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BELLSOUTH TELECOMMUNICATIONS, INC.  
DIRECT TESTIMONY OF RONALD M. PATE  
BEFORE THE FLORIDA PUBLIC COMMISSION  
DOCKET NO. 001797-TP  
APRIL 23, 2001

Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC. AND YOUR ADDRESS.

A. My name is Ronald M. Pate. I am employed by BellSouth Telecommunications, Inc. ("BellSouth") as a Director, Interconnection Services. In this position, I handle certain issues related to local interconnection matters, primarily operations support systems ("OSS"). My business address is 675 West Peachtree Street, Atlanta, Georgia 30375.

Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.

A. I graduated from Georgia Institute of Technology in Atlanta, Georgia, in 1973, with a Bachelor of Science Degree. In 1984, I received my Masters of Business Administration from Georgia State University. My professional career spans over twenty-five years of general management experience and marketing. I joined BellSouth in 1987,

1 and have held various positions of increasing responsibility since that  
2 time.

3

4 Q. HAVE YOU TESTIFIED PREVIOUSLY?

5

6 A. Yes. I have testified before the Public Service Commissions in  
7 Alabama, Florida, Georgia, Kentucky, Louisiana, South Carolina, the  
8 Tennessee Regulatory Authority and the North Carolina Utilities  
9 Commission.

10

11 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

12

13 A. The purpose of my testimony is to provide BellSouth's position on Issue  
14 Numbers 13 and 21 raised by DIECA Communications, Inc. d/b/a  
15 Covad Communications Company ("Covad") in its Petition for  
16 Arbitration filed with the Florida Public Service Commission  
17 ("Commission") on December 15, 2000.

18

19 ***Issue 13: What access should Covad have to BellSouth's loop makeup***  
20 ***information?***

21 Q. IN THE UNE REMAND ORDER, WHAT DID THE FCC REQUIRE OF  
22 INCUMBENT LOCAL EXCHANGE CARRIERS ("ILECS") REGARDING  
23 OPERATIONS SUPPORT SYSTEMS ("OSS")?

24

25

1 A. The FCC stated in its UNE Remand Order, ¶427 “We clarify that  
2 pursuant to our existing rules, an incumbent LEC must provide the  
3 requesting carrier with non-discriminatory access to the same detailed  
4 information about the loop that is available to the incumbent”. The FCC  
5 further concluded in ¶431 “that access to loop qualification must be  
6 provided to competitors within the same time intervals it is provided to  
7 the incumbent LEC’s own retail operations.  
8  
9

10 Q. DID THE FCC’S UNE REMAND ORDER IMPACT BELLSOUTH’S OSS  
11 AS THESE OSS ARE USED BY ALECS?  
12

13 A. The UNE Remand Order did not impact the existing ALEC OSS access  
14 offered by BellSouth other than to specify at paragraph 426 that “the  
15 pre-ordering function includes access to loop qualification []  
16 information.”  
17

18 Q. WHAT WAS BELLSOUTH’S RESPONSE TO THE FCC’S  
19 REQUIREMENT THAT LOOP INFORMATION BE AVAILABLE TO  
20 ALECS AS PART OF THE PRE-ORDERING FUNCTION?  
21

22 A. BellSouth developed and implemented procedures to provide ALECs  
23 with detailed loop information via the manual Service Inquiry (“SI”)  
24 process by February 17, 2000. Additionally, BellSouth implemented a  
25 detailed mechanized Loop pre-order process that was accessible

1 through all electronic interfaces that support pre-order functions (LENS  
2 and TAG) on November 18, 2000. This process is available to any  
3 ALEC that is interested in incorporating these procedures into its  
4 interconnection agreement.

5

6 Q. WHAT HAS THE FCC REQUIRED OF INCUMBENT LECS WITH  
7 REGARD TO PROVIDING LOOP QUALIFICATION INFORMATION  
8 THROUGH AUTOMATED OSS EVEN WHEN IT HAS NO SUCH  
9 INFORMATION AVAILABLE TO ITSELF?

10

11 A. In its UNE Remand Order the FCC has stated in ¶429 "If an incumbent  
12 LEC has not compiled such information for itself, we do not require the  
13 incumbent to conduct a plant inventory and construct a database on  
14 behalf of requesting carriers...In, addition, we expect the incumbent  
15 LECs will be updating their electronic database for their own xDSL  
16 deployment and, to the extent their employees have access to the  
17 information in an electronic format, the same format should be made  
18 available to new entrants via an electronic interface." BellSouth is in  
19 compliance with the FCC's order.

20

21 Q. PLEASE DESCRIBE THE MANUAL LOOP SI PROCESS.

22

23 A. The loop data is defined as the physical characteristics of the loop  
24 facilities which begin at the BellSouth central office and ends at the  
25 serving distribution terminal. Loop data consists of such information as

1 cable gauge and length, bridged taps, load coils, presence of Digital  
2 Loop Carrier ("DLC"), and other equipment that is part of local loop  
3 facilities.

4  
5 The ALEC completes the "Customer Information" section of the Loop SI  
6 form indicating if it wants the loop by telephone number, by address for  
7 spare copper pair or by address for spare DLC pair by checking off the  
8 appropriate request. The ALEC has the option of reserving spare pairs.  
9 The limit for LMU requests for spare pairs with or without reservations is  
10 three.

