

1 BELLSOUTH TELECOMMUNICATIONS, INC.
2 DIRECT TESTIMONY OF P.L. (SCOT) FERGUSON
3 BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION
4 DOCKET NO. 040130-TP
5 JANUARY 10, 2005
6
7

8 Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH
9 TELECOMMUNICATIONS, INC., AND YOUR BUSINESS ADDRESS.
10

11 A. My name is Scot Ferguson. I am employed by BellSouth Telecommunications,
12 Inc. ("BellSouth") as Manager – Network Interconnection Operations. In this
13 position, I handle certain issues related to local interconnection matters, primarily
14 operations support systems ("OSS"). My business address is 675 West Peachtree
15 Street, Atlanta, Georgia 30375.
16

17 Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.
18

19 A. I graduated from the University of Georgia in 1973, with a Bachelor of
20 Journalism degree. My professional career spans over 30 years with Southern
21 Bell, AT&T, BellSouth Corporation and BellSouth Telecommunications. During
22 that time, I have held positions of increasing responsibility in sales and marketing,
23 customer system design, product management, training, public relations, CLEC
24 support, and my current position in Network Interconnection Operations.
25

1 Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

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3 A. On July 20, 2004, the Parties filed a Joint Motion for Abeyance with the Florida
4 Public Service Commission (“Commission”) where the Parties asked for a 90-day
5 abatement of the arbitration proceeding so that they could include and address
6 issues relating to *United States Telecom Association v. FCC*, 359 F.3d 554 (D.C.
7 Circuit 2004) (“USTA II”) in this proceeding. During the 90-day abatement, the
8 Parties continued to negotiate, and, as a result, a number of issues have been
9 resolved.

10
11 My Direct Testimony provides BellSouth's position on two (2) of the remaining
12 unresolved arbitration issues related to Attachments 2 and 6 of the
13 Interconnection Agreement (BellSouth witnesses Blake, Morillo, Fogle and
14 Owens provide testimony as to the others). Specifically, I provide testimony on
15 Matrix Item 43 (Issue 2-25) – Access to Loop Makeup Information, and Matrix
16 Item 86(b) (Issue 6-3(b)) – Disputes Over Alleged Unauthorized Access to CSRs.

17
18 These issues are summarized in the Joint Issues Matrix filed on October 15, 2004
19 by BellSouth and NewSouth Communications Corporation (“NewSouth”),
20 NuVox Communications, Inc. (“NuVox”), KMC Telecom V, Inc. (“KMC V”)
21 and KMC Telecom III, LLC (“KMC III”)(together, “KMC”), and Xspedius
22 Communications, LLC, on behalf of its operating subsidiaries, Xspedius
23 Management Co. Switched Services, LLC (“Xspedius Switched”), and Xspedius
24 Management Co. of Jacksonville, LLC (“Xspedius Jacksonville”) (together,
25 “Xspedius”). I henceforth refer to these companies as “Joint Petitioners.”

1

2

Further, I will provide supporting evidence that the interconnection agreement language proposed by BellSouth for these issues is the appropriate language that should be adopted for this interconnection agreement by the Commission.

5

6 Q.

DO YOU HAVE ANY PRELIMINARY COMMENTS REGARDING THE UNRESOLVED ISSUES IN THIS PROCEEDING?

7

8

9 A.

Yes. The issues for which I provide testimony may or may not have underlying legal arguments. Because I am not an attorney, I offer no legal opinions on the issues. I offer testimony purely from an operations and policy perspective. If these issues require any legal arguments, BellSouth's attorneys will provide them in the appropriate briefs in this proceeding.

