

ORIGINAL

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EX PARTE OR LATE FILED

November 13, 2002

WRITTEN EX PARTE

RECEIVED

NOV 14 2002

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

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: WC Docket No. 02-307 Ex Parte # 2

Dear Ms Dortch:

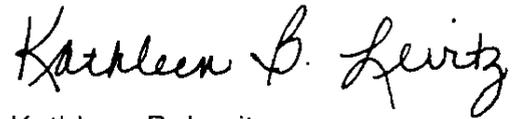
Paragraph 169 of the Varner Reply Affidavit filed as part of BellSouth's Reply in this proceeding contains a table categorizing the trouble reports received for digital loops within 30 days of their installation for the months of May through July 2002. The staff of the Wireline Competition Division working on the pending BellSouth application for authorization to provide interLATA services in Florida and Tennessee has asked BellSouth to update that table to include a similar analysis for the months of August and September 2002. The staff also asked BellSouth to explain in writing what it meant by the terms "defective plant facilities" and "CO wiring problems" as used in Paragraph 169. Finally the staff asked BellSouth to discuss whether troubles associated with the latter two categories of problems should be excluded when assessing the BellSouth's performance under the metric "Provisioning Troubles within 30 Days" for digital loops.

The attached document responds to the staff requests by updating Paragraph 169 to include the additional data analysis and by answering the other questions posed.

07/1

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

Sincerely,

A handwritten signature in black ink that reads "Kathleen B. Levitz". The signature is written in a cursive style with a large initial 'K' and a long, sweeping tail on the 'z'.

Kathleen B. Levitz

Attachment

cc: Christine Newcomb  
Rodney McDonald  
Janice Myles  
Luin Fitch  
James Davis-Smith  
Sara Kyle  
Beth Keating

**ATTACHMENT**

**% Provisioning Troubles in 30 Days / Digital Loops <DS1 (B.2.19.18.1.1) and >=DS1 (B.2.19.19.1.1):** In my original affidavit I included a statement in paragraph 154 that the majority of the missed sub-metrics for these measures were caused by defective plant facilities, CO wiring problems or TOWFOK reports. BellSouth was asked to provide a breakdown of these issues. The following data provide a breakdown for the Digital Loops in Florida as they relate to the troubles within 30 days closeout. All of the CLEC troubles were classified as one of the three categories.

<u>M</u> <u>th</u>	<u>T</u> <u>IR</u>	<u>F</u> <u>ili</u>	<u>C</u> <u>Offi</u>	<u>TOK/FOK</u>
<b>Digital &lt; DS1</b>				
May	35	20	11	4
June	48	42	0	6
July	37	20	13	4
August	49	30	14	5
September	30	13	12	5
May	43	23	10	io
June	Met Parity			
July	35	19	5	11

<u>Month</u>	<u>Transmission</u>	<u>Facility</u>	<u>Central Office</u>	<u>TOK/FOK</u>
August	41	23	4	14
September	39	18	8	13

Defective Plant Facilities: Any facility that is unable to meet the requirement that it was engineered to provide. All of these services are designed and required to meet industry standards for each of the specific products. At the time of installation, the BellSouth technician conducts transmission tests to make sure that the facility meets those requirements. Subsequent to the completion of that order, something happened to the facility, in most cases something outside of BellSouth's control (for example, cable got wet, foreign voltage found its way onto the facility) that causes that facility to no longer meet the transmission requirement. All these types of problems are grouped into the category "defective plant facilities."

Central Office **Wiring** Problem: As in the Defective Plant Facility, proper wiring is essential to meet the transmission requirements of a design circuit. There are numerous cross connections required within the central office to tie the outside plant facilities to the CLEC collocation point. For example, a copper facility goes through a Digital Cross Connect (DSX) field to cross connect to the tie pairs that run to the CLEC collocation Point of Termination frame. There are literally thousands of DSX points that require physical jumpers to make the electrical connection. After the circuit is tested, jumpers can, for example, break or short

out. Such problems cause a digital circuit to fail. All these types of problems are grouped into the category “central office wiring problems.

In many cases, because the metric captures problems occurring over a 30-day period following installation of a digital loop, a trouble included in the report may not have anything to do with the quality of the installation of the loop at all.

However, this metric checks to see for each digital loop trouble reported, whether there was an order associated with that loop completed within 30 days prior to the trouble's being reported, and if there was, the trouble is counted as a provisioning trouble within 30 days of installation.

The chart provided in the Varner affidavit was not intended to exclude troubles that are caused by defective facilities or central office wiring issues. Rather, the chart was intended to provide a high level explanation of the types of troubles that were found during the months, many of which were not related to the quality of the installation performed by BellSouth. The complexity of digital circuits necessitates an understanding of the different types of troubles to understand the performance data.