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May 14, 2002

Ms Marlene H. 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 is to inform you that on May 13, 2002, Ernest Bush, Robert Blau, Jonathan Banks, Dennis Davis, Glenn Reynolds and I met with Dorothy Attwood and members of her staff. The purpose of the meeting was to discuss issues raised in recent CLEC ex partes filed in this proceeding. In particular we discussed process improvements and capacity planning associated with the BellSouth Change Control Process (CCP) and BellSouth's efforts to correct problems with line loss reports provided to CLECs. Besides Ms Attwood, Wireline Competition Bureau staff attending the meeting included: Jeffery Carlisle; Michelle Carey; Renee Crittenden; Ian Dillner; and Dennis Johnson.

The attached documents formed the basis for the CCP presentation, which emphasized BellSouth's commitment to working with its CLEC customers to meet their OSS needs within capacity constraints. In particular, BellSouth reiterated its commitment to work each change request within 60 weeks of prioritization, subject to available capacity. BellSouth also explained that under its current proposal to address prioritization and scheduling, assuming no industry release in calendar year 2003, the CLECs could see at least 80% of the existing change request backlog eliminated. We also explained that although the dispute resolution process had explicit deadlines for action by BellSouth executives, BellSouth had no control over the time within which a state commission would resolve a dispute escalated to that commission. Finally,

clarifying the nature of "new" change requests, we explained how requests that BellSouth had rejected remained in that category because the requesting CLEC chose neither to use the dispute resolution process incorporated in the CCP nor to withdraw its request.

In accordance with Section 1.1206, I am filing two copies of this *ex parte* and related attachments and request that you place it in the record of the proceeding identified above. Thank you.

Sincerely,

Kathleen B. Levitz

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Attachments

cc: Dorothy Attwood
Michelle Carey
Jeffrey Carlisle
Renee Crittenden
Ian Dillner
Dennis Johnson
Susan Pié
James Davis-Smith

BellSouth's Change Control Process (CCP) Process Improvements & Capacity Planning

Dennis Davis

May 13, 2002

Talking Points

- CCP Process Improvement
  - Improvements
  - Issues Outstanding
- Capacity Planning
  - 2003 Release Options
    - 2003 Estimated Capacity
  - 2002 Post Quarterly Report

CCP Process Improvement

- Improvements Implemented
  - CLEC Affecting Definition – Broad in Scope; CLEC language verbatim
  - Appropriate BellSouth Representation in CCP
  - Expanded System Outage Reporting
  - Increased Scope of CCP
- Expected Improvements (pending balloting and/or CCP working effort)
  - Simplify Testing Process
    - Enable CLECs to provide a go/no go recommendation for releases
  - Approach to communicating CLEC Affecting Changes
  - Clarify language for change to frozen Map.

CCP Process Improvement

- Issues Outstanding
  - Prioritization and Scheduling
  - Defect Intervals for Medium and Low
  - Request to expedite Type 2s (without a mandated date)/Type 4s (BST initiated)

BellSouth Proposal to address Prioritization/Scheduling

Prioritization Scheduling**

•Type 6 (Defects) Planned for Maintenance Releases. Only in Production Releases if interval dictates

- •High Impact (10 Business Days)
- •Medium Impact (90 Business Days)
- •Low Impact (120 Business Days)

•Type 2

- •Mandates
- • Flow Through Change requests
- •Type 4/5 (Previously targeted may be removed from production release if mandated change request dictates.)
- •Type 4 is BST Initiated Change requests
- •Type 5 is CLEC Initiated Change requests

•Type 3 (Discretion of CCP Membership; Standalone release from Type 2s, 4s, 5s.)

•Change requests implementation 60 weeks from prioritization subject to available capacity.

Note: **Maintenance or Infrastructure Upgrades – Not explicitly stated as a priority but all parties should understand changes are required to maintain stability and improve performance.