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Item 43 (Issue 2-25): Under what circumstances should BellSouth be required to provide a CLEC with Loop Makeup information on a facility used or controlled by another CLEC? (Attachment 2, Section 2.18.1.4)

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Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

21

22 A.

Very simply, this issue belongs in BellSouth's Change Control Process ("CCP"). The CCP implemented the current process for shared loop applications by requiring a Letter of Authorization ("LOA") for one Competitive Local Exchange Carrier ("CLEC") to view the loop makeup ("LMU") information of a loop that is

23

24

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1 leased by another CLEC from BellSouth. Practically speaking, this means that all
2 requests by CLECs to view the LMU information for the loops of other carriers
3 for any application require an LOA. Importantly, the CLEC community has
4 embraced this process, and, to my knowledge, no CLEC has ever complained
5 about it.

6
7 As referenced above and as I explain later in this testimony, CLECs in 2001 –
8 through the Shared Loop Collaboratives – determined the need for the current
9 LOA process. Because of that CLEC request, and in conjunction with the
10 Georgia Public Service Commission (“GPSC”) order in Docket 11900-U to
11 implement electronic ordering of line splitting, a change request was properly
12 submitted through the CCP, was reviewed by members of the CCP, and was
13 implemented according to the guidelines of the CCP.

14
15 Consequently, the CCP is the body that should decide if a change to the existing
16 process is warranted, but *only* if a CCP member submits a change request asking
17 for such a change. Until such time as the CCP has been fully utilized with the
18 result being a decision to change the existing process, BellSouth should not be
19 required to provide a CLEC's loop information without an LOA to these few
20 CLECs that are parties to this arbitration proceeding.

21
22 BellSouth's proposed interconnection agreement language properly defines the
23 need for an LOA as a means to protect CLEC information, and is consistent with
24 the practice of the industry in BellSouth's region for approximately the last three

1 years. Interestingly, the Joint Petitioners do not propose *any* interconnection
2 agreement language regarding protection of LMU information.

3
4 Q. THE JOINT PETITIONERS' POSITION ON THIS ISSUE SEEMS TO IMPLY
5 THAT BELLSOUTH DOES NOT PROVIDE A PROPER LMU PROCESS.
6 PLEASE RESPOND.

7
8 A. As the state regulatory bodies and the FCC all have previously ruled, BellSouth
9 complies with the nondiscriminatory access requirements to provide to CLECs
10 access to LMU information for loops owned by BellSouth. The LMU/LOA
11 requirement that was properly implemented through the CCP was in place when
12 BellSouth's LMU process was reviewed and ruled compliant by this Commission
13 during the Commission's consideration of BellSouth's Section 271 application.
14 With respect to BellSouth's OSS (including access to LMU information), this
15 Commission stated in its *Consultative Opinion*, "We believe that BellSouth
16 provides ALECs nondiscriminatory access to its OSS."¹

17
18 To protect *all* CLECs and to comply with the change request implemented
19 through the CCP, BellSouth does not provide so-called "third-party" loop
20 information without an LOA, nor should it. The first time BellSouth did so, any
21 CLEC – including the Joint Petitioners – likely would be standing on this
22 Commission's doorstep to complain about BellSouth's actions. If the Joint
23 Petitioners want a change in the existing process, they should submit a change

¹ Florida Public Service Commission *Consultative Opinion No. PSC-02-1305-FOF-TL* in Docket No. 960768B-TL, at page 84.

1 request through the CCP, and if the other member CLECs agree with them,
2 BellSouth will support the change request in accordance with the CCP guidelines.

3
4 Q. HOW DID THE CURRENT LOA REQUIREMENT EVOLVE?

5
6 A. As background, BellSouth first developed the electronic LMU process to comply
7 with the 1999 *UNE Remand Order* (“*Order*”) that required incumbent local
8 exchange carriers (“ILECs”) to allow CLECs to view LMU information for loops
9 owned by the ILEC.² In the same timeframe as the *Order*, a CLEC submitted
10 through the CCP a change request (CR0361) for BellSouth to provide the same
11 pre-order functionality for viewing LMU information as mandated by the *Order*.
12 BellSouth met its obligation to the *Order* through the implementation of CR0361
13 in Release 7.0 on July 29, 2000. I have included CR0361 as Exhibit SF-1.