11  
12 The ALEC submits the Loop Makeup SI form to the Complex Resale  
13 Services Group ("CRSG") or their Account Team with a Local Service  
14 Request ("LSR"). The CRSG/Account Team forwards the SI form to  
15 BellSouth's Outside Plant Engineering Service Advocacy Center  
16 ("SAC"). The SAC verifies the availability of loop facilities. If the Loop  
17 Makeup SI indicates the ALEC wants the Loop Makeup by telephone  
18 number or circuit identifier the SAC will return a specific for the  
19 requested telephone /circuit identifier. If the Loop Makeup SI indicates  
20 the ALEC wants the makeup by address for spare copper pairs (ALEC  
21 will supply "Service Address" in "Customer Information" section) the  
22 SAC will return a specific for up to three spare copper pairs at that  
23 address. The ALEC will indicate the number requested, up to three,  
24 and will indicate if they want the pairs reserved. If there are no spare  
25 pairs or if the number of pairs available is less than the number

1 requested, the SAC will indicate in the "Comments" section that no  
2 spare pairs are available or that only some of the pairs are available. If  
3 no spare pairs are available, no LMU is returned. The LMU for the  
4 requested number of pairs will be detailed on page 2 of the Service  
5 Inquiry. The requested pairs will be reserved with a unique Facility  
6 Reservation Number ("FRN").

7  
8 The Outside Plant Engineer ("OSPE") will return the completed Service  
9 Inquiry to the CRSG/Account Team. The CRSG/Account Team reviews  
10 the SI form for completeness and forwards the loop SI request along  
11 with the LSR to the Local Carrier Service Center ("LCSC") for  
12 confirmation of a complete and accurate LSR. The CRSG/Account  
13 Team returns the loop response to the ALEC via electronic mail. The  
14 LCSC provides a firm Order Confirmation ("FOC") to the ALEC and  
15 generates a service order that automatically completes for billing the  
16 service.

17  
18 Q. WHY IS THE MANUAL LOOP MAKEUP SERVICE INQUIRY  
19 NECESSARY WHEN ELECTRONIC ACCESS IS AVAILABLE?

20  
21 A. The manual Loop Makeup ("LMU") SI process will continue to be a  
22 valuable means for obtaining loop information, even though electronic  
23 loop functionality is available. It is necessary to use this process for  
24 those situations where the Loop Facilities Assignment Control System  
25 ("LFACS") is not sufficiently populated with the data needed to make a

1 decision and thus the electronic LMU query does not suffice the ALEC's  
2 need. Additionally, this process is available for those ALECs who  
3 choose not to deploy the systems needed for the electronic query for  
4 LMU. ALECs may obtain documentation for the current Unbundled  
5 Network Element ("UNE") pre-ordering and ordering information  
6 pertaining to BellSouth's manual loop makeup at BellSouth's Website:  
7 <http://www.interconnection.bellsouth.com/guides/html/bpobr.html>

8  
9 Q. IS THERE ANYTHING IN THE FCC'S RULES OR ORDERS THAT  
10 REQUIRES BELLSOUTH TO PROVIDE ALECs WITH ELECTRONIC  
11 ACCESS TO LOOP MAKEUP INFORMATION?

12  
13 A. No. The FCC stated in its UNE Remand Order, ¶427 "We clarify that  
14 pursuant to our existing rules, an incumbent LEC must provide the  
15 requesting carrier with non-discriminatory access to the same detailed  
16 information about the loop that is available to the incumbent". The FCC  
17 further concluded in ¶431 "that access to loop qualification must be  
18 provided to competitors within the same time intervals it is provided to  
19 the incumbent LEC's own retail operations". Non-discriminatory access  
20 does not imply nor require that detailed information about loops must be  
21 available electronically and involve no manual processes. For  
22 BellSouth to serve its own retail customers, BellSouth must perform  
23 manual service inquiries for information when there is no electronic  
24 access for the requested retail service /product. Therefore, the service  
25 inquiry process for loop information for ALECs is accomplished in

1 substantially the same time and manner as for services offered to  
2 BellSouth's retail customers. Thus, these processes are in compliance  
3 with FCC rules and orders.

4  
5 Q. DOES BELLSOUTH MANUALLY PERFORM A SERVICE INQUIRY  
6 AND ORDER A SERVICE IN A MANNER THAT IS COMPARABLE TO  
7 THE PROCESSES USED FOR ALECs?

8  
9 A. Yes. The BellSouth Loop Makeup ("LMU") SI process and the ordering  
10 process for ALECs is comparable to BellSouth's Business-Class ADSL  
11 service that is sold to Network Service Providers ("NSPs"). BellSouth's  
12 Business-Class ADSL, sold from the FCC Tariff<sup>5</sup> and intended primarily  
13 for business applications, utilizes a manual SI and subsequent manual  
14 loop makeup when it is necessary to obtain exact loop makeup  
15 information. BellSouth utilizes this loop makeup information to  
16 determine if performance levels guaranteed by BellSouth can be  
17 obtained. The ALEC designer utilizes the loop makeup information  
18 obtained from BellSouth for similar purposes. The BellSouth Business  
19 Class ADSL is the comparable service to ALEC loops requiring loop  
20 makeup in this docket because performance levels for both are  
21 guaranteed.

22

23

24

25

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<sup>5</sup> BellSouth Telecommunications Tariff FCC. NO. 1



1 Information on the LMU process is described in a BellSouth Loop  
2 Makeup (LMU) ALEC Information Package available on BellSouth's  
3 Website: <http://interconnection.bellsouth.com/products/html/unes.html>

4  
5 Additionally, the Information Package is attached as Exhibit RMP-1.

6  
7 Q. DOES BELLSOUTH PROVIDE ACCESS TO OTHER DATABASES  
8 THAT MAY BE USEFUL IN OBTAINING PRE-ORDER INFORMATION  
9 IN CONNECTION WITH THE PROVISIONING OF ALEC XDSL  
10 SERVICE?

