BELLSOUTH

BellSouth Corporation
Suite 900
1133-21st Street, N.W.
Washington, DC 20036-3351

kathleen.levitz@bellsouth.com

Kathleen B. Levitz
Vice President-Federal Regulatory

202 463 4113
Fax 202 463 4198

August 20, 2002

WRITTEN EX PARTE

Ms Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 02-150

Dear Ms Dortch:

Attached to this letter are responses to questions relating to which staff in the Wireline Competition Bureau requested that BellSouth respond in writing. I have also sent the responses electronically to Michelle Carey, Aaron Goldberger and Pam Slipakoff.

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

Sincerely,

Kathleen B. Levitz

Kathleen B. Levitz

Attachments

cc: Michelle Carey
Aaron Goldberger
Pam Slipakoff
Susan Pié
James Davis-Smith

FCC Question #1

Question: Varner's Reply Affidavit discusses order types that were not meeting the benchmark because of network outages. Please explain how long these outages were and whether they were scheduled outages.

Response: This question refers to the mechanized Reject Interval response provided in Exhibit PM-2 of Alphonso Varner's affidavit beginning at paragraph 39, his reply affidavit beginning at paragraph 155 and BellSouth's ex parte filed on 8/15/02. As stated in each of these documents "BellSouth's root cause analysis determined that a number of LSRs that did not meet the one-hour benchmark were submitted when back-end legacy systems were out of service and were unable to process LSRs."

These out of service conditions for the back-end legacy systems are not network outages but are for scheduled down time for OSS Maintenance. The system maintenance applies equally to both retail and wholesale processing. The following is a breakdown of the scheduled maintenance time for each of the ordering systems:

For LEO/LESOG

Non-Design products apply the following exclusion:

Monday through Saturday 10:50PM-6:00AM
Saturday 10:50PM- Sunday 10:00AM
Sunday 10:50PM - Monday 6:00PM

Designed products apply the CABS downtime exclusion.

The posted hours of availability for CABS are different for Georgia than for the remaining states.

For Georgia only apply the following exclusion for CABS downtime:

Monday-Saturday 7:00 PM-06:00AM (CT)
Saturday 7:00PM -Monday 6:00AM (CT)

For all states except Georgia apply the following exclusion:

Monday-Friday 7:00PM-06:00AM (CT)
Saturday 6:00PM-Monday 6:00AM (CT)

For LNP products:

Design products apply the above CABS exclusion

Non Design products apply following SOCs exclusions:

AL, KY, MS, LA, TN Exclude the following hours, which are in CT: Monday - Saturday 12 Midnight - 6AM (CT), Sunday 12 Midnight - 10AM (CT)
FL, GA, NC, SC Exclude the following hours, which have been normalized to CT: Monday - Saturday 11PM - 5AM (CT), Saturday 11PM - Sunday 9AM (CT)
All States add 1st Sunday of each month only 9AM - 11AM Central time (CT)

FCC Question #2

Question: Stacy's Reply Affidavit says that the top 5 CLECs had high flow through rates, referencing rates from the first quarter of 2002. Please provide more recent data on this.

Response:

BellSouth's overall flow through performance remains strong. This is especially true for CLECs that submit large numbers of requests and yet maintain high flow through rates. The chart below, displaying the top 5 CLECs by electronic LSR volume in the region for the second quarter 2002, shows flow through rates for 2 of the 5 ranging from 94.3% to 95.1%.

CLEC	Total Mech LSR	% Flow Through
A	227,534	75.5%
B	214,488	82.1%
C	171,316	85.8%
D	77,785	94.3%
E	47,874	95.1%

The following chart reflects this same analysis based on the most recent flow through performance data for the month of June 2002. It demonstrates even stronger overall percent flow through results for the top 5 CLECs by electronic LSR volume in the region. Each CLEC had an aggregate Percent Flow Through rate of 80.2% or higher with two CLECs ranging from 94.8% to 96.0%.

CLEC	Total Mech LSR	% Flow Through
A	75,532	80.2%
B	72,004	81.4%

C	66,694	82.1%
D	23,962	94.8%
E	15,236	96.0%

Preliminary data for July reflects even further improvement for the two top CLECs by electronic LSR volume in the region as noted in the chart below.

