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June 26, 2002

Ex Parte Submission

Ms. Marlene Dortch
Federal Communications Commission
Room TW-B-204
445 12th Street, S.W.
Washington, D.C. 20554

Re: Joint Application by BellSouth Corporation, et al, for Provision of In-Region, InterLATA Services in Alabama, Kentucky, Mississippi, North Carolina, and South Carolina, WC Docket No. 02-150
ERRATA FILING

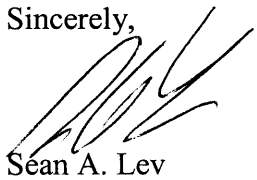
Dear Ms. Dortch:

On June 20, 2002, BellSouth filed a Joint Application for Provision of In-Region, InterLATA Services in Alabama, Kentucky, Mississippi, North Carolina, and South Carolina. BellSouth has recently discovered an error in that filing.

The first 12 pages of Exhibit WKM-9 to the affidavit of W. Keith Milner were produced in error and should be replaced with the attached pages. Exhibit WKM-9 is properly identified and discussed in Mr. Milner's affidavit. We regret any inconvenience caused by this mistake.

In accord with the Commission's rules governing ex parte communications, one copy of this ex parte is being submitted electronically to the Secretary.

Sincerely,



Sean A. Lev

Attachment

cc: Aaron Goldberger
Susan Pie
Cynthia Lewis
James Davis-Smith
Hon. John Garner (APSC)
Hon. Thomas M. Dorman (KYPSC)
Brian Ray (MPSC)
George Flemming (MPSC)
Hon. Jo Anne Sanford (NCUC)
F. David Butler (SCPSC)
Qualex

Exhibit WKM - 9

911 AND E911 SERVICES – Checklist Item 7

I. PURPOSE OF EXHIBIT

1. The purpose of this exhibit is to demonstrate that BellSouth offers CLECs nondiscriminatory access to 911 services. Specifically, it addresses: the documentation available to CLECs; the agreements needed to obtain 911 access; the databases used by BellSouth to provide this service; trunking arrangements; the general processes used including updates to the 911 databases; the access BellSouth provides to government bodies; and statistics regarding CLEC interconnection with BellSouth's 911 services and facilities in Alabama, Kentucky, Mississippi, North Carolina and South Carolina ("Five States").

2. In its Georgia and Louisiana Order, the Commission found that BellSouth was providing non-discriminatory access to its 911 and E911 services. See Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Georgia and Louisiana, Memorandum Opinion and Order, CC Docket No. 02-35, FCC 02-147, ¶ 250 (rel. May 15, 2002) ("GA/LA Order"). BellSouth's provision of 911 and E911 services in the Five States is the same as it is in Georgia and Louisiana. The Commission's finding are consistent with the recent Orders of the Alabama Public Service Commission ("APSC") (See Notice of Decision, Petition for Approval of a Statement of Generally Available Terms and Conditions Pursuant to Sec. 252 (f) of the telecommunications Act of 1996 and Notification of Intention to File a Petition for In-Region InterLATA Authority with

the FCC Pursuant to Sec. 271 of the Telecommunications Act of 1996, Docket 25835 (May 30, 2002) (App. C – AL, Tab 30); Kentucky Public Service Commission ("KPSC") (See Advisory Opinion at 34-35, Investigation Concerning the Propriety of Provision of InterLATA Services by BellSouth Telecommunications, Inc., Pursuant to the Telecommunications Act of 1996, Case No. 2001-00105 (Apr. 26, 2002)) (App. C – KY, Tab 38); Mississippi Public Service Commission ("MPSC") (See Final Order at 90, Consideration of the Provision of In-Region InterLATA Services by BellSouth Telecommunications, Inc. Pursuant to Section 271 of TA 96, Docket No. 97-AD-321 (Oct. 4, 2001)) (App. C – MS, Tab 14); North Carolina Utilities Commission ("NCUC") (See Notice of Decision, Application of BellSouth Telecommunications, Inc. to provide in-Region InterLATA Service Pursuant to Section 271 of the Telecommunications Act of 1996, Docket No. P-55, Sub 1022 (May 23, 2002)) (App. C – NC, Tab 24); and the Public Service Commission of South Carolina ("SCPSC") (See Order No.2002-77 at 95-96, Application of BellSouth Telecommunications, Inc. to Provide In-Region InterLATA Services Pursuant To Section 271 of the Telecommunications Act of 1996, Docket No. 2001-209-C (Feb. 14, 2002)) (App. C – SC, Tab 33) that likewise found that BellSouth has met the requirements of Checklist Item 7. The provision of access remains to this day consistent with the affirmative conclusions reached by the Commission, APSC, KPSC, MPSC, NCUC, and SCPSC.