11  
12 A. Yes. BellSouth provides information from its Loop Qualification System  
13 ("LQS"). LQS functions as a tool for BellSouth customers (retail;  
14 purchasers of BellSouth's Asymmetrical Digital Subscriber Line  
15 ("ADSL") service and D/ALECs to determine whether a particular  
16 service location meets certain technical criteria and as such is qualified  
17 for BellSouth's ADSL offering based on BellSouth's technical  
18 parameters. In other words, by entering a telephone number or  
19 address, LQS provides the user with a qualified "yes/no" response  
20 based on the technical parameters of BellSouth's ADSL offering only.  
21 LQS does not provide loop information as contemplated by the FCC's  
22 xDSL requirement. Subsequent to the FCC's UNE Remand order, LQS  
23 was made available for use by ALECs on an interim basis until the  
24 mechanized loop interface is deployed. The purpose of LQS did not  
25 change with providing access to ALECs - it remains a tool designed to

1 provide a response to the inquirer if the location is qualified for  
2 BellSouth's ADSL service. LQS does not provide the level of detailed  
3 information in order that a ALEC may make an independent judgment  
4 about whether the loop is capable of supporting advanced services  
5 equipment the ALEC intends to install. BellSouth continues to make  
6 LQS available to ALECS, on this basis, at no charge.

7

8 Q. HOW DOES AN ALEC OBTAIN ACCESS TO LQS?

9

10 A. An ALEC may contact its BellSouth account team to obtain information  
11 on gaining access to LQS. The account team will assist with the  
12 appropriate contract language and appropriate documentation  
13 necessary to obtain a password and resulting access to LQS. ALECs  
14 may obtain a Loop Qualification System DLEC/ALEC Job Aid via the  
15 BellSouth Website:

16 <http://www.interconnection.bellsouth.com/guides/html/bpobr.html>

17

18

19 Q. WHAT IS THE SOURCE OF THE LOOP INFORMATION CONTAINED  
20 WITHIN LQS?

21

22 A. The database of record for loop information is the Local Facilities  
23 Assignment and Control System ("LFACS"). Thus, the source of loop  
24 information in LQS is LFACS. LQS utilizes built-in algorithms and

25

1 design criteria in addition to the additional software systems described  
2 below:

3

4 • Loop Engineering Information System (“LEIS”) - An umbrella system with  
5 several modules, one of which is LEAD.

6

7 • Loop Engineering Assignment Data (“LEAD”) - LEAD is a snapshot of the  
8 LFACS database. It receives current data once a month for all wire  
9 centers. Each LEAD database is updated once each month.

10

11 • Hands-Off Assignment Logic - (“HAL”) HAL is a BellSouth developed  
12 software system designed to pull information from LFACS and join  
13 transactions that can not be performed by LFACS, including assignment of  
14 most service orders, among which includes assignments on ADSL  
15 facilities.

16

17 Q. IS DIRECT ACCESS TO LFACS OR LEIS/LEAD REQUIRED IN  
18 ORDER TO PROVIDE ALECS WITH DETAILED INFORMATION  
19 ABOUT THE LOOP?

20

21 A. No. BellSouth’s obligation is to provide requesting carriers the same  
22 underlying information that BellSouth has in any of its own databases or  
23 other internal records. BellSouth’s mechanized OSS interface and  
24 manual interface provides a means to submit either a mechanized LMU  
25 pre-order query or a manual LMU Service Inquiry (“SI”) and receive a

1 response based on information resident in LFACS or other Network  
2 records. In the case of LEIS/LEAD, access may be obtained by ALECs  
3 for LQS which provides a "yes/no" qualified response.

4

5 Q. HAS BELLSOUTH MADE LOOP QUALIFICATION INFORMATION  
6 AVAILABLE IN ACCORDANCE WITH THE FCC'S RULES AND  
7 REGULATIONS?

8

9 A. Yes. BellSouth has and will continue to provide, non-discriminatory  
10 access to the same detailed information about the loop that is available  
11 to BellSouth itself. This non-discriminatory access is provided through  
12 the manual service inquiry process. ALECs may also request LMU  
13 electronically through BellSouth's pre-ordering functionality.

14

15

16 ***Issue 21: Should BellSouth provide accurate service order completion***  
17 ***notifications for line sharing orders?***

18

19 Q. WOULD YOU DEFINE A COMPLETION NOTIFICATION?

20

21 A. Yes. A Completion Notification ("CN") is an electronic transaction set  
22 used to convey acceptance of changes by a ALEC to a previously  
23 submitted Local Service Request ("LSR") or to convey completion of a  
24 Local Service Request ("LSR"). The CN provides the ALEC with the  
25 information required for control and tracking of request(s).

1

2 Q. HOW ARE ACCURATE COMPLETION NOTIFICATIONS DELIVERED  
3 TO ALECS?

4

5 A. For all electronically submitted LSRs, completion notices are delivered  
6 to the ALEC through an Electronic Data Interchange ("EDI") interface,  
7 or through other negotiated electronic processing options (LENS, TAG  
8 or RoboTAG™), once BellSouth's systems determine that the service  
9 order is completed, is error free, and is in Completion/Error free ("CPX")  
10 or Posted Complete/Error free ("PCX") status.

11

12 Q. DOES BELLSOUTH PROVIDE COMPLETION NOTIFICATIONS ON  
13 MANUALLY SUBMITTED LOCAL SERVICE REQUESTS?

14

15 A. No. BellSouth does not provide CNs on manually submitted LSRs. CNs  
16 are provided only on electronically submitted LSRs that are completed,  
17 error free and are in the CPX or PCX status. Manually submitted LSRs  
18 require that ALECs determine CN status via manual means.

19

20 Q. SHOULD COMPLETION NOTICES FOR LINE SHARING REQUESTS  
21 BE TREATED THE SAME AS ALL OTHER ALEC SERVICE  
22 REQUESTS?