14
15 BellSouth implemented CR0361 with the capability that allowed CLECs to: 1)
16 view LMU information for BellSouth loops in use for a BellSouth retail end user
17 or spare loops in the BellSouth inventory; or, 2) view loops leased from BellSouth
18 and in service for that CLEC’s own end users.

19

² See *FCC 99-238* at ¶¶ 426-427.

1 In early 2001, CLECs *themselves*, within the Shared Loop Collaboratives,³
2 recognized that CLECs and Data Local Exchange Carriers (“DLECs”) had a need
3 to view each other’s LMU information for joint marketing efforts in line splitting
4 and line sharing scenarios. In laying out the guidelines to allow that viewing, the
5 Collaboratives members specified that such viewing should be available to
6 CLECs/DLECs *only if there is an LOA*. The Collaboratives members – following
7 the ground rules established in the Collaboratives – took the change-of-process
8 request to the CCP as the appropriate venue for implementation of any system
9 and/or process changes related to the CLEC interfaces.

10
11 In the same timeframe as the request from the Collaboratives members to the
12 CCP, the GPSC issued its order in Docket 11900-U requiring BellSouth to
13 implement electronic ordering of line splitting. To implement that order
14 technically, BellSouth had to develop a process to allow a CLEC to view LMU
15 information for a loop leased from BellSouth by another CLEC. As it happened,
16 the LOA process under development at the request of the Collaboratives members
17 provided the technical solution to satisfy the GPSC order.

18
19 Accordingly, BellSouth combined the two issues and developed CR0409 in May
20 2001 to both implement the change to the process conceived by the Collaboratives
21 members and to satisfy the GPSC order to implement electronic ordering of line

³ On January 26, 2000, a Line Sharing Collaborative was established to develop, with the mutual agreement of the so-called Data Local Exchange Carriers (“DLECs”) and BellSouth, the processes and procedures required to implement Line Sharing to meet the requirements of the FCC 3rd Report and Order in CC Docket No. 98-147, and 4th Report and Order in CC Docket No. 96-98 released December 9, 1999 (Line Sharing Order). In response to CC Docket 98-147, the “Line Share Reconsideration Order,” also known as the Line Splitting Order, the Line Splitting Collaborative was established on April 19, 2001. Due to similarities in issues between Line Sharing and Line Splitting, it was agreed mutually in May 2001 to combine what was then seven outstanding central office-based/Remote Terminal based Line Sharing/Line Splitting collaboratives into a single “Shared Loop Collaborative.”

1 splitting. CR0409 was placed in 'Pending Status' (denoting approval by the CCP)
2 on June 19, 2001, scheduled on September 6, 2001 for implementation in Release
3 10.3, and was implemented in that Release on January 5, 2002 – all steps in
4 accordance with CCP guidelines. I have included CR0409 as Exhibit SF-2.
5

6 As I mentioned earlier, from an operational standpoint, the LOA requirement
7 implemented for shared loop applications means that all requests for third-party
8 LMU information require an LOA, regardless of the reason for the request (and
9 this has been the case for the last three years). BellSouth's LMU process does not
10 ascertain the intent of a CLEC's request and can provide no determination as to
11 whether an LOA should be required because it is a shared loop application request
12 or another type of request. Thus, all third-party LMU requests are treated the
13 same.