2003 Release Plan without an Industry Release

March	June	August	October	December
BST Production (Predominantly Infrastructure) •Capacity = 418.65 Units •Network Infrastructure (N.I.); Type 2s, 6s, 4s and (optional are 5s)	CLEC Production •Capacity = 628 Units •Type 2s, 5s, 6s (optional are 4s)	BST Production •Capacity = 418.65 Units •Type 2s, 6s, 4s (optional are 5s); N.I.	CLEC Production •Capacity = 628 Units •Type 2s, 6s, 5s (optional are 4s)	BST Production •Capacity = 418.65 Units Type 2s, 6s, 4s (optional are 5s); N.I.

Note: Five Maintenance Releases primarily planned to address defects (includes Type 6s). Capacity = 505 Units

BellSouth Proposal to address Prioritization/Scheduling

Prioritization Scheduling**

•Type 6 (Defects) Planned for Maintenance Releases. Only in Production Releases if interval dictates

- •High Impact (10 Business Days)
- •Medium Impact (90 Business Days)
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- •Type 4 is BST Initiated Change requests
- •Type 5 is CLEC Initiated Change requests

•Type 3 (Discretion of CCP Membership; Standalone release from Type 2s, 4s, 5s.)

•Change requests implementation 60 weeks from prioritization subject to available capacity.

Note: **Maintenance or Infrastructure Upgrades – Not explicitly stated as a priority but all parties should understand changes are required to maintain stability and improve performance.

2003 Release Plan with an Industry Release

March	May	September	November
BST Production (Predominantly Infrastructure) •Capacity = 314 Units •Network Infrastructure (N.I.); Type 2s, 6s, 4s (optional are 5s)	CLEC Production •Capacity = 628 Units •Type 2s, 6s, 5s (optional are 4s)	BST Production •Capacity = 314 Units •Type 2s, 6s, 4s (optional are 5s); N.I.	Industry Release •Capacity = 1400 Units Type 3 (i.e., ELMS6)

Note: Five Maintenance Releases primarily planned to address defects (includes Type 6s).
Capacity = 347.5 Units

BellSouth Proposal
Summary

- Post 2002 Actual Capacity Report — Delivered May 10, 2002
  - Includes YTD 2002 Capacity Estimate
- 2003 Estimated Capacity by Release — Delivered May 10, 2002
- Two (2) Release Options — Delivered May 10, 2002
  - With Industry Release
  - Without Industry Release
- Type 4s/5s change request Cap. estimated — Delivered March 27, 2002
- Flow Through change request Cap. estimate — Target May 16, 2002
  - (Flow Through Cap. estimates not part of process)
  - Resend of Type 4s/5s change requests
- Implement change requests 60 weeks from prioritization subject to available capacity.
- Type 6 (Defects) to be implemented in Maintenance Releases (Units provided.)

BellSouth 2003 Capacity Planning Estimate & Release Options

Provided for use in CCP Prioritization Planning

May 10, 2002

2003 Release Plan and Capacity Planning Assumptions

- Assumptions
  - Capacity estimates are based on program levels similar to 2002.
  - CLEC releases will be scoped based on CLEC prioritization and implementation constraints.
  - Release schedule and scope will be baselined and under change control after the defined scoping phase for that release.
  - Capacity is provided for application changes to CLEC interfaces and associated gateways.
  - Capacity includes time spent in 2002 for those releases overlapping calendar years.
  - NPA/NXX Releases for 2003 are currently undefined and may require modifications to the release plan.
  - Industry Standard Release includes ELMS6 mapping and two new features (Frame Relay and Private Line).
  - Infrastructure changes in BST production releases include migration of functionality from the current system platform to the Service Gate Gateway (SGG), Delivery Order Manager (DOM), Service Order Generator (SOG) Systems in accordance with future technology direction.