23

24 A. Yes. Line sharing service requests that are submitted electronically  
25 should receive an electronically generated completion notification and

1 line- sharing LSRs submitted manually should not receive an  
2 electronically generated CN. There is no reason to develop a separate  
3 process for line sharing CNs.

4  
5 Q. WHAT MEANS ARE AVAILABLE TO ALECS TO DETERMINE THE  
6 STATUS OF A MANUALLY SUBMITTED LSR?

7  
8 A. ALECs can determine the status of a submitted LSR via BellSouth's  
9 CLEC Service Order Tracking System ("CSOTS"). CSOTS information  
10 is derived from the BellSouth Service Order Communications System  
11 ("SOCS"), which communicates all service orders to other BellSouth  
12 departments for provisioning and delivery. ALECs may, with an  
13 assigned login and password obtained through their BellSouth Account  
14 Team, access CSOTS via a web interface at:  
15 <https://clecview.bellsouth.com>

16  
17 The process is a simple, timesaving and accurate method of  
18 determining the current status, including completion status, on  
19 submitted LSRs.

20  
21 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

22  
23 A. Yes.

24  
25

Florida Public Service Commission

Docket No. 001797-TP

Exhibit RMP-1

Transmittal Cover Sheet for Ronald M. Pate Exhibit -1

This sheet transmits the

BellSouth Loop Makeup CLEC Information Package

Which consists of 10 pages.

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BellSouth LMU

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***BellSouth Loop Makeup (LMU)***

***CLEC  
Information Package***

*(Version 3, October 23, 2000)*

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**BellSouth LMU**

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**BellSouth LMU****Section 1: Introduction & Scope**

This Product Information Package is intended to provide to CLECs a product description and general ordering information specific to the general service offering described herein. Detailed ordering guidelines are provided in documents located on the BellSouth Interconnection Services Web site as specified.

Please contact your BellSouth Account Manager, if you have any questions about the information contained herein.

**Disclaimer Statement:** The information contained in this document is subject to change. BellSouth will provide notification of changes to the document through the CLEC Notification Process.

## BellSouth LMU

### Section 2: Version History / Control

Any future modifications, enhancements, and/or improvements that are made to this Loop Makeup (LMU) CLEC Information Package for BellSouth's LMU Service will be reflected accordingly in this section of the document.

| Section  | Date / Version       | Description   |
|--|----------------------|---|
| Table of Contents (TOC)                              | 07/28/00 – Version 1 | Version 2 (V2) has TOC and entire information package reformatted to include section numbers  |
| Version History / Control                            | 07/28/00 – Version 1 | This section was not required in the first posting release of this package. With V2, this section has been inserted as Section 2  |
| "Submitting a Request for Manual Loop Makeup"        | 07/28/00 – Version 1 | This section has been removed for the V2 posting and relocated to the "BellSouth Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guide for Manual Loop Makeup" web document  |
| "Guidelines for Interfacing with the CRSG UNE Group" | 07/28/00 – Version 1 | This section has been removed for the V2 posting and relocated to the "BellSouth Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guide for Manual Loop Makeup" web document  |
| "Loop Makeup Service Inquiry (Form)"                 | 07/28/00 – Version 1 | This form has been removed for the V2 posting and relocated to the "BellSouth Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guide for Manual Loop Makeup" web document   |
| "Service Description"                                | 07/28/00 - Version 1 | With V2, the section name has been re-titled as "Loop Makeup Service Description"   |
| Section 5: Ordering Information for LMUSI            | 09/15/00 - Version 2 | Sec 5.1 includes updated information for specifying a cancellation on the Manual LMUSI form. The update reads: "CLEC would request a cancellation by checking the box on the Manual LMUSI form."  |
| Section 5: Ordering Information for LMUSI            | 09/15/00 - Version 2 | At the end of Sec 5.2, a paragraph has been inserted redirecting the viewer to the LMU PO&OG web document for detailed instructions on placing Manual LMU requests  |
| Section 3.1: Service Description                     | 10/23/00 - Version 3 | In the 2 <sup>nd</sup> paragraph listing of various components for BellSouth's Loop Makeup Service, the following component was deleted for the time being: "... <i>disturbers in the same or adjacent binder groups;</i> ..." (See 10/16/00 Carrier Notification for further details.) |

## BellSouth LMU

### Section 3: Loop Makeup Service Description

#### Sec 3.1: Service Description

The **Loop Makeup (LMU) Service** described in this Information Package is for access to loop makeup information as a preordering function, *separate from* the placement of any UNE service order. *Loop Makeup Service Inquiries (LMUSI)* for preordering loop makeup are likewise unique from other preordering functions with associated services inquiries (SI).

BellSouth Interconnection Services will offer LMU to its CLEC customers in a manner that is consistent with the requirements of the FCC's Third Report and Order (99-238). This means that BellSouth will provide CLECs access to loop makeup information that consists of the composition of the loop material (copper/fiber); the existence, location and type of equipment on the loop, including but not limited to digital loop carrier or other remote concentration devices, feeder/distribution interfaces, bridge taps, load coils, pair-gain devices; the loop length; the wire gauge; and the electrical parameters of the loop. LMU can be requested using the following rate elements per LMUSI:

| USOC          | Rate Element  |
|---------------|---|
| • UMKLW       | Loop Makeup - Preordering Without Reservation, per working facility queried (MANUAL)  |
| • UMKLW       | Loop Makeup - Preordering Without Reservation, per spare facility queried (MANUAL) [Maximum No. of Spare Facilities per LMUSI is (3).]      |
| • UMKLP       | Loop Makeup - Preordering With Reservation, per spare facility queried (MANUAL) [Maximum No. of Spare Facilities per LMUSI is (3).]         |
| • <i>tbd*</i> | Loop Makeup - Preordering Without Reservation, per working facility queried (MECHANIZED)  |
| • <i>tbd*</i> | Loop Makeup - Preordering Without Reservation, per spare facility queried (MECHANIZED) [Maximum No. of Spare Facilities per LMUSI is (10).] |
| • <i>tbd*</i> | Loop Makeup - Preordering With Reservation, per spare facility queried (MECHANIZED) [Maximum No. of Spare Facilities per LMUSI is (10).]    |

\**tbd* - USOC for LMUSI submitted via the appropriate electronic interface, to be determined

Reserved facilities for which the CLEC does not plan to place a UNE service order should be cancelled by the CLEC in a timely manner.