II. DISCUSSION

3. In Alabama, Kentucky, Mississippi, North Carolina and South Carolina, access to 911 and E911 services is provided through existing tariffs to local government bodies. Once these local government bodies select a particular type of 911 service, BellSouth provides

end users of CLECs with access to the 911 service selected for the area in which they reside in a manner identical to the 911 service supplied to BellSouth's end users.

4. The original 911 service, known as Basic 911 (911), routes an end user call to 911 to a centralized answering location known as a Public Safety Answering Point ("PSAP"). The following steps are involved in the 911 emergency call process:

    a. The end user requires emergency aid and dials 9-1-1.

    b. The dialed digits are received in the end office that sends the Automatic Number Identification ("ANI") to the PSAP.

    c. The attendant at the PSAP obtains the pertinent information that identifies the call and the caller's need.

    d. The attendant then determines the appropriate agency and dials a 7-digit or 10-digit number, as appropriate, to transfer the caller to that agency. The calling party's emergency information is verbally relayed to the responding agency and a unit is dispatched to the caller's location.

5. Enhanced 911 service ("E911") is a full featured electronic system that provides three major enhancements to 911 service:

    a. Selective Routing electronically routes 911 emergency calls from a 911 tandem to the proper PSAP based on the Emergency Services Number ("ESN") routing code that has been assigned to the caller's address. The tandem office is a central office designated for a geographical area to receive end office E911 calls and route to the appropriate PSAP.

    b. The ANI provides the calling party's 7-digit or 10-digit telephone number, as appropriate, on a display at the PSAP.

    c. Automatic Location Identification ("ALI") provides the name and address associated with the calling party's telephone number on the display at the PSAP.

To receive the maximum benefit of E911, the area served must be assigned valid house numbers. Without a house number, dispatching is delayed and the responding agency has difficulty finding the correct address.

6. The following steps are involved in the E911 emergency call process:

   a. The subscriber requires emergency aid and dials 9-1-1.

   b. The digits are received in the end office that sends the ANI to the E911 BellSouth tandem office.

   c. The tandem office finds the associated ESN for the calling telephone number via the Telephone Number/Emergency Services Number ("TN/ESN") translation table.

   d. Based on the ESN, the call is switched, via a dedicated trunk, to the appropriate PSAP.

   e. The subscriber's ANI is displayed at the PSAP.

   f. The ANI information is sent to the Automatic Location Identification/Data Management System ("ALI/DMS") processors for retrieval of subscriber information.

   g. The ALI/DMS processor returns the ALI to the PSAP for display.

   h. The PSAP attendant verifies the telephone number and the street address that has appeared on the screen and obtains information as to which emergency service is needed. The attendant then depresses the button corresponding to the agency request, *e.g.*, fire, police or ambulance, and the call is automatically transferred.

   i. The details for each call (calling number, answering attendant's number, time of answer, time of transfer and/or disconnect and the trunk number) are printed at the PSAP after the call is disconnected.

   j. The agency receives the call and, if it so chooses, the caller's telephone number, name and street address are displayed. The PSAP attendant remains on the line for as long as needed to relay the call.

   k. The agency then dispatches, as needed, an emergency unit to the caller's address.

