



6/13

Please add these documents
to the file of Jocket 970509-
TL.

May 20, 1997

Thank-you.

Conny Monteiro

Ms. Natalie Monteiro
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL

Dear Ms. Monteiro,

The suspend and restore process, as it currently works in Sprint-Florida, LLC., is described below. Included after that description is an explanation of how the 1210 and DMS-10 switches differ from the 5ESS and DMS-100 switches with respect to the provision of 911 on lines disconnected for non-pay.

When a customer is suspended for non-payment, a representative in the Collections Department enters the customer's information into the Suspend and Restore System (SRS). SRS routes that information electronically to the Service Order Download System (SODS). SODS automatically works the service order to suspend service in the switch. Once the customer has paid their past due balance, their service is restored in a similar fashion. The representative in the Collections Department enters the customer's information into SRS. SRS routes the information to SODS and SODS automatically works the service order to restore service in the switch. This system is the same no matter what switch type is involved.

As long as all originating and terminating traffic is denied to these lines that are suspended for non-pay, there is no problem with this automated process successfully handling the suspends and restores in any of Sprint's switch types. The problem occurs in the DMS-100 and 5ESS when the suspended line needs to retain the ability to originate calls to 911 but deny origination to all other numbers and deny termination to all numbers.

The 1210 and DMS-10 switching systems have software internal to the switches, developed by the switch vendors, that allows lines suspended for non-pay to originate calls to a limited universe of called numbers. No calls are allowed to terminate to those suspended lines.

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- LIN _____
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

DOCUMENT NUMBER-DATE
06008 JUN 13 97
FPSC-RECORDS/REPORTING

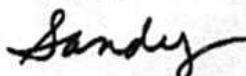
Let's look at the specifics in the case of the 1210 as an example. The 1210 switch has a translations table referred to as the EMERT table. This table was designed by the vendor of the switch and is populated by the local exchange company. Sprint has entered 911 in this table. When a line in the 1210 is placed on suspension, the switch knows to look at the EMERT table. The EMERT table tells the switch that the suspended line can originate calls to 911 only. When the line is restored, the switch no longer invokes the translations in the EMERT table and so the line is once again able to originate and terminate all calls. No changes were ever made on the customer's line in the switch. The entire process was able to occur just as described in the second paragraph, with the switch making everything happen.

Nortel and Lucent have not provided a software feature similar to the EMERT table in the DMS-100 and 5ESS switching systems. Therefore, when a customer's line in either a DMS-100 or 5ESS is suspended for non-payment, a change must actually be made in the switch to move the line to a new Line Class Code and Line Treatment Group. When the line is restored, another change must be made to switch the line back to the original Line Class Code and Line Treatment Group. (This is the information that is not currently retained in SODS.)

Sprint-Florida has requested quotes from Nortel and Lucent for the development of this software feature in the DMS-100 and 5ESS. Those quotes indicate that it will take longer (not available before 1999) and require more investment to solve the problem through the switch upgrades than it will to solve the problem through the SODS upgrade. Therefore, we have begun the implementation of the SODS upgrade.

If you have any other questions or need additional clarification, please call me at (904) 847-0173.

Sincerely,



Sandra A. Khazrace



BellSouth Telecommunications, Inc.
Suite 400
150 South Monroe Street
Tallahassee, Florida 32301

Fax 904 222-8640
904 222-1201

Nancy H. Sims
Director - Regulatory Relations

May 19, 1997

Ms. Natalie M. Monteiro
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850



Dear Ms. Monteiro:

Attached is BellSouth's response to the request concerning LEC provisions for providing access to 911 for subscribers whose service is temporarily disconnected for non-payment.

If I can be of further assistance, please advise.

Your very truly,

Nancy H. Sims
Director-Regulatory Relations

BellSouth Telecommunications, Inc.
FPSC Data Request
LEC to provide access to 911
May 19, 1997
Item No.1

QUESTION:

Does BellSouth Telecommunications, Inc., (BellSouth) foresee any problems with complying with 25-4.081, F.A.C., Emergency 911 Access? Please explain.

ANSWER:

At present, BellSouth sees no problems complying with the rule.

BellSouth Telecommunications, Inc.
FPSC Data Request
LEC to provide access to 911
May 19, 1997
Item No. 2

QUESTION:

Does BellSouth have any 5ESS or DMS100 switches. If so, please describe the measures BellSouth has taken or will take to comply with 25-4.081, F.A.C., for those areas serviced by these switches.