BellSouth's provision of loop data to the requesting CLEC on working facilities is contingent upon ownership considerations of the loop, whether by BellSouth or the requesting CLEC. CLEC is not authorized to receive loop data should loop be owned by an outside carrier.

Rates for all above elements will need to be included in your contract. Rates may be interim and subject to true-up pending approval of final rates by the respective State Commissions. Commission orders will specify the dates to which true-ups are applicable. (Continued on next page)

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## **BellSouth LMU**

The reservation holding timeframe is a maximum of four days from the time that BellSouth's loop makeup data is returned to the CLEC on the facilities queried. During this holding time that a Service Order is not placed, the reserved facilities are rendered unavailable to other customers, whether for CLEC(s) or for BellSouth.

### **Sec 3.2: Features and Benefits**

CLEC may use BellSouth's Loop Makeup (LMU) Service to determine if the loop queried is capable of supporting xDSL and other advanced data services, as applicable.

It is anticipated that LMU will be ordered most often by CLECs to determine whether or not modifications will be needed in order for the CLEC to provide advanced data services to an end user. The CLEC may request the loop makeup data per a manual or mechanized service inquiry, the Loop Makeup Service Inquiry (LMUSI), for either a working facility or for spare facilities, the number of which as specified in the Rate Element Table in the Service Description.

## **Section 4: Pre-Ordering Checklist**

### **Sec 4.1: Availability**

BST will offer this product in all states. Manual LMUSI will be submitted to BellSouth's Complex Resale Support Group (CRSG/ACCOUNT TEAM); Mechanized LMUSI will obtain loop data from BellSouth's Loop Facilities Assignment and Control System (LFACS). A CLEC's access to BellSouth's loop data, whether by mechanized or manual means, does not constitute a guarantee for the accuracy of such loop data. The information provided will be the information "as is" from BellSouth's hard copy records or BellSouth's databases.

### **Sec 4.2: Billing Information**

LMU will be billed from CABS. All activities herein described and associated with a unique USOC will incur a unique nonrecurring charge. The appropriate USOCs are still being assigned for the Mechanized LMUSI rate elements. Nevertheless, billing for all services rendered under LMU are applicable and shall be assessed to the CLEC.

---

## BellSouth LMU

### Section 5: Ordering Information for LMUSI

#### Sec 5.1: Description of Ordering Process

CLECs may request BellSouth's loop makeup data through six LMUSI types as outlined above in the Rate Elements Table in the Service Description Section per rate element. Should the CLEC wish to cancel a reservation on spare facilities, the cancellation would require the address and the reservation ID(s) (RESID). CLEC would request a cancellation by checking the box on the Manual LMUSI form. *[The reservation ID is also known as a facilities reservation number (FRN). Hereafter within the verbal description of this Information Package, this code will be referred to as the "RESID/FRN".]*

#### Sec 5.2: Manual Process

The CLEC will provide the requested information on the Manual LMUSI form as applicable in order to process the LMUSI on either a working facility or on up to three spare facilities.

- The CLEC will email or fax the Manual LMUSI form to BellSouth's Complex Resale Support Group (CRSG/ACCOUNT TEAM)
- Thereafter, BellSouth personnel from the CRSG/ACCOUNT TEAM will collect the necessary information from the appropriate BellSouth central office to obtain the requested loop data
- The CRSG/ACCOUNT TEAM forwards the updated LMUSI with the loop data to the CLEC. Please note that for inquiries on spare facilities involving a reservation, the LMUSI form will be returned to the CLEC with a unique RESID/FRN for each facility reserved

The **STANDARD SERVICE INTERVAL** for return of a Manual LMUSI is seven business days.

For a working pair LMUSI, the end user's address will be required along with either the telephone number or the circuit ID (CKID). For a spare pair LMUSI placed manually, the address of the service location is the only required input.

When the CLEC seeks to use the RESID/FRN of a single, reserved spare facility in the placement of a UNE service order, BellSouth will use its best efforts to assign to the CLEC the facility reserved as indicated on the return of the LMUSI form. For those limited occasions when BellSouth's assignment system cannot assign the specific facility of preferred loop makeup as reserved by the CLEC during the LMUSI transaction, BellSouth will assign the CLEC a facility that meets the BellSouth technical standards of the BellSouth type loop as ordered by the CLEC.

**Date of SERVICE DEPLOYMENT (MANUAL):** CLECs may start submitting Manual LMUSI requests upon the posting data of this Information Package to BellSouth's Interconnection Services Web site, **contingent upon** incorporating the necessary service provisions into one's Interconnection Agreement by amendment or new contract. Refer to the Section "Contract Specific Provisions".

For more detailed instructions on submitting a request for Manual LMU, refer to the **BellSouth Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guide for Manual Loop Makeup**. The Manual LMUSI form has also been relocated to this guide.