14
15 By way of example, when a CLEC inputs either the telephone number or street
16 address for which LMU information is being requested, the process (in simple
17 terms) compares the company code of the requesting CLEC to the company code
18 of the entity using the loop. If the company code on the loop record belongs to
19 either BellSouth or to the requesting CLEC, LMU information is provided. If the
20 code belongs to another CLEC, the LOA screen will appear and the correct
21 authorization information must be populated before the LMU information will be
22 provided, regardless of the CLEC's reason for wanting to view the LMU
23 information.
24

1 Q. DID ALL CCP MEMBERS HAVE AN OPPORTUNITY TO REVIEW AND
2 PROVIDE INPUT TO THE CHANGE REQUESTS THAT WERE
3 IMPLEMENTED BY BELLSOUTH?
4

5 A. Absolutely. While it is my understanding that none of the Joint Petitioners are, or
6 were, active members of the Shared Loop Collaboratives, they are CCP members.
7 CCP members are given an opportunity to receive and review a number of
8 different documents related to change requests and the software releases in which
9 those change requests are to be implemented. Additionally, these documents can
10 be found at BellSouth's interconnection website.

11
12 Such was certainly the case with CR0361 and CR0409. In fact, an examination of
13 Exhibit SF-2 reveals that, during September 2001, the CLECs received draft user
14 requirements, had a "walk-through" discussion meeting for those user
15 requirements, and received the final user requirements. All of those documents
16 and meetings contained information about the functional capabilities for
17 electronic ordering of line splitting and the LOA requirement.

18
19 As other examples of what was made available to CCP members for these change
20 requests, I have attached the following documents as exhibits:

21
22 Exhibit SF-3 Letter of Authorization (LOA) for Line Splitting CLEC
23 Information Package; also found at
24 www.interconnection.bellsouth.com/guides/unedocs/loa.pdf
25 Exhibit SF-4 User Requirements for Mechanization of Loop Makeup

1 Exhibit SF-5 Letter of Authorization for LMU to Support Line Splitting; also
2 found at
3 [www.interconnection.bellsouth.com/markets/lec/ccp_secure/docs/f](http://www.interconnection.bellsouth.com/markets/lec/ccp_secure/docs/final_user_req/10.3_CLEC_LMU_cr0409.pdf)
4 [inal_user_req/10.3_CLEC_LMU_cr0409.pdf](http://www.interconnection.bellsouth.com/markets/lec/ccp_secure/docs/final_user_req/10.3_CLEC_LMU_cr0409.pdf) (password secured
5 for CCP members)
6

7 In addition to the documents provided as exhibits, all change requests and releases
8 are discussed in monthly CCP meetings, according to the Release Management
9 processes outlined in the CCP guidelines. CCP-member CLECs are invited to
10 voice any comments and/or concerns at these meetings, or at any of the meetings
11 where draft and final user requirements are discussed. The meetings are open to
12 all interested CCP members.
13

14 Q. HAS THE LMU/LOA PROCESS BEEN AN ISSUE IN OTHER
15 ARBITRATION PROCEEDINGS?
16

17 A. This LOA process has been in place for almost three years, and, to the best of my
18 knowledge, this is the first time that it has been an arbitration issue.
19

20 Q. IS IT CLEAR TO BELLSOUTH WHY THE JOINT PETITIONERS BELIEVE
21 BELLSOUTH IS OBLIGATED TO PROVIDE A CLEC'S LMU
22 INFORMATION TO ANOTHER CLEC WITHOUT A LETTER OF
23 AUTHORIZATION?
24

1 A. No, and they have not presented any evidence proving any such obligation. What
2 *is* clear, however, is that Joint Petitioners want certain information they feel they
3 cannot get apparently because other CLECs might refuse to give permission via
4 an LOA. If that were to be proven true, that lack of cooperation or agreement
5 among CLECs does not – and should not – involve BellSouth.

6
7 Any disagreement among the CLECs with respect to the viewing of LMU
8 information should be worked out among the CLECs, or brought before this
9 Commission independent of this Section 252 arbitration proceeding. If there is, in
10 fact, a problem between CLECs that inhibits the attainment of an LOA, it is *not*
11 the result of any action by BellSouth. If the Joint Petitioners believe that their
12 inability to access the information of other CLECs has some anticompetitive
13 effect, then the Joint Petitioners' quarrel is with those other CLECs – not with
14 BellSouth.