Option A
2003 Release Plan without an Industry Release

Activity	CLEC Production Release	BST Production Release	BST Production Release (Predominantly Infrastructure)	Maintenance Release
Cave Soak	45 Business Days	45 Business Days	45 Business Days	N/A
Scope	Type 2s, 6s, 5s, and (optional are 4s)	Type 2s, 6s, 4s, and (optional are 5s); Network Infrastructure	Network Infrastructure, Type 2s, 6s, 4s, and (optional are 5s)	Defects (includes Type 6s)
Tentative Implementation Dates	6/03, 10/03	8/03, 12/03	3/03	2/03, 4/03, 7/03, 9/03, 11/03
Capacity per release (units)	628	418.65	418.65	101.1
# Releases	2	2	1	5
Total Capacity (units)	1256	837.30	418.65	505.5
Length (from scoping to production implementation)	10 Months	10 Months	10 Months	4 Months

Option B
2003 Release Plan with an Industry Release

Activity	CLEC Production Release	BST Production Release	BST Production Release (Predominantly Infrastructure)	Maintenance Release	Industry
Cave Soak	45 Business Days	45 Business Days	45 Business Days	N/A	60 Business Days
Scope	Type 2s, 6s, 5s, and (optional are 4s)	Type 2s, 6s, 4s, and (optional are 5s); Network Infrastructure	Network Infrastructure, Type 2s, 6s, 4s, and (optional are 5s)	Defects (includes Type 6s)	Type 3 (i.e., ELMS6)
Tentative Implementation Dates	5/03	9/03	3/03	2/03, 4/03, 8/03, 10/03, 12/03	11/03
Capacity per release (units)	628	314	314	69.5	1400
# Releases	1	1	1	5	1
Total Capacity (units)	628	314	314	347.5	1400
Length (from scoping to production implementation)	10 Months	10 Months	10 Months	4 Months	18 Months

Monitoring and Reporting Post-Release Capacity Utilization (May 10, 2002)[1]

2002 Annual Release Capacity Utilization – YTD Quarterly Report										
Categories	1Q		2Q		3Q		4Q		YTD / EOY	
	Units	%	Units	%	Units	%	Units	%	Units	%
Maintenance	190.1	40.1								
PSN Mandate	2.2	0.5								
Regulatory (Type 2)	41.5	8.7								
Defects (Type 6)	45.3	9.6								
Industry (Type 3)	0	0								
BellSouth (Type 4)	4	.8								
CLEC (Type 5)	191.1	40.3								
Total	**474.2**	**100**							**1800**[2]	

[1] The process is effective January 2002 with Release 10.3.1. Depicts capacity hours for calendar year 2002.Attached to this report is a list of all Type 2, 3, 4, 5, 6 change requests that were implemented.

[2] Estimated remaining capacity for calendar year 2002. Does not include any estimated capacity that is utilized for 2003 Release estimated capacity, actual posted 2002 capacity or 2001 capacity.

CCP CR	Type	Description	Release
133	2	Migration of UNE-P Notifications – Removal of CRIS SANO check	10.3.1
557, FTTF	2	Allow Electronic processing of Unbundled Universal Digital Channel(UDC) Loop Orders	10.3.1
557, FTTF	2	Update to support CCP 557	10.3.1
557, FTTF	2	Update to support CCP 557	10.3.1
	4	Directory Delivery Quantity (DIRQTYA) when REQTYP=M	10.3.1
606	4	Update to support CCP 606	10.3.1
606	4	Enhancement to Hunting	10.3.1
0040 (PHASE 1A)	5	Phase 1a-Order Tracking	10.3.1
371	5	Validation on TN vs Address Req Types A and E	10.3.1
371	5	Update to support CCP 371	10.3.1
371	5	Update to support CCP 371	10.3.1
	6	TAG to allow bldg/flr fields to be populated with NCON	10.3.1
	6	Hunting Fid not being put back in when change main TN but do not make any changes to hunting	10.3.1
	6	Updates to the ocn_id.dat table shouldn't require PAR to be bounced	10.3.1
	6	CFTN should reject non-numberics	10.3.1
	6	BILLCON-FB not required on Req Typ B B HDSL (4W)	10.3.1
	6	SVC ORD does not always appear on LNP TAG FOCs	10.3.1
	6	E-ISDN PRI and E-SYNCRHONET not being rejected	10.3.1
	6	MV with LEATNs and the ATN exists should get a C order not an N	10.3.1
	6	Receiving a due date when a due date should not be returned	10.3.1
	6	NP ORD and L Ord does not always appear on LNP TAG FOCs	10.3.1
	6	TAG not allowing bldg/flr fields to be populated even with NCON populated	10.3.1
459	6	Unable to view LSF Information on LENS CSR	10.3.1
498 (L), 626 (M)	6	CSR appears in LENS but not TAG / OCN Mis-mapping for CSR retrievals in TAG	10.3.1
580	6	LENS users unable to validate an address at a DPA location when attempting to issue a C order when the CSR has a DPA	10.3.1
588	6	Parsed CSR - DES field displays capitalization of first letter in the designation	10.3.1
589	6	Parsed CSR - YPH number not included in parsed listing for additional listings	10.3.1
590	6	Parsed CSR - LTXTY is not returned when foreign cross-reference listing is shown	10.3.1
591	6	Parsed CSR - LSC 65- Parenthesis should not surround city name	10.3.1
593	6	Parsed CSR-DIRNAME is parsing with an extra space after the comma that separates city & state	10.3.1
595	6	Parsed CSR-TL field contains part of LNFN	10.3.1
596	6	Parsed CSR - DES field displays captialization of first letter in the second word of the description	10.3.1