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## BellSouth LMU

### Sec 5.3: Mechanized Process

The CLEC will provide the information as prompted by the Operational Support System (OSS) interface for the LMUSI and as applicable to process the Service Inquiry on either a working facility or on up to ten spare facilities. Appropriate OSS interfaces for the mechanized process include LENS, TAG, and RoboTAG. Thereafter, the OSS interface submits the Mechanized LMUSI to LFACS for a response of loop makeup data. For instructions on preparing a Mechanized LMUSI, refer to **BellSouth's Pre-Ordering Business Rules**.

The **STANDARD SERVICE INTERVAL** for a response to a Mechanized LMUSI is near real time.

For a working pair LMUSI, the end user's address will be required along with either the telephone number or the circuit ID. For a spare pair LMUSI placed mechanically, the required inputs are the address of the service location along with the "Network Channel/Network Channel Interface/Secondary Network Channel Interface" (NC/NCI/SECNCI) code. For further specifications on this code, refer to **BellSouth's Technical Reference TR73600**.

Once the LMUSI has been initiated by the CLEC via the appropriate OSS interface, loop data will be obtained by means of BellSouth's Loop Facilities Assignment and Control System, formatted according to the configuration of the OSS interface utilized for the CLEC's LMUSI, and returned to the CLEC by such interface. Should the LMUSI requested by the CLEC include a reservation, the response communication to the CLEC will include a RESID/FRN for the entire set of facilities. Future releases of BellSouth's mechanized interfaces for LMU may entail unique RESID/FRNs for each facility reserved.

With the resulting loop data from the Mechanized LMUSI process, should the CLEC decide that it needs further loop data information in order to make a determination of loop qualification for its intended services, the CLEC may initiate a separate Manual LMUSI for a separate nonrecurring charge as identified by the associated USOC for that Manual LMUSI.

Date of **SERVICE DEPLOYMENT (MECHANIZED)**: CLECs may start submitting LMUSI requests mechanically at the end of the month of July, 2000, **contingent upon incorporating the necessary service provisions into one's Interconnection Agreement by amendment or new contract**. Refer to the Section "Contract Specific Provisions". This is also **contingent upon** CLECs having obtained the proper "Beta Test Agreement" for this service. CLECs should contact their respective CRSG/Account Team Representatives.

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## BellSouth LMU

### Section 6: Placing a UNE Service Order

Once the CLEC has reserved single or multiple spare pairs, the CLEC may determine if it wishes to place an order for **BellSouth Unbundled Loop Modification** CLEC Information Package and/or for a UNE Service Order (e.g. for a 2-wire ADSL compatible loop). For such a UNE Service Order, refer to the **Bellsouth Unbundled ADSL/HDSL Compatible Loops** CLEC Information Package.

BellSouth has provided this LMU service to allow the CLEC the opportunity and responsibility of determining the qualification for itself of BellSouth's loops for the specific services that the CLEC wishes to provide over certain loops. BellSouth further recognizes that the CLEC may choose to use equipment that it deems will enable it to provide a certain type and level of service over a particular BellSouth loop. However, such configurations may not match BellSouth's standards and specifications for the intended type and level of service. Accordingly, the CLEC bears full responsibility for being knowledgeable of BellSouth's standards and specifications of BellSouth's loops. The CLEC also bears full responsibility for making the appropriate ordering decisions of matching BellSouth loops with CLEC equipment that will accomplish the CLEC's end goal for the intended service it wishes to provide its end-user(s). The CLEC is responsible for any of its service configurations that may differ from BellSouth's technical standard of that service.

As part of BellSouth's ongoing management efforts of its network, BellSouth reserves the right to change out the originally assigned facility to a CLEC when it placed its UNE service order for another facility that matches the BellSouth technical standards of the loop ordered by the CLEC.



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## BellSouth LMU

### Section 7: Contract Specific Provisions

Before a Loop Makeup Service Inquiry (LMUSI) may be submitted by the CLEC, the CLEC must have an Interconnection Agreement that includes terms, conditions and rates for the LMUSI(s) being requested. This agreement must be in effect for all states where the CLEC plans to provide telecommunications services, as stipulated in the terms and conditions identifying those states wherein the CLEC is or seeks to become a certified alternative/competitive local exchange carrier for that state.

The information contained herein applies to the preordering LMU general service offering and is part of the standard BellSouth Interconnection Agreement. This general service offering is in accordance with BellSouth policies, procedures and regulatory obligations as well as the Standard Interconnection Agreement.

This general service offering does not address specific contract issues within a CLEC's Interconnection Agreement that may differ from this offering. Where specific contract issues differ from the information provided here, the contract provisions would prevail for the term of the contract.

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BellSouth LMU

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***BellSouth Loop Makeup (LMU)***

**CLEC**  
***Information Package***

*(Version 3, October 23, 2000)*

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## BellSouth LMU

### Section 1: Introduction & Scope

This Product Information Package is intended to provide to CLECs a product description and general ordering information specific to the general service offering described herein. Detailed ordering guidelines are provided in documents located on the BellSouth Interconnection Services Web site as specified.

Please contact your BellSouth Account Manager, if you have any questions about the information contained herein.

**Disclaimer Statement:** The information contained in this document is subject to change. BellSouth will provide notification of changes to the document through the CLEC Notification Process.

