

**BellSouth**  
Suite 900  
1133-21st Street, N.W.  
Washington, D.C. 20036-3351

robert.blau@bellsouth.com

**Robert T. Blau, Ph.D., CFA**  
Vice President-Executive and  
Federal Regulatory Affairs

202 463-4108  
Fax 202 463-4631

May 13, 2001

EX PARTE

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

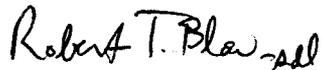
Re: CC Docket No. 02-35

Dear Ms. Dortch:

On May 13, 2002, Duane Ackerman, Margaret Greene, and I, representing BellSouth, met with Chairman Michael Powell, and his Legal Advisor, Kyle Dixon, to discuss the BellSouth application pending in this docket. Issues raised in the meeting are summarized in the attached document.

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

Sincerely,



Robert T. Blau

Attachment

cc: Chairman Michael Powell  
Kyle Dixon  
Renee Crittendon  
Susan Pié  
James Davis-Smith

**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%.