

1 BELL SOUTH TELECOMMUNICATIONS, INC.
2 REBUTTAL TESTIMONY OF JERRY L. WILSON
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4 DOCKET NO. 001797-TP
5 MAY 23, 2001
6

7 Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELL SOUTH
8 TELECOMMUNICATIONS AND YOUR BUSINESS ADDRESS
9

10 A. My name is Jerry L. Wilson. I am a Senior Director-Interconnection
11 Services with BellSouth Telecommunications, Inc. My business
12 address is 675 West Peachtree Street, Atlanta, Georgia.
13

14 Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND
15 EXPERIENCE.
16

17 A. I graduated from Mississippi State University in 1972 with a Bachelor of
18 Science Degree in Electrical Engineering. In 1978, I earned a Master of
19 Science Degree in Management from Pace University, New York. I
20 have over 30 years of experience in the telecommunications industry
21 and have held various positions in Network, Marketing, Planning, and
22 Regulatory during my career.
23

24 Q. HAVE YOU TESTIFIED PREVIOUSLY?
25

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

1 A. Yes. I have previously testified before numerous state regulatory
2 commissions, including the Florida Public Service Commission, on
3 various matters related to former jobs that I have held.

4
5 Q. HAVE YOU SUBMITTED TESTIMONY PREVIOUSLY IN THIS
6 DOCKET?

7
8 A. No. Mr. Ronald M. Pate submitted direct testimony on Issues 13 and
9 21 on April 23, 2001. However, I am adopting the direct testimony
10 submitted by Mr. Pate in this procedure.

11
12 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

13
14 A. The purpose of my testimony is to provide rebuttal of the direct
15 testimony of Mr. Tom Allen of Covad Communications Company
16 (“Covad”) on Issues 13 and 21.

17
18 **Issue 13: What access should Covad have to BellSouth’s loop makeup**
19 **information?**

20
21 Q. ON PAGES 22-23 OF HIS TESTIMONY, MR. ALLEN CITES ¶ 427 –
22 430 OF THE FCC UNE REMAND ORDER RELATING TO LOOP
23 MAKEUP (“LMU”) INFORMATION REQUIREMENTS. IS BELL SOUTH
24 MEETING THESE REQUIREMENTS TODAY?

25

1 A. Yes. BellSouth complies with all requirements of the UNE Remand
2 Order issued by the FCC. BellSouth provides the ALECs with non-
3 discriminatory access to the same detailed information about the loop
4 that is available to BellSouth retail operations. Additionally, access to
5 the loop information is provided to Covad within the same time intervals
6 that loop information is provided to BellSouth's retail operations.
7 BellSouth developed and implemented procedures to provide ALECs
8 with detailed loop makeup information via the manual Service Inquiry
9 ("SI") process on February 17, 2000. Additionally, BellSouth
10 implemented, on November 18, 2000, a detailed mechanized loop
11 makeup process that was accessible by all electronic interfaces that
12 support pre-order functions. BellSouth also provides ALECs access to
13 its Loop Qualification System ("LQS"), at no charge. This access
14 requires an amendment to the Interconnection Agreement. LQS is
15 utilized by BellSouth to pre-qualify its industrial and business class
16 ADSL services, based on BellSouth's defined technical parameters.

17

18 Q. MR. ALLEN, ON PAGE 23 OF HIS TESTIMONY, STATES
19 "BELLSOUTH HAS ONLY PROPOSED THAT COVAD HAVE
20 MEDIATED ACCESS TO SOME OF THIS INFORMATION, BY
21 OPERATION OF A LOOP MAKEUP SERVICE INQUIRY ("LMUSI")
22 PROCESS". PLEASE COMMENT.

23

24 A. I disagree with Mr. Allen on this matter. Using the LMUSI, Covad may
25 request loop makeup information on either working pairs or spare

1 facilities. In the case of working pairs, Covad is asked to submit the end
2 user's address and either telephone number or circuit identification
3 number. For spare pair/spare Digital Loop Carrier ("DLC") pair requests,
4 only the address is needed. ALECs may request, through the loop
5 makeup SI, a reservation of up to 3 pairs to a specific address (for up to
6 4 days). The standard service interval for return of a response to the
7 Manual LMU SI is 3 business days. BellSouth returns the LMU on
8 working Telephone Numbers/Circuit Identifier or LMU on spare facilities
9 with optionally reserved single or multiple spare pairs, which then allows
10 the ALEC to determine if it wishes to place an order for BellSouth
11 Unbundled Loop Modification or for an Unbundled Network Element
12 (e.g. for a 2-wire ADSL compatible loop).

