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December 4, 1997

Mrs. Blanca S. Bayo
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

RE: Docket No. 960786-TL

Dear Mrs. Bayo:

Today is BellSouth Telecommunications, Inc.'s deadline for filing a motion for reconsideration of Order No. PSC-97-1459-FOF-TL in the captioned docket. Although BellSouth is concerned with many of the Commission's findings in this Order, BellSouth has elected not to file a motion for reconsideration at this time. BellSouth recognizes that it will have an opportunity in a future proceeding to address each of the conclusions reached by the Commission in this Order and will wait until that time to discuss thoroughly remaining issues bearing on BellSouth's entry into the interLATA market in Florida.

However, in anticipation of another opportunity to apprise the Commission of BellSouth's position on these issues, BellSouth briefly outlines below its concerns with several, but not all, of the Commission's findings in its Nov. 19, 1997 Order. Moreover, while it recognizes that it cannot supplement the hearing record in this proceeding, BellSouth desires to inform the Commission of several positive developments that have occurred since the September hearing that will be shared in detail when BellSouth re-files its Statement of Generally Available Terms and Conditions (SGAT).

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BellSouth believes that the Commission's requirement that BellSouth offer a pre-ordering interface that is integrated with the industry-standard EDI ordering interface saddles BellSouth with a duty that is not required by the Telecommunications Act of 1996 nor contemplated by the industry. The fact that the industry itself standardized an ordering interface first and separate from the pre-ordering interface presupposes that the desired integration is the

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responsibility of the ALEC. Nonetheless, the record reflects that BellSouth offers ALECs the specifications for the Common Gateway Interface (CGI), a pre-ordering interface that allows for a direct, application-to-application pre-ordering interface with the ALECs' own OSS. There is nothing precluding ALECs from integrating pre-ordering information obtained through CGI with orders issued through EDI to create an integrated application-to-application interface capable of pre-ordering and ordering functions. However, because CGI allows BellSouth's OSS to interface directly with the ALECs' OSS, each ALEC must conduct the development work necessary on its side of the interface to manipulate the CGI data stream in the manner it desires, which would vary among ALECs.

The Commission also found BellSouth's TAFI interface (used for maintenance and repair) to be deficient, because BellSouth did not offer TAFI in a way that allowed an ALEC to integrate it with its own OSS. First, this is not necessary from a practical standpoint, as TAFI provides all maintenance and repair functions, including keeping maintenance histories, to which ALECs have on-line access. More importantly, however, no ALEC has requested that BellSouth provide TAFI functionality in that manner. The requests BellSouth has received for a machine-to-machine maintenance and repair interface have been for an industry-standard interface, and as the record in this proceeding shows, industry standards do not support TAFI's "expert system" functionality. BellSouth has worked cooperatively to establish an industry-standard machine-to-machine interface--as actually requested by ALECs--in addition to providing access to TAFI.

The Commission's conclusion on this issue is inconsistent with the "non-discrimination" standard of the Act. The Act requires BellSouth to provide ALECs with access to BellSouth's OSS equivalent to that BellSouth enjoys, not with access to interfaces for which there has been no legitimate request from an ALEC. In any event, it is undisputed that BellSouth offers ALECs in Florida access to maintenance and repair services through TAFI, the same system used by BellSouth's customer service representatives. This access, by definition, meets the non-discriminatory requirements of the Act.

With respect to performance measurements, BellSouth also expresses concern over the Commission's requirement that, to produce "meaningful" comparisons between BellSouth's retail operations and service provided to ALECs, BellSouth must provide "statistically valid commercial usage data" for several different measurements. As the Commission itself recognized in its Order, Section 271 does "not mandate any specified level of geographic penetration or market share." (p. 27). Yet, a requirement that BellSouth provide a yet-to-be-defined amount of commercial usage data that exceeds the data already provided to the Commission in this proceeding suggests a possibility that the Commission may indirectly rely on a metric test of local competition that the Act does not require.

Moreover, the performance measurements recommended by the ALECs are unnecessarily burdensome and reflect a misinterpretation of the purpose of performance measurements. Under the ALECs' view, every aspect of interaction between an ILEC and ALEC must be measured to demonstrate parity. This interpretation misconstrues the requirements of the Act and sets forth an impossible goal. The Act does not require parity in every step of a transaction between an ILEC and ALEC; rather, it requires non-discrimination in the ultimate outcome of those transactions. BellSouth's measurements focus on the sole goal of performance measurements, namely, to ensure that ALEC customers receive the same quality service that BellSouth offers to its end-users. In future proceedings, the Commission should be wary of ALEC attempts to obtain through Section 271 proceedings the performance standards they have been unable to secure through federal legislation or federal rulemakings.

Finally, BellSouth is pleased to report several positive developments since the conclusion of the September hearings. BellSouth is on schedule to meet the commitment it negotiated in its interconnection agreement with AT&T to provide AT&T with a customized, machine-to-machine pre-ordering interface, EC-LITE. This interface will also be available to other ALECs that request it. As BellSouth observed in Section 271 proceedings subsequent to the Florida hearings, BellSouth is also able to bill for unbundled local switching on a usage-sensitive basis. Further, BellSouth has received a final report from the consultant hired to evaluate BellSouth's Local Carrier Service Center (LCSC) operations in which the consultant concluded that the LCSCs were fully operational and ready to serve BellSouth's ALEC customers without qualification.

BellSouth will re-file its SGAT at the appropriate time in the future and looks forward to the day when it can bring the benefits of vigorous competition in the interLATA market to Florida consumers.

Please file the original and fifteen enclosed copies of this letter in the captioned docket. An additional copy of this letter is also enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served on the parties shown on the attached Certificate of Service.

Sincerely,


Nancy B. White

cc: All Parties of Record
A. M. Lombardo
R. G. Beatty
W. J. Ellenberg

CERTIFICATE OF SERVICE
DOCKET NO. 960786-TL

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