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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re. Complaint of the Florida Competitive Carriers Association Against BellSouth Telecommunications, Inc. Regarding BellSouth's Practice of Refusing to Provide FastAccess Internet Service to Customers who Receive Voice Service from a Competitive Voice Provider, and Request for Expedited Relief

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Docket No. 020507-TP

Filed: December 23, 2002

**REBUTTAL TESTIMONY AND EXHIBITS**

**OF**

**JAY BRADBURY**

**ON BEHALF OF**

**THE FLORIDA COMPETITIVE CARRIERS ASSOCIATION**

DOCUMENT NUMBER 020507-TP

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1                                   **FLORIDA COMPETITIVE CARRIERS ASSOCIATION**

2                                   **REBUTTAL TESTIMONY OF JAY BRADBURY**

3                                   **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

4                                   **DOCKET NO. 020507-TL**

5                                   **December 23, 2002**

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9

10   **Q.    PLEASE STATE YOUR NAME, BUSINESS ADDRESS, BY WHOM YOU**  
11       **ARE EMPLOYED, AND IN WHAT CAPACITY.**

12    A.    My name is Jay M Bradbury. My business address is 1200 Peachtree Street, Suite  
13           8100, Atlanta, Georgia 30309. I am employed by AT&T Corp. (AT&T) as a  
14           District Manager in the Law and Government Affairs Organization.

15

16   **Q.    PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL**  
17       **BACKGROUND.**

18    A.    I graduated with a Bachelor of Arts degree from The Citadel in 1966. I have taken  
19           additional undergraduate and graduate courses at the University of South Carolina  
20           and North Carolina State University in Business and Economics. I earned a  
21           Masters Certificate in Project Management from the Stevens Institute of  
22           Technology in 2000.

1 I have been employed in the telecommunications industry for more than thirty-two  
2 years with AT&T, including 14 years with AT&T's then-subsubsidiary, Southern Bell.  
3 I began my AT&T career in 1970 as a Chief Operator with Southern Bell's  
4 Operator Services Department in Raleigh, North Carolina. From 1972 through  
5 1987, I held various positions within Southern Bell's (1972 – 1984) and AT&T's  
6 (1984 – 1987) Operator Services Departments, where I was responsible for the  
7 planning, engineering, implementation and administration of personnel, processes  
8 and network equipment used to provide local and toll operator services and  
9 directory assistance services in North Carolina, South Carolina, Kentucky,  
10 Tennessee and Mississippi. In 1987, I transferred to AT&T's External Affairs  
11 Department in Atlanta, Georgia, where I was responsible for managing AT&T's  
12 needs for access network interfaces with South Central Bell, including the  
13 resolution of operational performance, financial and policy issues.

14  
15 From 1989 through November 1992, I was responsible for AT&T's relationships  
16 and contract negotiations with independent telephone companies within the South  
17 Central Bell States and Florida. From November 1992 through April 1993, I was  
18 a Regulatory Affairs Manager in the Law and Government Affairs Division. In  
19 that position, I was responsible for the analysis of industry proposals before  
20 regulatory bodies in the South Central states to determine their impact on AT&T's  
21 ability to meet its customers' needs with services that are competitively priced and  
22 profitable. In April 1993, I transferred to the Access Management Organization  
23 within AT&T's Network Services Division as a Manager – Access Provisioning

1 and Maintenance, with responsibility for ongoing management of processes and  
2 structures in place with Southwestern Bell to assure that its access provisioning  
3 and maintenance performance met the needs of AT&T's strategic business units.

4  
5 In August 1995, as a Manager in the Local Infrastructure and Access Management  
6 Organization, I became responsible for negotiating and implementing operational  
7 agreements with incumbent local exchange carriers needed to support AT&T's  
8 entry into the local telecommunications market. I was transferred to the Law and  
9 Government Affairs Organization in June 1998, with the same responsibilities.

10 One of my most important objectives in these negotiations has been to ensure that  
11 BellSouth provides AT&T with efficient and nondiscriminatory access to  
12 BellSouth's Operations Support Systems (OSS) throughout BellSouth's nine-state  
13 region to support AT&T's market entry. As part of my overall responsibilities, I  
14 have personally spent hundreds of hours in direct negotiations and implementation  
15 meetings with BellSouth personnel and subject matter experts. My activities have  
16 included direct participation in OSS implementation teams, review and analysis of  
17 data from the testing and use of BellSouth's interfaces as they are implemented,  
18 and continuing consultation with AT&T decision makers concerning OSS.

19  
20 **Q. HAVE YOU EVER TESTIFIED BEFORE?**

21 A. Yes, I have testified on behalf of AT&T in a number of state public utility  
22 commission proceedings regarding OSS issues, including arbitration, performance  
23 measurement, and Section 271 proceedings in all nine states in the BellSouth

1 region. I have also testified on behalf of AT&T in proceedings before the FCC  
2 regarding BellSouth's applications to provide in-region interLATA service.

3

4 **Q. ON WHOSE BEHALF ARE YOU PROVIDING THIS REBUTTAL**  
5 **TESTIMONY?**

6 A I am providing testimony on behalf of the Florida Competitive Carriers Association  
7 (FCCA), an advocacy group formed to promote competition broadly throughout  
8 Florida.

9

10 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

11 A. The purpose of my testimony is to respond to a number of assertions associated  
12 with Issues 2, 4, 5 and 6 contained in the testimony of BellSouth's witnesses John  
13 A. Ruscilli, Bill Smith, W. Keith Milner, and Eric Fogle about alleged "operational  
14 problems" associated with providing BellSouth's FastAccess® Internet access  
15 service (FA Service) to customers who receive voice service from an Alternative  
16 Local Exchange Carrier (ALEC). Responses to policy claims BellSouth's  
17 witnesses present that do not have an associated "operational problem" are  
18 discussed in the rebuttal testimony of Joseph Gillan.<sup>1</sup>

19

20 Collectively, BellSouth's witnesses claim that providing FA Service to *its own*  
21 existing customers or to consumers who want to be BellSouth FA Service  
22 customers, when they receive voice service from an ALEC, will cause harm to

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<sup>1</sup> This includes responses to the portions of Mr. Fogle's testimony related to Issues 6a and 6b, in which he repackages operational problems as elements in an invalid argument that changes in rates, terms and conditions are justified.

1 BellSouth and the consumers of Florida because of vaguely described operational  
2 issues, including:

- 3
- 4 • ALEC control over the entire loop (in both UNE-P and UNE-L situations)<sup>2</sup>
  - 5 ○ Permission for BellSouth to use the high frequency portion of the loop
  - 6 (HFPL)
  - 7 ○ BellSouth does not have any means to determine if any one of the
  - 8 hundreds of ALECs in the BellSouth region has granted authorization
  - 9 for BellSouth to access the HFPL for any given loop.
  - 10 ○ Negotiating rates, terms and conditions
- 11 • Additional operational costs<sup>3</sup>
  - 12 ○ Inability to “take full advantage of its DSL investments”
  - 13 ○ Unexplained “additional costs” to continue service to its own
  - 14 customers
- 15 • Would require that BellSouth provide<sup>4</sup>
  - 16 ○ Terminating ATM circuit
  - 17 ○ Help Desk
  - 18 ○ Installation Services
  - 19 ○ Access to the Internet
  - 20 ○ Customer Premises Equipment
- 21 • BellSouth would have to develop an alternative method of billing<sup>5</sup>
- 22 • The “telephone” number is the driver for provisioning, maintenance, billing and
- 23 record-keeping.<sup>6</sup>
  - 24 ○ All systems and “hundreds” of supporting sub-systems.
  - 25 ○ UNE-P and UNE-L wipe numbers from BellSouth systems.
  - 26 ○ BellSouth’s database does not include loop information for facilities-
  - 27 based ALEC telephone numbers, and BellSouth cannot use its database
  - 28 to readily determine whether a given loop is DSL compatible.
  - 29 ○ Systems “would have to be totally revamped.”
  - 30 ■ Very large, complex, and detailed internal system change

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<sup>2</sup> Ruscilli, Direct, page 12, line 9-21, Milner, Direct, page 5, line 1 through page 6, line 3; Milner, Direct, page 6, line 17-20; Milner, Direct, page 7, lines 4-7.

<sup>3</sup> Smith, Direct, page 6, line 1 through page 7, line 12.

<sup>4</sup> Milner, Direct, page 4, lines 13-18.

<sup>5</sup> Milner, Direct, page 4, lines 18-23; Fogle, Direct, page 5, lines 9-15.

<sup>6</sup> Milner, Direct, page 7, line 16 through page 8, line 15; Milner, Direct, page 9, lines 9-12; Fogle, Direct, page 2, line 22 through page 3, line 7, Fogle, Direct, page 4, lines 1-6; Fogle, Direct, page 4, lines 9-15.

- 1                   ▪ Massive amount of expensive and time consuming “re-writes”
- 2                   ▪ Very large amount of resources.
- 3           • Providing DSL signals over ALEC UNE-L loops is a “technical challenge,”
- 4                   and requires “additional equipment.”<sup>7</sup>
- 5           • Mechanized maintenance and trouble isolation systems cannot be used on
- 6                   stand-alone loops purchased by ALECs.<sup>8</sup>
- 7           • Providing service to BellSouth’s customers “is simply not feasible.”<sup>9</sup>

8           None of BellSouth’s witnesses provide any information or data to support these  
9           vague claims. And, as I will explain below, none of these allegations impose any  
10           significant administrative or operational burden upon BellSouth’s ability to provide  
11           FA Service to its own existing and potential customers. BellSouth’s claims are  
12           exaggerated, misleading, based on partial truths, and even where partially true,  
13           have been eliminated or mitigated by existing procedures and systems presently  
14           available to BellSouth.

15  
16   **Q.    IN UNE-P AND UNE-L SITUATIONS DOES ALEC CONTROL OR**  
17   **OWNERSHIP OF THE ENTIRE FREQUENCY SPECTRUM OF THE**  
18   **LOOP PRESENT PROBLEMS IN THE CONTINUED PROVISIONING**  
19   **OF FA SERVICE TO EXISTING CUSTOMERS OR POTENTIAL NEW**  
20   **CUSTOMERS?<sup>10</sup>**

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<sup>7</sup> Fogle, Direct, page 3, lines 9-12 and page 4 lines 21-22.

<sup>8</sup> Milner, Direct, page 9, lines 14-22; Fogle, Direct, page 4, lines 6-9; Fogle, Direct, page 4, line 23 through page 5, line 4.

<sup>9</sup> Fogle, Direct page 3, lines 14-19.

<sup>10</sup> Ruscilli, Direct, page 12, line 9-21; Milner, Direct, page 5, line 1 through page 6, line 3; Milner, Direct, page 6, line 17-20; Milner, Direct, page 7, lines 4-7.



1 A. No As should be obvious, from the fact that the FCCA has brought this issue to  
2 the Commission for resolution, ALECs have no problem providing BellSouth the  
3 permission necessary for BellSouth to serve its existing FA Service customers or  
4 future FA Service customers who are served by ALEC UNE-P or UNE-L  
5 arrangements.

6  
7 Identification of the ALEC serving a given UNE-P or UNE-L served end user is a  
8 very minor undertaking. For most UNE-P served end users, the telephone number  
9 will not have changed and, even where it has changed, the number will reside in  
10 BellSouth's switch and various provisioning, maintenance, and billing databases in  
11 exactly the same way as a BellSouth retail number or a resale number. When  
12 UNE-L is used to serve an end user, there is a higher probability that the  
13 association between loop and telephone number when the customer was  
14 BellSouth's retail end user may change – however, this is not a significant  
15 problem. The loop's circuit identification and the end users service address reside  
16 in BellSouth's databases that also contain the identification of the ALEC serving  
17 the end user. As I will discuss below, either one of these pieces of information is  
18 sufficient to make use of the BellSouth databases required to qualify, provision and  
19 maintain FA Service.<sup>11</sup>

20  
21 Further, there is an existing set of guidelines for providing other carriers with  
22 permission in the form of Letters of Authorization that the ALECs (and DLECs)  
23 and BellSouth have developed as a result of Line Sharing / Line Splitting

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<sup>11</sup> Should BellSouth's records about the telephone number in use on any UNE-L loop become out of sync, there are many sources that can be used to restore the proper relationship. These include the DA database that ALECs can only update by placing orders with BellSouth, the 911 database, the Line Information Data Base (LIDB), the National LNP Database, and, of course, direct reconciliation with the ALEC.

1 Collaborative meetings held over the past several years<sup>12</sup> There is also a Web  
2 accessible database associated with this process. No development is required for  
3 BellSouth to participate in this process as another DLEC.

4  
5 The FCCA does not believe that there is any justification for any changes in the  
6 rates, terms and conditions associated with FA Service to UNE-P and UNE-L  
7 serviced end users.

8  
9 **Q. ARE THERE ANY ADDITIONAL OPERATIONAL COSTS FOR**  
10 **BELLSOUTH TO CONTINUE TO PROVIDE FA SERVICE TO ITS**  
11 **EXISTING CUSTOMERS SERVED BY UNE-P OR UNE-L OR TO**  
12 **PROVIDE FA SERVICE TO NEW CUSTOMERS SERVED BY ALEC**  
13 **UNE-P OR UNE-L ARRANGEMENTS?**<sup>13</sup>

14 A. No. As to continuing FA Service to its own existing customers, every thing  
15 BellSouth needs is already in place and in service. After all, BellSouth is *currently*  
16 providing FA Service to these customers. As to new FA service customers, the  
17 request and the issue is for BellSouth to serve customers it has already planned to  
18 serve and invested to serve – once again every thing necessary to provide service is  
19 in place, it only needs to be placed in service. The FCCA is not asking BellSouth  
20 to provide FA Service to end users it would not otherwise serve.

21

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<sup>12</sup> Exhibit No. \_\_\_\_, JMB-1 is a copy of the current CLEC Information Package “Letter of Authorization (LOA) for Line Splitting.”

<sup>13</sup> Smith, Direct, page 6, line 1 through page 7, line 12.

1 While Mr. Gillan is the economist and has addressed the lack of any economic  
2 rationale for BellSouth's behavior (other than its desire to protect its position as  
3 the voice monopolist), I would note that BellSouth's policy is economically  
4 unsound. Willfully disconnecting revenue-paying customers from in-service  
5 investments in the first instance and refusing to place installed investments into  
6 revenue-producing service in the second is a decision that makes no sense.

7  
8 While Mr. Smith provided no indication what additional costs BellSouth would  
9 incur, Mr. Fogle claims (without any supporting evidence) that a splitter, wiring  
10 and additional manual effort would be needed.<sup>14</sup> However, as explained above,  
11 every thing necessary for BellSouth to continue to serve its existing FA Service  
12 customers is already in place and in service, and every thing necessary to serve a  
13 service address (end user) that BellSouth had planned and invested in to serve is in  
14 place needing only to be placed into service.

15

16 **Q. IS MR. MILNER CORRECT THAT IF BELLSOUTH PROVIDES FA**  
17 **SERVICE TO ITS OWN CUSTOMERS SERVED BY ALEC UNE-P OR**  
18 **UNE-L ARRANGEMENTS, BELLSOUTH WOULD BE REQUIRED TO**  
19 **PROVIDE A NUMBER OF OTHER ELEMENTS OF THE SERVICE?**<sup>15</sup>

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<sup>14</sup> Fogle, Direct, page 7, line 16 through page 8, line 16.

<sup>15</sup> Milner, Direct, page 4, lines 13-18.

1 A. Yes, and this is *no different* than what is required for BellSouth to provide FA  
2 Service to its retail customers or ALEC customers served by resale. To provide  
3 FA Service to *any* customer BellSouth must provide:

- 4 ○ Splitters
- 5 ○ Digital Subscriber Loop Access Modules (DSLAM)
- 6 ○ Terminating ATM circuit
- 7 ○ Help Desk
- 8 ○ Installation Services
- 9 ○ Access to the Internet
- 10 ○ Customer Premises Equipment
- 11

12 Without these elements, there simply is no BellSouth FA Service. Mr. Milner's  
13 statement is totally unremarkable; however, it does demonstrate that providing FA  
14 Service to BellSouth's existing and potential customers places no additional  
15 administrative or operational burdens on BellSouth.

16

17 **Q. WOULD BELLSOUTH HAVE TO DEVELOP AN ALTERNATIVE**  
18 **METHOD OF BILLING AS SUGGESTED BY MR. MILNER AND MR.**  
19 **FOGLE?<sup>16</sup>**

20 A. No. BellSouth already has in place the capability to render bills and accept  
21 payments using credit cards. This is clearly indicated in the information available  
22 on the FastAccess Internet Service Web site. (See Exhibit No. \_\_\_\_, JMB-2 at  
23 pages 17 and 18). Credit card billing is a common form of billing used by ISPs  
24 other than BellSouth and familiar to BellSouth's existing and potential customers.  
25 It is bizarre for BellSouth to argue in defense of a policy that disconnects service

---

<sup>16</sup> Milner, Direct, page 4, lines 18-23; Fogle, Direct, page 5, lines 9-15.

1 to *100 percent* of customers who make a decision to receive voice service from a  
2 new provider because *some* customers might object to a change in billing if  
3 BellSouth continued to provide the service! Additionally, it should be noted that  
4 in continuing to provide FA Service to ALEC resale customers, BellSouth faces  
5 the same alleged billing problems it describes in its testimony, but has no concerns  
6 in doing so.

7  
8 Further, BellSouth also has the capability to produce bills for customers that do  
9 not have working BellSouth telephone numbers. BellSouth provides final billing  
10 and adjustments daily to customers that no longer receive BellSouth telephone  
11 service and mails them to addresses across the country. BellSouth also bills  
12 customers who purchase services not identified by telephone numbers through the  
13 use of Miscellaneous Account Numbers (MANs).

14  
15 BellSouth's billing capabilities are well-developed and flexible. Pages 29 and 30 of  
16 Exhibit No. \_\_\_\_, JMB-2 are samples of monthly bills for FA Service that might be  
17 produced for customers who qualify for a discount (Sample Bill Profile 3) and  
18 those who do not (Sample Bill Profile 4). The discount applies if the FA Service  
19 customer also purchases one of a number of other BellSouth services. On pages 8  
20 and 9 of the same exhibit, there are a number of promotions, discounts and rebates  
21 that BellSouth FA Service billing system currently accommodates. Additionally,  
22 on page 18, the Commission can see that the billing system also has an on-line  
23 electronic capability.

1 Q. IS THE TELEPHONE NUMBER THE ONLY EFFECTIVE DRIVER OR  
2 METHOD OF ACCESS TO BELLSOUTH'S PROVISIONING,  
3 MAINTENANCE, BILLING, AND RECORD KEEPING SUCH THAT  
4 EXPENSIVE AND TIME CONSUMING "RE-WRITES" OF SYSTEMS  
5 ARE REQUIRED TO COMPLY WITH THE FCCA REQUEST?<sup>17</sup>

6 A. No. Mr. Milner and Mr. Fogle have taken a truth – that a telephone number  
7 provides an easy driver, method of access, or starting point for business  
8 transactions or database queries – and made it incorrectly appear that the absence  
9 of a telephone number is fatal to the process. It simply is not so. Virtually all  
10 BellSouth Operations Support Systems (OSS) and associated databases can be  
11 used with equal effectiveness when presented with any one of three key identifiers  
12 – the telephone number, a circuit identification number, or the service address.<sup>18</sup>  
13 In fact, in most cases, the most reliable starting point for database queries is the  
14 service address – the service address remains fixed, while telephone numbers and  
15 circuit identifications associated with the address may change at any time. This is  
16 particularly true of the databases associated with loop information.

17  
18 It is also true that BellSouth built the Loop Qualification System (LQS), used as a  
19 “database of convenience” to quickly provide an indication whether an end user

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<sup>17</sup> Milner, Direct, page 7, line 16 through page 8, line 15; Milner, Direct, page 9, lines 9-12, Fogle, Direct, page 2, line 22 through page 3, line 7; Fogle, Direct, page 4, lines 1-6; Fogle, Direct, page 4, lines 9-15.

<sup>18</sup> Exhibit No. \_\_\_\_, JMB-3 illustrates this. The exhibit shows what data fields are required (R), conditional (C), or optional (O) when sending a Loop Makeup Data Query to BellSouth to determine if a working loop can support DSL. On page 2, the table states: “Only one of circuit ID, Telephone Number, or Service Address is required.” Each entry is indicated as being conditional.

1 can be provided with BellSouth's FA Service, such that it can only be accessed by  
2 telephone number. However, LQS is not the "database of record" used when an  
3 order for FA Service is actually placed.<sup>19</sup> That database is the Loop Facilities  
4 Assignment and Control System (LFACS) database. LFACS contains information  
5 on all loops in the BellSouth region, regardless of whether they are in use to  
6 support BellSouth retail, ALEC resale, ALEC UNE-P or ALEC UNE-L, or are  
7 idle. LFACS can be accessed or queried using any of the three key identifiers.

8  
9 BellSouth's FA Service personnel have a method of determining the availability of  
10 FA Service without knowledge of a telephone number. On pages 16, 19, and 25  
11 of Exhibit No. \_\_\_\_, JMB-2, there are instructions for consumers who have only  
12 address information in various situations to "contact our representative" to  
13 determine if DSL can be provided.

14  
15 On-line and mechanized access to LFACS to qualify loops for DSL using any of  
16 the three key identifiers has already been developed and has been in service for  
17 over 18 months. Exhibit No. \_\_\_\_, JMB-5 "D/CLEC Pre-Ordering and Ordering  
18 Guide For Electronic Loop Makeup (LMU)" describes the use of the Local  
19 Exchange Navigation (LENS) system to obtain information from LFACS on-line.  
20 The Telecommunications Access Gateway (TAG) interface is used for mechanized  
21 queries and responses.

22  
23 Mr. Milner's and Mr. Folge's claims that development work is required in order to  
24 qualify loops for DSL in the absence of a telephone number are inaccurate. As

---

<sup>19</sup> Exhibit No. \_\_\_\_, JMB-4 "Loop Qualification System (LQS) CLEC Pre-Ordering and Ordering Guidelines", provides a description of LQS and how ALECs may utilize it.

1 discussed above, systems necessary to perform these functions already exist and  
2 are available to BellSouth. BellSouth need only train the appropriate personnel on  
3 the use of these systems that it has already developed.

4  
5 Finally, it is important to remember that it is only in the case where the ALEC is  
6 using UNE-L to serve its customer that BellSouth does not have the working  
7 telephone number in all of its systems. No changes at all (including training) are  
8 required when the ALEC customer is served using UNE-P

9  
10 **Q. IS THERE ANY “TECHNICAL CHALLENGE” OR “ADDITIONAL**  
11 **EQUIPMENT” NECESSARY TO GRANT THE RELIEF REQUESTED IN**  
12 **THE FCCA’S COMPLAINT?**<sup>20</sup>

13 A. No As discussed above, all of the equipment necessary to grant the relief the  
14 FCCA seeks is in place and in service for existing customers and in place awaiting  
15 activation in the new customer scenario. Further, as discussed above, there has  
16 been an on-going collaborative on line sharing and line splitting among BellSouth,  
17 the ALECs and the DLECs over a number of years. The results of these  
18 collaborative efforts have been documented in a number of ways. Exhibit No. \_\_\_\_,  
19 JMB-6 “Line Splitting (Central Office Based) CLEC Information Package”, is an  
20 example of such a document. To meet the FCCA request, BellSouth simply needs  
21 to follow the procedures in this and other documents as if BellSouth’s FA Service

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<sup>20</sup> Fogle, Direct, page 3, lines 9-12 and page 4 lines 21-22.



1 were any other DLEC providing DSL to end users over ALEC UNE-P or UNE-L  
2 arrangements.

3

4 **Q. IS IT TRUE THAT MECHANIZED MAINTENANCE AND TROUBLE**  
5 **ISOLATION SYSTEMS CANNOT BE USED ON STAND-ALONE LOOPS**  
6 **PURCHASED BY ALECS?**<sup>21</sup>

7 A. No. Full capability to use such systems exists; however, it is true that who and  
8 how they can be used will change if ALEC UNE-L arrangements are used, but the  
9 capability still exists and can be used effectively. It is simply a matter of  
10 establishing agreed upon procedures between BellSouth's and the ALEC's affected  
11 work centers.

12

13 Mr. Fogle is wrong when he states that "the end user will not know who to call for  
14 customer service" – the service being provided is BellSouth's FA Service and  
15 BellSouth's customer instructions are clear. On page 26 of Exhibit No. \_\_\_\_, JMB-  
16 2, the customer is instructed - "If you still need assistance, BellSouth's Help Desk  
17 and Technical Support personnel are available 24 hours a day, seven days a week."

18

19 **Q. HOW DO YOU RESPOND TO MR. FOGLE'S CLAIM THAT**  
20 **REQUIRING BELL SOUTH TO COMPLY WITH THE FCCA'S REQUEST**  
21 **"IS SIMPLY NOT FEASIBLE"?**<sup>22</sup>

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<sup>21</sup> Milner, Direct, page 9, lines 14-22; Fogle, Direct, page 4, lines 6-9, Fogle, Direct, page 4, line 23 through page 5, line 4.

<sup>22</sup> Fogle, Direct page 3, lines 14-19.

1 A. As demonstrated above, none of the “operational problems” that serve as the  
2 supposed foundation for his observation withstand scrutiny. None of BellSouth’s  
3 witnesses provide any data or other evidence to support their claims. For every  
4 claim, there is already a solution in place that either eliminates the problem or  
5 mitigates its impact such that there is no significant administrative or operational  
6 burden upon BellSouth’s ability to provide FA Service to its own existing and  
7 potential customers. There are no significant changes required to any of  
8 BellSouth’s systems and technology. At most, there is training to be conducted  
9 and procedures to be coordinated (most of which are already documented).

10  
11 It is perplexing that in this forum BellSouth has chosen not to discuss the systems  
12 and processes it has developed to support ALEC/DLEC DSL efforts through the  
13 Line Sharing/Line Splitting Collaboratives – LENS, TAG, mechanized LMU  
14 queries, mechanized ordering, etc. At the FCC, these efforts have been highlighted  
15 in each of BellSouth’s successful 271 applications as being efficient and non-  
16 discriminatory. Exhibit No. \_\_\_\_, JMB-7, is an excerpt from the Affidavit of  
17 William N. Stacy filed in the Florida/Tennessee Application that discusses these  
18 matters in some detail. Yet in this docket, BellSouth’s witnesses appear to be  
19 totally unaware of these efforts. Surely BellSouth is not now taking the position  
20 that these systems and processes are inadequate for BellSouth to use to respond to  
21 the FCCA’s request

22  
23 BellSouth’s allegations of “operational problems” do not support its policy of  
24 refusing to provide FA Service to consumers who elect to receive their voice  
25 service from an ALEC using UNE-P or UNE-L. As discussed in Mr. Gillan’s  
26 direct testimony, this Commission in its FDN Order has already found BellSouth’s  
27 “policy” deficient. Just last week, the Louisiana Commission also rejected

1           BellSouth's policy by adopting its Staff's recommendation that BellSouth be  
2           ordered to provide FA Service over loops used by ALECs.