13
14 The information provided by BellSouth is not mediated access to some of
15 the information sources available within BellSouth. BellSouth Outside
16 Plant Engineering specialists carefully review all appropriate databases
17 and manual records (e.g. detailed plat information, etc.), to completely
18 and correctly populate and return the LMU response in accordance with
19 BellSouth's *CLEC Pre-Ordering and Ordering Guide for Manual Loop*
20 *Makeup* available on BellSouth's Website:

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

22
23 Q. PLEASE COMMENT ON MR. ALLEN'S STATEMENT, ON PAGE 23 OF
24 HIS TESTIMONY, THAT BELLSOUTH DOES NOT GUARANTEE THE
25 ACCURACY OR RELIABILITY OF THE LMU INFORMATION.

1

2 A. BellSouth offers LMU to its ALEC customers in a manner that is
3 consistent with the requirements of the FCC's Third Report and Order
4 (99-238). While BellSouth's LMU response is based on highly accurate
5 and reliable loop information resident in its electronic and manual
6 databases, BellSouth cannot guarantee 100% accuracy of such loop
7 data. The information provided will be the information "as is" from
8 BellSouth's hard copy records or BellSouth's databases and is the same
9 information that BellSouth uses for its own operations.

10

11 Q. MR. ALLEN STATES, ON PAGE 23, THAT BELLSOUTH'S LMU
12 INFORMATION IS INCOMPLETE. DO YOU AGREE?

13

14 A. No. BellSouth's LMU data is complete. Mr. Allen is not specific in
15 stating what LMU information he feels is missing or incomplete in
16 BellSouth's LMU responses. As required by the FCC's Third Report and
17 Order (99-238), BellSouth provides ALECs access to loop makeup
18 information that consists of the composition of the loop material
19 (copper/fiber); the existence, location, and type of equipment on the loop,
20 including but not limited to digital loop carrier or other remote
21 concentration devices, feeder/distribution interfaces, bridged tap points,
22 load coils, pair gain devices; the loop length; the wire gauge; and the
23 electrical parameters of the loop. BellSouth LMU information is available
24 both electronically and manually. A comprehensive summary of the LMU

1 content is described in the following BellSouth documents, which can be
2 found on BellSouth's website at:

3
4 <http://www.interconnection.bellsouth.com/guides/html/bpobr.html>

5
6 *D/CLEC Pre-Ordering Guide For Electronic Loop Makeup ("LMU")*

7 Or

8 *BellSouth Loop Makeup ("LMU") CLEC Pre-Ordering Guide for Manual*
9 *Loop Makeup*

10
11 BellSouth has provided LMU on a manual SI basis since February 17,
12 2000 and on a mechanized basis since November 18, 2000. By the end
13 of first quarter 2001, additional LMU data is being returned when
14 populated in BellSouth's database (see Carrier Notification letter
15 SN1082138 for description). ALECs wishing to request revisions to
16 BellSouth's LMU process are encouraged to submit a Change Request
17 via the Change Control Process ("CCP") for review, discussion,
18 prioritization, and potential implementation. To my knowledge, Covad
19 has not submitted a Change Request to the CCP concerning LMU
20 content.

21
22 Q, IS MR. ALLEN CORRECT IN STATING, ON PAGE 23 OF HIS
23 TESTIMONY, THAT BELLSOUTH IS ALLOWED 7 BUSINESS DAYS
24 TO COMPLETE THE LMU SI?

1 A. No. Although Mr. Allen correctly states the interval that previously
2 existed for BellSouth's response time to a Manual LMUSI, the standard
3 service interval for return of a response to a Manual LMUSI is now three
4 business days. This information is available to Covad in the *BellSouth*
5 *Loop Makeup (LMU) CLEC Information Package* posted on BellSouth's
6 Website. Attached, as Exhibit JLW-1, is Version 4, dated April 16, 2001
7 of the guide that reflects the 3 business-day standard service interval.
8 Covad also may request LMU information electronically which returns
9 LMU information responses in near real time.