7. When a reseller or facilities-based CLEC customer dials 9-1-1, the call is treated just like that of any BellSouth customer. BellSouth routes the CLEC customer's E911 call to the appropriate PSAP, and it provides and validates the necessary customer information to the PSAP as outlined in ¶ 6, preceding. A 911 call is also treated just like that of any

BellSouth customer. In the case of 911, the reseller or facilities-based CLEC must deliver the ANI of their customer to the correct PSAP just as BellSouth is required to do.

8. When a reseller CLEC purchases BellSouth's local service for resale to its customers, 911 service is included. Similarly, a CLEC that purchases the Unbundled Network Element – Platform ("UNE-P") from BellSouth also obtains 911 service automatically. BellSouth provides and maintains the service. Facilities-based providers have their own switch and are responsible for getting the 911 call to the appropriate PSAP or, if E911, to the appropriate BellSouth 911 tandem. They are also responsible for getting their customer information in the BellSouth 911 database into the proper format.

9. For resale customers, BellSouth updates and maintains the ALI/DMS database that supports 911/E911 services at the same time it updates and maintains the ALI/DMS database for BellSouth's end users. Facilities-based CLECs electronically provide BellSouth with updated data for their end user customers that are added to the ALI/DMS database as the records are received.

10. BellSouth provides 911/E911 services to resale/UNE CLECs exactly as set forth in BellSouth's retail tariffs. BellSouth provides facilities-based CLECs access to 911/E911 services through interconnection agreements making their customers' numbers and address information available to 911 governmental agencies that provide emergency services.

11. For 911 service, BellSouth provides CLECs a list consisting of each municipality that subscribes to 911 service. The list also provides, if known, the conversion date to E911. This list is provided via the Internet at the following address: http://www.interconnection.bellsouth.com/carriertypes/lec/911/911_availability.html. In

municipalities that subscribe to 911 service, a facilities-based CLEC must arrange to have 911 calls from its end users accepted at the appropriate PSAP.

12. In order to ensure reliability of the 911 system, a facilities-based CLEC, in the same manner as BellSouth, installs a minimum of two dedicated trunks connecting the CLEC's end office to the BellSouth 911 tandem serving the calling customer's PSAP. The trunk interface may be either a 2-wire analog interface or a digital DS1 interface. The CLEC is responsible for the trunks and any cost associated with providing the trunks needed to reach the appropriate BellSouth 911 tandem. If a municipality has converted to E911 service, a facilities-based CLEC forwards its 911 calls to the appropriate BellSouth E911 tandem, along with the caller's ANI, according to which E911 tandem the end office information is loaded. If the E911 tandem trunks are not available (*i.e.*, due to high levels of end user calls in an emergency situation), BellSouth allows the facilities-based CLEC to route the call over BellSouth's network using a designated 7-digit or 10-digit voice line number, as appropriate, for the appropriate PSAP. This call will be transported over BellSouth's interoffice network along with BellSouth calls and, because the line does not carry data, it will not carry the ANI of the calling party.

13. BellSouth has developed the E911 Local Exchange Carrier Guide for facilities-based providers ("CLEC Guide") (Attachment 1) that provides the information facilities-based providers need to interconnect to BellSouth for 911 services. This guide can be found on the web at the following website: http://www.interconnection.bellsouth.com/main/clec.html. In general, the process for a facilities-based carrier begins with a pre-planning meeting. This meeting takes place early on in the interconnection process between the CLEC, the BellSouth Project Team

and BellSouth Network personnel. At this meeting the CLEC is asked to contact the BellSouth 911 Implementation Manager in order to handle their 911 needs. Once the CLEC makes this contact and any concerns are discussed and resolved, the CLEC receives the CLEC Guide and, with the assistance of its BellSouth Trunking Project Manager, orders the necessary 911 trunks through BellSouth's Local Interconnection Switching Center ("LISC"). The BellSouth CLEC 911 Implementation Manager works with the CLEC to determine the appropriate 911 tandem for routing the CLEC's 911 calls.