## BellSouth LMU

### Section 2: Version History / Control

Any future modifications, enhancements, and/or improvements that are made to this Loop Makeup (LMU) CLEC Information Package for BellSouth's LMU Service will be reflected accordingly in this section of the document.

| Section  | Date / Version       | Description  |
|--|----------------------|--|
| Table of Contents (TOC)                              | 07/28/00 – Version 1 | Version 2 (V2) has TOC and entire information package reformatted to include section numbers   |
| Version History / Control                            | 07/28/00 – Version 1 | This section was not required in the first posting release of this package. With V2, this section has been inserted as Section 2   |
| "Submitting a Request for Manual Loop Makeup"        | 07/28/00 – Version 1 | This section has been removed for the V2 posting and relocated to the "BellSouth Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guide for Manual Loop Makeup" web document   |
| "Guidelines for Interfacing with the CRSG UNE Group" | 07/28/00 – Version 1 | This section has been removed for the V2 posting and relocated to the "BellSouth Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guide for Manual Loop Makeup" web document   |
| "Loop Makeup Service Inquiry (Form)"                 | 07/28/00 – Version 1 | This form has been removed for the V2 posting and relocated to the "BellSouth Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guide for Manual Loop Makeup" web document  |
| "Service Description"                                | 07/28/00 - Version 1 | With V2, the section name has been re-titled as "Loop Makeup Service Description"  |
| Section 5: Ordering Information for LMUSI            | 09/15/00 - Version 2 | Sec 5.1 includes updated information for specifying a cancellation on the Manual LMUSI form. The update reads: "CLEC would request a cancellation by checking the box on the Manual LMUSI form."   |
| Section 5: Ordering Information for LMUSI            | 09/15/00 - Version 2 | At the end of Sec 5.2, a paragraph has been inserted redirecting the viewer to the LMU PO&OG web document for detailed instructions on placing Manual LMU requests   |
| Section 3.1: Service Description                     | 10/23/00 - Version 3 | In the 2 <sup>nd</sup> paragraph listing of various components for BellSouth's Loop Makeup Service, the following component was deleted for the time being: "... <i>disturbers in the same or adjacent binder groups;....</i> " (See 10/16/00 Carrier Notification for further details.) |

## BellSouth LMU

### Section 3: Loop Makeup Service Description

#### Sec 3.1: Service Description

The **Loop Makeup (LMU) Service** described in this Information Package is for access to loop makeup information as a preordering function, *separate from* the placement of any UNE service order. *Loop Makeup Service Inquiries (LMUSI)* for preordering loop makeup are likewise unique from other preordering functions with associated services inquiries (SI).

BellSouth Interconnection Services will offer LMU to its CLEC customers in a manner that is consistent with the requirements of the FCC's Third Report and Order (99-238). This means that BellSouth will provide CLECs access to loop makeup information that consists of the composition of the loop material (copper/fiber); the existence, location and type of equipment on the loop, including but not limited to digital loop carrier or other remote concentration devices, feeder/distribution interfaces, bridge taps, load coils, pair-gain devices; the loop length; the wire gauge; and the electrical parameters of the loop. LMU can be requested using the following rate elements per LMUSI:

| USOC          | Rate Element  |
|---------------|---|
| • UMKLW       | Loop Makeup - Preordering Without Reservation, per working facility queried (MANUAL)  |
| • UMKLW       | Loop Makeup - Preordering Without Reservation, per spare facility queried (MANUAL) [Maximum No. of Spare Facilities per LMUSI is (3).]      |
| • UMKLP       | Loop Makeup - Preordering With Reservation, per spare facility queried (MANUAL) [Maximum No. of Spare Facilities per LMUSI is (3).]         |
| • <i>tbd*</i> | Loop Makeup - Preordering Without Reservation, per working facility queried (MECHANIZED)  |
| • <i>tbd*</i> | Loop Makeup - Preordering Without Reservation, per spare facility queried (MECHANIZED) [Maximum No. of Spare Facilities per LMUSI is (10).] |
| • <i>tbd*</i> | Loop Makeup - Preordering With Reservation, per spare facility queried (MECHANIZED) [Maximum No. of Spare Facilities per LMUSI is (10).]    |

\* *tbd* - USOC for LMUSI submitted via the appropriate electronic interface, to be determined

Reserved facilities for which the CLEC does not plan to place a UNE service order should be cancelled by the CLEC in a timely manner.

BellSouth's provision of loop data to the requesting CLEC on working facilities is contingent upon ownership considerations of the loop, whether by BellSouth or the requesting CLEC. CLEC is not authorized to receive loop data should loop be owned by an outside carrier.

Rates for all above elements will need to be included in your contract. Rates may be interim and subject to true-up pending approval of final rates by the respective State Commissions. Commission orders will specify the dates to which true-ups are applicable. (Continued on next page)

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## **BellSouth LMU**

The reservation holding timeframe is a maximum of four days from the time that BellSouth's loop makeup data is returned to the CLEC on the facilities queried. During this holding time that a Service Order is not placed, the reserved facilities are rendered unavailable to other customers, whether for CLEC(s) or for BellSouth.

### **Sec 3.2: Features and Benefits**

CLEC may use BellSouth's Loop Makeup (LMU) Service to determine if the loop queried is capable of supporting xDSL and other advanced data services, as applicable.

It is anticipated that LMU will be ordered most often by CLECs to determine whether or not modifications will be needed in order for the CLEC to provide advanced data services to an end user. The CLEC may request the loop makeup data per a manual or mechanized service inquiry, the Loop Makeup Service Inquiry (LMUSI), for either a working facility or for spare facilities, the number of which as specified in the Rate Element Table in the Service Description.

## **Section 4: Pre-Ordering Checklist**

### **Sec 4.1: Availability**

BST will offer this product in all states. Manual LMUSI will be submitted to BellSouth's Complex Resale Support Group (CRSG/ACCOUNT TEAM); Mechanized LMUSI will obtain loop data from BellSouth's Loop Facilities Assignment and Control System (LFACS). A CLEC's access to BellSouth's loop data, whether by mechanized or manual means, does not constitute a guarantee for the accuracy of such loop data. The information provided will be the information "as is" from BellSouth's hard copy records or BellSouth's databases.