3

4           The FCCA request is "reasonable", "practicable", and "realistic" and should be  
5           granted.

6

7   **Q.    DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

8   **A.    Yes, it does.**

DOCKET NO. 020507-TP

EXHIBIT NO. \_\_\_\_\_ (JMB-1)



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**Letter of Authorization (LOA) For  
Line Splitting**

***Letter of Authorization (LOA) For  
Line Splitting***

***CLEC Information Package***

*(Version 3, February 19, 2002)*



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## Letter of Authorization (LOA) For Line Splitting

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## Letter of Authorization (LOA) For Line Splitting

### Chapter 1.0: Introduction

#### 1.1 Purpose and Scope

This document provides procedures to be utilized by the D/CLEC (Data/Competitive Local Exchange Carrier) for processing a Letter of Authorization (LOA) as it pertains to Central Office Based Line Splitting Service. The LOA process provides authorization for the DLEC LOA partner to submit a Loop Makeup (LMU) data request, High Frequency Spectrum Central Office (HFS CO) Based Unbundled Loop Modification (ULM) requests, and LSRs (Local Service Requests) associated with Line Splitting Unbundled Network Element Service on behalf of the Voice CLEC LOA Partner.

Please contact your appropriate BellSouth Account Team representative if you have questions about the information contained herein.

#### 1.2 Disclaimer Statement

The information contained in this document is subject to change. BellSouth will provide notification of changes through the BellSouth Line Sharing/Splitting Collaborative and through the BellSouth Carrier Notification process.

#### 1.3 Version History / Control

Any future modifications, enhancements, and/or improvements that are made to this CLEC Information Package will be reflected accordingly in this section of the document.

Section	Date/Version	Description
All	01/08/02 – Version 1	Initial Version Release
LOA document added.	02/15/2002 – Version 2	Updated Version Release
LOA Web Address Added	02/19/2002 – Version 3	Updated Version Release



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## Letter of Authorization (LOA) For Line Splitting

### Chapter 2.0: Overview

In a unified effort to support and authorize BellSouth's role in the release of the Voice CLEC's end user information to their respective LOA partner (DLEC), the LOA process for Line Splitting was developed by the CLEC Collaborative members. The LOA allows the DLEC to:

- View Loop Makeup data
- Order HFS CO Unbundled Loop Modification
- Order Line Splitting of an end user's loop that belongs to the Voice CLEC for provisioning Line Splitting Service.

Additional information on the LOA process will be provided in Chapter 4.0 of this document.





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## Letter of Authorization (LOA) For Line Splitting

### Chapter 3.0: General Guidelines

#### 3.1 Availability

BellSouth offers this service in all nine states within the BellSouth region.

#### 3.2 Contract Specific Provisions

The LOA is not intended to modify the terms and conditions of the BellSouth Interconnection Agreement. Please refer to the BellSouth Interconnection Agreement. For specific language, terms, and conditions applicable for Line Splitting.

D/CLECs must provide LOAs when they are participating in a Line Splitting partnership. The LOA must be on file *prior to* the DLEC partner issuing requests for LMU, HFS CO ULM, or LSRs associated with Line Splitting Service.



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## Letter of Authorization (LOA) For Line Splitting

### Chapter 4.0: Process Guidelines for LOA

A cancellation or new LOA will be provided to the web master for posting when:

- A newly executed LOA is to be added

*or*

- An existing LOA is to be cancelled

Appropriate selections with electronic signatures must be made to indicate the cancellation. If a cancellation is received from the CLEC/DLEC a copy of the cancellation will be placed in both parties' respective folders.

The same LOA document will be used to notify BST (BellSouth Telecommunications) of cancellation. Appropriate fields have been added to the LOA to simplify the cancellation process.

The CLEC will obtain a copy of an LOA from the Collaborative Web Site. Electronic signatures from both parties will be obtained by the CLEC. A copy of the LOA can be obtained from the following web address:

[http://www.interconnection.bellsouth.com/markets/lec/line\\_sharing\\_collab/index.html](http://www.interconnection.bellsouth.com/markets/lec/line_sharing_collab/index.html)

A copy of the LOA is also included in Chapter 5.0 of this document.

In addition to the required LOA, there are three (3) fields on the LSRs for LMU (manual or electronic), ULM, and Line Splitting that must be populated when a LOA is involved. These fields **must** be populated with the Voice CLEC information as follows:

- **LSP AUTH** - Company Code of the Voice CLEC
- **LSP AUTH DATE** - Date that the Voice CLEC provided authorization to the DLEC
- **LSP AUTH NAME** - Name of the person from the Voice CLEC that is providing authorization to the Data LEC.

The voice CLEC will provide the DLEC with the Local Service Authorization Code (LSP AUTH) to be used with BellSouth systems and documents when provisioning Line Splitting Service to voice CLEC end users and represents the agreement between the DLEC and CLEC. The LSP AUTH is the voice CLEC Company Code (CC) that appears on the voice CLEC End User Customer Service Record (CSR). The LOA will list all Company Codes for the specified voice CLEC to which the DLEC is authorized.

*continued on next page*

*Version 3 –February 19, 2002*



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## Letter of Authorization (LOA) For Line Splitting

### Chapter 4.0: Process Guidelines for LOA

#### 4.1 Electronic Signatures

To create the electronic signature the computer must be connected to a scanner to complete the following detailed procedure. The following steps will be taken:

- Create a signature legibly on white paper and scan the signature
- Save the scanned image with a .jpg (jpeg) extension by giving it a unique name

To edit the signature picture before inserting it, the following steps will be taken:

- When the image appears in Microsoft Photo Editor, make any changes you want (i.e., crop the picture, add special effects, adjust the brightness, contrast, and color)
- Save changes and click Exit

**Note:** If Microsoft Photo Editor is not installed, run the Setup program again and install it.

To insert the signature, the following steps will be taken:

- Open the LOA Word document
- Position the insertion point where you want to insert the scanned signature
- On the insert menu, point to "picture" and click "from file"
- Double click on the signature picture to insert the signature onto the LOA

The executed LOAs will be housed on the Internet for the convenience of all involved parties. The signed LOA will be provided to the web master at the following e-mail address:

<mailto:chris.green@bridge.bellsouth.com>

*continued on next page*

*Version 3 –February 19, 2002*



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## Letter of Authorization (LOA) For Line Splitting

### Chapter 4.0: Process Guidelines for LOA

#### 4.2 Posting and Housing the LOA

When the web master receives the LOA, the following action will be taken:

- Internet addresses/folders and passwords for each of the D/CLECs participating in LOA partnerships will be established.
- A copy of the LOA will be posted in each party's folder
- An e-mail confirmation will be sent from the web master to the submitting party/parties advising that the LOA has been posted and the date of posting.

It is important to note that each time a new Line Splitting partnership is executed, BellSouth must receive an electronically signed LOA from the new Line Splitting Voice CLEC *and* DLEC partners.

If a folder has *not* been created for the submitting parties, the web master must obtain passwords for the party/parties involved. This involves a ten (10)-calendar day turn-around. However, the web master will acknowledge that the document has been received by returning an email of acknowledgement. The password will be provided to the new LOA participant/s as soon as the web master has created appropriate folder/s.

The web master will place a copy of the signed LOA document in each party's password protected folder. The CLEC for whom the folder was created will have the password for their respective folder. The only other access to the folder will be a BellSouth Billing Subject Matter Expert (SME).

Changes to the folder content can only be processed through the web master. The D/CLEC will *not* be permitted to remove documents from the folders.

#### 4.3 Accessing LOA Folder

As stated earlier, all folders are password protected. Once the web master furnishes the passwords, the folders may be accessed at the following web address:

<http://interconnection.bellsouth.com/2partyagree/>

Caution should be exercised to insure the correct folder is accessed. If the incorrect folder is selected, it will be necessary to clear the browser's history file. These instructions can be found on the Two Party Agreement web site.

<http://interconnection.bellsouth.com/2partyagree/>

*Version 3 –February 19, 2002*



## Letter of Authorization (LOA) For Line Splitting

### 5.0 Line Splitting Service Letter of Agreement (Example Form)

\_\_\_\_\_ ("Voice CLEC") and \_\_\_\_\_ ("Data LEC") jointly enter into this Letter of Authorization and state as follows:

1. Voice CLEC and Data LEC have entered into an agreement pursuant to which Data LEC may order Loop Make Up, High Frequency Spectrum Unbundled Loop Modification, or Line Splitting Services, or any combination thereof, on unbundled loops purchased by Voice CLEC. Such agreement authorizes Data LEC to represent Voice CLEC in submitting requests for BellSouth Line Splitting Services and issuing maintenance and trouble repair tickets on co-provisioned line splitting services. Data LEC is further authorized access to Voice CLEC's end user records for the purposes of performing loop make up. Voice CLEC is responsible to BellSouth for all charges that may be incurred in connection with local service requests, and maintenance and repair trouble tickets for line splitting services submitted by Data LEC.
2. Voice CLEC provides Data LEC with the Local Service Provider Authorization Code(s) (LSPAUTH) assigned below which is(are) to be used with BellSouth systems and documents when providing Line Splitting service to Voice CLECs end users
3. In the event of a Line Splitting BellSouth billing dispute between Voice CLEC and Data LEC all costs associated with such disputes shall be borne by Voice CLEC and Data LEC.
4. This Letter of Authorization shall continue in effect unless canceled by prior written notice to BellSouth by either Voice CLEC or Data LEC.
5. This LOA is not intended to modify the terms and conditions of the BellSouth Interconnection Agreement.

The undersigned execute this Letter of Authorization (Both parties required to execute authorization)

Voice CLEC: \_\_\_\_\_ Data LEC: \_\_\_\_\_

Signature: \_\_\_\_\_ Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_ Print Name: \_\_\_\_\_

Title: \_\_\_\_\_ Title: \_\_\_\_\_

Date: \_\_\_\_\_ Date: \_\_\_\_\_

LSPAUTH (Company Code): \_\_\_\_\_  
(List all applicable Voice CLEC Company Codes)

The undersigned cancel this Letter of Authorization (Either party may cancel authorization)

Voice CLEC: \_\_\_\_\_ Data LEC: \_\_\_\_\_

Signature: \_\_\_\_\_ Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_ Print Name: \_\_\_\_\_

Title: \_\_\_\_\_ Title: \_\_\_\_\_

Date: \_\_\_\_\_ Date: \_\_\_\_\_

*Continued on next page*

Version 3 -February 19, 2002



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## Letter of Authorization (LOA) For Line Splitting

### 5.0 Line Splitting Service Letter of Agreement

The above LOA form can be found at the following web address:

[http://www.interconnection.bellsouth.com/forms/html/lec\\_form.html](http://www.interconnection.bellsouth.com/forms/html/lec_form.html)

### Chapter 6.0 Acronyms

BST	BellSouth Telecommunications
CC	Company Code
CLEC	Competitive Local Exchange Carrier
CO	Central Office
CSR	Customer Service Code
DLEC	Data Local Exchange Carrier
DSL	Digital Subscriber Line
HFS CO	High Frequency Spectrum Central Office
Jpeg	Soft Ware for creating pictures
LMU	Loop Makeup
LOA	Letter of Authorization
LSP	Local Service Provider
LSP AUTH	Local Service Provider Authorization Code
LSR	Local Service Request
SME	Subject Matter Expert
ULM	Unbundled Loop Modification
UNE	Unbundled Network Element

**DOCKET NO. 020507-TP**

**EXHIBIT NO. \_\_\_\_\_ (JMB-2)**



**FREE  
Modem**  
after rebate\*

**\$50  
Cash  
Back\***

BellSouth®  
**FastAccess™**  
Internet Service

- ▣ About FastAccess DSL
- ▣ Features and Benefits
- ▣ Products and Pricing
- ▣ Order Now

---

- ▣ Home Networking
- ▣ Common Questions
- ▣ Your FastAccess DSL Account
- ▣ Customer Service

Enter your phone number below

\_\_\_\_ - \_\_\_\_ - \_\_\_\_

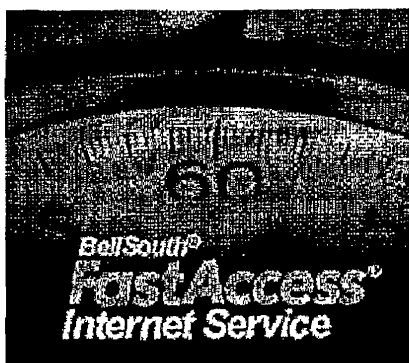
**Submit**

Experience the speed of DSL for  
less than the price of dial-up -  
**Get 3 months for just  
\$19.95/month\***



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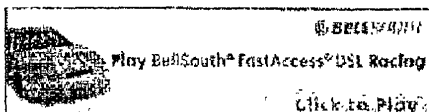
About FastAccess DSL. [What kind of computer do you need?](#)

### About FastAccess DSL

BellSouth FastAccess Internet Service provides high-speed Internet access to your home. Using your existing telephone line, it delivers *download* speeds of up to 50 times faster than 28.8K dial-up *modems*.<sup>\*</sup> FastAccess DSL is fast, flexible, and affordable and will forever change the way you work, live, and communicate.



- [FastAccess DSL Home](#)
- [Features and Benefits](#)
- [Products and Pricing](#)
- [Order Now](#)
- [Home Networking](#)
- [Common Questions](#)
- [Your FastAccess DSL Account](#)
- [Customer Service](#)



### Compare the Difference

Just how fast is FastAccess DSL? Take a look and see the dramatic difference. FastAccess DSL can download a 3.8MB file in as fast as **20 seconds**. Download times with a 56K and 28.8K modem are so slow, it's staggering: more than **9 and 17 minutes** respectively!

Download Time: 3.75 Mb Scanned Image



17:47

28.8K modem



9:09

56K modem



:20

FastAccess

### 5 smart reasons to order BellSouth FastAccess DSL

BellSouth FastAccess DSL lets you experience the Internet at high-speed. Take a look at some of the advantages.

#### Super Speed

Zoom from Website to Website. Download e-mail attachments, photos and music up to 50 times faster than with a 28.8K modem.<sup>\*</sup>

#### Instant Connections

No more dial-up hassles or waiting to connect to the Internet. Just click and go!

#### Talk and Surf

FastAccess DSL lets you use the Internet while talking on the phone – all on the same phone line. No more busy signals!

**Low Price**

For only \$45 a month\*\* – about \$1.50 a day – you'll get everything FastAccess DSL has to offer.

**Customer Care**

BellSouth – nationally recognized for Internet service reliability and customer care – has a knowledgeable, friendly tech-support group available to assist you 24 hours a day, seven days a week.

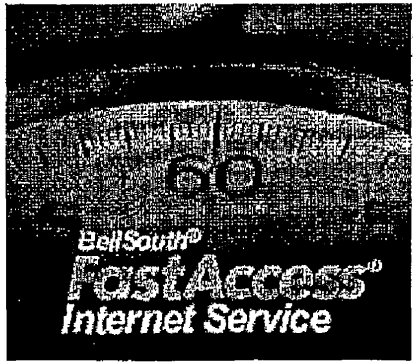
\*Download speeds may vary

\*\*The special \$45 monthly rate is for customers with BellSouth® Complete Choice® or Area Plus® subscribers on the same line as FastAccess DSL. For non-Complete Choice or Area Plus subscribers the monthly rate is \$49.95.

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## Features and Benefits

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- [About FastAccess DSL](#)
- [Products and Pricing](#)
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- [Common Questions](#)
- [Your FastAccess DSL Account](#)
- [Customer Service](#)

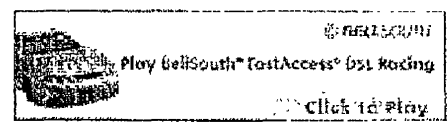
Discover a whole new Internet with BellSouth FastAccess DSL. You experience more of the Internet - quicker! High-speed DSL connectivity gives you faster access to the things you love - online shopping, e-mail, digital photos, homework helper, movie trailers, e-tickets and instant news. Your family will love the value of FastAccess Service.



- [SPEED](#)
- [VALUE](#)
- [TALK AND SURF](#)
- [INSTANT CONNECTION](#)
- [CONVENIENCE](#)
- [EASY INSTALLATION](#)
- [CUSTOMER SERVICE](#)
- [HOME NETWORKING](#)
- [GAMING](#)
- [ADDITIONAL BENEFITS](#)



*"Highest Customer Satisfaction Among High-Speed Internet Service Providers in a Tie"*  
—J.D. Power and Associates



**BELLSOUTH WELCOME SERVICE** makes switching from AOL® or other Internet service provider a simple and convenient process. [Learn more](#) about how easy switching can be.

### SPEED

Surf the Web and download large files in minutes instead of hours. Get e-mail attachments, digital photos, music and streaming video up to 50 times faster than with a 28.8K dial-up connection \*

### VALUE

For only \$45 a month\*\* - about \$1.50 a day - you'll get everything FastAccess DSL has to offer. An additional \$10 per month lets you connect up to 4 computers with [FastAccess HomeNetworking!](#)

### TALK AND SURF

FastAccess DSL lets you use the Internet while talking on the phone-

all on the same phone line. No more busy signals!

**INSTANT CONNECTION**

FastAccess DSL provides a direct connection from your computer to our DSL network. With no dial-up delays or busy signals, it is ready when you are.

**CONVENIENCE**

BellSouth keeps it simple - from easy installation and set up to a single bill for your Internet and phone charges.

**EASY INSTALLATION**

BellSouth offers two easy installation options.

**Self Installation -**

You can install the DSL modem yourself - it's easy, quick and convenient. When your modem kit arrives, install your modem hardware and software using our step-by-step guide. Our Customer Service Help Desk is available 24 hours a day, seven days a week if you have any questions. If you have additional questions, we can send a technician to install the service for you at a reasonable fee. It's your choice. Please note that self-installation is not available for Macintosh computers, laptops without Windows® 98 and a USB port, or in certain locations.

**Professional Installation -**

You can choose to have a BellSouth certified technician install your DSL service. Schedule a convenient appointment and leave the rest to us.

**CUSTOMER SERVICE**

You can use our FastAccess Support site to get fast answers to frequently asked questions, access automated solutions, read troubleshooting tips and download software to help you manage your DSL service. BellSouth also has a knowledgeable, friendly technical support groups to assist you 24 hours a day, seven days a week.

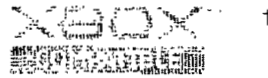
**HOME NETWORKING**

Get high-speed Internet access on multiple computers with FastAccess HomeNetworking Service. The speed of FastAccess DSL can be shared by up to four computers in your home. Share files and a printer from any room in your home - all while protected by the professional-grade firewall that's included.

**GAMING**

Reap the rewards of online gaming with your FastAccess DSL connection. BellSouth is an Xbox™ Live compatible provider. Install your Xbox with your FastAccess DSL Ethernet modem or your 2Wire™ Home Portal and experience more from your gaming.

adventures with Xbox Live. The [instructions for Xbox installation](#) with your FastAccess DSL modem are available here.



#### **ADDITIONAL BENEFITS**

You will enjoy more benefits as a BellSouth FastAccess Service customer.

##### **RealOne SuperPass Special Trial Offer**

Experience an exciting 14 day trial subscription of RealOne SuperPass plus \$100 worth of PC games! With RealOne SuperPass, FastAccess DSL customers will enjoy the Web's hottest media subscriptions! LIVE heart-thumping sports, late-breaking local and world news and round-the-clock entertainment from your favorite Web channels - make your Web time really count!

##### **Superior E-mail**

Five e-mail accounts are included with your service. You can create different identities for yourself or give each family member their own e-mail address. Also, your BellSouth e-mail is easy to reach from any Internet connection so you stay in touch while at work or traveling.

##### **Personal Web Page Space**

Easy-to-use tools are available so you can design your own 10MB personal Web page. You can easily post photos, share information, create chat rooms and message boards, add favorite links, design newsletters, maintain your daily planner calendar and more.

##### **Instant Messaging**

Chat online with one or more friends. BellSouth® Messenger alerts you when your friends come online so you can chat real-time. It's free and easy, and it's just one more way BellSouth is making Internet service better for you.

##### **Back-up Dial Account**

FastAccess DSL comes with a back-up dial-up account that gives remote access to the Internet when you are at home or traveling.

##### **MailGuard Service**

Free e-mail protection helps you by intercepting annoying junk e-mail.

**Home Page Features from BellSouth Internet Service**

**Customizable BellSouth Start Page**

Play games, view films, catch-up on breaking news and more.

**Internet Radio**

Enjoy over 150 types of radio stations.

**Newsgroups**

Post messages, read articles and share content with over 35,000 newsgroups.

**Internet Tools**

Enhance your DSL connectivity with diagnostics and self-help from the Connection Manager tool.

\*Download speeds may vary

\*\* The special \$45 monthly rate is for customers with BellSouth® Complete Choice® or Area Plus® subscribers on the same line as FastAccess DSL. For non-Complete Choice or Area Plus subscribers the monthly rate is \$49.95.

†Xbox, Xbox Live, the Live logo, and the Xbox logos are either registered trademarks or trademarks of Microsoft Corporation in the United States and/or other countries and are used under license from Microsoft.

††J.D. Power and Associates 2002 Syndicated Internet Service Provider Residential Customer Satisfaction Study<sup>SM</sup>. Study conducted among national and regional ISPs and based on 4,829 responses  
[www.jdpower.com](http://www.jdpower.com)

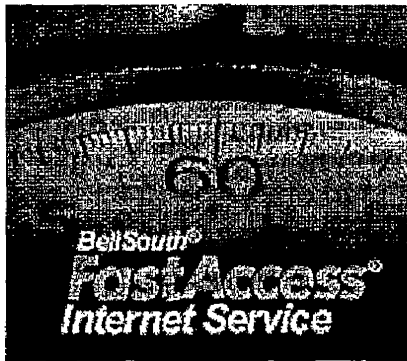
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Products and Pricing



- FastAccess DSL Home
- About FastAccess DSL
- Features and Benefits
- Order Now
- Home Networking
- Common Questions
- Your FastAccess DSL Account
- Customer Service

**FREE**  
**Modem**  
 after rebate



**\$50**  
**Cash**  
**Back**

Experience the speed of DSL for  
 less than the price of dial-up -  
**Get 3 months for just**  
**\$19.95/month\*\*\***

FastAccess DSL Monthly Rate	\$45.00
-----------------------------	---------

This special \$45.00 monthly rate is for customers who subscribe to BellSouth® Complete Choice®, BellSouth® Area Plus®, or other qualifying BellSouth package, on the same line as FastAccess DSL. You may [learn more](#) about these plans to start saving now! For BellSouth customers who do not subscribe to a BellSouth qualifying package, the monthly rate is \$49.95.

FastAccess HomeNetworking Monthly Rate	\$10.00 Additional
--	--------------------

Home  
 Networking  
 Equipment  
**Free**  
 after rebate



Add FastAccess HomeNetworking to your FastAccess Service for \$10.00 more a month. Your whole family can share the speed of a FastAccess DSL connection on multiple computers at the same time. You can share Internet access, files, printers, scanners and more by linking equipment over your home network. [Learn more about FastAccess HomeNetworking Service.](#)

Equipment & Installation Charges		
	Value	Promotional Price*
Service Activation	\$50.00	\$50.00
Installation		
Self Installation	\$35.00	\$0.00

Professional Installation	\$99.95	\$99.95
<b>Modem (for Single Users)</b>		
Bring Your Own Modem	\$0.00	\$0.00
BellSouth provided DSL USB Modem	\$200.00	Free (After Rebate)
BellSouth provided DSL Ethernet Modem	\$200.00	Free (After Rebate)
<b>Residential Gateway (for Home Networking Users)</b>		
BellSouth provided Gateway – Using existing telephone lines to network	\$299.00	Free (After Rebate)
BellSouth provided Gateway – Using wireless and existing telephone lines to network	\$399.00	\$100.00 (After Rebate)
*Promotional prices require a 12-month service commitment. Early termination fees will apply.		

\*BellSouth may provide a refurbished modem. You will be billed for the selected modem and will receive a rebate coupon. The rebate will be a credit applied within two (2) billing cycles following BellSouth receipt of coupon. You must return coupon within thirty (30) days. The "Free Modem after Rebate" offer requires 12 month commitment. Early termination fees apply. See Pricing Terms and Conditions for details. Customers who supply their own modem are not eligible for this promotion. Applicable taxes and fees will be based on the full price of all products and services, and no taxes or fees will be added to any reward or rebate. Limited time offer.

\*\*The \$50 Cash Back Reward is available with online orders only. After a successful installation, you will receive an e-mail at your bellsouth.net e-mail address with instructions on how to redeem the rebate coupon. You must return the coupon within 30 days of receipt. You will be mailed a rebate check for \$50 within 30 days of the date BellSouth receives your completed coupon. As the customer, you are responsible for all taxes and governmental fees on BellSouth FastAccess Service and equipment. Taxes are computed on the original charges, and will not be added to the reward. You must keep the service for 12 months, otherwise a \$50 termination fee will apply. Applicable taxes and fees will be based on the full price of all products and services, and no taxes or fees will be added to any reward or rebate. This is a limited time offer. BellSouth reserves the right to discontinue this reward offer at any time.

\*\*\*Price compared to \$23.90 per month for unlimited dial-up service with AOL as of 8/1/02. BellSouth Answers<sup>SM</sup> or BellSouth Solutions customers will be billed \$19.95 per month for the first three full months of service. Customers without BellSouth Answers or BellSouth Solutions will be billed \$24.90 per month for the first three months.



Charges for partial month, if applicable, will also be billed at the discounted monthly rate

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[Order Now](#)

Enter the phone number(s) you would like to test for BellSouth FastAccess Internet Service:

Line 1  -  -

Line 2  -  -

Line 3  -  -

Line 4  -  -

- [FastAccess Home](#)
- [What is DSL?](#)
- [Features & Benefits](#)
- [Pricing](#)
- [Connection Manager](#)
- [FAQ](#)
- [My FastAccess Account](#)
- [Customer Care](#)

[Test Phone Number](#)  
[BellSouth.com](#) | [BellSouth Internet Service](#)

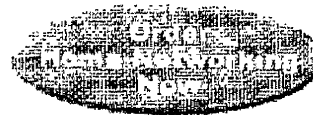


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## Home Networking

Home  
Networking  
Equipment  
Free  
after rebate



- FastAccess DSL Home
- About FastAccess DSL
- Features and Benefits
- Products and Pricing
- Order Now
- Common Questions
- Your FastAccess DSL Account
- Customer Service

### Be a Power House!

Make your home a power house with BellSouth FastAccess HomeNetworking. Why should one computer have all of the fun? Now the speed of FastAccess DSL can be shared by up to 4 computers in your home. Plus share files and printers from any room in your home.