15
16 Although BellSouth has been placed in a curious 'gatekeeper' position by the
17 rules of the Telecommunications Act, BellSouth should not be required to provide
18 information without an LOA simply because the Joint Petitioners now disagree
19 with the policy established by the CLECs or because they now have concerns
20 about asking another CLEC for permission to view such information.

21
22 Q. HOW DOES BELLSOUTH WANT THIS COMMISSION TO RESOLVE THIS
23 ISSUE?

24

1 A. BellSouth requests that the Commission order that BellSouth's proposed language
2 on this issue be adopted as the appropriate language for this interconnection
3 agreement. There is nothing to support the Joint Petitioners' position that
4 BellSouth should be required to provide this information in the absence of
5 authorization from the CLEC that is leasing the loop from BellSouth and that has
6 a business relationship with BellSouth.

7
8 This Commission certainly should not order BellSouth to implement a change to
9 an existing process (to satisfy only the Joint Petitioners) that countermands the
10 current regional operating process that was developed by the CLECs within the
11 CCP. To do so would undermine the legitimacy of the decisions made by the
12 very change management process that this Commission has previously found to
13 be a compliant and collaborative process.

14
15 Further, this Commission should support BellSouth's suggestion that if the Joint
16 Petitioners wish to pursue this issue, they should submit a change request to the
17 CCP. To do otherwise would affect every other CLEC that does not have a voice
18 in this arbitration proceeding. If the CLECs, through the CCP, agree that a
19 change is appropriate, BellSouth will certainly support that change in accordance
20 with the CCP guidelines.

21
22
23 ***Item 86 (Issue 6-3) (B): How should disputes over alleged unauthorized access to CSR***
24 ***information be handled under the agreement? (Attachment 6, Sections 2.5.6.2 and***
25 ***2.5.6.3)***

1

2 Q. WHAT IS BELLSOUTH'S POSITION ON THIS ISSUE?

3

4 A. The Party providing notice of the alleged impropriety should notify the offending
5 Party that additional applications of service may be refused, that any pending
6 orders for service may not be completed, and/or that access to ordering systems
7 may be suspended if such use is not corrected or ceased by the fifth (5th) calendar
8 day following the date of the notice. In addition, the alleging Party may, at the
9 same time, provide written notice to the person(s) designated by the other Party to
10 receive notices of noncompliance that the alleging Party may terminate the
11 provision of access to ordering systems to the other Party and may discontinue the
12 provisioning of existing services if such use is not corrected or ceased by the tenth
13 (10th) calendar day following the date of the initial notice. If the other Party
14 disagrees with the alleging Party's charges of unauthorized use, the other Party
15 should proceed pursuant to the dispute resolution provisions set forth in the
16 General Terms and Conditions of the Agreement.

17

18 Q. WHY DOES BELLSOUTH BELIEVE IT IS IMPORTANT TO HAVE SUCH
19 DEADLINES AS PART OF THE INTERCONNECTION AGREEMENT
20 LANGUAGE?

21

22 A. CLECs are well aware that BellSouth does not suspend or terminate access to
23 OSS interfaces on a whim. If the problem is the result of an isolated instance, the
24 problem can usually be easily corrected. However, if circumstances indicate a
25 systemic problem with unauthorized CSR access, then the Joint Petitioners want

1 BellSouth to file a complaint with the Commission, which could take months, or
2 even years, to resolve before suspending service to the CLEC.

3
4 This means that a CLEC could continue to access the Customer Proprietary
5 Network Information (“CPNI”) of untold numbers of CLEC and BellSouth
6 customers – without proper authority – while BellSouth waits for the regulatory
7 process to run its course. BellSouth is obligated to protect this information under
8 federal CPNI rules as well as under Florida state law.⁴ Without recourse against
9 the offending CLEC for such an extended period as the Joint Petitioners’ language
10 would allow, BellSouth no doubt would be subject to customer complaints to this
11 Commission for our not being able to do so.