ANSWER:

The majority of BellSouth's switches are 5ESS or DMS100s. In order to meet the requirements of the rule, BellSouth is going to assign a new line class code to the subscriber's line that will give them denied originating, denied termination and 911 access only. We are calling this line code #E91. The translations are now being processed. Because we are doing a line class code only, we will not lose any features. On the DMS 100, if RingMaster is already on the line, we are getting an incapability notice from the switch indicating that the line can't have denied termination. BellSouth is presently working with Northern Telecom to determine if there is a local incapability change that can be made to the switch.

Pammy Sims:

• The line class code

BellSouth Telecommunications, Inc.
FPSC Data Request
LEC to provide access to 911
May 19, 1997
Item No. 3

QUESTION:

Is BellSouth aware of any technological barriers that would prevent a LEC from complying with 25-4.081, F.A.C.?

RESPONSE:

At this time there are no barriers to prevent compliance. The only foreseeable problem could be the DMS100/RingMaster incapability which we are working on with Northern Telcom.



Sandra A. Khazraee
Manager - Regulatory

Southern Operations
Box 2214
Tallahassee, Florida 32316-2214
Mail Code 2565
Telephone (904) 847-0173
Fax (904) 599-1458

May 16, 1997

Ms. Natalie Montiero
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL



Dear Ms. Montiero,

Thank you for the opportunity to provide additional information regarding our request for a waiver to provide 911 service on lines which have been disconnected for nonpay.

Our inability to meet compliance in the 5ESS and DMS-100 switch types is not internal to the switch. We identified the same switch changes that GTE identified for provision of 911 on lines that have been disconnected for non pay. Sprint agrees with their statement that "customer features are preserved". Our difficulty stems from the inability of our automated operations support system to automatically change lines to new line class codes. Our system, SODS, does not store or keep a database of the existing Line Class Codes or Translations Group assignments. If we change the suspended line to the new Line Class Code to meet the suspend requirement, we cannot automatically restore the line back to the original code because our SODS system does not store this information.

Let me illustrate. A customer's line is in a particular Line Class Code (LCC) and Line Treatment Group (LTG) depending on the type of service they have and any restrictions on their line. When they are disconnected for non-pay, their line is moved to a different LCC/LTG via service order process. The new LCC/LTG will retain the features on the line but will establish the restriction that this customer can only dial out to 911 and cannot receive any incoming calls. When the customer resolves the payment issues with the Company, his line must now be moved back to the original LCC/LTG. SODS has not stored this information and therefore, the customer cannot automatically be moved back to the correct LCC/LTG.

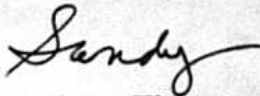
Sprint believes that GTE has an automated operations support system which is able to store the LCC/LTG information and is therefore able to automatically restore the customer's service when payment has been made.

We identified three options to fix the problem. The options are: change the SODS system, change the switches to include this capability as part of a normal suspend and restore function, or perform the functions manually rather than automatically through SODS.

Sprint has determined the most viable solution to be the SODS programming changes. We have already begun to work on those changes.

If you require any additional information with regard to this waiver request, please let me know. I'll be happy to work with you as necessary to answer all questions.

Sincerely,

A handwritten signature in cursive script that reads "Sandy".

Sandra A. Khazraee



Beverly Y. Menard
Regional Director-Regulatory & Industry Affairs (FL)

GTE Telephone Operations

One Tampa City Center
Post Office Box 110, FLTC0616
Tampa, Florida 33601-0110
813-483-2526
813-223-4888 (Facsimile)

May 15, 1997

Ms. Natalie M. Monteiro
Division of Communications
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0872



Dear Ms. Monteiro

Subject: Rule 25-4.081, F.A.C., (Emergency 911 Access)

Enclosed is GTE Florida Incorporated's (GTEFL's) response to the Commission Staff's data request dated May 8, 1997.

If you have any additional questions, please contact Barbara Hammar of my staff at 813-483-2524.

Sincerely,

Beverly Y. Menard

Beverly Y. Menard

BYM:BBH:wjh
Enclosure

**GTE FLORIDA INCORPORATED'S RESPONSE
TO THE DATA REQUEST DATED MAY 8, 1997 ON
COMMISSION RULE 25-4.081, F.A.C., EMERGENCY 911 ACCESS**

- 1) Does GTE Florida Incorporated (GTE) foresee any problems with complying with Rule 25-4.081., (Emergency 911 Access)? Please explain.