### Upgrade to BellSouth FastAccess HomeNetworking

Add FastAccess HomeNetworking to your FastAccess Service for just \$10.00 more a month.

### BellSouth FastAccess HomeNetworking Benefits

#### Speed

Family members can now share the speed of their FastAccess DSL connection on multiple computers at the same time.

#### Sharing

Your entire household can share Internet access, files, printers, scanners and more by linking equipment over your home network.

#### Simplicity

Setting up a home network is easy using our do-it-yourself kit. In fact, typical installation time is less than an hour! You can choose to connect your home network using your existing telephone lines or wireless solution. Either way, there are no new computer wires to run between rooms.

#### Security

Every computer on your home network will be protected by a professional-grade firewall.

#### Support

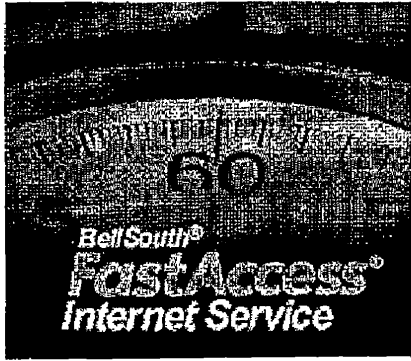
With BellSouth, live tech support is a telephone call away 24 hours a day, seven days a week should you need assistance getting your home network up and running smoothly. Specialized ongoing support from a dedicated customer service group will continue to be available, via telephone, to assist you with adding another computer to your network or file and printer sharing for as long as you subscribe to the service.

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Pricing Terms and Conditions



## Common Questions

We want you to be as informed as possible about BellSouth FastAccess DSL Service and the technology that powers it. You may read these Common Questions to learn more, and review the [glossary of terms](#)



- FastAccess DSL Home
- About FastAccess DSL
- Features and Benefits
- Products and Pricing
- Order Now
- Home Networking
- Business Services
- Your FastAccess DSL Account
- Customer Service

- Tell Me About FastAccess Service
- I Want to Order FastAccess Service.
- What Features and Services are Available?
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- Can I Share FastAccess DSL on Multiple Computers?
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### Tell Me About FastAccess Service.

#### BroadBand Service

**Q. What is DSL?**

**A.** DSL is an industry acronym for Digital Subscriber Line technology which delivers high-speed Internet access. Using your existing telephone line, it delivers download speeds of up to 50 times faster than 28.8K modems. The service lets you send data and voice over the same line, at the same time so you can talk or fax while you access the Internet.

**Q. What is ADSL?**

**A.** ADSL (Asymmetric Digital Subscriber Line) is a technology for transmitting digital information at high bandwidths on existing telephone lines to homes and businesses. ADSL simultaneously accommodates both analog (voice) and digital data on the same line. ADSL is asymmetric in that it uses most of the channel to transmit downstream to the user and only a small part to receive information from the user.

**Q. What is IFITL?**

**A.** IFITL stands for Integrated Fiber In The Loop. It is a similar technology to ADSL for use with fiber optic telephone lines (ADSL relies on copper telephone lines). IFITL technology is used for our FastAccess DSL customers who have fiber optic lines. There is no distinguishable difference between the two technologies in terms of connection speed.

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#### BellSouth FastAccess DSL

**Q. What are the capabilities of FastAccess Service?**

**A.** FastAccess DSL allows you to search the web and download large files up to 50 times faster than a 28.8K modem and use the Internet and talk or fax on the same line, at the same time. Checking e-mail, online shopping, viewing digital photos and accessing homework helpers and news are all faster.

**Q. How fast is FastAccess DSL?**

**A.** FastAccess Service gives you the Internet up to 50 times faster than 28.8Kbps


modems, with up to 1.5 Megabits per second downstream and up to 256 kilobits per second upstream.

Q. Can I use my telephone or fax machine when I am online?

A. Yes. DSL technology expands the capabilities of your existing telephone line. A DSL modem or router splits your single telephone line into two frequencies. BellSouth FastAccess DSL uses the high frequency spectrum available on your telephone line to transmit data. This process does not interfere with the lower frequencies used during voice transmission. As a result, FastAccess DSL customers can use the Internet and talk on the telephone or fax at the same time.

Q. Will I be able to use the Internet if I am away from home or if FastAccess DSL ever goes down?

A. If you have a dial tone, you can still use your telephone for voice conversations. You can access the Internet by using the dial-up service included with BellSouth FastAccess Service. This service gives you 20 hours of usage per month at no charge and may be used when away from home, or if FastAccess Service is not available. You will be able to use the dial-up service even if your DSL modem is unplugged or disabled.

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#### How It Compares

Q. How does FastAccess DSL compare with regular dial-up service?

A. FastAccess DSL provides connection speeds up to 50 times faster than a 28.8K modem.

This shows the average time to download a 3.7MB video clip (Min:Sec)

14.4K dial-up modem:	35:53
28.8K dial-up modem:	17:47
33.6K dial-up modem:	15:14
56K dial-up modem:	09:09
1.5Mb:	00:20

Q. How does FastAccess DSL compare with ISDN?


A. FastAccess DSL offers speeds up to 1.5Mb-384K downstream and 256-512K maximum upstream, making it even faster than ISDN. In addition, FastAccess Internet DSL sends data and voice over the same line so you can talk on the telephone while connected to the Internet.

This shows the average time to download a 3.7MB video clip (Min:Sec)

64K ISDN:	08:00
128K ISDN:	04:00
1.5Mb:	00:20

Q. How does FastAccess DSL compare with a cable modem?


A. FastAccess Internet Service offers an excellent way to browse the Internet at lightning fast speeds. You get speeds up to 1.5Mb-384K downstream and 256-512K maximum upstream depending on product selection. Also, FastAccess DSL runs over your existing telephone line. Cable modem has a shared connection.


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Security Concerns

Q. Is FastAccess DSL secure?

A. Your DSL connection is a dedicated connection from your computer to our central office so you benefit from a more secure connection. No Internet connection is 100% secure, therefore, we offer a home networking device that includes a professional grade firewall to help protect your computer against cyberintruders.

 [Home networking](#)

 I Want to Order FastAccess Service.

Is FastAccess DSL Available?

Q. How can I determine if FastAccess DSL is available for my home?

A. You may enter your telephone number to determine if service is available for your home. If you do not yet have your telephone number and want to determine availability on the basis of your new address, please contact our representative.

Q. If one number doesn't qualify, will another number at my home qualify?

A. Yes. In some cases, an individual customer location may have some telephone lines that qualify and some that do not. Since not all telephone lines in an area served by FastAccess DSL will qualify for service, you will want to enter all numbers to check availability.

Q. Can I change my phone number to get a number which does qualify?

A. Changing your telephone number changes the number assigned to your physical telephone line, not the line itself. As a result, changing your telephone number will not affect the current availability of FastAccess Service at your location.


Q. What are the reasons why a line does not qualify for service?

A. These are the top reasons a telephone line does not pre-qualify for FastAccess DSL:

1. The distance from the Central Office must be within 18,000 feet of your home. This distance is determined by the actual length of your cable pair, not the driving distance from your location to the Central Office.
2. The facilities serving the telephone line are not equipped to provide FastAccess DSL at this time.
3. The telephone line has been enhanced with special equipment to provide better voice quality which disrupts the signal needed for FastAccess DSL.
4. Changes in your local telephone service may affect BellSouth's ability to provide DSL service to you.

Q. How can I get FastAccess DSL in the future?

A. BellSouth continues to make enhancements and upgrades to increase the availability of FastAccess Service in the region. We are eager to provide you with FastAccess DSL, so please continue to visit us to see if FastAccess DSL has become available to you.

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#### What is included?


**Q. What's included with BellSouth FastAccess DSL?**

**A. FastAccess DSL includes**

- unlimited access to the web
- Internet service
- five separate mailboxes
- 10MB of space for building a personal web page
- a back-up dial-up account to use when traveling
- free technical support

**Q. What's not included with FastAccess DSL?**

**A. The price for FastAccess Service does not include the cost for your telephone line. However, FastAccess DSL lets you use talk and use the Internet on the same line. This service does not include a back-up dial-in modem.**

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#### What Does FastAccess DSL Cost?

**Q. What are the charges for FastAccess DSL?**

**A. You may learn about current prices for FastAccess DSL.**

**Q. Are there any additional usage charges?**

**A. Additional usage charges may apply for backup dial account usage. This dial-up account includes 20 hours of usage per month at no additional cost. After exceeding 20 hours of usage additional charges will apply. Please see the Pricing Terms and Conditions for details.**

**Q. Are there any charges associated with my equipment?**

**A. Yes. The modem will be billed to your BellSouth telephone bill in four interest-free installments, including a first month payment of \$24.98, and three additional payments of \$24.99. A shipping and handling fee of \$14.95 will also be applied on the first invoice for all self-install kits. The Annual Percentage Rate (APR) is 0%. You may also have the full price of the modem billed to a credit card.**

**Q. How will I be billed?**

**A. Your FastAccess Service charges will appear on your monthly BellSouth telephone bill. You also may choose to have these charges billed directly to a credit card. However, if you do bill to your credit card, you will not receive separate itemization of your charges. You will be billed one month in advance for your service. Your first bill may contain charges for a partial month up to your monthly billing date. It also will show your installation and activation fees if those need to be applied.**

**Q. Where will my FastAccess DSL charges appear?**

**A. Your FastAccess Service charges will appear on the BellSouth Internet Service part of your telephone bill. Modem equipment charges will appear on the "Other Charges and Credits" section of your bill.**



Q. What are Interlata Internet Provider Charges? Are these in addition to my FastAccess DSL charges?

A. BellSouth provides you with local Internet access only at this time. You must use a Global Services Provider (GSP) to access the global Internet. UUNE I provides global Internet access for BellSouth FastAccess DSL subscribers. Charges for BellSouth and the GSP, UUNE I, are separate charges and appear that way on your bill. The GSP charge was included as part of the monthly FastAccess Service rate.

Q. Can I view, receive or pay my bill electronically?

A. Yes. By visiting our billing page you can view and pay your bill online, stop receiving a paper bill, start receiving a paper bill, and update your billing e-mail address online.

Q. Can my professional installation fee be broken into installments?

A. Installment billing on your professional installation is not available.

Q. Will I be charged for the self-installation option?

A. You will not be charged if you install the service yourself. If you request a technician to visit your home to help with installation, additional charges may apply.

Q. How will I be billed for my equipment?

A. The modem will be billed to your BellSouth telephone bill in four interest-free installments, including a first month payment of \$24.98, and three additional payments of \$24.99. A shipping and handling fee of \$14.95 will also be applied on the first invoice for all self-install kits. The Annual Percentage Rate (APR) is 0%. You may also have the full price of the modem billed to a credit card.

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#### Are there BellSouth Discounts?

Q. If I installed FastAccess DSL before getting BellSouth Complete Choice, BellSouth Area Plus or other qualifying BellSouth package, can I still receive my BellSouth Answers<sup>SM</sup> savings?

A. Yes. Call the BellSouth billing department after BellSouth Complete Choice, BellSouth Area Plus or other qualifying plan has been added to your service. Tell our representative you want to begin receiving your discount. It may take 1-2 billing cycles to see the discount on your bill.

Q. I want to ensure that I get the BellSouth Answers savings since I have more than one line.

A. You must have BellSouth Complete Choice, BellSouth Area Plus Service or other qualifying plan billed to the same line as FastAccess Service to qualify for the discount.

Q. What should I do if I am not receiving my BellSouth Answers savings?

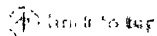
A. If your telephone bill shows charges for BellSouth Complete Choice, BellSouth Area Plus, or other qualified plan, but not the BellSouth Answers savings, contact the billing department. They can review your account to confirm eligibility and ensure that the discount is applied.

Q. What are Interlata Internet Provider charges? Are these in addition to my FastAccess DSL charges?

A. BellSouth provides you with local Internet access only at this time. You must

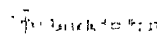
use a Global Services Provider (GSP) to access the global Internet. UUNET provides global Internet access for BellSouth for FastAccess DSL subscribers. Charges for BellSouth and the GSP, UUNET, are separate charges and appear that way on your bill. The GSP charge was included as part of the monthly FastAccess Service rate

- Q. How long does it take credits to appear on my bill?
- A. It may take up to two billing cycles over two months for credits to appear on your telephone bill. This includes discounts for BellSouth Answers plans.



Placing an Order

- Q. How do I order FastAccess DSL?
- A. You may order FastAccess Service for your home online. If you do not currently have BellSouth telephone service contact BellSouth to establish your telecommunications service.
- Q. How can I check the status or modify my order?
- A. You may call the BellSouth Customer Service Help line at 1-888-321-2375.
- Q. Is it easy to switch to BellSouth FastAccess Service if I am using another Internet Service Provider?
- A. Yes. BellSouth Welcome Service makes switching from AOL® or other Internet Service Provider a simple and convenient process. Learn [more](#) about how easy switching can be.
- Q. Will I have to change my e-mail address when I sign-up for FastAccess DSL?
- A. If you are currently a BellSouth customer for Internet access, you will be able to keep your current BellSouth Internet Service e-mail address for use with your new FastAccess DSL connection. If you are a new BellSouth Internet customer you will be provided with up to five new e-mail addresses at no additional cost.




Installation

- Q. Can I install FastAccess DSL myself?
- A. It is easy to install FastAccess Service. After you place your order, we will activate FastAccess DSL on your telephone line and ship your modem kit to you. You simply install your modem hardware and software using our easy step-by-step instruction guide. Our Help Desk is available to assist you 24 hours a day, seven days a week. There also is [additional contact information](#) for your assistance.
- Q. Can I change my order or installation appointment?
- A. Contact us 72 hours before your installation appointment if you need to reschedule.
- Q. How can I check the status of my order?

A. You will receive an e-mail confirming your order, with either the date of the self-installation kit delivery, or the date of your installation appointment. You will receive another e-mail when your self-installation kit is shipped. Contact us if you need additional information.

Q. How do I order more filters and HomePNA adapters for a self-installation?

A. You can order additional filters and adapters online.

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### What Features and Services are Available?

#### FastAccess DSL Features

Q. How many e-mail addresses do I get?

A. Five e-mail addresses, with 10MB capacity, are included with your FastAccess Service account. This lets you create different identities for yourself, or give family members their own e-mail address. You may also purchase additional e-mail addresses and capacity, or select our home networking service and receive eight e-mail addresses, each with 25MB capacity.

Q. Is an Instant messaging service available?

A. BellSouth® Messenger® service lets you easily chat online with one or more friends. You will be alerted when your friends come online so you can chat real-time. It's easy and free!

Q. Can I create my own personal Web page?

A. You can design your own 10MB personal Web page with easy-to-use tools. You can easily post photos, share information, create chat rooms and message boards, add your favorite links, design newsletters, post your daily planner calendar and more.

Q. Are newsgroups available?

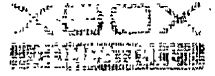
A. You will be able to post messages, read articles and share content with an upgraded platform that lets you enjoy over 35,000 newsgroups.

Q. Will I be able to make video connection to friends and family?

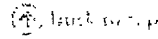
A. You will be able to download streaming audio and video, and play Internet games with ease. FastAccess DSL provides you a fast link to the Internet for your home.

Q. Will I be able to "game" online?

A. Reap the rewards of online gaming with your FastAccess DSL connection. BellSouth is an Xbox™ Live compatible provider. Install your Xbox with your FastAccess DSL Ethernet modem or your 2Wire™ Home Portal and experience more from your gaming adventures with Xbox Live. The instructions for Xbox installation with your FastAccess DSL modem are available [here](#).



Xbox, Xbox Live, the Live logo, and the Xbox logos are either registered trademarks or trademarks of Microsoft Corporation in the United States and/or other countries and are used under license from Microsoft.



#### FastAccess DSL Services

**Q. What will I use as my "start" page?**

**A.** The BellSouth Internet Services start page is fully customizable to meet your individual needs and interests. You can listen to your favorite tunes with BellSouth Internet Radio - free music radio with over 150 stations in a variety of styles. Plus, you can play games, view films, catch up on breaking news and more.

**Q. Can I access my BellSouth e-mail while at work or traveling?**

**A.** You easily can access your BellSouth e-mail from any Internet connection so you can stay in touch while at work, traveling or visiting friends.

**Q. Can I get FastAccess Service and still use my AOL e-mail address and AOL account?**

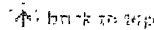
**A.** You can have both FastAccess DSL and all your AOL features and content. Using the AOL "Bring Your Own Access" plan, you can maintain your unique AOL features and e-mail address, reduce your monthly AOL charge and still enjoy the benefits of DSL speed.


**Q. Is a back-up dial account provided?**

**A.** FastAccess Service also includes access to a back-up BellSouth Internet Service dial-up account. This account may be used while you are traveling or if FastAccess DSL is temporarily interrupted. The back-up dial account provides for 20 hours of usage per month at no additional cost to you. (However, you will be responsible for any long distance or roaming charges that may be incurred for all back-up dial usage.) In the event you use our back up dial account for more than 20 hours in any month, you agree to pay BellSouth \$2.00 for the first hour or fraction thereof in excess of 20 hours and \$1.00 per hour for each additional hour or fraction thereof in excess of 21 hours. Billing for usage over 20 hours will not exceed \$19.95.

**Q. Is software available to manage my DSL connectivity?**

**A.** You can enhance your broadband experience with BellSouth FastAccess Connection Manager 2.0-a diagnostic and self help tool designed to manage your FastAccess DSL connectivity.



 **What Do I Need?**

Line Requirements

- Q. How do I know if my line will work with FastAccess Service?
- A. You can learn if your line is pre-qualified for FastAccess DSL by checking it online
- Q. Will I need an additional telephone line?
- A. No. FastAccess DSL operates over your existing telephone line, without interfering with voice or fax transmission. You can access the Internet and talk or fax at the same time on the same phone line

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#### Computer Requirements


- Q. What type of computer do I need?
- A. You may view the [list of computers](#) that operate with FastAccess Service
- Q. Does my computer qualify?
- A. To test your computer to see if it is compatible with FastAccess DSL, download our [Computer Qualification Tool](#).

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#### Modem Requirements

- Q. What equipment will I need to install FastAccess DSL?
- A. You will need a DSL modem. BellSouth offers this when you [order your FastAccess Service](#).
- Q. Can I use my own modem?
- A. You can use your own BellSouth FastAccess DSL "Qualified" modem.
- Q. What is a Qualified modem?
- A. A Qualified modem is one that has been tested by BellSouth and is confirmed to work with FastAccess Service. These qualified modems are divided into two categories, Supported and Unsupported
- Q. What is a Supported modem?
- A. A Supported modem is one that will receive full support by the BellSouth Customer Help Desk. You may [review a list of Supported modems](#).
- Q. What is an Unsupported modem?
- A. An Unsupported modem is one qualified to work with FastAccess DSL, but not supported by the BellSouth Customer Help Desk. You may [review a list of Unsupported modems](#). Any questions or problems with these modems must be referred to the manufacturer. If modem problems cannot be resolved by the manufacturer, you may need to purchase a different modem to work with FastAccess DSL.
- Q. I have a DSL modem but I am not sure of the make or model number

- A. If you have had BellSouth FastAccess Service previously and received a modem from BellSouth, you have a supported modem. You may call our Customer Service Help Desk if you need additional help identifying your modem type.

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#### Operating System Requirements


- Q. Do the modems provided with FastAccess Service support Windows® XP operating system?

- A. New customers purchasing FastAccess Service using the Windows XP operating system will receive modems that are supported by FastAccess Technical Support.

All existing customers upgrading to Windows XP operating system must download the latest client software and modem drivers to become compatible with the new operating system. FastAccess Service will operate successfully with Windows XP operating system when the new software is downloaded. Visit [FastAccess Support](#) for the latest client software and modem drivers. Contact [FastAccess Technical Support](#) if you have additional questions.

- Q. Should I upgrade my system now with Windows® XP operating system?

- A. If you upgrade your operating system, there are additional computer requirements needed for Windows XP and FastAccess DSL Service to operate successfully. You may [review the minimum PC requirements](#) to ensure your computer meets those requirements. Our [FastAccess Technical Support](#) can assist with any additional questions.


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#### Can I Share FastAccess DSL on Multiple Computers?

##### Sharing a DSL Connection

- Q. What are the benefits of FastAccess HomeNetworking Service?

- A. Home networking is great for sharing files on your computer, sharing equipment such as printers throughout the home, and accessing more and better entertainment and information. For example, gamers can enjoy playing head-to-head with other members of the family or with people across the country. With FastAccess HomeNetworking Service, all of the computers on your network can play and use the Internet at the same time. And with the FastAccess HomeNetworking solution, a firewall is included to assist in protecting all of the computers on your network from hacker attacks.

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##### FastAccess HomeNetworking

- Q. What is FastAccess HomeNetworking Service?

- A. With FastAccess HomeNetworking Service you can share your FastAccess DSL connection with up to four computers in your home. You can also share files among your computers and share one printer. You will receive support 24 hours a day, seven days a week. You can add BellSouth FastAccess HomeNetworking for just \$10.00 more a month. Prices are subject to change. The service requires a 12-month service agreement and the purchase of an installation kit (starting at \$149.00).

**Q. What does FastAccess HomeNetworking Service include?**

**A.** FastAccess HomeNetworking Service includes high-speed FastAccess DSL Service for up to four computers in your home. You will receive a home network gateway that includes a high-performance router, with a built-in DSL modem, and a professional grade firewall, all in one device! Every computer connected to your network is protected by a professional grade firewall, therefore there is no need to load special firewall software on each computer! Simple installation with no special wiring needed. Technical support is available for your home network anytime you need it.

**Q. Why should I order FastAccess HomeNetworking Service instead of purchasing a router from a store?**

**A.** BellSouth will provide you with what you need to easily connect up to four computers to your home network without any special wiring. FastAccess HomeNetworking Service is designed to work seamlessly with your FastAccess DSL Service. Our FastAccess HomeNetworking web site and consultants will help you design the perfect network for your home, and our technical support specialists are available 24 hours a day, seven days a week, to answer any questions you may have. When you purchase your home networking solution through BellSouth, you receive the best in home networking equipment. Buying directly from BellSouth allows you to take advantage of our lower costs while receiving additional value, customer support and a personal customized network design.

**Q. Do I need to put in special wiring to install FastAccess HomeNetworking Service?**


**A.** No special wiring is needed to install FastAccess HomeNetworking Service. The beauty of FastAccess HomeNetworking is the flexibility of the product. You can connect devices directly to the residential gateway using an Ethernet, phone line, wireless or a USB connection from your computer(s) to the residential gateway. Computers in different rooms can be connected using your existing telephone lines or a wireless solution. Either way, there are no new computer wires to run between rooms. If you already have Ethernet cabling in your home, you can use that method as well without using HomePNA.

**Q. What is the difference between networking using existing telephone lines and a wireless solution?**

**A.** A telephone line based network uses your existing telephone lines to create a network. Computers that are connected to the network using this networking technology must reside in a room with a nearby telephone jack. A wireless capable network allows you to connect computers to the broadband home network using 802.11b wireless technology. Wireless technology allows you to experience all the benefits of DSL from virtually anywhere in your home without being tied down by any wires.

**Q. Can I get FastAccess HomeNetworking Service if I purchase a router from someone other than BellSouth?**

**A.** BellSouth offers support for your network only when you purchase FastAccess HomeNetworking Service. This BellSouth service is available for a monthly networking charge and a one-time residential gateway equipment charge.


 BellSouth

 I Have a Question About My FastAccess Service.

**Managing My FastAccess DSL Account**

**Q. Can I get online assistance with my FastAccess Service bill?**

- A. You can better understand your FastAccess DSL bill, the charges and your billing options. You may also see sample bills online. BellSouth offers you the ability to view and pay your bill online.
- Q. I need to review some solutions to questions I have with my FastAccess Service.
- A. BellSouth offers FastAccess Support, our online support, letting you ask questions and get answers, review common questions and "how-to's," and automated solutions for you.

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
#### Moving My FastAccess DSL

- Q. I am moving and will keep my same number in my new home.
- A. Call the BellSouth Service Center to move your telephone number to your new location. Ask the representative to check if the new location pre-qualifies for FastAccess DSL. If it does, the representative can place the order to move the service.  
If the new location does not pre-qualify for FastAccess DSL, call the FastAccess Service billing department to change your DSL account to a dial-up Internet account, or request that your Internet account be disconnected. Remember, BellSouth is constantly making network enhancements and upgrades to be able to provide FastAccess DSL to more customers in more areas. Visit us in the future to see if FastAccess Service is pre-qualified for you!

- Q. I am moving within the BellSouth region and want to get FastAccess Service at my new home.
- A. Call the BellSouth Service center and order a telephone line for your new location. Ask the representative to verify if FastAccess Service is available for that number. If the new telephone number does pre-qualify for service you may have the representative place the order for FastAccess DSL, or you may order FastAccess Service online at your convenience.

If your new telephone number does not pre-qualify, call the FastAccess Service billing department to change your DSL account to a dial-up Internet account, or request that your Internet account be disconnected. Remember, BellSouth is constantly making network enhancements and upgrades to be able to provide FastAccess DSL to more customers in more areas. Visit us in the future to see if FastAccess Service is pre-qualified for you!

- Q. I am moving outside the BellSouth region.
- A. Call the BellSouth Service center and ask that your telephone line be disconnected. Contact the FastAccess Service billing department and ask that your FastAccess DSL account be disconnected.

 [Home to top](#)

#### IP Addresses

- Q. What is an IP address?
- A. IP Addresses are numbers used to identify a specific location on the Internet, much like a phone number is used to identify a specific location on a telephone network. Every device connected to the Internet has a unique IP Address. For instance, a web site such as www.---.com would be assigned a unique numeric IP Address (222.222.222.222), much like your home has a unique phone number (222-222-2222). When a user types www.---.com into their browser, the software goes to an Internet directory, finds that the web site "lives" at IP Address 222.222.222.222, and connects to that address over the World Wide Web.



**Q. What is Dynamic IP?**

A. A Dynamic IP is an IP address that changes periodically. A different IP address may be assigned every time you connect to the Internet. This makes it more difficult for others to locate your computer or other device from elsewhere on the Internet.

**Q. What is Static IP?**

A. This is an Internet Protocol address that remains the same every time a user logs onto the Internet. Because it is a "fixed" address, it is easier for other Internet users to locate and connect to the hosting computer. It potentially enables a user to "host" a website, or other type of server connection (such as an e-mail or FTP server). As a result, this type of connection is less secure than a dynamically assigned IP address. Static IP is not available for residential accounts from BellSouth at this time.

[Click here to go to the top of the page.](#)

**Service Performance**

**Q. I want to check my DSL connection.**

A. You can check your FastAccess DSL connection by [downloading](#) the [FastAccess Connection Manager 2.0](#).

**Q. Will I be able to use my telephone or access the Internet if my FastAccess Service or modem fails?**

A. Most likely you will be able to use your telephone and access the Internet even if there are problems with your modem. DSL modems are designed so that your regular telephone service will operate even if the modem is unplugged or disabled. Also, you will still be able to use your regular dial-up analog modem if there is an outage with FastAccess Service in your area.