12
13 BellSouth’s proposed language, on the other hand, balances the Joint Petitioners’
14 right not to be suspended or terminated versus BellSouth’s right to protect its
15 network, information and processes in the most expedient manner.

16
17 Q. HAS BELLSOUTH EVER SUSPENDED OR TERMINATED A CLEC’S
18 ACCESS AND/OR USE OF OSS INTERFACES BECAUSE OF ABUSIVE OR
19 UNAUTHORIZED ACCESS TO CSR INFORMATION?

20
21 A. I am aware of only one circumstance. In that particular case, the offending CLEC
22 had developed an automatic program that continuously accessed the CSR
23 database requesting CSR information on a series of telephone numbers, with and
24 without proper authorization. That activity not only violated CPNI regulations,

⁴ Section 364.24(2), *Florida Statutes*.

1 but it also caused a degradation of service in the performance of BellSouth's OSS
2 that materially impacted the CLECs' ability to access CSR information. That is
3 clearly the type of abuse and resulting impacts that BellSouth hopes to avoid in
4 the future.

5
6 Generally speaking, other past CLEC abuse of CSR access was isolated and not
7 systemic within the operations of the offending CLECs. When the CLECs were
8 notified, the problems were resolved, and BellSouth did not have to revoke CSR
9 access.

10
11 Q. HOW DOES BELLSOUTH WANT THIS COMMISSION TO RESOLVE THIS
12 ISSUE?

13
14 A. BellSouth would like for the Commission to rule that the interconnection
15 agreement language proposed by BellSouth for this issue is the appropriate
16 language to protect both BellSouth and the Joint Petitioners. BellSouth must be
17 given the opportunity to protect the information that BellSouth is obligated to
18 protect, and to ensure that all of its CLEC customers have the nondiscriminatory
19 OSS access that BellSouth is obligated to provide. There must be a reasonable
20 and timely remedy in the event that the actions of individual CLECs jeopardize
21 BellSouth's abilities in that regard, and BellSouth believes that its proposed
22 language provides just that.

23
24
25 Q. DOES THAT CONCLUDE YOUR TESTIMONY?

1

2 A. Yes.



Change Request Form

Internal Reference # _____ (1) Date Change Request Submitted 8/12/99 (2)
 CLEC BST (3) Company Name AT&T (4)
 CCM Jill Williamson (5) Phone 404-810-8562 (6)
 CCM Email Address jrwilliamson@att.com (7) Fax 404-810-8605 (8)
 Alternate CCM _____ (9) Alternate Phone _____ (10)
 Originator's Name Jill Williamson (11) Phone 404-810-8562 (12)
 Title of Change Pre-order loop inquiry (13)

Category: Add New Functionality Change Existing (14) Desired Due Date 4/00 (15)
 Originating CCM assessment of impact Major Minor None expected (16)
 Originating CCM assessment of priority Urgent High Medium Low (17)

Interfaces Impacted (18)		
<input checked="" type="checkbox"/> Pre-Ordering	<input type="checkbox"/> Ordering	<input type="checkbox"/> Maintenance
<input checked="" type="checkbox"/> LENS	<input type="checkbox"/> EDI	<input type="checkbox"/> TAFI
<input type="checkbox"/> LPOG	<input type="checkbox"/> LENS	<input type="checkbox"/> EC-TA Local
<input checked="" type="checkbox"/> TAG	<input type="checkbox"/> EDI-PC	

Type Of Change - Check one or more, as applicable (19)		
<input checked="" type="checkbox"/> Software	<input type="checkbox"/> Hardware	<input type="checkbox"/> Industry Standards
<input type="checkbox"/> Product & Services	<input checked="" type="checkbox"/> New or Revised Edits	<input type="checkbox"/> Process
<input type="checkbox"/> Documentation	<input type="checkbox"/> Regulatory	<input type="checkbox"/> Other

Description of requested change including purpose and benefit received from this change. (Use additional sheets, if necessary.) (20)
As part of its request for the capability to order XDSL loops electronically, AT&T also requested that BellSouth mechanize the required pre-order loop service inquiry. as well. BellSouth stated that it could not deliver this capability with OSS'99, but would look at implementing it as part of the "second phase" of OSS'99. BellSouth also agreed to develop a project plan to work on implementation of this functionality over the Y2K window, for delivery subsequent to the close of the Y2K window. AT&T is requesting that this functionality be delivered with XDSL loops in the first quarter of 2000.