10

11 Q. PLEASE DESCRIBE MAP VIEWER WHICH IS MENTIONED BY MR.
12 ALLEN ON PAGE 23 OF HIS TESTIMONY, AND WHY BELLSOUTH
13 DOES NOT PROVIDE ALECS WITH DIRECT ACCESS TO MAP
14 VIEWER.

15

16 A. Map Viewer is a customized software application, available in North
17 Carolina, South Carolina, Georgia, Florida and 13 wire centers in
18 Alabama, that provides BellSouth Outside Plant Engineering Design and
19 Service Advocate Center employees with access to BellSouth's
20 electronically stored plat records. A functionality of Map Viewer is to
21 access the electronically stored plats maintained in the Corporate
22 Facilities Database and compile a loop make-up report. Map Viewer is
23 not a "database" nor does access to Map Viewer provide only "loop
24 make-up information". Rather, Map Viewer accesses plat records that
25 contain nearly every detail of BellSouth's outside plant network.

1 BellSouth considers this detailed plat information as proprietary.
2 Even though BellSouth, for reasons outlined above, will not provide
3 ALECs direct access to Map Viewer, the appropriate information from
4 BellSouth's database(s) is made available through the electronic and
5 manual LMUSI process.

6

7 Q. HAS BELLSOUTH DESIGNED THE ELECTRONIC LOOP MAKEUP
8 INQUIRY TO PRECLUDE COVAD FROM EFFECTIVELY USING THE
9 SYSTEM, AS SUGGESTED BY MR. ALLEN ON PAGE 24 OF HIS
10 TESTIMONY?

11

12 A. No. On the contrary, BellSouth has designed the electronic loop makeup
13 inquiry to permit ALECs to effectively use the system. Mr. Allen testified,
14 "BellSouth requires that Covad search for loop makeup by identifying a
15 BellSouth loop product." This is not correct and suggests a misunderstanding
16 of the LMU process. BellSouth does not require Covad to identify a BellSouth
17 loop product, but rather optionally allows the ALEC to select a Loop Service
18 Type or Network Channel/Network Channel Interface/Secondary Network
19 Channel Interface ("NC/NCI/SECNCI") code set combination. BellSouth
20 translates the optionally entered Loop Service Type or NC/NCI/SECNCI code
21 set into an Outside Plant Equivalence Code ("OEC") that BellSouth's Loop
22 Facility Assignment and Control System (LFACS") uses to assign an order.
23 The OEC is used by LFACS in its search criteria to find facilities that meet
24 specific transmission characteristics, not specific products. For instance, the
25 ALEC may request spare facilities that have a Loop Service Type of 2-wire

1 ADSL. This is translated into an appropriate OEC value used by LFACS to
2 search for spare facilities that meet the transmission characteristics required
3 for a 2-wire ADSL service. If no Loop Service Type or NC/NCI/SECNCI code
4 set is entered, the system defaults to a POTS OEC value. The selection of a
5 2-wire ADSL Loop Service Type in no way requires the ALEC to subsequently
6 order a 2-wire ADSL product; it is merely used to limit the search criteria
7 within LFACS. If Covad would like to see any available spare loop at an
8 address, Covad may simply request a Loop Makeup and leave the Loop
9 Service Type field or NC/NCI/SECNCI values blank. In this scenario,
10 BellSouth will return available loop that would support a POTS type service
11 (this could be unloaded or loaded copper, pair gain, or fiber terminal).
12 BellSouth believes the electronic loop makeup inquiry process, as it is
13 currently designed, permits ALECs to effectively use the system by allowing
14 them to see a smaller subset of available pairs that meet specific
15 transmission characteristics needed by ALECs. If no spare pairs exist that
16 meet the desired characteristics, the ALEC may broaden the search to see
17 additional available pairs.

18 B.

19
20 **Issue 21: Should BellSouth be required to provide accurate service**
21 **order completion notification for line shared UNE orders?**

22
23 Q. HAS BELL SOUTH REFUSED TO SEND COVAD A SERVICE ORDER
24 COMPLETION NOTIFICATION, AS MR. ALLEN STATES ON PAGE 25
25 OF HIS TESTIMONY?