**Q. How can I check the status of the DSL system for my area?**

A. You may [view the](#) operating status of the BellSouth Internet Service system to keep informed about known problems or scheduled maintenance that may affect your service.

**Q. How do I report a repair?**

A. You may be able to solve your problem yourself by checking the [BellSouth online assistance](#). It will give you Troubleshooting Tips, system status and trouble reporting contact numbers. If you still need assistance, [BellSouth's Help Desk](#) and Technical Support personnel are available 24 hours a day, seven days a week.

**Q. Are there some Troubleshooting Tips?**

A. You may [review helpful](#) solutions to common situations and problems quickly and easily online.

[Click here to go to the top of the page.](#)

**Warranties and Returns**

**Q. Is there a warranty on the modem?**

A. Yes. The modem is under warranty for the first 12 months of service. If it breaks, we will repair it or replace it.

Q. How do I return my self-installation kit?

A. A UPS Authorized Return Service label will be enclosed in your Self Installation Kit if you need to return it. First, you will need to call Customer Service at 1-888-321-2DSL (2375) to process your return. Next, you will need to fill in the top portion of the UPS label to prepare your package for shipment. Customer service will give you a tracking number to write on the bottom line, next to REF#, and next to REF#/DATE on your return label.

After the information is filled out, attach the label to the front of your package. It is very important that you keep the bottom portion of the UPS Authorized Return Service label as a reference. Be sure to use secure packaging to protect the equipment during shipping. Then, simply give your package to any UPS driver; allow five to seven days from the date of shipment for your return to be processed.

Q. How long do I have to return my self-installation kit?

A. You have 30 days from the time that the modem was sent to you (Ship Date) to return your Self-Installation Kit.

Q. How do I replace a defective modem?

A. If your modem does not work because of defective materials or workmanship *within* one year of the Ship Date or the Professional Installation Date, follow the returns process and call 1-888-321-2DSL (2375) for a replacement modem.

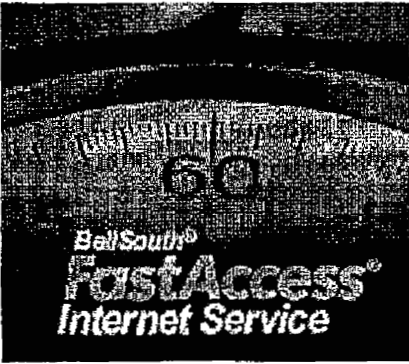
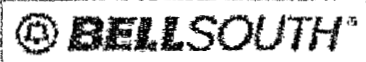
If your modem does not work for any reason *more than* one year after the Ship Date or the Professional Installation Date, either contact the modem manufacturer for assistance or contact BellSouth Internet Services to purchase a replacement modem.

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## Your FastAccess DSL Account

Welcome to Your FastAccess DSL Service Account, where you will have access to online assistance to manage your account.

- [FastAccess DSL Home](#)
- [About FastAccess DSL](#)
- [Features and Benefits](#)
- [Products and Pricing](#)
- [Order Now](#)
- [Home Networking](#)
- [Common Questions](#)
- [Customer Service](#)

- [FastAccess Service Support](#)
- [My FastAccess Service Bill](#)
- [Troubleshooting Tips](#)
- [FastAccess Connection Manager](#)
- [Glossary](#)
- [Contact Us about Your FastAccess Service](#)
- [Order Additional Equipment](#)
- [Self-Installation Guides](#)
- [Would you like to share your FastAccess DSL connection with multiple computers in your home?](#)

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# BellSouth® Internet Service

At Home      At Work      Customer Support  
FastAccess Support Site | [www.fastaccess.com](http://www.fastaccess.com) Special Offer

Tuesday, December 17, 2002

## Sample Bill Profile 3

**Sample: Monthly bill, with BellSouth® Complete Choice® or BellSouth® Area Plus®, or other BellSouth qualifying package:**

This sample bill shows most BellSouth FastAccess Internet Service charges that will appear on an on-going basis, after your first bill. Most FastAccess DSL charges will appear in the "Detailed Statement of Non-Regulated Charges" section under "Other Service Provider(s)", which is generally located toward the end of your bill.

**Notes:** Actual prices may vary.

404-555-1212  
Charges for Jan 1, 2002 thru Jan 31, 2002  
BellSouth Internet charges  
UserID: mcustomer

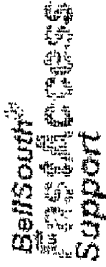
1. FastAccess Service Charge from Jan 1 thru Jan 31	47.00
2. BellSouth Equipment Service	435.00
3. Various Taxes	28.00
<b>Total BellSouth Internet Current NonRegulated charges</b>	<b>42.05</b>

404-555-1212  
Charges for Jan 1, 2002 thru Jan 31, 2002  
Global Service Provider Charges  
UserID: mcustomer

4. Global Mobility Service	2.95
Charges from Jan 1 thru Jan 31	
1 user @ 2.95 per user	
<b>Total UUNET Current NonRegulated charges</b>	<b>2.95</b>
<b>Total Other Service Provider(s) Unregulated Charges</b>	<b>45.00</b>

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Last Modified: 10/18/2002 11:13:42 PM  
Last Modified: 10/18/2002 11:13:42 PM  
Control: GUNTER@K.LINQ.COM Control: GUNTER@K.LINQ.COM  
MSISDN: 555-VIRADOWS N: 5.0; L2USER: m01681E;

# BellSouth® Internet Service



At Home      At Work      Customer Support  
FastAccess Support Site | [www.fastaccess.com](http://www.fastaccess.com) Special Offer

Tuesday, December 17, 2002

## Sample Bill Profile 4

Sample: Monthly bill, without BellSouth® Complete Choice® or BellSouth® Area Plus®, or other BellSouth qualifying packages:

This sample bill shows most BellSouth FastAccess Internet Service charges that will appear on an on-going basis, after your first bill. Most FastAccess DSL charges will appear in the "Detailed Statement of Non-Regulated Charges" section under "Other Service Provider(s)", which is generally located toward the end of your bill.  
Note: Actual prices may vary

404-555-1212			
Charges for Jan 1, 2002 thru Jan 31, 2002			
BellSouth Internet charges			
Use-ID: mcustomer			
1. FastAccess Service Charge from Jan 1 thru Jan 31		47.00	
2. BellSouth Area Plus		XX.XX	
Total BellSouth Internet Current: Non-Regulated charges		47.00	
404-555-1212			
Charges for Jan 1, 2002 thru Jan 31, 2002			
Global Service Provider Charges			
UserID: mcustomer			
3. Global Service Provider		2.95	
Charges from Jan 1 thru Jan 31			
1. user@ 2.95 per user		2.95	
Total UUNET Current Non-Regulated charges		2.95	
Total Other Service Provider's Unregulated Charges		49.95	

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Internet Billing, Contract, Invoicing, Control Panel, Please Contact: [customersupport@bellsouth.net](mailto:customersupport@bellsouth.net) (770) 944-1010  
MSIE 5.5 WINDOWS NT 5.0; LG&USEF; #01.0810



DOCKET NO. 020507-TP

EXHIBIT NO. \_\_\_\_\_ (JMB-3)

CG-BRUL-001  
Issue 12E-October, 2002

CHAPTER 53.0 - Loop Makeup Data On Working Loops Query

53.1 Loop Makeup Data On Working Loops Query

This query requests loop makeup data on a working loop.

TABLE bg. Loop Makeup Data On Working Loops Query

Loop Makeup Data on Working Loops Query											
Field Names			Usage								
BST	LSOG 3	LSOG 4	Field Length	Char Type	R/C/O	Business Rules	I S S 7	I S S 9	L E N S	Valid Values	
<b>Loop Makeup Data on working Loops Query</b>											
COMPANY CODE			4	N	R	Operating Company Number (OCN)		X	X		
ACNA			3	A/N	R	Access Carrier Name Abbreviation		X	X		

Docket No.: 020507-TP  
 Witness: Jay Bradbury  
 Exhibit No. \_\_\_\_\_, (JMB-3)  
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INQ-NUM	INQNUM	INQNUM	16	A/N	R	Inquiry Number  Inquiry Number uniquely identifies each Pre-Order transaction.	X	X	
CKT-ID			36	A/N	C	Circuit ID  Only one of circuit ID, Telephone Number or Service Address is required.	X	X	See Appendix T
TN	WTN	WTN	24	A/N	C	Telephone Number Only one of circuit ID, Telephone Number or Service Address is required.	X	X	Format must be: 101 555-1234 where: 101=NPA 555=NXX 1234= Line Number
LSP-AUTH		X	4	N	C	Local Service Provider Authorization Identifies the CLEC granting authorization to the CLEC requesting LMU on a loop owned by the authorizing CLEC	X	X	

Docket No.: 020507-TP  
 Witness: Jay Bradbury  
 Exhibit No. \_\_\_\_\_ (JMB-3)  
 Page 2 of 7

LSP-AUTHNAME		X	15	A/N	C	Local Service Provider Authorization Name Name of the person from the Local Service Provider who signed authorization letter		X	X	
<b>Service Address Information</b> <b>Only one (1) address may be specified per request</b>										
HOUSE-NUM	SANO	SANO	13	A/N	C	House Number  Identifies the house number of the service address.		X	X	Special Characters include: " - " = Dash
HOUSE-NUM-SUFFIX	SASF	SASF	5	A/N	O	House Number Suffix  Identifies the suffix for the house number of the service address.		X	X	Special characters include:  <ul style="list-style-type: none"> <li>• " - " = Dash</li> <li>• " / " = Virgule</li> </ul>
STREET-NAME	SASN	SASN	35	A/N	C	Street Name  Identifies the street name of the service address.		X	X	Special Characters include: " * " = Asterisk

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 Witness: Jay Bradbury  
 Exhibit No. \_\_\_\_\_ (IMB-3)  
 Page 3 of 7

						Required when the Service Address is entered.				
STREET-DIR	SASD	SASD	2	A/N	O	Street Directional Prefix  Identifies the street directional prefix of the service address.		X	X	<ul style="list-style-type: none"> <li>• N = North</li> <li>• E = East</li> <li>• W = West</li> <li>• S = South</li> <li>• NE = Northeast</li> <li>• NW = Northwest</li> <li>• SE = Southeast</li> <li>• SW = Southwest</li> <li>• " " = (Blank)</li> </ul>
THOROUGHFARE	SATH	SATH	10	A/N	O	Street Thoroughfare  Identifies the thoroughfare portion of the street name of the service address		X	X	See Appendix B
STREET-SUFFIX	SASS	SASS	4	A/N	O	Street Directional Suffix  Identifies the street directional suffix of the street service address.		X	X	<ul style="list-style-type: none"> <li>• N = North</li> <li>• E = East</li> <li>• W = West</li> <li>• S = South</li> <li>• NE = Northeast</li> <li>• NW =</li> </ul>

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 Exhibit No. \_\_\_\_\_ (JMB-3)  
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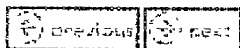
										<ul style="list-style-type: none"> <li>• Northwest</li> <li>• SE = Southeast</li> <li>• SW = Southwest</li> <li>• " " = (Blank)</li> </ul>
STRUC-BLDG	BLDG	BLDG	15	A/N	O	Structure Building and Data  Identifies the building located at the street address.		X	X	See Appendix C & D
ELEV-FLOOR	FLOOR	FLOOR	14	A/N	O	Elevator Floor and Data  Identifies the floor number of the street address.		X	X	See Appendix C & D
UNIT-ROOM	ROOM	ROOM	15	A/N	O	Unit Room and Data  Identifies the room of the street address.		X	X	See Appendix C & D
CITY	SALOC	SALOC	32	A/N	C	City Name		X	X	Special Characters include: "*" = Asterisk

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 Witness: Jay Bradbury  
 Exhibit No.: \_\_\_\_\_ (JMB-3)  
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						Identifies the city or community where the service is located.  Required when the Service Address is entered.			
STATE	SAST	SAST	2	A/N	C	State Code  Identifies the state where the service is located.  Required when the Service Address is entered.	X	X	<ul style="list-style-type: none"> <li>• AL = Alabama</li> <li>• FL = Florida</li> <li>• GA = Georgia</li> <li>• KY = Kentucky</li> <li>• LA = Louisiana</li> <li>• MS = Mississippi</li> <li>• NC = North Carolina</li> <li>• SC = South Carolina</li> <li>• TN = Tennessee</li> </ul>
ZIP-CODE	SAZC	SAZC	5 or 9	N	O	Zip Code  Identifies the zip code of the service address.	X	X	

Docket No.: 020507-TP  
 Witness: Jay Bradbury  
 Exhibit No. \_\_\_\_\_ (JMB-3)  
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UNNUM-HOUSE-IND	N/A	N/A	1	A/N	O	<p>Unnumbered Address Indicator</p> <p>An indicator, which identifies the address as being on an unnumbered or unnamed street.</p>		X	X	<ul style="list-style-type: none"> <li>• Y = Street Number not populated.</li> <li>• N = Street Number is populated.</li> </ul>
-----------------	-----	-----	---	-----	---	--	--	---	---	---



DOCKET NO. 020507-TP

EXHIBIT NO. \_\_\_\_\_ (JMB-4)



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**Loop Qualification System (LQS)  
CLEC Pre-Ordering and Ordering Guidelines**

***Loop Qualification System (LQS)  
CLEC Pre-Ordering and Ordering Guidelines  
(Version 3, August 27, 2002)***





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## Loop Qualification System (LQS) CLEC Pre-Ordering and Ordering Guidelines

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## Loop Qualification System (LQS) CLEC Pre-Ordering and Ordering Guidelines

### Chapter 1.0: Introduction

#### 1.1 Purpose and Scope

This Pre-Ordering and Ordering Guide is intended to provide the D/CLEC (Data/Competitive Local Exchange Carrier) facility description and general information specific to processing a request for the service offering described herein. This document is an original version in this format; an updated version in the old format. This replaces a job aid currently being used by the CLECs. For that reason, this package carries the version number of 3.

For the remainder of this document, Loop Qualification System will be referred to as LQS. A detailed description of this facility offering will be provided in **Chapter 3.0, Overview**, of this document. Contact your Local Support Manager (LSM) if you have questions about the information contained herein.

#### 1.2 Disclaimer Statement

The information contained in this document is subject to change. BellSouth will provide notification of changes through the D/CLEC Notification Process. This guide will be maintained until such time that it's content is incorporated into the BellSouth Business Rules – Local Ordering (BBR-LO). The BBR-LO is found at:

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

*continued on next page*



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**Loop Qualification System (LQS)  
CLEC Pre-Ordering and Ordering Guidelines**

**Chapter 1.0: Introduction**

**1.3 Version History/Control**

Any future modifications, enhancements, and/or improvements that are made to this Pre-Ordering and Ordering Guide for LQS will be reflected accordingly in this section of the document.

Section	Date / Version	Description
All	8/27/2002 – Version 3	This document is an original version in this format; an updated version in the old format.



---

## Loop Qualification System (LQS) CLEC Pre-Ordering and Ordering Guidelines

### Chapter 2.0: Overview

LQS was originally designed as an internal tool utilized by BellSouth and Internet Service Providers (ISPs) reselling BellSouth ADSL (Asymmetric Digital Subscriber Line) Service to determine if a telephone number(s) at a specific service address qualified for BellSouth ADSL Service. Subsequently, LQS access has been made available to any requesting D/CLEC via the Interconnection Agreement. For further specifications on the BellSouth ADSL offering, refer to the BellSouth Access Tariff – FCC (Federal Communications Commission) Number 1. This can be located at the following web address:

<http://cpr.bellsouth.com/pdf/fcc/fcc.htm>

While the information returned via LQS may provide some indication of loop characteristics, it does **not** provide the level of detailed information Mechanized or Manual Loop Makeup (LMU) provides. For more information on BellSouth's Loop Makeup product, refer to the BellSouth LMU CLEC Information Package located at the BellSouth Interconnection Services Web site in the CLEC Products Section at:

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

The Loop Qualification System (LQS) described in this guide is for D/CLECs to utilize when accessing BellSouth's LQS. Additional information can also be obtained by accessing the LQS web site at the following address:

<http://lqs.bellsouth.com>

**Note:** To access this site, a USER ID and password is required. Information relative to obtaining the User ID and password is contained within this document.

A user can perform an on-line query on up to **five** manually entered telephone numbers at the same time. The current offering limits a User ID (Identification) to 2,000 qualifications in a 24-hour period. A user can also submit up to 1,000 numbers at once using the **Bulk Submit** utility to submit an ASCII file. The 2,000 number-limitation also applies to bulk submissions.

The information contained in LQS is derived from the Loop Engineering Assignment Data (LEAD) Database and provides a "best effort" response regarding a loop's ability to support BellSouth's ADSL service.

*continued on next page*



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## Loop Qualification System (LQS) CLEC Pre-Ordering and Ordering Guidelines

### Chapter 2.0: Overview

The LEAD Database is a once-per-month-per-wire-center "snapshot" of the information contained in the Loop Facilities Assignment and Control System (LFACS) Database. 1/30<sup>th</sup> of all wire centers are updated every day. Currently there is a 98% accuracy rate on returned responses within LQS. LQS **cannot** be guaranteed based solely on the system response. Guaranteed service of BellSouth's Business Class ADSL does **not** utilize LQS but instead requires a manual Service Inquiry (SI).



---

## Loop Qualification System (LQS) CLEC Pre-Ordering and Ordering Guidelines

### Chapter 3.0: Pre-Ordering Guidelines

#### 3.1 Availability

LQS is available within all nine states of the BellSouth region. Terms and Conditions for LQS Service **must** be included in the Local Interconnection Agreement. This will be discussed in detail in Section 3.2 of this document.

To establish access to the LQS System, the D/CLEC will contact their LSM. Access to the LQS System will require a minimum of two (2) business days once the LSM has been contacted.

#### 3.2 Contract Specific Guidelines

For LQS access to be provided, the D/CLEC must have an Interconnection Agreement that includes the terms and conditions for the service.

If a D/CLEC requests access to LQS and such access is **not** already covered by the existing Interconnection Agreement, the Contract Negotiator should be contacted to provide the appropriate amendment.



---

## Loop Qualification System (LQS) CLEC Pre-Ordering and Ordering Guidelines

### Chapter 4.0: Ordering Guidelines

Once it has been confirmed that a D/CLEC is authorized via the Local Interconnection Agreement or an amendment has been added to the existing contract to utilize the LQS System, a User Name and Password must be obtained. The sections beginning below will walk you through the steps necessary to establish access and actually utilize the LQS System. Detailed information on the BellSouth LQS application is available at the following web site:

<http://lqs.bellsouth.com/Application.html>

#### 4.1 Establish/Discontinue Access to LQS

The D/CLEC will contact their LSM to establish or discontinue access to the LQS System. Prior to calling the LSM, it is the responsibility of the D/CLEC to provide a User Name. The User Name must consist of eight (8) case-sensitive characters. This information will be furnished to BellSouth at the time the request is initiated. Once the request is initiated, it will take a minimum of two (2) business days to get the access established.

If it becomes necessary to discontinue the password and delete the account in the LQS System, the D/CLEC is responsible for contacting his/her LSM. The User Name on the account to be discontinued must be furnished at the time the request is initiated.

#### 4.2 Installing the LQS Application

Once access has been established, the following steps will be taken to log into the LQS System:

- Double click the BellSouth Loop Qualification icon on the PC (Personal Computer) Desktop. (The LQS Login box will appear.)
- Enter your User Name and Password.
- The BellSouth LQS Status window will appear.

Once the Status window appears, you are ready to submit a Loop Query.

#### 4.3 Loop Queries

There are two types of Loop Queries. These include:

- **LQS Status Window**
- **Bulk Submit Utility**

*continued on next page*



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## Loop Qualification System (LQS) CLEC Pre-Ordering and Ordering Guidelines Chapter 4.0: Ordering Guidelines

### LQS Status Window:

The LQS Status Window will be selected when you are going to query the LQS status of up to five (5) 10-digit telephone numbers. The following steps will be taken:

- On the LQS Status Window, enter the 10-digit telephone numbers (excluding hyphens)
- Click the "Get Status" Button
- The status information for each number will be displayed

**Note:** Information needed to interpret the results of the "status" is included in Section 4.4 of this document.

### Bulk Submit Utility:

The LQS Bulk Submit Utility method will be selected when you are going to query the LQS status of up to 1,000 telephone numbers at one time. The telephone numbers must be contained in the ASCII file format including one 10-digit telephone number per line excluding hyphens and containing no titles, headers, or footers. From the LQS "Status" Window, the following steps will be taken:

- Select "Utilities" from the Menu Bar
- Select "Submit Bulk File"
- Select the file containing the telephone numbers

When completed, the "LQS Bulk File Results" Window will display indicating the status for all of the telephone numbers submitted on the bulk form. The user has the option at this point of:

- Selecting the contents and copying them to another file

*or*

- Saving the contents to another file

**Note:** Information needed to interpret the results of the "status" is included in Section 4.4 of this document.

*continued on next page*





**Loop Qualification System (LQS)  
CLEC Pre-Ordering and Ordering Guidelines**

**Chapter 4.0: Ordering Guidelines**

The table below indicates the sections from this point on that are included in this chapter and the appropriate page numbers for each. This will furnish you with a reference for ease in locating the information that is needed to interpret the LQS information.

<b>Section Name and Number</b>	<b>Page Number</b>
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*continued on next page*



## Loop Qualification System (LQS) CLEC Pre-Ordering and Ordering Guidelines

### Chapter 4.0: Ordering Guidelines

#### 4.4 Interpreting Query Results

There will be a Reason Code displayed for each telephone number queried. The Reason Codes include:

- A** (Available) – The loop is currently qualified for ADSL or PC Data.
- P** (Planned) – The loop is currently not qualified but is projected to support ADSL or PC Data. Projected service date will be included with initial feedback.
- N** (Not Qualified) – The loop is not qualified for ADSL or PC Data **or** the loop qualification status cannot be determined with certainty because of missing data or some other error condition.

When an "A" or "P" response is received, the following codes will also be shown immediately following the Reason Code:

- "C" for Copper or an "F" for Fiber
- Speed Code will follow a loop qualified as A,C (Available, Copper)
- "Planned Date" will follow a loop qualified by "P" ("Planned")
- An external "Reason Code" and description (E\*) will follow an "N" ("Not Qualified") response

Additional information on positive and negative responses is available in Sections 4.4 and 4.5 of this document. Typical response formats include:

A,C,C5

or

P,C,L0,2000.01.01

or

N,E2

(Service not available for this telephone number)

*continued on next page*



## Loop Qualification System (LQS) CLEC Pre-Ordering and Ordering Guidelines

### Chapter 4.0: Ordering Guidelines

#### 4.5 Typical LQS Output Screen

The Internal Reason Code and Enhanced LQS GUI (Graphical User Interface) fields are displayed for each telephone number queried and is viewable via the drop down arrow indicated with a + sign which means additional information is available.

Following is an example of a typical output screen provided by the LQS Enhanced GUI:

```
N,E2,Service not available for this phone number.  
I2,Copper loop is loaded.  
dt=,rz=15,cz=9,sc=pots1{ADSL},cap=null,  
Loopbits={isF1CableLoaded,IsRc,hasTnId},wkg  
NpaNxx(205298,hm=brhmalch,{},#p=1,#l=1996)  
WC(brhmalch,10/08/2001,205967,tdl=18.0,cap({ADSL},<no date>),{})  
LivingUnit(1auc6.4,sz=1,cap=null)  
WireCenterProxy(205298,brhmalch,{},#=1996)  
Taper(111901,{},(14.1+3.9=18.0))  
F1Cable(8,{}),p=136  
DT(r 3827 river view dr,{},cap {},<no date>,null,(0,0,0))  
XB(802,{}),cap({},<no date>),(396,16,0),p=1036
```

Provided below is an explanation of each line item with a copy of the line output from the above example as reference. The general format of this explanation will be:

<Line Number>, <Item Name if multiple item line>, <Explanation>

**Note:** If a line or line element has the message "**not a network data element**", this data item is LQS software system oriented and does **not** contain pertinent information relative to the loop qualification; therefore, a definition of this element will not be provided.

#### 4.6 Line-By-Line Explanation of LQS Output Screen:

Beginning below is a line-by-line explanation of the data included on the LQS Output Screen.

##### Line 1 – External Reason Code Qualification Response:

**Output:** N,E2,Service not available for this phone number.

1, Loop Qual Response/External Reason Code

*continued on next page*



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#### Line 2 - Internal Reason Code Qualification Response:

**Output:** 12,Copper loop is loaded.

12, Loop Qual Response/Internal Reason Code

#### Line 3 – Specific Data Associated with the Telephone Number:

**Output:** dt=,rz=15,cz=9,sc=pots1{ADSL},cap=null,

3, dt = Data Type

min = remote DSLAM fed straight F1 terminal  
pcd = IFTL Ethernet based service  
fmx =DIFTL (Data over Fiber In The Loop) based service  
fax =DIFTL (Data over Fiber In The Loop) based service  
null=no data type detected by refresh program

3, rz = Resistance Zone of Customers Serving Terminal

RZ is an indicator of the subscriber loop resistance limits of a particular geographic area. Used for metal facilities (e.g., RZ13=1300 ohms, RZ15=1500 ohms.)

Values typically = null, 13, 15, 18, etc.

3, cz = Carrier Resistance Zone of Customers Serving Terminal

CZ is an indicator of the maximum resistance between the remote terminal cabinet and the customers serving terminal. Used for derived facilities only (e.g., CZ9=900 ohms.)

Values typically = null, 9, or 15

3, sc = Service Category

Service Categories map to 15 Outside Plant Equivalence Code (OEC) parameters that describe the relevant characteristics of the service from an outside plant provisioning perspective. These OEC parameters allow LFACS Center to accurately select the outside plant facilities with the appropriate transmission characteristics.

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The OEC parameters include the number of conductors required, the manual assistance indicator, the grade of service (party line or single), class of service, pair gain indicator, non-local indicator, category (i.e., voice grade, digital data, ISDN (Integrated Services Digital Network)), CO (Central Office)-side terminations, quality, signaling, metallic requirement, digital data rate, loop assignment type, loop qualification, and de-specialization.

By matching these parameters, LFACS is able to determine which OEC category a service request falls into and in turn, to know what type of facility to look for. The address tells LFACS where to look.

- POTS (Plain Old Telephone Service) 1 is a 2-Wire, single-party, voice grade loop, "S" type CO terminations with ordinary loss levels, loop start signaling, metallic facilities not required, and any DD rate.
- POTS3B is a 2-Wire, 4 or 8 party voice grade service, "B" type CO terminations, ordinary loss, loop start, no metallic requirement, and any DD rate.
- POTS5 is a 2-Wire, single party, voice grade, "C" type CO terminations, ordinary loss levels, loop start signaling with no metallic requirement and any DD rate.
- DOV 4 is a 2-Wire single party, locally or non-locally switched voice grade, "M" type CO terminations, ordinary loss, loop, ground or battery start that could or could not have a metallic requirement with an "L" digital design rate.