Note: Features with no corresponding CCP CR number either: 1. Require no number (i.e., NPA Splits), 2. have been retroactively reclassified based on review due to new CLEC affecting definition and/or 3. a companion feature depicting a change.

CCP CR	Type	Description	Release
601	6	Parsed CSR – MSG ID and MSG Text not being returned on successful Parse CSR queries	10.3.1
608	6	Line Sharing Disconnects Requiring Cable ID to be input - TAG 7.7	10.3.1
610,597,598,599,600,594,592	6	Parsed CSR	10.3.1
612	6	Notifications for Auto-Clarifications are being formatted incorrectly	10.3.1
	2	Support Florida NPA split 561/772	10.3.2
	2	SLTN is not converting for FL 561/772 NPA Split does not appear on DB09.TRETFD_V9DT1 table	10.3.2
	2	DB09.TRETFD_HD BAN1, BAN2, not converting for FL NPA 561/772 split	10.3.2
	2	ECCKT - Not converting for NPA 561 split on DB09 tables: TSERVICE_DTL and TRETFD_V9DT1	10.3.2
	2	not converting on DB09.TENDU table for FL 561/722 NPA SPLIT	10.3.2
	6	Line USOC should appear in the Line Class of Service Field	10.3.2
520	6	LENS/TAG Miscalculation of UNE-P Due Dates	10.3.2
520	6	Update to support CCP 0520	10.3.2
520	6	LENS/TAG Miscalculation of UNE-P Due Dates	10.3.2
643	6	UNE-P Due Date - when line USOC is in feature field, a due date is not calculated	10.3.2
	2	Update to support Single C	10.4
	2	Update to support Single C	10.4
	2	Mechanize "Full Account" Conversion to UNEP via Single 'C' Order Generation	10.4
	2	Xdsl Migration Cleanup	10.4
	2	Update to support Single C	10.4
	2	For Loop Make up, allow a message type of "00*"(where * is wildcard) as a valid msg id	10.4
	2	Mechanize "Full Account" Conversion to UNEP via Single 'C' Order Generation	10.4
657	2	Local Service Freeze-Availability for REQTYP M Non-Complex	10.4
0016	5	SI Enhancement for SL1, SL2, DS0, DS1 and ISDN	10.4
0016	5	Update to support CCP 0016	10.4
0016	5	Update to support CCP 0016	10.4
0016	5	Update to support CCP 0016	10.4
0016	5	Service Inquiry Enhancement for SL1, SL2, DS0, DS1 and ISDN - Pre-ordering	10.4
0040 (PHASE 1B)	5	Order Tracking-Add "error status" to "Order Tracker" report in PMAPS	10.4
0096,	5	Update to support CCP 0096	10.4
0096, 494	5	Allow Changes in Directory Deliveries	10.4
137	5	Flow thru Request Type CB, Act of P and Q	10.4
651	5	Parsed CSR - Hunting	10.4

Note: Features with no corresponding CCP CR number either: 1. Require no number (i.e., NPA Splits), 2. have been retroactively reclassified based on review due to new CLEC affecting definition and/or 3. a companion feature depicting a change.

