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May 14, 2002

WRITTEN EX PARTE

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:

At the request of the Common Carrier Bureau staff, BellSouth submits this letter in response to certain questions posed by the Commission staff, to provide the following information on the line loss reports provided to CLECs by BellSouth.

BellSouth provides CLECs with line loss notifications via two different methods - a report on the web (the "web report") and a report sent via a Network Data Mover (the "NDM Report"). Currently, four CLECs (AT&T, MCI, DeltaCom and e.spire) receive the NDM Report; presumably, the remainder of the CLECs utilizes the web report. Throughout the course of BellSouth's initial and supplemental application, MCI has raised various allegations regarding the line loss reports. In each case, MCI has overstated the significance of the issues associated with the report. In addition, while other CLECs utilize the reports, MCI has been the only CLEC to complain about the process in this case.

MCI first raised issues about the line loss report in August 2001, when it alleged that the information on the NDM Report did not match the information contained on the web report. As addressed in the initial Reply Affidavit of William Stacy, ¶ 294-295, BellSouth's investigation at that time indicated that "the information in these reports does not match because, when the Line Loss Report

was mechanized using Connect:Direct [NDM] in 1998, it was customized per MCI/WorldCom specifications. That customization for MCI/WorldCom did not include a requirement for Switched in Error ("SE") records." The exclusion of SE records from the NDM Report, done at MCI's request, caused the largest discrepancy between the NDM Report and the web report. In addition, BellSouth discovered, upon additional investigation, that there were other reason codes that appeared on the web report but did not appear on the NDM such as BF ("Business Failure") and TF ("Temporary Service"). The discrepancy between the two reports for MCI over the period from May 2001-February 2002 was approximately 8,000 records, the majority of which were SE records. On February 2, 2002, BellSouth recoded the NDM to include SE records, at MCI's request, as well as to include the other reason codes that were included on the web report but not on the NDM. From December through February, BellSouth provided MCI with a weekly file, which included all disconnect reasons that were not on MCI's NDM file. On March 2, 2002, as discussed in the Supplemental Reply Affidavit of William Stacy, ¶¶ 213-220, BellSouth made additional changes to BellSouth's retail systems to require the use of specific disconnect codes on orders where an end user was returning to BellSouth from a CLEC. The failure to use these disconnect codes correctly had caused the omission of line loss notifications from the NDM.

Subsequent to the changes implemented in February and March 2002, a discrepancy between the web report and the NDM Report continued to exist. BellSouth investigated the problem and determined that while the NDM Report was generated by using the Major Account Number ("MAN") code on the Service Order to identify the losing carrier, the web report was generated using the Alternate Exchange Carrier Name ("AECN").¹ BellSouth determined that the AECN was a more reliable method of determining the losing carrier because the MAN code frequently changes as carriers are acquired and consolidate operations and can be incorrectly input by the receiving company (CLEC or BellSouth) without the error being identified by the BellSouth systems. Consequently, while the data for the total of all NDM Reports captured all of the line loss notifications in the aggregate, it was possible for a particular line loss to be attributed to the incorrect carrier due to an incorrect MAN code on the Service Order. As discussed in the Supplemental Reply Affidavit of William Stacy, ¶ 218, BellSouth implemented a coding change on April 15, 2002, whereby the NDM is generated using the identical fields that are used to generate the web report, thus ensuring consistency between the reports.²

After the implementation of Single C, BellSouth experienced certain errors in the reports. From March 24, 2002 - April 15, 2002, the web report incorrectly

¹ This problem continued after the implementation of Single C. BellSouth provided MCI with a recovery file for post-Single C losses containing the 1,063 missing records.

² By design, the web report does not contain circuit ID information while the NDM does contain such information, and the web report lists the disconnect telephone numbers only by account while the NDM Report lists each line telephone number that is disconnected.

reflected inward migrations on the web report as line losses. BellSouth fixed this issue on April 15.

Also, an error occurred with both reports from April 15, 2002 to May 6, 2002. This resulted in a failure to transmit line loss notifications for certain disconnect activity. This problem affected 25,342 records (region-wide) out of a total of 42,715 records. BellSouth discovered this problem on Friday, May 3, and implemented a fix for the problem on Monday, May 6. On Tuesday, May 7, BellSouth put a Carrier Notification Letter on the interconnection website informing CLECs of the issue and stating that "[c]ustomers impacted are advised to contact the BellSouth E-Commerce Support to have a report provided for the omitted data." Also on May 7, BellSouth placed a notice on the web report itself informing CLECs of this issue and explaining how they could obtain the missing records. Since that time, nine CLECs (including MCI) have requested and received the missing data.

BellSouth believes that it has identified and resolved all issues associated with both the NDM Report and the web report and that these reports are providing accurate records to CLECs.

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

Sincerely,

A handwritten signature in cursive script that reads "Kathleen B. Levitz".

Kathleen B. Levitz

cc: Dorothy Attwood
Michelle Carey
Renee Crittenden
Aaron Goldberger
Dennis Johnson
Susan Pié
James Davis-Smith