Values typically = pots1, pots3b, pots5, dov4

**Note:** 3, cap = Line Capability in the software system. This is not a network data element.

#### Line 4 – Specific Data Associated with the Telephone Number

**Output:** Loopbits={isF1CableLoaded,IsRc,hasTnld},wkg

IsRc - = System Item Status

This is *not* a network data element.

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Wkg = Pair Evaluation (PE) Status of Telephone Number

wkg = normal line in service with a telephone number

ct = connect through - A loop from the central office to the serving terminal that remains "connected" through the network. This allows the next customer who moves to that location to have dial tone initiated at the central office without cross connects being required in the field.

Valid loop statuses include:

- CT (Connect Through)
- CF or CNF (Connected Facility)
- PCF (Partially Connected Facility)
- WKG (Working)
- RCT - Connect through originating at a switcher
- RCF - Connected facility originating at a switcher
- RWK - Working loop originating at a switcher
- IDLE

**Note:** Of these, only WKG and RWK are working values.

Values typically = wkg, ct, etc.

#### Line 5 – System Oriented NPA, NXX

**Output:** NpaNxx(205298,hm=brhmalch,{},#p=1,#l=1996)

Note: This is not a network element.

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#### Line 6 – Wire Center Level Data

**Output:** WC(brhmalch,10/08/2001,205967,tdl=18.0,cap({ADSL},<no date>),{ })

6, <wc cli> = LEIS 8 character wire center CLLI (Common Language Location Identifier) Code

6, mm.dd.yyyy = extract date of current wire center data being used in Loop Qual

6, npanxx = primary npanxx of this wire center

6, tdl = wire center specific taper code dead length. If the taper code exceeds this length, all lines are **disqualified** to minimize false positive qualifications

6, cap = system software parameter indicating ADSL capability and date if planned

#### Line 7 – Living Unit Data

**Output:** LivingUnit(1auc6.4,sz=1,cap=null)

The Living Unit ID (LUID) is a value from LFACS for this specific address utilized by the system software. This is not a network data element.

#### Line 8 – System Oriented Wire Center Proxy Data

**Output:** WireCenterProxy(205298,brhmalch,{ },#=1996)

This data has **no** value to a Network user. This is not a network data element.

#### Line 9 – Taper Code Information

**Output:** Taper(111901,{ },(14.1+3.9=18.0))

9, <taper code> = the taper code of the customers serving terminal

9, XB = the x-box that LQS associates with this taper code. This data can be ambiguous if there are multiple taper codes associated with an x-box.

9, (f1.f1, f2.f2, tot.tot) = Outside Plant District provided; F1/F2/Total distances for this taper code

F1 = distance from the central office to the x-box for copper fed x-boxes

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F2 = maximum distance from x-box to the distribution terminal for that taper code

**Line 10 – F1 Cable Information**

**Output:** F1Cable(8,{}),p=136

F1 = First Loop Segment for the CO

10, F1 cable = F1 cable assignment

10, F1 pair = F1 pair assignment

**Line 11 – Serving Terminal Information**

**Output:** DT(r 3827 river view dr,{},cap{<no date>,null,(0,0,0))

11, provides serving terminal name in LFACS database

11, cap = system capability for this terminal and date if planned

11, (aaa,bbb,ccc) = working line info for this x-box

aaa = total lines working in this terminal

bbb = **copper** ADSL qualified lines working in this terminal. (Qualified from the CO.)

Note: A remote DSLAM (Digital Sub Line Access Multiplexer) makes this number irrelevant.

ccc = pg lines working in this terminal

**Line 12 – FN/F2 Crossbox Information**

**Output:** FnCrossBox(802,{},cap{<no date>),(1,0,0),null),p=1036

F2 = Second Loop Segment from the CO.

12, FnCrossBox = the f2 cable name associated with this telephone number values = null if none, f2 cable name, or mr/ahj name if existing ADSL service

12, cap = system capability for this x-box and date if planned

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12, (aaa,bbb,ccc) = working line info for this x-box

aaa = total lines working in this x-box

bbb = copper ADSL qualified lines working in this x-box. (Qualified from the CO.)

Note: A remote DSLAM makes this number irrelevant.

ccc = pg lines working in this x-box

12, pair = F2 pair assignment.

#### 4.7 Internal Reason Codes (Positive LQS Response)

Internal Reason Codes are provided for **positive** Internal Response Results. In order to properly understand the Internal Response Results, the following information is furnished to provide an explanation of the possible Internal Reason Codes.

##### **IQ1 = Copper-qualified loop**

This copper loop **does** qualify for ADSL service.

##### **IQ2 = Pair Gain loop qualified with copper-qualified cross-box**

This customer is currently served via Digital Loop Carrier (DLC) that will **not** support ADSL service. However, records indicate 10 or more qualified copper pairs do exist at the cross-box. A Facility Reservation Number must be obtained by the D/CLEC in order to move the customer to an unloaded copper pair suitable for Line Sharing.

##### **IQ3 = Qualified through Remote DSLAM on cross-box**

This response code means BellSouth has an existing remote solution (Remote DSLAM) available in the Remote Terminal (RT) in which this customer receives their voice service.

**NOTE:** Due to the proactive logic in LQS, this code masks any other codes describing the loop currently serving the customer. The only valid assumption will be that the F2 portion of the customer loop is qualified for a type of ADSL.

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#### **IQ4 = Qualified through Straight F1 on distribution terminal**

This copper loop **does** qualify for ADSL service and is served by an F1 facility only. (It does **not** pass through a cross-box).

#### **IQ5 = Qualified through CMS Update**

BellSouth has an existing or planned Integrated Fiber In The Loop (IFITL) remote solution serving this customer.

#### **IQ6 = F1 Loaded loop qualified by copper-qualified cross-box**

This customer is currently served via a loaded copper pair that will **not** support ADSL service. However, records indicate 10 or more qualified unloaded copper pairs do exist at the cross-box. A FRN must be obtained by the D/CLEC in order to move the customer to an unloaded copper pair suitable for Line Sharing.

#### **IQ7 = F1 Loaded qualified by copper qualified distribution terminal**

This customer's specific pair will not support ADSL service. However, other pairs in this customer terminal can provide ADSL service and it is allowed to qualify on the assumption the line can be moved to an ADSL capable pair.

#### **IQ8 = PC Data qualified through LEIS-LEAD update**

BellSouth has an existing IFITL remote solution serving this customer that is capable of carrying ADSL service.

#### **IQ9 = Qualified by RZ override**

A system override of the stored RZ has been applied. This occurs when the F1+F2 distance < 14.0 KF.

#### **IQ10 = Qualified for ADSL over fiber- MX**

BellSouth has an existing or planned Data Over Fiber In The Loop (DFITL) remote solution serving this customer.

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#### **IQ11 = Qualified for ADSL over fiber- AX**

BellSouth has an existing or planned DFITL remote solution serving this customer.

#### **IQ12 = Force-qualified through remote capability on individual loop.**

Loop manually forced to qualify for some reason. Generally, this means there is a field notification of a records problem in LFACS. It is force qualified to insure it will qualify in the system.

#### **IQ13 = Pair Gain qualified by copper-qualified distribution terminal**

This customer's specific pair will not support ADSL service. However, other pairs in the customer's terminal can provide ADSL service and it is allowed to qualify on the assumption the line can be moved to an ADSL capable pair. This is the same as IQ7 but on a pair gain rather than a loaded F1 pair.

#### **IQ14 = Conditional qualification; CO DAML**

Effective with Release 8.8, a previously unqualified DAML line will now be allowed to qualify. In addition, an assessment is made to determine the ability to provision ADSL service. A DAML is an electronic unit that puts two (2) telephone numbers on one copper/pair gain facility. This renders the line unusable for ADSL service and this new qualification requires a review of the facility to provide ADSL service, if possible.

#### **E6 = When the loop data does *not* exist in LQS, the external code E6 is given and repeated in the internal code field>**

### **4.8 Speed Codes**

In addition to Internal Reason Codes, Speed Codes are also furnished with "positive" response codes. In order to properly understand the Internal Response Results, the following information is furnished to provide an explanation of the possible Speed Codes.

The table on the next page provides translations for speed codes returned in LQS for loops qualified as A,C. The speed code indicates the conservative maximum BellSouth ADSL service rate that may be purchased for that loop *without* a Service Inquiry.

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**LQS RETURN CODES (MAXIMUM SPEED SUPPORTED BY A QUALIFIED LOOP)**

Speed Code	Estimated Maximum Speed	Business or Industrial	USOC	Downstream Rate	Upstream Rate
A5	6.5KF	Business Class	ADL51	4-6 Mbps	640 Kbps
B5	8.0KF	Business Class	ADL41	2-4 Mbps	640 Kbps
C5	9.4KF	Business Class	ADL31	1.5 Mbps	512 Kbps
D5	9.5KF	Business Class	ADL61	768 Kbps	512 Kbps
E5	12.0KF	Business Class	ADL21	384 Kbps	384 Kbps
F5	15.5KF	Business Class	ADL71	192 Kbps	192 Kbps
L0	18.0KF (Copper ADSL) or PC-Data (Fiber) or remote DSLAM	Industrial Class (Also known as Consumer/Residential rate)	ADL11, ADL12	1.5 Mbps max	256 Kbps max

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**4.9 Positive Response Results**

The following table indicates the format of possible *External* and *Internal* Reason Codes for positive response results received from LQS.

External Reason Code	Internal Reason Code
A, C, Speed Code	IQ1, Copper-qualified loop
	IQ2, Pair Gain loop qualified with copper-qualified cross-box (requires cut-over)
	IQ3, Qualified through Remote DSLAM on crossbox. CAUTION: Pair Gain loop - See note below for this code.
	IQ4, Qualified through Straight F1 on distribution terminal
	IQ6, F1 Loaded loop qualified by copper-qualified cross-box (requires cut-over)
	IQ9, Qualified by RZ Override
A, F	IQ5, Qualified through CMS update
	IQ8, PC-Data qualified through LEIS-LEAD update
	IQ10, Qualified for ADSL over fiber-MX
	IQ11, Qualified for ADSL over fiber-AX
P, C, Speed Code, Date	Planned for service on Copper
P, F, Date	Planned for Service on Fiber

**Note:** A,F denotes end-user is in an ALL-FIBER neighborhood, also called IFITL. BellSouth provides broadband to these customers via PC DATA, which is an Ethernet-based architecture. D/CLECs should treat telephone numbers that return A,F in LQS as *unqualified*.

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**4.10 Internal/External Reason Codes (Negative LQS Response)**

When a negative LQS response is received, as with a positive response, reason codes will be given. The table below shows these reason codes and includes both positive and negative feedback. The external reason codes are actually error codes that will be explained in Section 4.11 of this document.

External Reason Codes	Internal Reason Codes
Null	When paired with certain External Reason Codes, such as E2, this code may be null.
E0 – Request ignored – file size limit	Same
E1 – Syntax error in phone number	Same
E2 – Service is not available for this phone number	I1: Copper loop with RZ>13 I2: Copper loop is loaded I3: Copper loop has Digital Added Main Line (DAML) I4: Pair Gain Loop with no Remote Solution I5: Taper code is a dead zone I6: Loop has PG DAML I7: Fn cable is loaded I9: Terminal CZ > 9 I10: Existing service category not compatible I11: Phone number is foreign exchange I12: Taper code exceeds distance limit <Max F1 Distance + Max Fn Distance>. Limit = <Taper Distance Limit> I13: NPA-NXX is not found I14: Taper code Max F1 Distance = 0.0 KF I15: PE status not recognized as WKG, CT, or PRU I16: No loops found in NPANXX I17: Forced disqualified loop: SOEG transmission problem with line (Was Dead Loop) I18: Filtered by wire center

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External Reason Codes	Internal Reason Codes
	<b>I19: Dead loop: Different Premises Address (DPA)</b>
	<b>I20: Existing USOC (Universal Service Order Code) is incompatible</b>
<b>E3 – Loop currently unqualified. Please try again later.</b>	<b>I4: Pair gain loop with no Remote DSLAM</b>
	<b>I8: Wire center not DSLAM-equipped</b>
<b>E4 – Existing service type is incompatible</b>	<b>Same</b>
<b>E5 – Not used</b>	<b>Same</b>
<b>E6 – Loop information currently not available.</b>	<b>Same</b>
<b>E7 – Not used</b>	<b>Same</b>
<b>EA1 – Syntax error in Address Key</b>	<b>Same</b>
<b>EA2 – Address Key is not valid</b>	<b>Same</b>
<b>EA3 – Address is not F/C capable</b>	<b>Same</b>

**4.11 Not Qualified Response Results**

This section explains the reason codes (internal and external) that may be received indicating why the loop *cannot* be qualified.

**E1 – “Syntax error in phone number”**

- Invalid telephone number format or character found

**E2 - “Service is not available for this phone number”**

Internal Codes I1, I9 I12, and I14

- The loop is too long to support ADSL
  - I1: overall loop resistance > 1300
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- I9: Carrier Zone > 900
- I12: Taper code exceeds distance limit <Max F1 Distance + Max Fn Distance>. Limit = <Taper Distance Limit>. Example: 13.27+6.1=19.37).

In this example: F1 length is 13.27 KF; maximum length of distribution pair is 6.1 KF; Total is 19.37 KF. This exceeds the 18.0KF maximum.

- I14: Taper code Max F1 Distance = 0.0 KF; in taper code file, if cross-box is entirely PG fed, shows 0.0 KF distance; would only qualify based on remote solution.

#### Internal Codes I2 and I7

- The loop contains one or more load coils.

#### Internal Codes I3 and I6

- The phone number is on a DAML.

#### Internal Code I5

- The customer falls within a known "dead" zone, an area flagged by maintenance personnel where ADSL is known not to work.

#### Internal Code I10

- The line is not POTS or plain Centrex.
- There may be existing ADSL or Line Sharing on the line

#### Internal Code I11

- The phone number is a Foreign Exchange/Foreign Central Office (FX/FCO) line.

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#### Internal Code I13 and I16

- The NPA-NXX belongs to one customer (e.g. a University) and all numbers in the range are PBX (Private Branch Exchange) DID (Direct Inward Dialing) or Primary Rate ISDN numbers

OR

- The NPA-NXX belongs to a CLEC

OR

- The NPA/NXX is a BellSouth NPA/NXX but currently has no working loops

#### Internal Code I15

- The Pair Evaluation (PE) status of the loop must be WKG (Working), CT (Connect Through) or PRU (Pair Restriction Usage) status or the TN (Telephone Number) is incompatible for PE reasons.

#### Internal Code I17

- Outside plant engineering has determined that this TN is incompatible with ADSL services even though it originally qualified; future qualification is prevented.

#### Internal Code I18

- Custom filter established for designated wire centers (would never appear on CLEC response)

#### Internal Code I19

- TN appears in multiple locations, either in same wire center or different wire centers; incompatible with ADSL

#### E3 - "Loop currently unqualified. Please try again later"

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#### Internal Code I4

- The loop is behind a digital loop carrier system and no Remote DSLAM is available.

#### Internal Code I8

- This central office is not equipped with a BellSouth DSLAM.

#### E4 - "Existing Service type is Incompatible"

- Service generally available to this location, but loop is not a BellSouth-provided exchange access line as required by the tariff to provision ADSL.

#### E6 - "Loop information currently not available"

When the loop data does not exist in LQS, external code E6 is given and it is repeated in the internal code field.

- The phone number is on an ISDN line.
- The phone number is newly installed and not yet in LQS.
- The phone number is a DID behind a PBX.
- The phone number is served via Primary Rate ISDN.
- The phone number may belong to a facilities-based CLEC and is outside of BellSouth's network.

**Note:** LQS triggers a forced refresh on an E6 response. If this is a valid BellSouth number, the number will be recognized in LQS within 48 hours. It may or may not qualify at that point based upon other existing LQS qualification criteria

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**4.12 Logic Sequence of LQS**

LQS will stop the search and logic routines when the first error condition appears. That error will be reported. It does not continue and find all error codes prior to stopping the search. The table below indicates the error checking sequence utilized by LQS.

<b>Error Item</b>	<b>Output Upon Error Identification</b>
1) Check Taper Code for dead zone.	Check for existence of NPA-NXX. 15: Taper Code is a dead zone
2) Check for proper input.	E1: Syntax error in phone number
3) Check for existence of NPA-NXX.	Check for existence of NPA-NXX I13: NPA-NXX not found
4) Check for existence of loop in database	E6: Loop information currently not available.
5) Check for FX (Foreign Exchange) Service	E2: Service not available I11: Phone Number is Foreign Exchange I19: Dead Loop: Different Premises Address (DPA)
6) Check for incompatible services	E2: Service not available I10: Existing Service Category not compatible
7) Check if Remote Solution exists: If Remote Solution exists, check for copper F2:	
A) Loading	E2: Service not available 17: FN cable is a loaded DAML
B) Presence of DAML	E2: Service not available 16: Loop has DAML
C) Carrier Zone >900Ω	E2: Service not available 19: Terminal CZ>9
If NO remote Solution exists: Check for Copper, then DLC.	

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<b>Error Item</b>	<b>Output Upon Error Identification</b>
8) Check for loaded copper pair	<b>E2: Service not available I2: Copper loop is loaded</b>
9) Check for DAML presence	<b>E2: Service not available/ I3: Copper loop has DAML</b>
10) Check to see if loop is not in "dead zone"	<b>E2: Service not available/ I5: Tape Code is a dead zone</b>
11) Check if loop is not a Foreign Exchange (FX)	<b>E2: Service not available/ I11: Telephone Number is Foreign Exchange</b>
12) Check if loop is not disqualified because of E2: Service not available...transmission problems previously discovered	<b>I17: Forced disqualified. Transmission problem with line.</b>
13) Check if loop not DPA (Different Premises Address)	<b>E2: Service not available/ I19: DPA</b>
14) Check if loop is not service-incompatible with ADSL (including PBX trunk).	<b>E2: Service not available/ I10: Existing service category incompatible</b>
15) Check if loop does not have DAML	<b>E2: Service not available/ I3: Copper Loop has DAML</b>
16) Check if loop is not Taper Code Disqualified	<b>E2: Service not available/ I12: Taper Code exceeds distance limit</b>
17) Check if loop is UNE-P	<b>E2: Service not available/ I20: existing USOC is incompatible</b>

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Error Item	Output Upon Error Identification
18) Check for RZ Code	E2: Service not available I1: Copper loop with RZ>13
19) Check for DLC presence	E2: Service not available I3: Copper loop has DAML
20) Check Taper Code length.	E2: Service not available I12: Taper Code distance
21) Check for BellSouth DSLAM	E3: Loop currently unqualified I8: Wire Center not DSLAM-equipped

Since LQS performs the check for the presence of a BellSouth DSLAM, if LQS shows the error, "The Central Office" is not equipped with ADSL", the loop can be assumed but not guaranteed to be qualified.

If LQS finds the existence of a BellSouth Remote Solution, most of the data about the loop is ignored except for F2 qualifications. Therefore, if LQS shows the response "Qualified Through Remote Solution", only the F2 portion of the loop can be assumed to be qualified. Typically, these serving arrangements will not have copper pairs available. A Manual Loop Makeup needs to be requested in these situations to determine if any copper pairs exist at the remote terminal site.

Numbers not having an LFACS cable pair assignment, such as the phone in a Collocation space, will not show up in LQS.



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## Loop Qualification System (LQS) CLEC Pre-Ordering and Ordering Guidelines

### Chapter 5.0: Acronyms

ADSL	Asymmetric Digital Subscriber Line
BBR-LO	BellSouth business Rules – Local Ordering
CC	Company Code
CF	Connected Facility
CLEC	Competitive Local Exchange Carrier
CLLI	Common Language Location Identifier
CO	Central Office
CT	Connect Through
DAML	Digital Added Main Line
DFITL	Data Over Fiber In The Loop
DID	Direct Inward Dialing
DLC	Digital Loop Carrier
DLEC	Data Local Exchange Carrier
DPA	Different Premises Address
DSLAM	Digital Sub Line Access Multiplexer
FCC	Federal Communications Commission
FCO	Foreign Central Office
FRN	Facility Reservation Number
FX	Foreign Exchange
GUI	Graphical User Interface
ID	Identification

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### Chapter 5.0: Acronyms

IFITL	Integrated Fiber In The Loop
ISDN	Integrated Services Digital Network
ISP	Internet Service Provider
LCM	Local Contract Manager
LEAD	Loop Engineering Assignment Data
LFACS	Loop Facilities Assignment and Control System
LMU	Loop Makeup
LMUSI	Loop Makeup Service Inquiry
LOA	Letter of Authorization
LSM	Local Support Manager
LQS	Loop Qualification System
LSP	Local Service Provider
LUID	Living Unit Identification
OEC	Outside Plant Equivalence Code
PBX	Private Branch Exchange
PC	Personal Computer
PCF	Partially Connected Facility
PE	Pair Evaluation
POTS	Plain Old Telephone Service
PRU	Pair Restriction Usage

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**Loop Qualification System (LQS)  
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**Chapter 5.0: Acronyms**

RT	Remote Terminal
SI	Service Inquiry
TN	Telephone Number
USOC	Universal Service Order Code
WKG	Working



DOCKET NO. 020507-TP

EXHIBIT NO. \_\_\_\_\_ (JMB-5)



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**Electronic Loop Makeup (LMU)  
CLEC Pre-Ordering and Ordering Guide**

***DICLEC  
Pre-Ordering and Ordering Guide  
For  
Electronic Loop Makeup  
(LMU)***

*(Version 5, August 1, 2002)*

*Date of Version 08/01/2002  
Version 5*



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## Electronic Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guide

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## Electronic Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guide

### Chapter 1.0 – Introduction

#### 1.1 Purpose and Scope

This Information Package is intended to provide D/CLECs (Data/Competitive Local Exchange Carriers) a description and general information specific to processing an electronic request for Loop Makeup (LMU). This document is an updated version and does not address Loop Modification.

Please contact the BellSouth SME (Subject Matter Expert) for BellSouth **Electronic** Loop Makeup if you have questions about the information contained within.

#### 1.2 Disclaimer Statement

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

This guide will be maintained until such time that its content is incorporated into the BellSouth Business Rules – Local Ordering (BBR-LO). The BBR-LO is found at:

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



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**1.3 Version History/Control**

Any future modifications and/or improvements that are made to this package will be reflected accordingly in this section of the document.

<b>Section</b>	<b>Date/Version</b>	<b>Description</b>
All	03/16/2001 – Issue 1.0	Initial Issue Release
All	06/04/2001 – Issue 2.0	Updated Issue Release Chapters renumbered to omit Table of Contents as a Chapter to comply with KPMG and BellSouth Intellectual Properties Guidelines. Chart on Page 11 added.
Chapter 1.0, Section 1.2	02/07/2002 –Version 3	Disclaimer statement
Table of Contents	02/07/2002 –Version 3	Updates made to Chapter 4.0 Sections and Tables
Chapter 2.0, Section 2.1	02/07/2002 –Version 3	Introduce verbiage re: the Letter of Authorization (LOA)
Chapter 3.0, Section 3.5	02/07/2002 –Version 3	Focuses on the specifics associated with obtaining LMU data for other CLEC owned facilities where the LOA is required
Chapter 4.0, Section 4.3	02/07/2002 –Version 3	Updates to various bullet points, especially pertaining to LOA
Chapter 4.0, Section 4.3	02/07/2002 –Version 3	Updates to various bullet points
Chapter 4.0, Section 4.5	02/07/2002 –Version 3	Addresses the facility reservation number (FRN) ( <i>top</i> )
Chapter 6.0	02/07/2002 –Version 3	Various acronyms added, especially pertaining to LOA
Chapter 3.0, Section 3.5	07/03/2002 – Version 4	Provided additional clarification on the circumstances when a CLEC would order a working UNE facility ( <i>bottom</i> )
Chapter 4.0, Section 4.4	07/03/2002 – Version 4	Added the "Search Hierarchy Table" ( <i>bottom</i> )
Chapter 4.0, Section 4.4	07/03/2002 – Version 4	Expanded the "LFACS Spare Loop Selection Criteria Table" with additional NC / NCI / SECNCI codesets
Chapter 4.0, Section 4.4	07/03/2002 – Version 4	Inserted the "BellSouth LATY Values" Table directly after the LFACS table

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Chapter 5.0, Section 5.1	07/03/2002 – Version 4	Revised the LMU data definitions with additional clarification
Chapter 4.0, Section 4.4, <i>Table 4.4.2</i>	08/01/2002 – Version 5	For the LENS Loop Service Type "UVL-2W/SL2 Loop Start" the SPD value changed from D to A
Chapter 5.0, Section 5.1	08/01/2002 – Version 5	Clarifies that for the "SSC" data field output that DAML for two telephone numbers reflects incompatibility with ADSL service.
Chapter 5.0, Section 5.2	08/01/2002 – Version 5	Updates the user that the presentation "Informational Seminar on Electronic LMU" is available via BellSouth's Interconnection web site

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## Electronic Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guide Chapter 2.0 – Overview

### Electronic Loop Makeup Overview

Loop Makeup is described as the physical characteristics of the loop facilities, starting at the BST (BellSouth Telecommunications) CO (Central Office) listed in chronological order and ending at the service distribution terminal. LMUs consist of cable gauge and length, BTs (Bridge Taps), LCs (load coils), presence of DLC (Digital Loop Carrier) and any other equipment that is part of the local loop facilities.

BellSouth's provision of loop data to the requesting D/CLEC is contingent upon the ownership considerations of the loop whether by BellSouth or the requesting D/CLEC. The requesting D/CLEC is **not** authorized to receive loop data on a loop owned by another D/CLEC unless authorization is specifically granted by the owning CLEC and the Letter of Authorization (LOA) is on file with BellSouth.

The loop makeup of **spare** facilities may be requested with **or** without reservation. Quite simply this means that the D/CLEC has the option of reserving or not reserving the facilities.

In summary, the functionality of the electronic loop makeup deployment allows the requesting D/CLECs to:

- Determine loop "makeup" detail on specific facilities
- Determine independently if an end user's loop is capable of supporting their implementation of xDSL (Digital Subscriber Line) or line sharing services
- View existing facilities (identified telephone number or circuit ID (Identifier)) when the facilities are owned by the submitting D/CLEC or BellSouth or if the D/CLEC has been authorized by the owning CLEC.
- Query for new/spare facilities owned by BellSouth
- Reserve new/spare facilities for ninety-six (96) hours excluding weekends and BellSouth observed holidays
- Cancel unneeded reservations for new/spare facilities within the ninety-six (96) hour timeframe.



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## Electronic Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guide

### Chapter 3.0 – General Guidelines

#### 3.1 Availability

BellSouth offers this service in all nine states within the BellSouth region.