CCP CR	Type	Description	Release
651	5	Translation of BST Hunting to LSOG4 Format for Parsed CSR	10.4
	6	Remove appointment code from R order for Directory	10.4
	6	LENS needs to display the TAG Inquiry number on LMU spares and loop reservations	10.4
	6	add FORMAT 180 to LESOG tables for SOER ERROR autoclarificaiton	10.4
	6	Correct AC to N for C-Port Out	10.4
	6	LESOG issuing duplicate orders for same LSR/CC/PON	10.4
	6	No longer calc due date for xDSL ACT of C/LNA of D	10.4
	6	Improper edites on the CC field	10.4
	6	Facility check should not consider holidays	10.4
	6	Room,bldg (Location Standards) are not parsed in DDA	10.4
	6	tag returns error that customer address can not be found	10.4
	6	Missing arrow on Change PIC/LPIC page	10.4
	6	Error message LEOS3055 differs from requirements and is truncating reqtyp	10.4
547	6	Mech LMU - Unable to reserve specific cable & pair in an associated terminal	10.4
585	6	CFA Invalid Auto Clarification	10.4
611	6	Incorrect Error Message being sent on an Auto-Clarify for a SUP	10.4
611	6	Incorrect Error Message being sent on an Auto-Clarify for a SUP	10.4
620	6	LESOG is failing to return the new DD on FOC for all REQTYPs for SUP3's	10.4
627	6	Jack USOC does not appear on LENS Summary & not submitted to LEO when ordered on REQTYP E, ACT of C	10.4
628	6	LENs is allowing users with expired passwords to enter system	10.4
633	6	Parsed CSR - First DID Trunk USOC parses	10.4
634	6	Parsed CSR-Directory Delivery House Number containing a hyphen parses with hyphen	10.4
635	6	Parsed CSR - Error message displayed when access to the record is not authorized improperly formats the customer code	10.4
636	6	Parsed CSR - When directory delivery address contains initials	10.4
637	6	Parsed CSR - When a caption listing is encountered the YPH FID is incorrectly incorporated into the caption arrangement & does not parse	10.4
638	6	Parsed CSR - Listed Name is parsed although part of caption arrangement when /DGN is part of the caption	10.4
639	6	Parsed CSR - Additional listings that are part of an indention arrangement should not parse when "OV" or "UN" listing instruction codes are used	10.4
658, 632	6	Missing xDSL Notifications to EDI / FOCs not received/status only on DSL	10.4
681	6	No value is being returned for SNUM by SGG/TAG for loop makeup	10.4

Note: Features with no corresponding CCP CR number either: 1. Require no number (i.e., NPA Splits), 2. have been retroactively reclassified based on review due to new CLEC affecting definition and/or 3. a companion feature depicting a change.

CCP CR	Type	Description	Release
703	6	Parsed CSR - Miscellaneous Account Numbers are parsed & displayed in the ATN field	10.4
	6	getting error on hunting on REQTYP M Conversions	10.4.1
713	6	Sporadic error message on LMU inquiries in LENS	10.4.1
715	6	Error on Hunting on REQTYP M Conversions	10.4.1
716	6	Action Code USOC BSX++ REQTYP M ACT=V & M	10.4.1
706	6	Service Order Generator defect for Call Forwarding / Busy & Don't Answer Numbers	10.4.1

Note: Features with no corresponding CCP CR number either: 1. Require no number (i.e., NPA Splits), 2. have been retroactively reclassified based on review due to new CLEC affecting definition and/or 3. a companion feature depicting a change.

Additional Feature Candidates for
2002 Releases
Releases 10.6, 11.0
May 10, 2002

CCP Number	Description	Type	Scheduled
0625 (FTTF)	Mech Removal of DSL with UNE-P conversions, LNA=V	2	Under Review for R11.0
0725 (FTTF)	Denials/Restorals on Converted/Disconnected Accounts	2	Scheduled for R10.6
0541 (FTTF)	Mechanization of UCL-Non Designed	2	Scheduled for R10.6 and R11.0