date notification has been discontinued.
  - No “Double FOCs” have been generated since February 11.

## Performance Data Reliability

- KPMG has submitted an “Interim Report” detailing the status of the three performance metrics audits it is conducting in Georgia.
  - Audits are comprehensive, encompassing BellSouth’s compliance with metric definitions, the integrity of BellSouth’s processing procedures, validation of reported results, collection and storage practices, etc.
  - Results: Audit 1: 98% criteria passed; Audit 2: 100% criteria passed; Audit 3: in progress with specific test status detailed in Report.
  - KPMG has no open exception or issue with any significant impact on the measures upon which BellSouth relies in making its 271 case.
- Both the GPSC and the LPSC have stated that the data is reliable.
- Both the GPSC and the LPSC require annual audits for at least the next four years.

## CLECs Have Captured Significant Market Share in Georgia and Louisiana

- CLECs serve
  - More than 18.5% of the lines in Georgia.
  - More than 8.9% of the lines in Louisiana.
- CLECs share of the Georgia market is now twice what it was in New York and Texas when 271 authority was sought in those states.
- CLECs share of the Louisiana market is greater than what it was in New York and Texas when 271 authority was sought in those states.
- Between July and December, 2001, UNE-P lines in Georgia increased by 83,000 or more than 58%.



SIGNING, CASHING, AND/OR DEPOSITING OF THIS CHECK WILL SWITCH YOUR  
LONG DISTANCE, LOCAL TOLL, AND LOCAL SERVICES TO AT&T.

710571

75-285  
010

CALL 1 800 909-7365, ext. 17767, FOR YOUR  
CHECK CODE BEFORE CASHING YOUR CHECK.

WRITE YOUR CODE HERE

□ □ □ □

NO. 1446605  
Issue Date: 4/12/02  
Check expires 30 days  
from date of issue.

7705652767 083 PMWU 116 L 01

Seventy-five and 00/100 Dollars

Check Amount

\$75.00

Attention: financial institution. Check must be endorsed  
with payee's signature to be valid for cashing and/or  
deposit. Payee's name cannot be altered.

**VOID IF ALTERED.**  
Amount may not exceed \$75.

**PAY TO THE ORDER OF:**

David Frolio  
4497 Belvedere Pl. NE  
Marietta, GA 30067

*Edward M. Dwyer*  
AUTHORIZED SIGNATURE

Citizens State Bank, Clara City, MN 56222

⑈ 1446605⑈ ⑆091904856⑆ 76 057 1⑈

Now you can get local  
and long distance  
together from AT&T.



Dear David Frolio:

Most people think of us as a long distance company, but we've got exciting news to share with you: Now we handle every type of call — including calls across the street.

That means extra convenience for you, because when your phone company is AT&T, you'll receive just one bill each month, have one customer service number to call for everything, and enjoy competitive rates every time you pick up your home phone.

Here's what's included for just \$35.90\* a month:

- Unlimited local calls
- Unlimited calling features to choose from
- 7¢-a-minute in-state and state-to-state long distance and local toll calls from home, morning, noon and night

Of course, if you'd prefer a different combination of services, just let us know and we'll tailor a package to your specific calling needs.

Here's one more reason to accept this offer now: the \$75 check at the top of this page. It's yours to cash and enjoy as soon as you call 1 800 909-7365, ext. 17767, to sign up. So call today to enjoy these great benefits at this great price!

Sincerely,

*Gina Grossmann*

Gina Grossmann  
AT&T Marketing Manager

Unlimited local calls,  
with no time limits

Unlimited choice of  
calling features

7¢-a-minute state-to-state long  
distance — all the time

One simple bill

**CALL**  
1 800 909-7365,  
ext. 17767.

\*A per line access fee for local service (FCC Line Charge) and Universal Connectivity Charges of 35¢ per line and 11.5% on state-to-state calls apply. For more details about these charges, please call 1 800 909-7365, ext. 17767. The \$35.90 monthly fee is calculated by combining the \$3.95 fee for the specific AT&T domestic long distance calling plan with local toll service and the \$31.95 fee for AT&T Local Service. To complete your order for AT&T Local Service, you must call our toll-free number and speak to an AT&T representative to indicate the local calling features you wish to receive and your local directory listing. For residential customers only.



Please see important information on the back.