#### 3.2 Standard Service Interval

The Standard Service Interval for response to an electronic LMU request is near real time. Once the request is initiated, loop data will be obtained via BellSouth's Loop Facilities Assignment and Control System (LFACS). The information returned to the D/CLEC from LFACS will be discussed in detail later in this document.

#### 3.3 Contract Specific Guidelines

Before an electronic request for LMU may be submitted, the D/CLEC must have an Interconnection Agreement that includes terms, conditions, and rates for the LMU inquiries being requested. This agreement must be in effect for all states where the D/CLEC plans to provide telecommunications services, as stipulated in the terms and conditions identifying those states wherein the D/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 D/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.

The respective Local Contract Manager (LCM) for each D/CLEC should be contacted if questions arise concerning contract provisions.

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## Electronic Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guide

### Chapter 3.0 – General Guidelines

#### 3.4 D/CLEC Responsibilities

BellSouth provides LMU service to allow the D/CLEC the opportunity and responsibility of determining the qualification for itself of BellSouth's loops for the specific services that the D/CLEC wishes to provide over certain loops. BellSouth further recognizes that the D/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 D/CLEC bears full responsibility for being knowledgeable of BellSouth's standards and specifications for BellSouth's loops. The D/CLEC also bears full responsibility for making the appropriate ordering decisions of matching BellSouth loops with D/CLEC equipment that will accomplish the D/CLEC's goal for the intended service it wishes to provide its end user(s).

The D/CLEC is responsible for any of its service configurations that may differ from BellSouth's technical standard of that service. BellSouth reserves the right to change out the originally assigned facility for another facility that matches the BellSouth technical standards of the loop ordered by the D/CLEC.

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## Electronic Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guide

### Chapter 3.0 – General Guidelines

#### 3.5 Pre - Ordering Information

LMU is provided for BellSouth spare facilities and for working facilities when the ordering CLEC or BellSouth is the end user's voice loop service provider. These LMU requests do **not** require a LOA.

A Letter of Authorization is required when the D/CLEC or BellSouth is **not** the voice loop service provider. The LOA Process provides authorization from the voice loop owner, when/if the D/CLEC (ordering party) is **not** the owner of the voice loop. LMU will be provided on any request when the authorization provided by the requesting Carrier is a valid match to the ownership of the account. On the LOA, there are 3 required fields for mechanized LMU requests on working loops owned by another CLEC. These required fields include the following:

- **LSP AUTH (Local Service Provider Authorization)**

Company Code (CC) - a 4 numeric code of the CLEC granting the LOA

- **LSP AUTHDATE (Local Service Provider Authorization Date)**

Date formatted as month, day, and year (MMDDYYYY) – an 8 numeric date representing the date the LOA was granted

- **LSP AUTHNAME (Local Service Provider Authorization Name)**

Name of the CLEC owner authorizing the LOA and signing it – 15 alphanumeric

When the requirements are not met for these 3 fields, the mechanized system will return messages indicating that information is missing or incorrect.

It is worth noting that the only time a CLEC may order a UNE facility where loop makeup has already been conducted on that facility and returned with a response status of "WKG" for working is in the case of either line sharing or line splitting. Working facilities



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have already been assigned to a voice and/or voice + data carrier. For stand-alone UNE facilities, a CLEC should request LMU on spare facilities so that such facilities may be available for ordering, assignment, and provisioning.

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The entire LOA guidelines for processing a LOA are located on the following web sites:

<http://interconnection.bellsouth.com/2partyagree>

[http://www.interconnection.bellsouth.com/markets/lec/line\\_splitting\\_collab/index.html](http://www.interconnection.bellsouth.com/markets/lec/line_splitting_collab/index.html)

[http://www.interconnection.bellsouth.com/guides/html/lens\\_tafi.html](http://www.interconnection.bellsouth.com/guides/html/lens_tafi.html)



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## Electronic Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guide Chapter 4.0 – Ordering Information

Electronic Loop Makeup may be ordered in several ways. The method discussed in this guide is LENS (Local Exchange Navigation System)

### 4.1 LENS

The D/CLEC can request electronic loop makeup through LENS. LENS is an on-line, interactive, menu driven system that permits subscribers to perform pre-order inquiry functions and process requests for various products, features, and services currently offered by BellSouth.

For additional information on LENS, the D/CLEC should contact their specific Local Contract Manager or review the Customer Guides section of the BellSouth Interconnection Services Web site at:

[http://www/interconnection.bellsouth.com/guides/html/lens\\_tafi.html](http://www/interconnection.bellsouth.com/guides/html/lens_tafi.html)

### 4.2 D/CLEC LENS Required Input

The D/CLEC xDSL pre-order LMU transaction in LENS requires the user to input certain data based on the specific type of facility involved.

From the LENS Main Menu, click Inquiry. The Inquiry Screen will appear. From the pull down menu select one of the following:

- **Loop Makeup for Working Loops** (existing facilities)
- **Loop Makeup for Spare Facilities** (new or spare facilities)
- **Cancel Facilities Reservation** (cancel previously reserved loop makeup facilities)

*continued on next page*



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## Electronic Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guide

### Chapter 4.0 – Ordering Information

#### Section 4.3 Existing Facilities

For existing facilities, the *Loop Makeup for Working Loops* will be selected. The following *required* data must be entered:

- Enter the telephone number or service address
- Select the area where the telephone number or service address is located
- Once the above information is entered, click "Validate".
- The system will verify the telephone number or service address
- Once the telephone number or service address has been validated, click "Proceed with Inquiry".
- A prompt will be received for LOA information. If LOA is required, enter the valid LOA data.
- Select "Submit Inquiry"

The next screen, **Processing Request**, will come up with the following message:

#### **Processing**

**The loop makeup request normally takes 30-45 seconds to process –  
please wait for a response before proceeding.**

The information returned from LFACS as a result of this inquiry will be discussed in **Chapter 6.0 Output Returned From LFACS**.

*continued on next page*



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## Electronic Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guide

### Chapter 4.0 – Ordering Information

#### Section 4.4. New or Spare Facilities

For requests for loop makeup involving *new* or *spare* facilities, the **Loop Makeup for Spare Facilities** should be selected and the following **required** entries made:

- Enter the telephone number or service address
- Select the area where the telephone number or service address is located
- Once the above information is entered, click “Validate”
- The system will verify the validity of the telephone number or service address
- Once the telephone number or service address has been validated, click “Proceed with Inquiry”
- A prompt will be received to select the Loop Service Type for the spare facility type. The default Loop Service Type is POTS1. Additionally, the search hierarchy (described below) and the number of spare loops may be selected.
- Select “Submit Inquiry” to search for loops without reserving them (select “Submit Reservation Request for the Number of Spare Loops Indicated Above” to search for loops and simultaneously reserve the facilities, if available).

On the next page begins a chart depicting the LFACS Spare Loop Selection Criteria. Beyond this chart is an associated chart depicting the BellSouth Loop Assignment Type (LATY) codes. Bear in mind, CLECs may also choose to define their search hierarchy on spare facilities according to the hierarchy values and definitions below.

LENS Value	Definition
Standard Default (POTS1)	Standard default – based on type of service requested (selection preference for POTS1 is given in this order: Integrated DLC, Universal DLC, and then copper (either loaded or non-loaded).
Copper (NL, L), UPG, IPG-SDP=D	Non-loaded copper Loaded copper Universal pair gain Integrated pair gain with side door port

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UPG, IPG-SDP=D, METAL	Universal pair gain Integrated pair gain with side door port Metal
Copper (L, NL), DLC	Loaded copper Non-loaded copper DLC (Digital Loop Carrier)

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NC	NCI	SECNCI	EN	SS	UC	Notes
(Null)	(Null)	(Null)	(Null)**	POTS1 (Single Party POTS)	N/A	LFACS will return loops that will support 2-wire, single party, voice grade loops. Selection preference is given in this order Integrated DLC, Universal DLC, and then copper (either loaded or non-loaded)
			**DEFAULT			
LXR*	02QB9 00 A	02DU9 00A	ADSL (2-wire)	SS12 (Program, High Capacity, Wideband, 2-wire Low-Speed DDS)	UC	LFACS will return 2-wire loops that are non-loaded copper only from the CO to the end user.
LXC*	02QB9.00 H	02DU9 00H	HDSL (2-wire)	SS12 (Program, High Capacity, Wideband, 2-wire Low-Speed DDS)	UC	LFACS will return 2-wire loops that are non-loaded copper only from the CO to the end user
LXC*	04QB9 0 0H	04DU9 00H	HDSL (4-wire)	SS12 (Program, High Capacity, Wideband, 4-wire Low-Speed DDS)	UC	LFACS will return 4-wire loops that are non-loaded copper only from the CO to the end user.
LX*N or LX*#	02QC3 O OF	02NO2	Short Copper Loop (2-wire) or Long Copper Loop (2-wire)	SS12 (Program, High Capacity, Wideband, 2-wire Low-Speed DDS)	UC	LFACS will return 2-wire loops that are non-loaded copper only from the CO to the end user
LX*N or LX*#	04QC3 O OF	04NO2	Short Copper Loop (4-wire) or Long Copper Loop (4-wire)	SS12 (Program, High Capacity, Wideband, 4-wire Low-Speed DDS)	UC	LFACS will return 4-wire loops that are non-loaded copper only from the CO to the end user.

*The following NC | NCI | SECNCI codesets below are newly documented with the posting of Version 4.*

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TY--	(Null)	(Null)	UVL-2W/SL1 Loop Start	POTS-1 (Analog VG Non-Designed SL1 - Loop Start)	UN	LFACS will return loops that will support 2-wire, single party, voice grade loops. Selection preference is given in this order: Universal DLC, and then copper (either loaded or non-loaded). IDLC is not compatible
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LY--	02QC3 O OD	02LS2	UVL-2W/SL2 Loop Start	POTS-1 (Analog VG Non-Designed SL2 - 2-wire Loop Start)	UN	LFACS will return loops that will support 2-wire, single party, voice grade loops. Selection preference is given in this order: Integrated DLC, Universal DLC, and then copper (either loaded or non-loaded) IDLC must have SDP=A to be compatible
LY--	04QC2 O OD	04LS2	UVL-4W/SL2 Loop Start	SS-6 (Analog VG Designed SL2 - 4- wire Loop Start)	UN	LFACS will return loops that will support 4-wire, designed, voice grade loops. Selection preference is given in this order: Integrated DLC, Universal DLC, and then copper (either loaded or non-loaded) IDLC must have SDP=D to be compatible
LY--	02QC3.O OB	02GS2	UVL-2W/SL2 Ground Start	SS-1L (Analog VG Designed SL2 - 2- wire Ground Start)	UN	LFACS will return loops that will support 2-wire, designed, voice grade loops. Selection preference is given in this order: Integrated DLC, Universal DLC, and then copper (either loaded or non-loaded). IDLC must have SDP=D to be compatible.
LY--	04QC2 O OB	04GS2	UVL-4W/SL2 Ground Start	SS-6 (Analog VG Designed SL2 - 4- wire Ground Start)	UN	LFACS will return loops that will support 4-wire, designed, voice grade loops. Selection preference is given in this order: Integrated DLC, Universal DLC, and then copper (either loaded or non-loaded). IDLC must have SDP=D to be compatible
LY--	02QC3 RV O	02RV2 T	UVL-2W/SL2 Reverse Battery	SS-2L (Analog VG Designed SL2 - 2- wire Reverse Battery)	UN	LFACS will return loops that will support 2-wire, designed, voice grade loops. Selection preference is given in this order. Integrated DLC, Universal DLC, and then copper (either loaded or non-loaded). IDLC must have SDP=D to be compatible
LY--	04QC5 O OJ	04DU5 24	UDL-4W/DSO 2.4 KBPS	SS-8 (Digital Data Designed DSO - 2.4 KBPS)	N/A	LFACS will return loops that will support digital data. Loops must be non-loaded or DLC IDLC must have SDP=D to be compatible

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LY--	04QC5 O OK	04DU5.48	UDL-4W/DSO 4 8 KBPS	SS-8 (Digital Data Designed DS0 - 4.8 KBPS)	N/A	LFACS will return loops that will support digital data. Loops must be non-loaded or DLC. IDLC must have SDP=D to be compatible
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**Chapter 4.0 – Ordering Information**

LY--	04QC5.O OL	04DU5.96	UDL-4W/ DSO 9 6 KBPS	SS-8 (Digital Data Designed DS0 - 9 6 KBPS)	N/A	LFACS will return loops that will support digital data. Loops must be non-loaded or DLC. IDLC must have SDP=D to be compatible.
LY--	04QC5.O OM	04DU5 19	UDL-4W/DSO 19 2 KBPS	SS-8 (Digital Data Designed DS0 - 19.2 KBPS)	N/A	LFACS will return loops that will support digital data. Loops must be non-loaded or DLC. IDLC must have SDP=D to be compatible.
LY--	04QC5 O OP	04DU5.56	UDL-4W/DSO 56 KBPS	SS-9 (Digital Data Designed DS0 - 56 KBPS)	N/A	LFACS will return loops that will support digital data. Loops must be non-loaded or DLC. IDLC must have SDP=D to be compatible.
LY--	04QC5 O OQ	04DU5 64	UDL-4W/DSO 64 KBPS	SS-9 (Digital Data Designed DS0 - 64 KBPS)	N/A	LFACS will return loops that will support digital data. Loops must be non-loaded or DLC. IDLC must have SDP=D to be compatible.

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HC*-	04QB9 11	04DU9 BN or 04DU9.1KN or 04DU9.DN or 04DU9.1SN	UDL-4-W DS1 & ISDN	SS-11 (Digital Data Designed DS1 - ISDN: AMI-SF, AMIESF, B8ZS-SF, B8ZS-ESF)	N/A	LFACS will return loops that will support, wideband high capacity, 1 544 Mbs Digital Data Rate loops. Selection preference is given in this order: Equipped multiplexer pairs, T1 conditioned non-loaded copper only (DLC and loaded copper are incompatible)
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**Chapter 4.0 – Ordering Information**

LY--	02QC5 O OS	02IS5	UDL-2W Basic Rate ISDN	ISDNB1 (Basic Rate ISDN)	UD	LFACS will return loops capable of supporting basic rate ISDN. Copper loops must be non-loaded, DLC and side door IDLC are compatible in some instances.
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**NOTES:**

Where an asterisk (\*) is shown in association with a NC code in the table, valid values are an alpha character or hyphen such as: A or -.

Where a pound sign (#) is shown in association with a NC code in the table, valid values are an alpha character, except for N, or hyphen such as: A or -.

(1) Integrated DLC with Side Door: When an integrated DLC system (i.e., no corresponding COT – the digital signals are integrated directly into a digital

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switch) has "side door" capability, certain time slots within the system may be pulled out of the data stream before entering the digital switch and routed to a digital channel bank within the CO. This converts the digital signal back to an analog signal and provides a frame appearance in the CO. This is required for certain designed circuits that are working via DLC.

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**Table 4.4.3: BellSouth LATY Values**

LATY	Value
AD	The AD LATY value is used to identify service requests for which facilities at a DISC*S Optical Network Unit equipped to support ADSL service (identified in LFACS by the DISCS/ADOU system type x LTS code combination) are the only facilities that are considered assignable.
MX	The MX LATY value is used to identify service requests for which DISC*S MX facilities (identified in LFACS by the MXDIS system type) are the only facilities that are considered assignable.
PC	The PC LATY value is used to identify PC Data service requests to ensure that facilities that are used to deliver PC Data service are the only facilities that are considered assignable for PC Data service requests.
S1	The S1 LATY value is used in the POTS 1 service category to assure that only universal and metal facilities are assignable for SL 1 unbundled loop service order requests that map to the POTS I service category and contain the LATY value of S1.
SH	The SH LATY value is used in the SS12 service category to assure that either metal facilities that have been conditioned with a new SHDL conditioning code or DLC (Digital Loop Carrier) facilities that are represented by the SDS LTS code are the only facilities that are assignable for service order requests that map to the SS12 service category and contain the LATY value of SH.
UC	The UC LATY value is used to identify service requests for which non-loaded copper facilities are the only facilities that are considered assignable (There is one exception and those are POTS1 and LNSHR service requests. Both loaded as well as non-loaded facilities are considered assignable for service order requests that map to the POTS1 and LNSHR service categories and contain a LATY value of UC).
UD	The UD LATY value is used to identify ISDN UDC (Universal Digital Channel) unbundled loop service requests for which DISC*S facilities, identified in LFACS by the DISCS/EBUD, IDISCS/EBUD and LDISCS/EBUD system types with LTS code of EBUD), are the only compatible facilities for those system types. Other compatible facilities are non-loaded copper facilities and DLC facilities provisioned for ISDN
UN	The UN LATY value is used to identify unbundled loop service requests for which integrated facilities are considered un-assignable (There is one exception and those are POTS1 and LNSHR service requests. Integrated facilities that have the Side Door Port (SDP) option set to A (Access) are considered assignable for service order requests that map to the POTS1 and LNSHR service categories and contain a LATY value of UN).
UZ	The UZ LATY is used in the SS12 service category to assure that only non-loaded metal facilities that have an associated Resistance Zone (RZ) value of less than or equal to 13 are assignable for service requests that map to the SS12 service category and contain a new LATY (Loop Assignment Type) value of UZ. Used for Unbundled Copper Loop Non-Design.

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## Electronic Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guide

### Chapter 4.0 – Ordering Information

#### Section 4.4: New or Spare Facilities (Cont.)

After "Submit Inquiry" or "Submit Reservation Request..." is selected, the next screen, **Processing Request**, will come up with the following message:

#### Processing

The loop makeup request normally takes 30-45 seconds to process –  
please wait for a response before proceeding.





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**Chapter 4.0 – Ordering Information**

**Section 4.5 Cancel Reserved Loop Makeup Facilities**

When a D/CLEC has requested to reserve a facility through electronic LMU, a Facility Reservation Number (FRN) is included in the loop makeup data returned from LFACS. This is a reservation number on the facilities on which loop makeup was verified. Should the D/CLEC determine that the reserved facilities are not needed, they should be canceled. Select the **Cancel Facilities Reservation** option.

Enter the following **required** data on the Inquiry Menu:

- Enter the telephone number or circuit ID
- Select the area where the telephone number or circuit ID is located
- Once the above information is entered, click "Continue to Loop Makeup".
- On the Cancel Loop Reservation Screen, enter the FRN in the **Reservation ID (RESID)** space.
- Click **Submit Cancellation Request** to process the request.



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**Chapter 5.0 - Output Returned From LFACS**

It is important to understand the output information provided by LFACS. This includes the following:

- Loop Makeup Data Definitions
- System Names for Digital Loop Electronics

**5.1 Loop Makeup Data Definitions**

The definitions beginning below and continuing on next few pages will be helpful in interpreting the loop makeup data returned from LFACS. Under the "Size" column, "A" refers to alpha and "N" refers to numeric data output.

Name	Definition	Size
LOOP	Loop aggregate, 1 occurrence for working circuit, up to 10 occurrences for spare facilities	
LPSTAT	Loop status: WKG=working circuit, PND-IN=pending-in circuit, PND-OUT=pending-out circuit, CT=connect-through, CF=connected facility, SP=spare	1-7A
MTR	Meets transmission requirements indicator: Y or Null NOTE: When the pairs selected meet de-specialization criteria, FACS generates LMU remarks and populates MTR with a "Y". The "Y" is only populated when count de-specialization applies. More specifically, a "count de-specialization" code is a two alphanumeric character attribute in FACS that identifies a specific terminal or cable range within a terminal that may be de-specialized differently than the other pairs in that area. This enables FACS to determine if some services can be removed from the local loop design process if they are assigned to appropriately qualified pairs.	1A
RTF	Receive/Transmit Indicator: Identifies if pair is used to support the receive or transmit side of a 4-wire service (e.g., R=receive pair, T=transmit pair) NOTE. If this indicator is populated with either a "T" or "R" and the transmission medium type is "METAL", repeaters would exist on the loop	1A



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SSC	Single Subscriber Carrier Indicator: identifies that two circuits are associated with the physical loop. Examples follow: P=physical pair of AML, D=derived pair of AML 1=Channel One, UDC Device, 2= Channel Two, UDC Device A=Channel One, DSSC Device B=Channel Two, DSSC  NOTE: When DAML is present for two telephone numbers, ADSL cannot be provided over the facility because the second voice channel is utilizing the upper spectrum of the facility	1AN
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**Chapter 5.0 - Output Returned From LFACS**

Name	Definition	Size
RZ	Resistance Zone: indicator of the subscriber loop resistance limits of a particular geographic area. Used for metal facilities (e.g., RZ13=1300 ohms, RZ15=1500 ohms).	1-2 N
CZ	Carrier Zone: indicator of maximum resistance between the remote terminal cabinet and the customer serving terminal. Used for derived facilities only (e.g., CZ9=900 ohms)	1-2 N
TPR	Taper Code: design characteristics of segment of plant (Not returned to the end user – for reporting purposes only)	1-6 AN
FN	Segment Aggregate, 1-9 occurrences per loop	
CA	Cable identifier of specific feeder or distribution cable within a wire center	1-10AN
PR	Pair Identifier of unique pair within a cable	1-4AN
ABP	Assignable Binding Post Identifier associated with a fiber channel NOTE: When data field is populated, it indicates that service location is served by fiber.	1-4N
TEA	Terminal Identifier	1-50AN

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CQ	<p>Count Qualification Code associated with a pair appearance at a terminal. NOTE: This codes is a two alphanumeric character attribute in LFACS that supports the automatic assignment of loop facilities for services requiring specific transmission characteristics in the loop Outside Plant Engineers may pre-determine which OSP facilities can satisfy the transmission requirements for a given service. Within BellSouth, this code is used for certain digital data services to pre-qualify facilities for a specific rate (example, 56kbps) digital data service. Valid codes currently used in BellSouth are as follows:</p> <p>Q1 2.4, 4.8, or 9.6        Q2 19.2        Q3 56.0        Q4 64.0        PP P-phone        D1 DS1-1.544        A5 6.5 KF Business Rate ADL51        B5 8.0 KF Business Rate ADL41        C5 9.4 KF Business Rate ADL31        D5 9.5 KF Business Rate ADL61        E5 12.0 KF Business Rate ADL22        F5 15.5 KF Business Rate ADL71</p> <p>LO 18.0 KF (copper ADSL), PC-Data, or remote DSLAM Mass Market Consumer Rate ADL11, ADL12</p>	1-2AN
CD	<p>Count De-specialization Code associated with a pair appearance at a terminal. NOTE: This field is not currently used in BellSouth.</p>	1-2AN

*continued on next page*

**Chapter 5.0 - Output Returned From LFACS**

Name	Definition	
TRMED	<p>Transmission Medium Type or system type supporting the loop segment (e.g., METAL, SLC96) NOTE: A value of "METAL" indicates a copper facility. A value of anything other than "METAL" indicates the system type of the DLC. For those facilities that are all copper, the transmission media type of "METAL" will be populated for all segments. This data field is always populated.</p>	1-9AN
TLM	<p>Telemetry Indicator: special pair conditions indicator (e.g., ADE=air dryer, CPT=cable pressure transducer, CPC=cable pressure contactor, FTD=flow transducer, BAT=battery)</p>	1-4AN



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RLA	Remote Location Address: address of remote terminal location	1-50 AN
RLC	Remote Location CLLI: Common language location identifier of remote location	1- 11AN
LTS	Line Terminal Status: an indicator of the plug-in device (the card that is placed in the DLC) that is either equipped or pre-engineered in the pair gain system of the facility supporting the segment of plant. The field-side LTS code will be populated unless the field side LTS is NREQ (not required), in which case the CO-side LTS code will be populated. EXAMPLE: A Line Terminal Status of "ES" indicates that the DLC system is equipped for a single party service; "ESX" is an equipped single party extended range plug-in.	1-4 AN
RLOE	Remote Location Originating Equipment: code used to identify a particular type of remote switching device, DSLAM terminal or splitter (e.g., RSU, DSLMRT, LSPLTR) NOTE. Population of this data field indicates incompatibility with ADSL unless remote collocation is used. Population of this field with a splitter code would indicate that the facility is already being served by an ADSL service provider via a remote solution. Also, be advised that the three referenced codes are the only ones for RLOE used in BellSouth at this time	1-7 AN
ONUTYPE	Optical Network Unit Type: the system type of the ONU. (e.g., Marconi DISC*S=DISCS or Alcatel Litespan=LTSP2) NOTE. When data field is populated, it indicates that service location is served by fiber.	1-9 AN
LMU	Loop Makeup Aggregate, 1 per segment	

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**Chapter 5.0 - Output Returned From LFACS**

Name	Definition	Star
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LMSTAT	<p>Loop Makeup Status or status of count makeup for that segment</p> <p style="text-align: center;">Loop Makeup Status          OSPE Action Indicated          CLEC Impact</p> <p>OK          No action required          No action required</p> <p>Manual or MAN          Loop Makeup cannot be formatted for TIRKS correctly due to its complexity or size;          OSPE prepare Loop Makeup manually          Loop Makeup may not be formatted correctly due to complexity or size; optionally request manual loop makeup to confirm</p> <p>??          If the terminal in which a count makeup exists and an Engineering Work Order (EWO) is completed that affects the terminal, then the count makeup in the terminal becomes questionable and LFACS automatically reflects this status with "???" OSPE to prepare updated loop makeup          Loop makeup provided may be questionable, request manual loop makeup</p> <p>Missing          Prepare new count makeup.          There is no count makeup at terminal, request manual loop makeup.</p>	
LUINT	<p>Length Unit (e.g., KF=kilofeet, FT=feet, MI=miles) NOTE: BellSouth loop makeup is typically built in kilofeet. Any exception to this would be indicated in this field.</p>	1- 2AN
NLD	<p>Load Point Number identifies the number of load coils on this count segment only. (If blank, but COIL is populated, the default is the 6KF rule, meaning a load coil is placed every six kilofeet down the length (backbone, main run) of the pairs).</p>	1-2N
COIL	<p>Load Coil Type: type of load coil associated with a cable count. If the first character of the load field is alphabetic, the alphabetic character is excluded from the stated code. EXAMPLES: H88, 22,44,66,88,135,175. The COIL is normally H88 meaning 88 millihenry inductance with "H" spacing, normally one inductor per 6000 feet. An entry in the load type field signifies the pairs are loaded. NOTE: If this data field is blank, it means that the load point number is blank or zero.</p>	1- 4AN



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ES	End Section: central office end section defines the distance from the central office to the first load coil. Required on loaded F1 pairs, including derived ("PG") cables that originate at subscriber carrier remote terminals.	1-8N w/de c pt
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**Chapter 5.0 - Output Returned From LFACS**