1

2 A. No. BellSouth has not refused to provide Covad with service order
3 completion information. BellSouth's intent is to provide Covad a
4 Completion Notification ("CN") on line sharing UNE orders like it does for
5 other ALEC orders.

6

7 Q. DID BELLSOUTH ADOPT AN ALTERNATIVE PROCESS FOR LINE
8 SHARING UNE ORDER COMPLETION NOTIFICATIONS UNTIL
9 BELLSOUTH COMPLETED NECESSARY SOFTWARE CHANGES?

10

11 A. Yes. BellSouth's in-place process for providing Completion Notifications
12 for ALEC orders required modification in order to provide reliable CNs for
13 the recently introduced line sharing UNE orders. Therefore, ALECs were
14 asked to use the COSMOS or SWITCH CFA (Connecting Facility
15 Assignment") Report (depending on the state location) to confirm the
16 order status as either "working" or "pending". A status of "working"
17 shown in the CFA Report is a reliable indication that the line sharing
18 UNE order has been provisioned. This interim process required some
19 additional manual effort by the ALEC but provided accurate information
20 to the participants. ALECs may access the BellSouth Interconnection
21 Services Daily Operations Report Site and select the COSMOS/SWITCH
22 Report:

23

<https://clec.bellsouth.com/>

24

25 BellSouth, meanwhile, has worked to produce the software changes that

1 were necessary to improve the CN process.

2

3 Q HAS BELLSOUTH NOW PLACED THE PERMANENT COMPLETION
4 NOTICE PROCESS INTO PRODUCTION?

5

6 A. Yes. Effective April 28, 2001, the Completion Notification for
7 mechanized line sharing UNE orders will be returned electronically to the
8 ALECs and the CNs for manually submitted orders may be obtained via
9 the CLEC Service Order Tracking System ("CSOTS") or Purchase Order
10 Number ("PON") Status Report. In either case, the CN information for
11 line sharing UNE orders is accurate without further steps by the ALEC.

12

13 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

14

15 A. Yes.

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Florida Public Service Commission

Docket No. 001797-TP

Exhibit JLW-1

Transmittal Cover Sheet for Jerry L.Wilson Exhibit-1

This sheet transmits the
BellSouth Loop Makeup (LMU) CLEC Information Package
Which consists of 11 pages

BellSouth LMU

BellSouth Loop Makeup (LMU)

***CLEC
Information Package***

(Version 4, April 16, 2001)

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

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

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

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

BellSouth LMU

Section 2: Version History / Control

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

Section	Date / Version	Description
Table of Contents (TOC)	07/28/00 – Version 1	Version 2 (V2) has TOC and entire information package reformatted to include section numbers
Version History / Control	07/28/00 – Version 1	This section was not required in the first posting release of this package. With V2, this section has been inserted as Section 2
"Submitting a Request for Manual Loop Makeup"	07/28/00 – Version 1	This section has been removed for the V2 posting and relocated to the "BellSouth Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guide for Manual Loop Makeup" web document
"Guidelines for Interfacing with the CRSG UNE Group"	07/28/00 – Version 1	This section has been removed for the V2 posting and relocated to the "BellSouth Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guide for Manual Loop Makeup" web document
"Loop Makeup Service Inquiry (Form)"	07/28/00 – Version 1	This form has been removed for the V2 posting and relocated to the "BellSouth Loop Makeup (LMU) CLEC Pre-Ordering and Ordering Guide for Manual Loop Makeup" web document
"Service Description"	07/28/00 - Version 1	With V2, the section name has been re-titled as "Loop Makeup Service Description"
Section 5: Ordering Information for LMUSI	09/15/00 - Version 2	Sec 5.1 includes updated information for specifying a cancellation on the Manual LMUSI form. The update reads: "CLEC would request a cancellation by checking the box on the Manual LMUSI form."
Section 5: Ordering Information for LMUSI	09/15/00 - Version 2	At the end of Sec 5.2, a paragraph has been inserted redirecting the viewer to the LMU PO&OG web document for detailed instructions on placing Manual LMU requests
Section 3.1: Service Description	10/23/00 - Version 3	In the 2 nd paragraph listing of various components for BellSouth's Loop Makeup Service, the following component was deleted for the time being: "... <i>disturbers in the same or adjacent binder groups;....</i> " (See 10/16/00 Carrier Notification for further details.)
Section 5.2: Manual Process	04/16/01 - Version 4	CRSG receives Manual LMUSI requests via email