14. BellSouth provides and maintains the necessary equipment at the E911 Control Office (E911 Tandem) and the Database Management System to perform E911 services for the requesting local E911 customer. These services include some or all of the following as needed:

    a. Transporting the E911 calls from the CLEC's switches to the E911 tandem of the E911 system;

    b. Switching the E911 calls through the E911 Tandem to the Public Safety Answering Point;

    c. Storing the names, addresses, and associated telephone numbers from the CLEC's customers in electronic data processing databases for the E911 Database Management System;

    d. Transmission of the information associated with the CLEC's customers to the PSAP upon the customer dialing 9-1-1.

15. The facilities-based CLEC furnishes lists of its NPA/NXXs and 911 tandems to BellSouth and obtains from BellSouth a Master Street Address Guide ("MSAG") which is a listing of standard street names, address ranges and ESN used for validation of subscriber data.

16. BellSouth has contracted with a third-party 911database provider, Intrado (formerly SCC), located in Boulder, Colorado to provide 911 database services on its behalf for all subscribers, on a non-discriminatory basis, for whom BellSouth is the 911 host. The facilities-based CLEC uses the CLEC Guide and MSAG to format customer data correctly before sending an electronically mechanized file to Intrado. These data are then included in BellSouth's 911database, with subsequent updates processed on a daily basis. If these daily update records fail system validity edits when compared to the current MSAG, the erroneous record is marked with an error code (as specified in the CLEC Guide) and mechanically faxed back to the relevant CLEC for review, investigation, correction, and resubmission. The facilities-based CLEC is responsible for correcting the errors and mechanically resubmitting its subscriber information to Intrado. The processing cycle is repeated daily until the record passes all validity edits and the data can be posted to the E911 databases. It is the CLEC's responsibility to review and correct its own errors since Intrado does not have access to the facilities-based CLEC's customer records. In this fashion, Intrado, on behalf of BellSouth, maintains CLEC customer 911 database listings with the same accuracy and reliability as BellSouth's customer listings. Intrado receives a file every night from BellSouth containing E911/911 updates for BellSouth's own customers as well as BellSouth's Reseller and UNE-P customers. The data are processed and Intrado corrects the errors on behalf of BellSouth. The CLEC also has the option of hiring Intrado or another database vendor to perform error correction and other database functions on its behalf if it chooses not to do it itself.

17. During nightly E911 database processing, Intrado creates an updated file and transmits it to BellSouth. This file contains 911 call routing information for BellSouth subscribers as

well as subscribers of other service providers such as facilities-based and reseller CLECs. Information in this file is used to update the BellSouth network switches allowing 911 calls to be routed to the appropriate city or county agency for handling. This nightly process of updating end user subscriber information keeps the E911 network and database current, thereby allowing proper 911 call routing and display of location information to emergency service agencies.

18. The facilities-based CLEC also has a responsibility to remain in contact with the governmental body providing emergency services to determine the following information:

    a. Default ESN - a 3-digit number that translates to a specific PSAP where calls are routed in case the CLEC cannot deliver ANI from their switch to the BellSouth E911 tandem, and

    b. Surcharge information – the money billed by the CLEC on behalf of the governmental body to their customers for providing E911 service. The CLEC must also obtain information from the governmental body in order to remit these surcharges back to the county. A list of governmental body coordinators for each state is included in the CLEC Guide.