Name	Definition	Size
LDSP	Load Spacing: lengths between load coils of a segment. The entries are in order, starting at the Central Office end, and are separated by commas. The first entry for an F1 cable represents the distance from load point #1 (closest to the CO) to load point #2. For cables that originate at a cross connect terminal, the first entry is the distance from the cross connect terminal to the first load point beyond it. If blank, but COIL is populated, the default is the 6KF rule, meaning a load coil is placed every six kilofeet down the length (backbone, main run) of the pairs.	1-9N w/de c pt
BO	Build Out Aggregate, Occurs 1-2 times per LMU aggregate NOTE: Build Out is associated with loaded cable and may be placed to add capacitance to the cable between load coils. This is only used when proper load spacing cannot be obtained due to natural boundaries (e.g., river crossings).	
BOCAP	Build Out Capacitance is the capacitance in microfarads ( $\mu$ f) of the build out (e.g., .083). Refer to "NOTE" under the "BO" definition.	1-5N w/de c
BORES	Build Out Resistance is the resistance in ohms of the build out. Refer to "NOTE" under the "BO" definition.	1-5N
BOOFF	Build Out Offset is the distance from the central office side of the segment to the build out in KF/FT/MI. Refer to "NOTE" under the "BO" definition.	1-9N w/de c pt
SPL	Splice Section Aggregate occurs 1-10 times per LMU aggregate	
GA	Gauge (thickness) of the cable section (e.g. 19, 22, 24, 26)	1- 7AN
LGTH	Length of the cable gauge	1-9N w/de c pt
UBA	Type of cable (e.g., underground=U, buried=B, aerial=A) (optional)	1A
CAPAC	Capacitance: the capacitance in microfarads ( $\mu$ f) per mile of a cable gauge (total capacitance if referring to a bridge tap).	1-5N w/de c

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BTOFF	Bridge Tap Offset: bridge tap offset indicates if a gauge length is bridge tap. A data value of X or Y indicates the gauge length is a bridge tap and the offset of the bridge tap is equal to the sum of the prior non-bridge tap segment lengths. A numeric value specifies the distance from the beginning of the cable to the start of the bridge tap. Decimal points are valid.	1-9AN w/de c pt
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**Chapter 5.0 - Output Returned From LFACS**

**5.2 System Names for Digital Loop Electronics**

COT	RT	SLC-96 Description	LFACS	MODE
SLC-96	SLC-96	Universal - Mode 1, 2, 3	SLC96	1, 2, 3
None	SLC-96	Integrated - Mode 1, 2	ISLC96	1, 2
None	SLC-96	Integrated - Sidedoor Port (SDP)/Digital Cross connect System (DCS) - Mode 1, 2	ISLC96	1, 2 SDP=D
FCO	SLC-96	INA (Integrated Network Access) - Mode 1, 3 system non-locally switched, no local switch appearance, trunked to Foreign C.O. (FCO)	LSLC96	1, 3
COT	RT	SLC-5 Description	LFACS	MODE
SLC-5	SLC-5	Universal - FPC at C O., EFPB Mode 1 at RT e/w Auto Cut	SLC5	1
SLC-96	SLC-5	Universal EFPB - Mode 1, 2	96SL5	1, 2
None	SLC-5	Integrated EFPB - Mode 1, 2	ISLC5	1, 2
None	SLC-5	Integrated - SDP/DCS - EFPB Mode 1, 2	ISLC5	1, 2 SDP=D
FCO	SLC-5	INA - EFPB Mode 1	LSLC5	1
None	SLC-5	FP303	IS5T	n.a.
COT	RT	Fujitsu Description	LFACS	MODE
FDLC	FDLC	Universal - Mode 1, 2, 3	FDLC	1, 2, 3
None	FDLC	Integrated - Mode 1, 2	IFDLC	1, 2
None	FDLC	Integrated - SDP/DCS - Mode 1, 2	IFDLC	1, 2 SDP=D
FCO	FDLC	INA - Mode 1, 3	LFDLC	1, 3
SLC-96	FDLC	Universal - Mode 1, 2, 3	96FD	1, 2, 3
COT	RT	DMS-1 Urban Description	LFACS	MODE
DMS-1U	DMS-1U	Universal DMS-1 Urban	DMS1U	n.a.
None	DMS-1U	Integrated DMS-1 Urban	IDMS1U	n.a.
None	DMS-1U	Integrated - SDP/DCS	IDMS1U	n.a. SDP=D
FCO	DMS-1U	INA	LDMS1U	n.a.
COT	RT	PAIR GAIN - OTHER Description	LFACS	MODE
D4	D4	Universal D4 channel Banks, Pulsecom BusinessBank	DCB	n.a.
FCO	D4	INA	DCBINA	n.a.
PG-Flex	PG-Flex	Universal PG-Flex	PGFLX	n.a.
		PG-FlexPlus (future RL)	IPGPLS	





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8UMUX	8UMUX	Fitel-MUX 8UMUX BRI Extension System - 8 ISDN Lines	8UMUX	n.a.
Conklin 359	RMT	Conklin 359 (CO) & 357/358 or 368 BRITEmux™ RMT Multiplexer - 8 ISDN Lines (98-03-021BT)	BMXU	1
SLC-96	RMT	Conklin 357/358 or 368 BRITEmux™ RMT Multiplexer - 8 ISDN Lines (98-03-021BT)	BMX96	1
D4	RMT	Conklin 357/358 or 368 BRITEmux™ RMT Multiplexer - 8 ISDN Lines (D4 & Conklin 928 MiniBANK) (98-03-021BT)	BMXD4	n.a.
SLC-5	RMT	Conklin 357/358 or 368 BRITEmux™ RMT Multiplexer - 8 ISDN Lines (98-03-021BT)	BMXS5	FPC
BBT	BBT	Broadband Technologies	BBT	n.a.
4N1 COT	4N1 RT	Raychem Miniplex 4N1 Multi-line Carrier System (98-09-002BT) "RFG" cable names	MX4P	1

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**Electronic Loop Makeup (LMU)**  
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**Chapter 5.0 - Output Returned From LFACS**

**5.2 System Names for Digital Loop Electronics (Cont.)**

COT	RT	Lucent - SLC-2000 Description	LFACS	MODE
SLC2000	SLC-2000	Universal - Mode 1	SLC2T	1
SLC-96	SLC-2000	Universal - Mode 2	96SLT	2
None	SLC-2000	Integrated - Mode 1, 2	ISLC2T	1, 2
None	SLC-2000	Integrated - SDP/DCS - Mode 1, 2	ISLC2T	1, 2 SDP=D
FCO	SLC-2000	INA - Mode 1	LSLC2T	1
None	SLC-2000	TR303	ISL2T	n.a.
COT	RT	Reltec - DISC*S Description	LFACS	MODE
DISC*S	DISC*S	Universal	DISCS	n.a.
None	DISC*S	Integrated	IDISCS	1, 2
None	DISC*S	Integrated - SDP/DCS	IDISCS	1, 2 SDP=D
FCO	DISC*S	INA	LDISCS	1
None	DISC*S	TR303	IDIST	n.a.
COT	RT	DSC - Litespan 2000 Description	LFACS	MODE
DSC	DSC	Universal Litespan 2000	LTSP2	n.a.
None	DSC	Integrated Litespan 2000 (TR08)	ILTSP2	1
None	DSC	Integrated - SDP/DCS	ILTSP2	1 SDP=D
FCO	DSC	INA - Mode 1	LLTSP2	1
None	DSC	TR303	ILTST	n.a.
		Multiplexers Description	LFACS	LMOS
		DDM-2000 OC-1 SONET (fiber reach)	DM201	DM201
		DDM-2000 OC-3 SONET	DM203	DM203
		DDM-2000 OC-12 SONET	DM212	n.a.
		FLM-150-ADM OC-3 SONET	FLM15	FLM15
		FLM-150 Plus OC12 (DS1 output)	FLM15	FLM15
		FLM-600 OC-12 SONET	FLM6	n.a.
		FLM6 (DS2 output)	FLM06	n.a.
		Litespan 2000 (DS1 Output)	LTS03	n.a.
		SLC-2000 (DS1 Output)	SLC03	n.a.
		DDM-1000, DML-45, DML3x50, 828AF & other non-SONET asynchronous multiplexers e/w DS1 output	DS1SYS	DS1SY

Note: In the mode column, SDP denotes the Sidedoor Port (SDP) (D) Dedicated attribute value in LFACS, whereby the integrated DLC is compatible with non-switched and non-locally switched services. This job aid provides system names for approved loop electronics products only

For typical responses received from LFACS, refer to the **Electronic Pre-Order Loop Makeup Job Aid for LENS** that may be obtained from your Local Contract Manager. Also, under the Guides section for Preordering, the **Presentation for DICLEC Informational Seminar** **On BellSouth's Loop Prequalification Tools** is available via the BellSouth Interconnection web site at:

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**Chapter 6.0 – Acronyms**

ABP	Assignable Binding Post
BO	Build Out Aggregate
BOCAP	Build Out Capacity
BOOFF	Build Out Offset
BORES	Build Out Resistance
BST	BellSouth Telecommunications
BT	Bridge Tap
BTOFF	Bridge Tap Offset
CAPAC	Capacitance
CO	Central Office
CQ	Count Qualification Code
D/CLEC	Data/Competitive Local Exchange Carrier
DCS	Digital Cross Connect System
DLC	Digital Loop Carrier
DMS	Data Management System
CD	Count Despecialization Code
ES	End Section
FRN	Facility Reservation Number
GA	Gauge

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## Electronic Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guide

### Chapter 6.0 – Acronyms

ID	Identifier
INA	Integrated Network Access
LC	Load Coil
LCM	Local Contract Manager
LDSP	Load Spacing
LENS	Local Exchange Navigation System
LFACS	Loop Facilities Assignment and Control System
LGTH	Length
LMSTAT	Loop Makeup Status
LMU	Loop Makeup
LOA	Letter Of Authorization
LPSTAT	Loop Status
LSP	Local Service Provider
LSP AUTH	Local Service Provider Authorization
LSP AUTH DATE	Local Service Provider Authorization Date
LSP AUTH NAME	Local Service Provider Authorization Name
LUINT	Length Unit
MTR	Meets Transmission Requirements



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## Electronic Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guide

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### Chapter 6.0 – Acronyms

NLD	Load Point Number
PR	Pair Identifier
RESID	Reservation ID
RTF	Receive/Transmit Indicator
SDP	Sidedoor Port
SLC	Subscriber Loop Carrier
SME	Subject Matter Expert
SPL	Splice Section Aggregate
SSC	Single Subscriber Carrier
TEA	Terminal Identifier
TRMED	Transmission Medium Type
UBA	Type of Cable (Underground, buried, or aerial)
xDSL	Digital Subscriber Line

**DOCKET NO. 020507-TP**

**EXHIBIT NO. \_\_\_\_\_ (JMB-6)**



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**Line Splitting (Central Office Based)  
CLEC Information Package**

***Line Splitting (Central Office Based)***

***CLEC  
Information Package***

*Version 4, November 15, 2002*





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**Line Splitting (Central Office Based)  
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## Line Splitting (Central Office Based) CLEC Information Package

### Chapter 1.0 – Introduction

#### 3.3 Purpose and Scope

This CLEC Information Package is intended to provide the CO (Central Office) Based Line Splitting Phase III an equipment description and general information specific to processing a request for the UNE (Unbundled Network Element) service offering described herein. A detailed description of this service will be provided in **Chapter 2.0, Overview**, of this document.

Please contact the BellSouth Local Contract Manager for CO Based Line Splitting Service if you have questions about the information contained herein.

#### 1.2 Disclaimer Statement

The information contained in this document is subject to change. BellSouth will provide notification of changes through the Interconnection Notification Process.

#### 3.3 Version History / Control

Any future modifications, and/or improvements that are made to this guide for the CO Based Line Splitting Product Team will be reflected accordingly in this section of the document.

Section	Date/Version	Description
All	02/14/2002 – Version 1.0	Initial Version Release
All	07/08/2002 – Version 2.0	Update all sections and include phase III offering.
3.0	8/6/2002 – Version 3.0	Update to include company policy Wireless telecommunications services and DAMLs
2.0	8/6/2002 – Version 3.0	Update to include CC Docket Language
3.0	11/15/02 – Version 4.0	Update BellSouth's policy on DAML



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## Line Splitting (Central Office Based) CLEC Information Package

### Chapter 2.0: Overview

In the Advanced Services Docket (CC Docket No. 98-147), the FCC (Federal Communications Commission) ordered all Incumbent Local Exchange Carriers (ILECs), including BellSouth, to:

- Unbundle the high frequency portion of the local loop
- Make available a new Unbundled Network Element

**NOTE:** From this point on within this document, the reference to ILECs will be made as BellSouth since this document is BellSouth specific.

In addition, CC Docket No. 96-98 (319 Remand) further directed that CLECs (Competitive Local Exchange Carriers) be allowed sub-loop access at any accessible interconnection point on the loop (except closed splices). In CC Docket 98 – 147, the "Line Share Reconsiderations Order", Line Splitting Order, the FCC clarified the requirement for Line Splitting.

The primary points of the Line Splitting Order include the following:

- In a request for clarification from both AT&T (American Telephone & Telegraph) and WorldCom, the FCC ruled that CLECs providing voice service using the UNE-platform be allowed to either self-provision necessary equipment or partner with a competitive data carrier to provide xDSL (Digital Subscriber Line) service on the same line.
- The FCC denied a request from AT&T that BellSouth continue to provide xDSL services in the event customers choose to obtain voice service from a CLEC on the same line.

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## Line Splitting (Central Office Based) CLEC Information Package

### Chapter 2.0: Overview continued

- To avoid confusion, in the Texas 271 Order the FCC defined "line splitting" where the voice and data service is provided by competing carriers over a single loop. The Line Splitting Order provided additional detail.
- BellSouth has an obligation to permit CLECs to engage in line splitting when converting from UNE-P when the CLEC purchases the entire loop and provides its own splitter. (BellSouth is willing to provide the splitter.)
- If a CLEC is providing voice service using UNE-P, that CLEC may order an unbundled xDSL-capable loop terminated in a collocated splitter, DSLAM (Digital Sub Line Access Multiplexer) equipment, and unbundled switching combined with shared transport. That will replace its existing UNE-P arrangement with a configuration that allows provisioning of both data and voice services.
- BellSouth is required to make all necessary network modifications to facilitate line splitting. This includes providing nondiscriminatory access to OSS (Operational Support System) necessary for pre-ordering, provisioning, maintenance and repair, and billing for loops utilized in line splitting arrangements.

Line Splitting is a non-designed arrangement that will allow a D/CLEC (Data/Competitive Local Exchange Carrier) to provide data and voice service over a single loop. The voice and data carriers may be the same **or** two different carriers. Line Splitting consists of the following:

- UNE Loop
- UNE Port
- Cross connections originating at a BellSouth Central Office
- BellSouth Owned Splitter or CLEC Owned Splitter

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## Line Splitting (Central Office Based) CLEC Information Package

### Chapter 2.0: Overview continued

The major difference in Line Sharing and Line Splitting is that with Line Sharing BellSouth **owns** the voice service and bills the end user accordingly. With Line Splitting, the voice service **rides** BellSouth facilities but is **purchased** by a CLEC as a stand alone UNE Loop and Port.

Through the Line Splitting collaborative, BellSouth included the following as a part of the Line Splitting process:

- When two carriers are involved in the provisioning of Line Splitting, a Letter of Authorization will be required from a DLEC when ordering service on behalf of the CLEC or voice owner.
- The voice owner of the loop will provide BellSouth with a signed Letter of Authorization ("LOA") between the CLEC voice owner and the DLEC where the Line Splitting services are to be provisioned. This LOA document is unique to the BellSouth Line Splitting Service. There is a D/CLEC information package posted to the web. This package can be viewed at the following web address:

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

BellSouth has developed Line Splitting in phases to accommodate the following ordering scenarios:

- Conversion of existing UNE-P to line splitting with DLEC owned Splitter - This is the **only** version that can be ordered mechanically. When converting from UNE P to Line Splitting, the change will be "switch with change" to allow billing for the addition of two cross-connections. This is also known as "Phase I".
- Conversion of existing UNE-P to Line Splitting with BST owned Splitter - When converting from UNE-P to Line Splitting, the change will be "switch with change" to allow billing for the addition of a cross-connection. This offering is a part of "Phase II".

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**Line Splitting (Central Office Based)  
CLEC Information Package**

**Chapter 2.0: Overview continued**

- Conversion of existing line sharing to line splitting with the data provider remaining the same – When converting from existing line sharing to line splitting, BellSouth will allow a “switch as is” process. This will require collocation with the CLEC cable and pairs with an established splitter arrangement. The “switch-as-is” will be permitted under the above referenced scenarios. This offering is a part of Phase II”.
- Conversion of existing line sharing to line splitting with the data provider changing - When converting from existing line sharing to line splitting, BellSouth will allow a “switch-as-is” process. This will require collocation with the CLEC cable and pairs of an established splitter arrangement. The “switch-as-is” will be permitted under the above referenced scenarios. This offering is part of “Phase II.”

Line Splitting Phase III is available **July 19, 2002**. Phase III of BellSouth’s Line Splitting service introduces the following ordering options:

- Conversion of existing Line Splitting Data CLEC (DLEC)-Owned to Line Splitting BellSouth-Owned Splitter - **Voice provider changes.**
- Conversion of existing Line Splitting DLEC-Owned to Line Splitting BellSouth-Owned Splitter - **Voice provider remains the same.**
- Conversion of existing Line Splitting #1DLEC-Owned to Line Splitting #2 DLEC-Owned Splitter – **Voice and Data provider changes.**
- Conversion of existing Line Splitting #1 DLEC-Owned to Line Splitting #2 DLEC-Owned splitter – **Voice provider changes; Data provider remains the same.**
- Conversion of existing Line Splitting #1 DLEC-Owned to Line Splitting #2 DLEC-Owned Splitter – **Data provider changes; voice provider remains the same.**
- Conversion of existing Unbundled Network Elements-Platform (UNE-P) to Line Splitting - BellSouth Owned Splitter - **Different voice provider.**

*continued on next page*



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## Line Splitting (Central Office Based) CLEC Information Package

### Chapter 2.0: Overview

- Conversion of existing UNE-P to Line Splitting DLEC-Owned Splitter - **Different voice provider.**
- Conversion of existing Voice Resale to Line Splitting BellSouth-Owned Splitter – **Voice provider remains the same.**
- Conversion of existing Voice Resale to Line Splitting BellSouth-Owned Splitter – **Voice provider changes.**
- Conversion of existing Voice Resale to Line Splitting DLEC-Owned Splitter – **Voice provider remains the same.**
- Conversion of existing Voice Resale to Line Splitting DLEC- Owned Splitter – **Voice provider changes.**

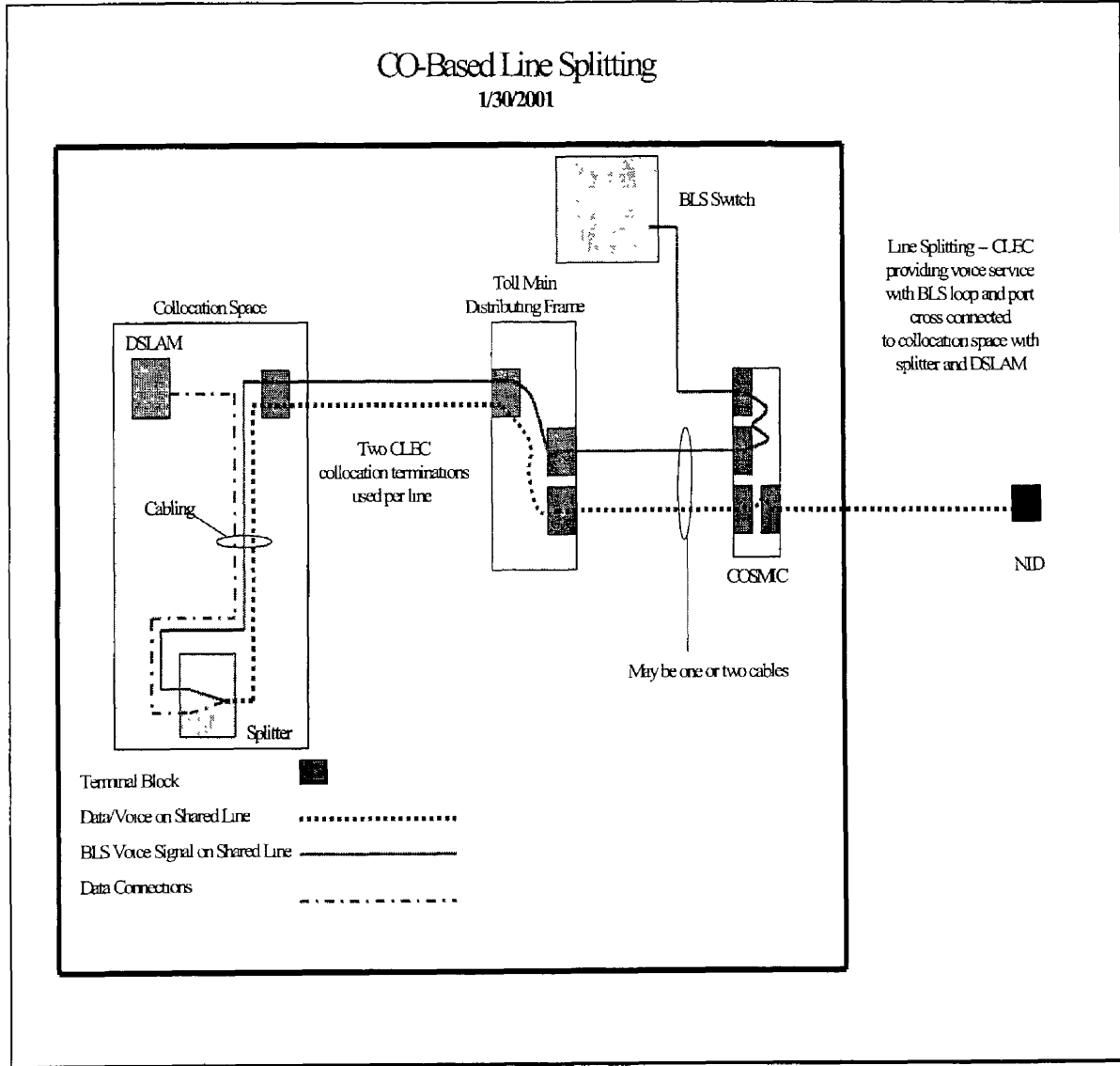
On the next page is a diagram depicting the line splitting arrangement where the DLEC owns the splitter. In this diagram:

- The CLEC provides voice service to the end user and BellSouth provides the loop and port UNEs and cross connections to the CLEC.
- The CLEC or DLEC may provide the DSLAM. The Splitter may be provided by the LEC (Local Exchange Carrier) providing the DSLAM or BellSouth. (The UNE network elements are explained on Page 11 of this document.)
- The data is provided over the high frequency spectrum UNE of the loop spectrum.

*continued on next page*



**Line Splitting (Central Office Based)**  
**CLEC Information Package**  
**Chapter 2.0: Overview continued**



On the next page is a diagram depicting a splitter arrangement where BellSouth owns the splitter.

*continued on next page*

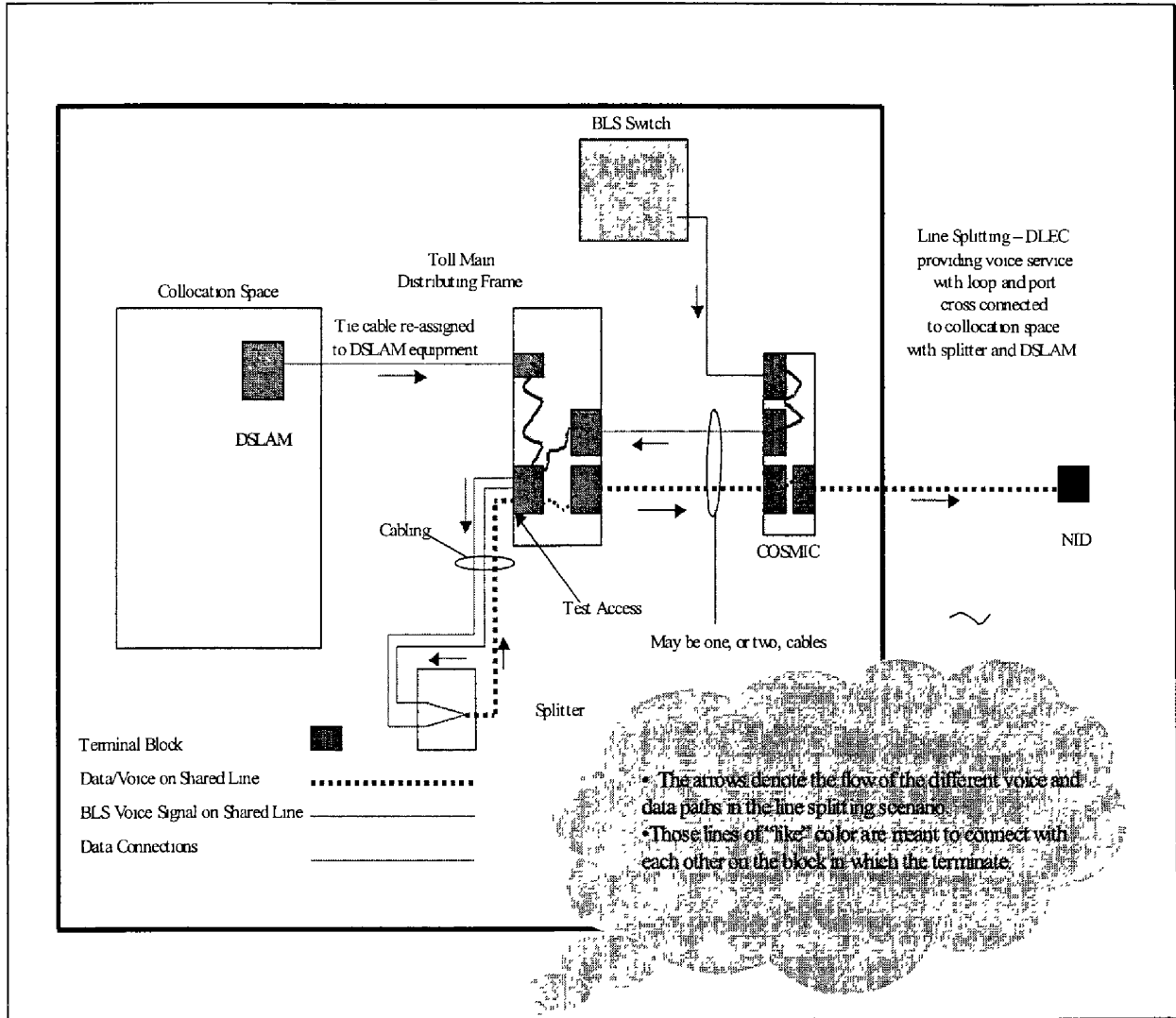




**Line Splitting (Central Office Based)  
 CLEC Information Package**

**Chapter 2.0: Overview continued**

**Line Splitting DLEC Provided Voice**



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## Line Splitting (Central Office Based) CLEC Information Package

### Chapter 3.0 Basic Service Capabilities

Because line splitting provides a service where voice and data operate on the same loop, an unloaded, 2-wire copper loop **must** serve the end user. The loop used for line splitting will be non-designed. The line splitting loops **must not** have:

- Load coils
- Low pass filters
- Range extenders
- Dual Channel Copper DAMLs (Digital Added Main Lines), PG DAMLs or similar devices

A process is being developed to remove a DAML if there is only one channel being used.