BellSouth LMU

Section 5.2: Manual Process	04/16/01 - Version 4	The standard service interval for the return of a response on Manual LMUSI requests has been reduced from 7 to 3 business days.
Section 5.2: Manual Process	04/16/01 - Version 4	The paragraph containing instruction on the use of the RESID/FRN has been removed. RESID/FRN are addressed more explicitly in the Pre-Ordering & Ordering Guide for Manual LMU
Section 5.2: Manual Process	04/16/01 - Version 4	"Date of Service Deployment" has been changed to "Service Availability"
Section 5.3: Mechanized Process	04/16/01 - Version 4	In addition to BellSouth's Pre-Ordering Business Rules, CLECs are notified that another document will be posted in April, 2001 to assist with ordering of Mechanized LMU
Section 5.3: Mechanized Process	04/16/01 - Version 4	"Date of Service Deployment" has been changed to "Service Availability"

BellSouth LMU

Section 3: Loop Makeup Service Description

Sec 3.1: Service Description

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

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

USOC	Rate Element
• UMKLW	Loop Makeup - Preordering Without Reservation, per working facility queried (MANUAL)
• UMKLW	Loop Makeup - Preordering Without Reservation, per spare facility queried (MANUAL) [Maximum No. of Spare Facilities per LMUSI is (3).]
• UMKLP	Loop Makeup - Preordering With Reservation, per spare facility queried (MANUAL) [Maximum No. of Spare Facilities per LMUSI is (3).]
• <i>tbd*</i>	Loop Makeup - Preordering Without Reservation, per working facility queried (MECHANIZED)
• <i>tbd*</i>	Loop Makeup - Preordering Without Reservation, per spare facility queried (MECHANIZED) [Maximum No. of Spare Facilities per LMUSI is (10).]
• <i>tbd*</i>	Loop Makeup - Preordering With Reservation, per spare facility queried (MECHANIZED) [Maximum No. of Spare Facilities per LMUSI is (10).]
<i>* tbd - USOC for LMUSI submitted via the appropriate electronic interface, to be determined</i>	

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

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

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

BellSouth LMU

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

Sec 3.2: Features and Benefits

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

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

Section 4: Pre-Ordering Checklist

Sec 4.1: Availability

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

Sec 4.2: Billing Information

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

BellSouth LMU

Section 5: Ordering Information for LMUSI

Sec 5.1: Description of Ordering Process

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

Sec 5.2: Manual Process

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

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

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

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

SERVICE AVAILABILITY (MANUAL): *Contingent upon incorporating the necessary service provisions into one's Interconnection Agreement by amendment or new contract, CLECs may start submitting Manual LMUSI requests. Refer to the Section "Contract Specific Provisions".*

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

BellSouth LMU**Sec 5.3: Mechanized Process**

The CLEC will provide the information as prompted by the Operational Support System (OSS) interface for the LMUSI and as applicable to process the Service Inquiry on either a working facility or on up to ten spare facilities. Appropriate OSS interfaces for the mechanized process include LENS, TAG, and RoboTAG. Thereafter, the OSS interface submits the Mechanized LMUSI to LFACS for a response of loop makeup data. For instructions on preparing a Mechanized LMUSI, refer to **BellSouth's Pre-Ordering Business Rules**. Please note that on April 26, 2001, BellSouth will also post BellSouth's D/CLEC Pre-Ordering & Ordering Guide for Electronic Loop Makeup (LMU) Guide, Version 1, on the BellSouth Interconnection Web Site in the Customer Guides Section.

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

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

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

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

SERVICE AVAILABILITY (MECHANIZED): *Contingent upon incorporating the necessary service provisions into one's Interconnection Agreement by amendment or new contract, CLECs may start submitting Mechanized LMUSI requests. Refer to the Section "Contract Specific Provisions".*

BellSouth LMU

Section 6: Placing a UNE Service Order

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

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

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

BellSouth LMU**Section 7: Contract Specific Provisions**

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

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

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