CLEC	Total Mech LSR	% Flow Through
A	89,851	90.3%
B	85,724	86.3%

The July improvement is significant in that the combined LSR volume for these two CLECs grew by 19% over the June volume while the Percent Flow Through results improved on a percentage point basis by a plus 5% for each CLEC.

Further analysis of the June 2002 Percent Flow-Through Service Requests (Aggregate Detail) report reveals that 277 users experienced a flow-through rate in excess of 90%.[1] Of significant note is that 47 of these users electronically submitted in excess of 1,000 LSRs with 85 users submitting between 100 and 999 LSRs. Below is a comparison of this same analysis BellSouth provided in the Stacy direct affidavit utilizing March 2002 data. One can see the growth in the number of users achieving strong flow through performance.

	March 2002	June 2002
No. of Users with Flow Through Rate exceeding 90.0%:	246	277
No. of Users submitting 1,000 plus LSRs with 90.0% plus Flow Through	39	47
No. of Users submitting 100 to 999 LSRs with 90.0% plus Flow Through	80	85

The number of CLECs experiencing higher flow through rates clearly demonstrates that BellSouth is providing CLECs with electronic interfaces capable of accepting flow through eligible requests.

[1] The term "user" instead of "CLEC" is used when referring to a horizontal line of data represented on the Flow-through Report, because each line of data represents an Operating Company Number ("OCN") and some CLECs have multiple OCNs. Thus, on the Flow-through Report, two or more users may represent a CLEC's total data.

FCC Question #3

Question: BellSouth has stated that of the 35 issues identified by the Flow Through Task Force, 31 have been addressed and the remaining 4 will be addressed in Release 10.6. Please provide verification of this and give the status of the remaining 4.

Response: As shown on Stacy Exhibit WNS-49 filed on June 20, 2002, BellSouth has implemented 31 of the 35 items from the FTTF. Three of the remaining 4 flow through task force items are scheduled to be implemented in Release 10.6 during the weekend of August 24-25, 2002. The fourth item, FTTF-11, Mechanization of UCL-Non Designed, will be implemented in two phases. The first phase in scheduled to be implemented in release 10.6, and the second phase is scheduled for release 11.0 during the weekend of December 7-8, 2002.

FCC Question #4

Question: BellSouth provided the number of UCL-ND lines by state. Please provide UCL-ND orders as a percentage of all orders processed, either on a state by state or regionwide basis. Also, please confirm the date for implementation of electronic ordering and flow through of these orders.

Response: UCL-ND makes up a miniscule percentage of the orders processed by BellSouth. In June 2002, CLECs submitted a total of 85 manual LSRs for UCL-ND across BellSouth's nine-state region. During that same timeframe, 496,359 LSRs were submitted electronically and 25,022 were submitted manually, for a total of 521,381 LSR submissions. LSRs for UCL-ND thus represent only 0.34% of all manual LSRs submitted and only 0.02% of all LSRs submitted.

BellSouth will implement a mechanized ordering capability for UCL-ND on August 24, 2002, that will enable CLECs to order UCL-ND via all mechanized interfaces. Those orders will fall out for manual handling by BellSouth's LCSC. BellSouth will implement full flow-through mechanization of UCL-ND LSRs during December 2002.

FCC Question #5

Question: In Varner's Reply Affidavit at para. 33, he stated that he reviewed the raw OCI data and it indicated no impact for March. Please quantify what "no impact" means.

Response: The term "no impact" means that the OCI results for March were correct as stated and all orders that completed in March 2002 were included in the measurement. When AT&T had requested a download of its OCI raw data file for March from the PMAP website, some of its orders were not included in its raw data file. However, all orders were included in the aggregate calculations for the OCI sub-metrics.

FCC Question #6

Question: Varner's Reply Aff at para 50 discusses the issue of when an order that is processed in one month but has a jeopardy issued in the following month is not reflected in metrics. Please explain why these orders can't be captured by the metrics.