BellSouth is changing its policy on DAMLs for Line Splitting. The revised policy is that Line Splitting is incompatible with dual channel copper DAMLs and all Pair Gain (PG) DAMLs, but compatible with single channel copper DAML, provided no other conditions make the loop incompatible.

This change in policy necessitates a process change for assignment handling . Orders with DAMLs should fall out for manual handling in the AFIG. The AFIG will check the loop to determine if the DAML is copper or PG. If the DAML is copper, the AFIG will determine if there is a vacant channel. If a vacant channel exists, the DAML should be removed and the shared loop order should be worked on the loop. If both channels are working, the AFIG will return the order to the LCSC with the error message "FRN required, both sides of DAML working".

The change in policy provides the DLEC with additional options when performing pre-qualification assessment and necessitates a change in electronic loop make up output. During pre-qualification, the DLEC may choose to "conditionally qualify" the loop with a copper DAML by submitting the LSR and having the AFIG identify the single or dual channel condition.

Unbundled network elements (UNEs) are not available for purchase or for conversion from Special Access or Private Line Circuits if such network elements will be used to provide wireless telecommunications services.

BellSouth has existing UNE offerings in place that will allow CLECs to determine the loop makeup. High frequency Spectrum Unbundled Loop Modification will be developed for CLECs to order modification(s) on **existing** loops. This product is different and unique from the BellSouth Unbundled Loop Modification, Version 3, posted to the Interconnection web site.

*continued on next page*



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**Line Splitting (Central Office Based)**  
**CLEC Information Package**  
**Chapter 3.0: Basic Service Capabilities continued**

CLECs must be able to use these offerings for the following:

- To determine if loops qualify for their data service

The CLEC's meet point is located where the cable and pairs belonging to the CLEC terminate. A passive signal filter is installed at the customer's premises as CPE (Customer Provided Equipment) and will be the responsibility of the customer (or CLEC). In some instances, a splitter may be used at the end user's location.

The CLEC ordering the UNE loop for line splitting will be BellSouth's customer of record. This is normally the CLEC providing the voice service to the end user. This CLEC and its agents are the **only** customers that BellSouth will interact with for subsequent activity, trouble reports, etc.

**3.1 UNE Network Elements**

The Line Splitting network elements are different depending upon who provides the splitter. The splitter is not a UNE. The splitter is utilized to provide access to the high frequency spectrum.

**D/CLEC Owned Splitter**

The UNE network elements included in a D/CLEC owned splitter arrangement are:

- A stand alone UNE loop and port with a Network Interface Device (NID) and a collocation cross connection to the collocation space
- A second collocation cross connection from the collocation space connected to a voice port (This applies only to a D/CLEC owned splitter.)
- A splitter in a collocation area that will divide the spectrum
- Collocation area may belong to the voice CLEC or the DLEC
- Data Services provided over the upper spectrum of the local loop
- Through a pre-existing agreement, the CLEC or DLEC provides the DSLAM
- The LSOD (Line Splitter System Ordering Document) will be used to activate or deactivate Connecting Facility Assignments (CFA) or to order a BellSouth splitter.

*Continued on next page*

**Chapter 3.0: Basic Service Capabilities continued**



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## Line Splitting (Central Office Based) CLEC Information Package

### BellSouth Owned Splitter

The network elements included in a BellSouth owned splitter are:

- A non-designed analog loop from the Serving Wire Center (SWC) to the NID at the end user's location - This loop will have CFA and splitter port assignments *and* a collocation cross connection from the collocation space connected to a voice port.
- Located in a common area as close to the collocation area as possible or in a BellSouth relay rack
- Ordered using the existing Line Splitting procedures
- D/CLEC submits Line Splitter System Ordering Document (LSOD) to the CRSG to order BellSouth provided splitters or activate or deactivate CFA.

### Chapter 4.0: Features and Benefits

Line splitting includes the following features and/or benefits:

- Line Splitting service includes all of the features, functions, and capabilities that the switch is capable of providing, including but not limited to the following:

Line signaling and signaling software

Digit reception

Dialed number translations

Call Screening

Routing including calling plans using switch routing tables

Recording

Call supervision

Dial tone

Switching

*continued on next page*



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**Line Splitting (Central Office Based)**  
**CLEC Information Package**  
**Chapter 4.0: Features and Benefits continued**

Telephone number provisioning

Announcements

Calling features and capabilities (including call processing)

Carrier pre-subscription (i.e., InterLATA and IntraLATA toll)

Carrier Identification Code (CIC) portability capabilities

Testing and other operational features inherent to the switch and switch software

- Features inherent to the switch and switch software not currently being used or not purchased by BellSouth are still available to the CLEC through the BFR (Bonafide Request Services).
- The end user port provides platforms such as adjuncts, Public Safety Systems (911), Operator Services, Directory Assistance Services, and Advanced Intelligent Network (AIN).
- The switching capabilities used will be based on the line side features they supported.
- This service will also be capable of routing local, IntraLATA, InterLATA, and International calls to the customer's preferred carrier.
- The combination of these elements with certain switch features replicates several BellSouth retail service offerings including:

Basic residential *and* business service with and without features

Enhanced local calling areas defined in the switch routing tables for residential *and* business services

- AIN triggers, where available, are also part of this service and include off hook immediate, off hook delay, terminating attempt, public office dialing plan, feature code, and customized dialing plan. The service includes the triggers only. Charges will apply for queries or "dips" into databases such as LNP (Local Number Portability), 800 databases, etc.

*Continued on next page*



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**Line Splitting (Central Office Based)**  
**CLEC Information Package**  
**Chapter 4.0: Features and Benefits continued**

- Since the CLEC receives the switched access revenues associated with this service, access recordings are available through subscription to the Access Daily Usage File (ADUF). The ADUF files provide data to enable the CLEC to bill switched access service charges to the appropriate Interexchange Carrier. Receipt of ADUF messages requires CLECs to purchase Network Data Mover (NDM) Connect Direct software. Switch recordings detailing local usage, IntraLATA toll usage, and per use of vertical features are available through subscription to the Optional Daily Usage File (ODUF).

**Chapter 5.0: Pre-Ordering Guidelines**

**5.1 Targeted Installation Intervals**

Line Splitting is available in **all** states within the BellSouth region. For exact installation intervals, refer to the BellSouth Interval Guide located at:

[http://www.interconnection.bellsouth.com/guides/other\\_guides/pdf/gintl001.pdf](http://www.interconnection.bellsouth.com/guides/other_guides/pdf/gintl001.pdf)

The targeted installation intervals are based upon receipt of a clean, manual LSR (Local Service Request) for the end user order. An SI (Service Inquiry) will not be required.

**5.2 Contract Specific Provisions**

The CLECs involved must have a pre-existing arrangement between themselves. BellSouth will **not** participate in this arrangement.

The CLEC owning the UNE loop and requesting line splitting arrangements must have Line Splitting language, collocation language, and rates included in their existing contract.



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## Line Splitting (Central Office Based) CLEC Information Package

### Chapter 6.0 Ordering Guidelines

The D/CLEC will order the splitter equipment for Line Splitting Service by submitting a LSOD to the CRSG/Account Team. The LSOD will also be used for activating/deactivating DS0 (Digital Service Level 0) collocated cable(s)/pair(s) to line splitting cable(s)/pair(s). The LCSC renders the FOC to the CRSG for LSOD associated service orders.

The CRSG is the initial receipt point for the LSOD document and will:

- Validate the LSOD
- Process the LSOD through Network
- Serves as the help desk for the CLEC/DLEC.

The CLEC will forward an LSR directly to the LCSC to request end user line splitting services.

For detailed information relative to the LSR, refer to the BBRLO (BellSouth Business Rules for Local Ordering). The BellSouth Business Rules for Local Ordering are located at:

<http://www.interconnection.bellsouth.com/guides/leo/pdf/gleoo023.pdf>

There are unique NC (Network Channel), NCI (Network Channel Interface), and SECNCI (Secondary Network Channel Interface) Codes **required** on the LSR when Line Splitting is requested. These codes are not used to provision this service because Line Splitting service is a non-designed UNE. Regardless of splitter ownership, the following codes apply when ordering Line Splitting service:

NC Code	NCI Code	SECNCI
SWXX	02QE9	02DU9



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## Line Splitting (Central Office Based) CLEC Information Package

### Chapter 7.0 Line Splitter System Ordering Document

Due to page constraints and internal links within the LSOD, a copy is not available in this document. By clicking on the hyperlink below, you may access the form with the associated line-by-line instructions.

[http://www.interconnection.bellsouth.com/markets/lcc/line\\_sharing\\_collab/docs/BLS/LSOD-doc.xls](http://www.interconnection.bellsouth.com/markets/lcc/line_sharing_collab/docs/BLS/LSOD-doc.xls)

### Chapter 8.0 Maintenance and Repair

Data troubles will be reported directly to the CWINS (Customer Wholesale Interconnection Network Services) Center. CLEC voice troubles will be handled "business as usual".

Maintenance and Trouble Receipt Flows and the Line Splitting Maintenance Flow are available on the Collaborative website.

#### 8.1 CLEC TAFI

TAFI (Trouble Administration Facilitation Interface) is the vehicle used by BellSouth and CLEC users to process their end-user trouble reports on non-designed (POTS) voice-grade services.

Additional information on CLEC TAFI may be found in Chapter 14 of CLEC TAFI at the web address shown below:

Or go directly to the LENS (Local Exchange Navigation System)/TAFI Guide, enter the following from the BellSouth Home Page:

[http://interconnection.bellsouth.com/guides/lens\\_tafi.html](http://interconnection.bellsouth.com/guides/lens_tafi.html)

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## Line Splitting (Central Office Based) CLEC Information Package

### Chapter 8.0 Maintenance and Repair continued

#### 8.2 DLEC TAFI

DLEC TAFI for Line Splitting is completely different from regular CLEC TAFI. Since the DLEC is providing high-speed data access over the same physical facilities via the Line Splitting methodology, the DLEC will be limited in TAFI to **only** processing Line Splitting and Line Share Data (LSD) reports. A separate password and DLEC TAFI account are required. This will enable the DLEC to:

- Access trouble history on the end user's account
- Request a vendor meet and
- Run a baseline MLT (Mechanized Loop Test)
- View a splitter signature on the loop

Additional information on DLEC TAFI may be found in Chapter 14 of CLEC TAFI at the web address shown below:

Or go directly to the LENS (Local Exchange Navigation System)/TAFI Guide, enter the following from the BellSouth Home Page:

[http://interconnection.bellsouth.com/guides/html/lens\\_tafi.html](http://interconnection.bellsouth.com/guides/html/lens_tafi.html)



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**Line Splitting (Central Office Based)**  
**CLEC Information Package**

**Chapter 9.0 Acronyms**

ADUF	Access Daily Usage File
AFIG	Assignment Facility Inventory Group
AIN	Advanced Intelligent Network
AT&T	American Telephone and Telegraph
BBRLO	BellSouth Business Rules for Local Ordering
BFR	Bonafide Request Services
CCM	Circuit Capacity Management
CIC	Carrier Identification Code
CLEC	Competitive Local Exchange Carrier
CO	Central Office
CPE	Customer Provided Equipment
CRIS	Customer Records Information System
CRSG	Complex Resale Support Group
DAML	Digital Added Main Line
DLEC	Data Local Exchange Carrier
DSLAM	Digital Sub Line Access Multiplexer
DSO	Digital Service Level 0
FCC	Federal Communications Commission
FOC	Firm Order Confirmation

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**Line Splitting (Central Office Based)  
CLEC Information Package**

**Chapter 9.0 Acronyms continued**

ILEC	Incumbent Local Exchange Carrier
LCSC	Local Carrier Service Center
LNP	Local Number Portability
LSOD	Line Splitter System Ordering Document
MOU	Minutes of Use
NC	Network Channel
NCI	Network Channel Interface
NDM	Network Data Mover
NID	Network Interface Device
ODUF	Operational Daily Usage File
OSS	Operational Support System
RD	Received Date
SECNCI	Secondary Network Channel Interface
SI	Service Inquiry
SME	Subject Matter Expert
UNE	Unbundled Network Element
UNE-P	Unbundled Network Element-Platform
xDSL	Digital Subscriber Line

**DOCKET NO. 020507-TP**

**EXHIBIT NO. \_\_\_\_\_ (JMB-7)**

**REDACTED -- For Public Inspection**

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of: )  
 )  
Application by BellSouth Corporation, )  
BellSouth Telecommunications, Inc., ) WC Docket No. 02-\_\_\_\_  
and BellSouth Long Distance, Inc., for )  
Provision of In-Region, InterLATA )  
Services in Florida and Tennessee )

**AFFIDAVIT OF WILLIAM N. STACY**  
September 20, 2002

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- UNEs. Also, CSRs for both CLECs and BellSouth are updated in the same time and manner – usually 24 hours after an order has been completed.
358. Effective with Release 10.5 on June 1-2, 2002, a new feature was implemented in LENS that provides the capability of viewing multiple CSRS. This feature allows CLECs to view up to four CSRs for Non-Complex accounts on a single inquiry.
359. BellSouth provides CLECs with a PSO flag via the LENS interface. The Pending Service Order (“PSO”) indicator alerts CLECs whenever there is a pending service order against an account. The PSO indicator is used because the details of a pending order could be from a competing CLEC. Therefore, that information is confidential to the CLEC that placed the pending order. If a CLEC sees a PSO Flag on the CSR, that CLEC can view the details of the pending order in CSOTS only if that CLEC issued the pending order. Other CLECs’ pending orders cannot be viewed. These matters are also discussed in the Affidavit of Ken L. Ainsworth.
360. The PSO indicator is currently not available via the TAG interface. However, change request CR0127 has been opened to implement the PSO indicator for the TAG interface. On May 22, 2002, the CLEC participants in the CCP prioritized CR0127 as number seven out of 26 change requests.
361. BellSouth thus provides CLECs with nondiscriminatory access to customer service record information.
362. Please also see my discussion above on integration and parsing.

**Loop Makeup Information**

363. Based on the evidence in the record, the Commission found,
- that BellSouth provides competitive LECs with access to loop qualification information in a manner consistent with the requirements of the *UNE Remand Order*. Specifically, [the Commission found] that BellSouth provides competitors with access to all of the same detailed information about the loop that is available to itself and in the same time frame as

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any of its personnel could obtain it. [Footnotes omitted.]  
Georgia/Louisiana Order, ¶ 112.

364. These findings apply equally to Florida and Tennessee.
365. As shown in the table below, the CLECs have made extensive use of this access and have received timely responses.

Month	Total queries for electronic LMU	% Within 1 Minute
Jan-02	5,876	96.7%
Feb-02	10,183	97.8%
Mar-02	10,999	96.8%
Apr-02	9,487	92.8%
May-02	23,94168	96.7%
Jun-02	8,415	80.9% <sup>69</sup>
Jul-02	6,922	99.3%

366. Using the LMU functionality in TAG or LENS, CLECs can request LMU on existing facilities that are owned by the requesting CLEC or BellSouth, can request LMU on new or spare facilities that are owned by BellSouth, and can create and cancel reservations for new or spare facilities owned by BellSouth.<sup>70</sup>
367. CLECs may request LMU information using a telephone number or a circuit ID. In response, CLECs are provided with information on that particular loop. In addition, CLECs may request LMU information on spare facilities that serve the end user. CLECs may request information on one to ten loops per transaction. If the CLEC requests that the loop or loops meet certain specifications, BellSouth will return information on the loop or loops that meet those specifications. If the CLEC does not make such a request,

<sup>68</sup> BellSouth continuing to investigate data feeds. Duplicate records appear to be in COG files; further analysis needed.

<sup>69</sup> DOM queuing problem discovered affecting LMU responses 6/2/02 -- 6/7/02; temporary fix implemented 6/7; permanent code fix implemented 6/27/02. Although performance was still degraded in June, it improved in July and the benchmark was met in every state.

<sup>70</sup> This functionality allows a DLEC to view the LMU of a CLEC-owned facility, provided the two parties have executed the appropriate Letter of Authorization and provided this information to BellSouth.

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BellSouth returns information on the spare loop or loops that would support POTS. The following list of LMU elements is currently available to CLECs through the TAG and LENS interfaces. The following information is available through electronic access to BellSouth's LFACS database, when it is populated in the LFACS database.

- Cable and pair
- Loop Status (SP, WKG, CT, CF, etc.)
- Length by Gauge
- Loop Length by Segment
- 26 gauge equivalent loop length
- Quantity of load coils
- Location of load coils
- Quantity of bridged taps
- Location of bridged tap by occurrence
- Length of bridged taps by occurrence
- Location of pair gain/DLC – address of remote terminal
- System type of DLC
- Source of data - actual
- Presence of DAML (Single Subscriber Carrier Indicator)
- Loop medium (copper or fiber)
- Length that is copper or fiber
- Type of Plant (aerial, buried, or underground)
- Availability of spare facilities
- Number of gauge changes
- Assignable binding post
- Loop makeup status
- Build Out Capacity, Resistance, and Offset



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- Resistance Zone (RZ)
- Carrier Zone (CZ)
- Remote Terminal CLLI code
- Telemetry Indicator
- Line Terminal Status
- ONU Type (Optical Network Unit)
- Load coil type

368. In late September 2001, BellSouth implemented an enhancement that provides for an electronic query from LFACS to the Corporate Facilities Database (“CFD”) for loop qualification information. The CFD is a digitized version of the plats available in Georgia, North Carolina, South Carolina, Florida and thirteen (13) wire centers in Alabama. As a result of this enhancement, when a CLEC sends an electronic query to LFACS for loop qualification information, and all of the necessary information is not resident in LFACS, an electronic query will be automatically launched to the CFD to generate the required additional information. This additional loop qualification information resulting from the queried CFD will automatically be combined with the LFACS information and provided to the CLEC. Also, the information obtained from the query to the CFD will be populated in the LFACS database and thus, is available for electronic loop qualification information queries.

369. Some of the LMU information listed above may not be entered in the LFACS database. In those instances, if a CLEC should determine that it needs additional information that is not available electronically, the CLEC would submit a manual LMU service inquiry request, just as BellSouth does for itself when the data is not available electronically.

370. Personnel in BellSouth’s Outside Plant Engineering department must then use a combination of Engineering Work Orders, field visits and plats that contain records of BellSouth’s Outside Plant Facilities to develop the LMU. The Outside Plant Facility

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information resides in the CFD. In the BellSouth states and wire centers that do not use the CFD, this data is stored on manual or paper plats. After BellSouth obtains LMU data from the plats (via CFD or paper plats), BellSouth then populates LFACS with the LMU data that was generated from the plats. This service inquiry process is accomplished in substantially the same time and manner (whether retrieved from CFD or paper plats) for BellSouth and for the CLECs.

371. In previous state and federal filings, including in BellSouth's recent Georgia/Louisiana and Five States 271 applications, Covad has complained repeatedly of inaccuracies in BellSouth's Loop Facilities Assignment and Control System ("LFACS") database. This complaint has been rejected, and should be again, because BellSouth provides CLECs with the same information as it does for itself. BellSouth offers CLECs access to LFACS via LENS and TAG. LFACS is the same database that is used by BellSouth's retail operations. The database is the primary source of BellSouth's loop data, and contains certain minimum information about each pair, including whether or not that pair contains load coils. However, detailed cable makeup information is not available for all pairs, depending on whether a pair in that complement has been used for a designed service in the past. Therefore, any inaccuracies affect both the CLECs and BellSouth's retail operations in the same way. BellSouth disagrees with Covad's allegations of widespread inaccurate data in BellSouth's loop makeup databases. Although BellSouth's LFACS database is not perfect, it is very accurate.

372. In some instances, some of the detailed LMU information may not be listed in the LFACS database. In those instances, if a CLEC should determine that it needs additional information that is not available electronically, it can submit a manual LMU Service Inquiry request. Similarly, for BellSouth to serve its own customers, BellSouth must submit a service inquiry to obtain facility information for the requested retail

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service/product when the data is not available electronically. Nondiscriminatory access does not require that all detailed information about loops must be available electronically and involve no manual processes. The fact is, if BellSouth has access to the detailed information required for loop qualification electronically, that information will be provided to the CLEC electronically. Likewise, CLECs and BellSouth can obtain all other available information through the manual process. Therefore, BellSouth provides to CLECs nondiscriminatory access to all of the same detailed information about the loop that is available to BellSouth, in compliance with the Commission's *UNE Remand Order*.<sup>71</sup>

373. Although 100% of BellSouth's loops are populated in LFACS with certain basic information, not all will have the detailed loop makeup information necessary to qualify a loop. It is estimated that as much as 85% of loops in some major metropolitan areas are populated in LFACS with detailed loop makeup information. As of June 2002, Loop Makeup data is populated in LFACS on approximately 51% of the total network feeder or distribution cable pairs region-wide. Since March 2002, detailed loop makeup has been populated on an additional 1,204,867 segments, although this impacted the total percent loop makeup by less than 0.5%. BellSouth will have to populate detailed loop makeup data on an additional 1,714,393 segments to raise this to 52%.

374. More important, BellSouth is continuously updating and/or populating loop makeup data in LFACS. Each time an Outside Plant Engineer issues an Engineering Work Order ("EWO"), loop makeup data is input/updated on every cable pair handled on the EWO. Additionally, each time a CLEC uses the manual service inquiry process, BellSouth loads the resulting loop makeup information into LFACS for future queries. As more CLECs

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<sup>71</sup> Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Third Report and Order and Fourth Further Notice of Proposed Rulemaking, 15 FCC Rcd 3696, ¶ 427 (1999) ("UNE Remand Order").

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enter a local market, the loop makeup data grows correspondingly as a result of the increased number of manual inquiries that are handled.

375. Covad suggested that BellSouth should be required to implement a plan to complete and update its loop records for all residential accounts. BellSouth provides its loop records to CLECs in a nondiscriminatory manner, although it is not required to make such information available to CLECs if it has not made it available for itself. The Commission supports this position. In its UNE Remand Order, the Commission stated “[w]e disagree, however, with Covad’s unqualified request that the Commission require incumbent LECs to catalogue, inventory, and make available to competitors loop qualification information through automated OSS even when it has no such information available to itself. If an incumbent LEC has not compiled such information for itself, we do not require the incumbent to conduct a plant inventory and construct a database on behalf of requesting carriers.”<sup>72</sup>

376. In addition to electronic access to LMU via LENS and TAG, and at the specific demands of CLECs like Covad and MPower, BellSouth also offers its Loop Qualification System (“LQS”) to Network Service Providers (“NSPs”), including CLECs, which they may use to determine if POTS lines will carry BellSouth’s industrial or business class ADSL service.<sup>73</sup> CLECs may use LQS to obtain a qualified “yes/no” response based on defined technical parameters of BellSouth’s industrial and business class ADSL offerings. The “yes/no” response allows the CLEC to determine if a telephone number(s) at a specific address is qualified (served by a loop that will support ADSL service) for BellSouth’s ADSL service. For each telephone number or address entered, LQS will provide a number of positive responses and reason codes. A complete listing of the external and

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<sup>72</sup> UNE Remand Order ¶ 429.

<sup>73</sup> Upon written request to BellSouth, a registered CLEC will be provided access to LQS. CLECs may access LQS data either in bulk, via a web interface request or via a real-time, CORBA (Common Object Request Broker Architecture) interface.

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internal reason codes can be found in the Loop Qualification System DLEC/CLEC Job Aid.<sup>74</sup>

377. For the *guaranteed-speed* ADSL wholesale services that it offers to its wholesale customers (Network Service Providers or “NSPs”), BellSouth also provides LMU information through a manual service inquiry process. BellSouth provides LMU information to CLECs through a manual service inquiry process in substantially the same time and manner as it does for NSPs.
378. BellSouth has conducted many free informational seminars in the past twelve months for the CLECs on how to use BellSouth’s manual and mechanized loop makeup systems and how to interpret the responses provided.<sup>75</sup> Most recently, on June 18, 2002, BellSouth announced a free informational seminar to update CLECs on the use of BellSouth’s pre-qualification tools, including LMU and the loop qualification system (“LQS”).<sup>76</sup> The seminar was held on July 9, 2002 in Atlanta. Twenty-two representatives of six CLECs/DLECs attended the meeting. The feedback from the customer surveys indicated that the information provided was valuable and informative. One participant said, “I knew the basics of this system and was able to keep up easily. I learned a lot and all my questions were answered by the materials provided or in the presentation.”

<sup>74</sup> <http://www.interconnection.bellsouth.com/guides/bpobr/pdf/lqsja.pdf>.

<sup>75</sup> BellSouth conducted free informational seminars on BellSouth’s Loop Makeup Service including manual and mechanized Loop Makeup ordering and LQS on June 11, 2001 in New Orleans, June 18, 2001 in Atlanta, June 13, 2001 in Charlotte, July 10, 2001 in Orlando, July 17, 2001 at the CLEC Inforum in Atlanta. Forty-six (46) individuals were trained during these five sessions. Three additional training sessions were held via Conference Bridge. Fourteen individuals participated in a call held on September 13th. A supplemental call was held on September 27th, after all of the CLECs had an opportunity to try what they had learned. The training was a success – no new issues were raised on the 27th and CLECs advised that all of their previous concerns had been addressed. A third conference call training was held on September 28th. BellSouth received positive comments on feedback forms from CLECs. Training sessions resulted in reducing the number of errors resulting from inaccurate LMU from 25 per day to 2.25 errors per day for one CLEC alone.

<sup>76</sup> See Carrier Notification Letter SN 91083168 (June 18, 2002), [http://www.interconnection.bellsouth.com/notifications/carrier/carrier\\_pdf/91083168.pdf](http://www.interconnection.bellsouth.com/notifications/carrier/carrier_pdf/91083168.pdf). I discussed LQS in ¶ 249 of my affidavit of June 20, 2002.

CERTIFICATE OF SERVICE

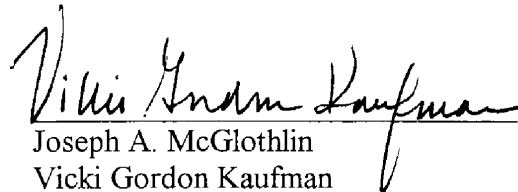
I HEREBY CERTIFY that a true and correct copy of the foregoing Rebuttal Testimony and Exhibits of Jay Bradbury on behalf of the Florida Competitive Carriers Association has been furnished by (\*) hand delivery, (\*\*) electronic mail or by U. S. Mail this 23rd day of December, 2002, to the following:

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