RESPONSE:

GTE does not foresee any problems with complying with Rule 25-4.081, F.A.C. GTE has provisioned and tested Emergency 911 access in all three switch technologies (GTD5, 5ESS and DMS100).

- 2) Does GTE have any 5ESS or DMS100 switches? If so please describe the measures GTE has taken or will take to comply with 25-4.081, F.A.C., for those areas serviced by these switches.

RESPONSE:

Yes, GTE has both 5ESS and DMS100 switches.

With 5ESS switches, new Line Class Codes were created to only allow 9-1-1 as the valid dialing pattern. These new Line Class Codes are used to change a line from working to temporarily disconnected. This change modifies the allowed dialing patterns but still maintains all line features.

With DMS100 switches, new Translation Groups were created to allow 9-1-1 as the valid dialing pattern. These new Translation Groups are used to change a line from working to temporarily disconnected. This change modifies the allowed dialing patterns but still maintains all line features.

As outlined above, GTE's procedures for temporary disconnect do not totally remove the customer's line from the switch's data base. Therefore, all customer features are preserved as the line is changed from working to temporarily disconnected and then back to working.

- 3) Is GTE aware of any technological barriers that would prevent a LEC from complying with 25-4.081, F.A.C.?

RESPONSE:

At this time, GTE is not aware of any technological barriers that would prevent a LEC from complying with 25-4.081, F.A.C.

STATE OF FLORIDA

5-15

Commissioners:
JULIA L. JOHNSON, CHAIRMAN
SUSAN F. CLARK
J. TERRY DEASON
JOE GARCIA
DIANE K. KIESLING



DIVISION OF COMMUNICATIONS
WALTER D'HAESELEER
DIRECTOR
(904) 413-6600

Public Service Commission

May 8, 1997

Ms. Nancy H. Sims
BellSouth Telecommunications, Inc.
150 South Monroe Street, Suite 400
Tallahassee, FL 32301-1556

Dear Ms. Sims:

Sprint-Florida recently requested a waiver pursuant to the rule that requires a LEC to provide access to 911 for subscribers whose service is temporarily disconnected for non-payment. They contend that their 5ESS and DMS100 switches are incapable of "remembering" what features the disconnected customer had prior to suspension. Sprint further contends that the next generation of software for these switches will not be available until July of 1998 and installing the "memory" capability in the switches will require making a core system change to the generic software.

Does BellSouth Telecommunications, Inc., (BellSouth) foresee any problems with complying with 25-4.081, F.A.C., (Emergency 911 Access)? Please explain.

Does BellSouth have any 5ESS or DMS100 switches? If so, please describe the measures BellSouth has taken or will take to comply with 25-4.081, F.A.C., for those areas serviced by these switches.

Is BellSouth aware of any technological barriers that would prevent a LEC from complying with 25-4.081, F.A.C.?

Please provide a written response by May 15, 1997. If you have any questions, please call me at (904) 413-6584. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Natalie M. Monteiro".

Natalie M. Monteiro
Bureau of Certification

STATE OF FLORIDA

5-15

Commissioners:
JULIA L. JOHNSON, CHAIRMAN
SUSAN F. CLARK
J. TERRY DEASON
JOE GARCIA
DIANE K. KIESLING



DIVISION OF COMMUNICATIONS
WALTER D'HAESELEER
DIRECTOR
(904) 413-6600

Public Service Commission

May 8, 1997

Ms. Beverly Y. Menard, Regulatory Director
GTE Florida Incorporated
c/o Mr. Ken N. Waters
106 East College Avenue, Suite 1440
Tallahassee, FL 32301-7704

Dear Ms. Menard:

Sprint-Florida recently requested a waiver pursuant to the rule that requires a LEC to provide access to 911 for subscribers whose service is temporarily disconnected for non-payment. They contend that their 5ESS and DMS100 switches are incapable of "remembering" what features the disconnected customer had prior to suspension. Sprint further contends that the next generation of software for these switches will not be available until July of 1998 and installing the "memory" capability in the switches will require making a core system change to the generic software.

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Does GTE have any 5ESS or DMS100 switches? If so, please describe the measures GTE has taken or will take to comply with 25-4.081, F.A.C., for those areas serviced by these switches.

Is GTE aware of any technological barriers that would prevent a LEC from complying with 25-4.081, F.A.C.?

Please provide a written response by May 15, 1997. If you have any questions, please call me at (904) 413-6584. Thank you.

Sincerely,

Natalie M. Monteiro
Bureau of Certification