### **Sec 4.2: Billing Information**

LMU will be billed from CABS. All activities herein described and associated with a unique USOC will incur a unique nonrecurring charge. The appropriate USOCs are still being assigned for the Mechanized LMUSI rate elements. Nevertheless, billing for all services rendered under LMU are applicable and shall be assessed to the CLEC.

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## BellSouth LMU

### Section 5: Ordering Information for LMUSI

#### Sec 5.1: Description of Ordering Process

CLECs may request BellSouth's loop makeup data through six LMUSI types as outlined above in the Rate Elements Table in the Service Description Section per rate element. Should the CLEC wish to cancel a reservation on spare facilities, the cancellation would require the address and the reservation ID(s) (RESID). CLEC would request a cancellation by checking the box on the Manual LMUSI form. *[The reservation ID is also known as a facilities reservation number (FRN). Hereafter within the verbal description of this Information Package, this code will be referred to as the "RESID/FRN".]*

#### Sec 5.2: Manual Process

The CLEC will provide the requested information on the Manual LMUSI form as applicable in order to process the LMUSI on either a working facility or on up to three spare facilities.

- The CLEC will email or fax the Manual LMUSI form to BellSouth's Complex Resale Support Group (CRSG/ACCOUNT TEAM)
- Thereafter, BellSouth personnel from the CRSG/ACCOUNT TEAM will collect the necessary information from the appropriate BellSouth central office to obtain the requested loop data
- The CRSG/ACCOUNT TEAM forwards the updated LMUSI with the loop data to the CLEC. Please note that for inquiries on spare facilities involving a reservation, the LMUSI form will be returned to the CLEC with a unique RESID/FRN for each facility reserved

The **STANDARD SERVICE INTERVAL** for return of a Manual LMUSI is seven business days.

For a working pair LMUSI, the end user's address will be required along with either the telephone number or the circuit ID (CKID). For a spare pair LMUSI placed manually, the address of the service location is the only required input.

When the CLEC seeks to use the RESID/FRN of a single, reserved spare facility in the placement of a UNE service order, BellSouth will use its best efforts to assign to the CLEC the facility reserved as indicated on the return of the LMUSI form. For those limited occasions when BellSouth's assignment system cannot assign the specific facility of preferred loop makeup as reserved by the CLEC during the LMUSI transaction, BellSouth will assign the CLEC a facility that meets the BellSouth technical standards of the BellSouth type loop as ordered by the CLEC.

Date of **SERVICE DEPLOYMENT (MANUAL)**: CLECs may start submitting Manual LMUSI requests upon the posting date of this Information Package to BellSouth's Interconnection Services Web site, **contingent upon** incorporating the necessary service provisions into one's Interconnection Agreement by amendment or new contract. Refer to the Section "Contract Specific Provisions".

For more detailed instructions on submitting a request for Manual LMU, refer to the **BellSouth Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guide for Manual Loop Makeup**. The Manual LMUSI form has also been relocated to this guide.



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## BellSouth LMU

### Sec 5.3: Mechanized Process

The CLEC will provide the information as prompted by the Operational Support System (OSS) interface for the LMUSI and as applicable to process the Service Inquiry on either a working facility or on up to ten spare facilities. Appropriate OSS interfaces for the mechanized process include LENS, TAG, and RoboTAG. Thereafter, the OSS interface submits the Mechanized LMUSI to LFACS for a response of loop makeup data. For instructions on preparing a Mechanized LMUSI, refer to **BellSouth's Pre-Ordering Business Rules**.

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Once the LMUSI has been initiated by the CLEC via the appropriate OSS interface, loop data will be obtained by means of BellSouth's Loop Facilities Assignment and Control System, formatted according to the configuration of the OSS interface utilized for the CLEC's LMUSI, and returned to the CLEC by such interface. Should the LMUSI requested by the CLEC include a reservation, the response communication to the CLEC will include a RESID/FRN for the entire set of facilities. Future releases of BellSouth's mechanized interfaces for LMU may entail unique RESID/FRNs for each facility reserved.

With the resulting loop data from the Mechanized LMUSI process, should the CLEC decide that it needs further loop data information in order to make a determination of loop qualification for its intended services, the CLEC may initiate a separate Manual LMUSI for a separate nonrecurring charge as identified by the associated USOC for that Manual LMUSI.

Date of **SERVICE DEPLOYMENT (MECHANIZED)**: CLECs may start submitting LMUSI requests mechanically at the end of the month of July, 2000, **contingent upon incorporating the necessary service provisions into one's Interconnection Agreement by amendment or new contract**. Refer to the Section "Contract Specific Provisions". This is also **contingent upon** CLECs having obtained the proper "Beta Test Agreement" for this service. CLECs should contact their respective CRSG/Account Team Representatives.

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## BellSouth LMU

### Section 6: Placing a UNE Service Order

Once the CLEC has reserved single or multiple spare pairs, the CLEC may determine if it wishes to place an order for **BellSouth Unbundled Loop Modification** CLEC Information Package and/or for a UNE Service Order (e.g. for a 2-wire ADSL compatible loop). For such a UNE Service Order, refer to the **BellSouth Unbundled ADSL/HDSL Compatible Loops** CLEC Information Package.

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## BellSouth LMU

### Section 7: Contract Specific Provisions

Before a Loop Makeup Service Inquiry (LMUSI) may be submitted by the CLEC, the CLEC must have an Interconnection Agreement that includes terms, conditions and rates for the LMUSI(s) being requested. This agreement must be in effect for all states where the CLEC plans to provide telecommunications services, as stipulated in the terms and conditions identifying those states wherein the CLEC is or seeks to become a certified alternative/competitive local exchange carrier for that state.

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