19. Subscribers, regardless of their current local service provider, are able to choose the local service provider of their choice and retain their current telephone number as long as they are remaining in the same rate center. This is referred to as Service Provider Local Number Portability ("LNP"). In order to reflect the correct dial tone provider during an emergency call, the National Emergency Number Association ("NENA") implemented the assignment of a NENA Company ID for each Incumbent LEC and CLEC. When an end user changes local service providers ("LSP"), the NENA Company ID reflected in the E911 database must be updated to change from the former LSP to the new LSP. The E911 database is modified to accommodate this change so that the PSAP display reflects the current local service provider company by displaying its company's NENA ID. There

are two new functions of change codes, U and M, that accomplish this. The current local service provider will issue a service order that will allow the record to be available or "unlocked" (coded as "U"). The new local service provider will issue an update to the record to "migrate" (coded as "M") the record with the information for the new company. This process is generally accepted nation-wide and allows the actual record to remain in the database "as is". The CLEC is fully responsible for submitting the needed U or M, as appropriate, to update the E911 database. In order to protect the integrity of the E911 data, BellSouth and Intrado have implemented a validation process using the Number Portability Administration Center ("NPAC") database to identify the correct dial tone owner. The U and M process, the error processes and the NPAC validation processes are provided in the CLEC Guide. This system insures that BellSouth is able to meet the requirements of any foreseeable reasonable demand for 911/E911 service.

20. BellSouth provides and maintains sufficient dedicated E911 circuits according to provisions of the E911 tariff and the specifications of the E911 customer. BellSouth routinely monitors service levels (including call blockages) on E911 trunk groups and takes appropriate, coordinated action with the responsible CLEC to provide additional trunks as needed. These trunk servicing activities are performed at the same time and in the same manner that BellSouth services the E911 trunk groups from its own switches, on a first come first served basis.

21. BellSouth has had procedures in place since early 1996 for CLECs to connect their switches to BellSouth's E911 tandems. As of March 31, 2002, CLECs had requested and BellSouth had provided the following E911 trunks: 166 – Alabama, 121 – Kentucky, 98 – Mississippi, 611 – North Carolina, and 302 – South Carolina. In its nine-state region,

BellSouth had a total of 5,080 trunks in service connecting CLEC switches to BellSouth's E911 tandems.

22. As of March 31, 2002, the following number of CLECs were sending BellSouth mechanized updates for inclusion in the 911 database: 15 – Alabama, 12 – Kentucky, 15 – Mississippi, 27 – North Carolina, and 20 – South Carolina. Within BellSouth's entire nine-state region, 68 facilities-based CLECs were sending such mechanized updates. Because the methods and procedures that allow other carriers, including independent LECs, to access BellSouth's E911 and 911 updating capabilities have been in place for some time, it has become routine for CLECs to obtain such updating. For this reason, end-to-end testing of E911 database updating was not necessary.

23. When BellSouth makes any changes to the 911 system, it notifies all potentially affected CLECs. CLECs are notified officially on the BellSouth Interconnection website: http://www.interconnection.bellsouth.com/notifications/carrier/index.html. This includes, but is not limited to, NPA split or overlay information, Central Office conversions and E911 Tandem re-homes. In addition to the official notification, the 911 Implementation Manager sends out correspondence informing the CLECs of any 911 specific information on these system changes that might affect them.

III. CONCLUSION

24. By this exhibit, it has been shown, among other things, that:

a. Education and assistance is given to CLECs to provide 911/E911 service by providing project managers for trunking, a CLEC Implementation Manager and the E911 Local Exchange Carrier Guide for Facilities-Based Providers;

b. BellSouth's 911 network is non-discriminatory because it does not distinguish between BellSouth's customers and the customers of other service providers;

c. All calls are routed to the PSAP over the same trunks;

d. The same vendor maintains, in a nondiscriminatory manner, the ALI/DMS database for all other Local Service Providers that interconnect to BellSouth.

e. Maintenance and testing activities done by BellSouth on any 911 facilities are done without regard to the owner of the facilities;

f. All records remain in the 911 database with the implementation of the "unlocking" and "migrating" process with Service Provider Local Number Portability; and

g. BellSouth is able to meet any reasonable foreseeable demand for 911/E911 service.

Based on the foregoing, BellSouth has demonstrated that it offers CLECs nondiscriminatory access to 911/E911 services in Alabama, Kentucky, Mississippi, North Carolina, and South Carolina in accordance with the Commission's rules and the requirements of the Telecommunications Act of 1996.