Response: Jeopardy data are reported in the data month in which the due date occurs and use timestamps from the SOCS History File to calculate the Interval. Prior to implementation of PMAP 4.0 in April 2002, the source data; *i.e.*, SOCS History File, imported to PMAP contained one month's data in most cases. Consequently, if an order went into Jeopardy status in one month; *e.g.*, February, and had a due date in a subsequent month; *e.g.*, March, PMAP did not have the beginning timestamp when it attempted to calculate the interval in March. As a result, the Notice was not reflected in the data for either month. This situation occurs very infrequently and, with PMAP 4.0 implementation, jeopardy notices associated with such orders are now reflected in the data for the month in which the due date occurs].

FCC Question #7

Question: In his Reply Aff at para 53, Varner responds to an allegation by AT&T that SOA data is not reliable and that the numbers provided by AT&T are miscalculated. Please clarify this explanation. What measure does BellSouth claim AT&T miscalculated? In particular in paras 52 to 55 of his Reply Affidavit, Varner refers generally to "spread sheet columns" that he states AT&T miscalculated.

Response: Varner Reply Affidavit paragraphs 52 to 55 respond to a part of the AT&T ex parte filing of 7/26/02. Specifically, AT&T stated incorrectly "The summary lines are inaccurate and overstate results in all but one case." This statement referred to Service Order Accuracy data for May 2002 that were included in the ex parte. As stated in Varner Reply Affidavit Para 58, there was one error in the reporting of the data, namely that BellSouth inadvertently reversed the labels on the two reports; i.e., mechanized data were labeled as

non-mechanized and vice versa. However, AT&T's ability to analyze the data was unaffected by this mistake as evidenced by the fact that AT&T labeled the data correctly in its ex parte filing.

With respect to its allegation that BellSouth reported inaccurate data, the error was actually on the part of AT&T. To illustrate the error that AT&T made, it is instructive to look at the total for sub-category Resale Residence Non-mechanized used in the Varner Reply Affidavit. The accuracy rate for this sub-category is the average accuracy for the four product disaggregations that compose the sub-category. AT&T miscalculated the accuracy rate for this subcategory as 1- (12 errors/322 sampled orders). However, this method of calculation is incorrect because the ratio of sampled to total orders for each of the four product disaggregations included in Residence Resale Non-mechanized is not constant. To do the calculation correctly, one must first identify the number of errors for each product disaggregtion separately. The sum of those four numbers divided by the total number of orders would yield the correct result. Per the example in Varner Reply Affidavit, the correct calculation of error rate would be (303+0+71+0 errors)/22958 orders, which yield a 1.63% error rate or 98.37% accuracy rate. Contrary to AT&T's claims the summary lines are calculated correctly.

FCC Question #8

Question: BellSouth indicated that it would be filing revised line-sharing loop data for Kentucky. Has it been filed?

Response: Yes, these data were included in BellSouth's Ex Parte filed 8/14/02.

FCC Question #9

Question: For GA, Mar 2002 to June 2002 data, please recalculate Reject Interval and FOC Timeliness for UNE Other Non-Design as BellSouth has already done for AL, KY, MS, NC, and MS. The PMs are B.1.4.15, B.1.9.15, and B.1.12.15.

Response:

Georgia

B.1.4.15 (Reject Interval FM UNE Other Non Des)
B.1.7.15 (Reject Interval PM UNE Other Non Des)

No change for March through June with restatement

Georgia

B.1.9.15 (FOC FM UNE Other Non Des)

	March	April	May	June
Measure Benchmark	95.00%	95.00%	95.00%	95.00%
Volume	2,732	3,314	3,385	3,320
Old Numerator	2,655	3,228	3,278	3,216
Old CLEC	97.18%	97.40%	96.84%	96.87%
Net Improvement	71	81	72	51
New Numerator	2,726	3,309	3,350	3,267
New CLEC	99.78%	99.85%	98.97%	98.40%

Georgia

B.1.12.15 (FOC PM UNE Other Non Des)

	March	April	May	June
Measure Benchmark	85.00%	85.00%	85.00%	85.00%
Volume	749	1,444	1,043	1,171
Old Numerator	543	1,273	986	1,118
Old CLEC	72.50%	88.16%	94.53%	95.47%
Net Improvement	14	27	14	2
New Numerator	557	1,300	1,000	1,120
New CLEC	74.37%	90.03%	95.88%	95.64%