Known dependencies (21)

Additional Information Yes No (22)

List all business specifications and/or requirements documents included (or Internet / Standards location, if applicable)

RF-1870
(5/98)



Change Request Form

This Section to be completed by BCCM only.

Change Request Log #	<u>CR0361 (formerly TAG0812990)</u> (23)	Clarification	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	(24)
Clarification Request Sent	_____ (25)	Clarification Response Due	_____ (26)	
Status	<u>1</u> (27)			
Enhancement Review Date	<u>9/28/99</u> (28)	Target Implementation Date	<u>07/29/00</u> (29)	
Last Modified By	<u>BCCM</u> (30)	Date Modified	<u>08/15/00</u> (31)	
Review Results (32)				
<u>Accepted for TAG only. At this time, BST has no plans to offer pre-order functionality in LENS</u>				
Canceled Change Request	<input type="checkbox"/> Duplicate	<input type="checkbox"/> Training	<input type="checkbox"/> Clarification Not Received	(33)
Cancellation Acknowledgment	CLEC _____	BST _____	Date _____	(34)
Request Appeal	<input type="checkbox"/> Yes	<input type="checkbox"/> No		(35)
Appeal Consideration (36)				
Agreed Release Date _____ (37)				



RF1871
8/00

Change Request Form

To be completed by BCCM only: Date Sent: 05/17/2001

(1) CHANGE REQUEST LOG # CR 0409

(2) STATUS 1

To be completed by CCM or BellSouth:

(3) REQUEST TYPE	<input checked="" type="checkbox"/> TYPE 2 (REGULATORY)	<input type="checkbox"/> TYPE 3 (INDUSTRY)	<input type="checkbox"/> TYPE 4 (BST)	<input type="checkbox"/> TYPE 5 (CLEC)
	<input type="checkbox"/> TYPE 6 (DEFECT) NOTE: COMPLETE SECTION 2	<input type="checkbox"/> EXPEDITED FEATURE	<input type="checkbox"/> FLOW-THRU	

SECTION 1

(4) COMPANY NAME	BellSouth
(5) OCN	
(6) CCM NAME	Brenda Files
(7) TELEPHONE NUMBER	205 321 2105
(8) CCM EMAIL ADDRESS	Change.Control@bridge.bellsouth.com
(9) CCM FAX NUMBER	205 321 5160
(10) ALTERNATE CCM NAME	
(11) ALTERNATE PHONE NUMBER	
(12) ORIGINATOR'S NAME	
(13) ORIGINATOR'S PHONE NUMBER	
(14) TITLE OF CHANGE REQUEST	LINE SPLITTING - REMOVE EDIT IN LMU PROHIBITING CLEC FROM RECEIVING LOOP DATA
(15) CATEGORY	<input type="checkbox"/> ADD NEW FUNCTIONLITY <input checked="" type="checkbox"/> CHANGE EXISTING

Attachment A-1A

Jointly Developed by the Change Control Sub-team comprised of BellSouth and CLEC Representatives.



RF1871
8/00

Change Request Form

(16) DESIRED DUE DATE		JUNE, 2001		
(17) ORIGINATING CCM ASSESSMENT OF IMPACT	<input checked="" type="checkbox"/> HIGH	<input type="checkbox"/> MEDIUM	<input type="checkbox"/> LOW	
	(18) ORIGINATING CCM ASSESSMENT OF PRIORITY	<input checked="" type="checkbox"/> URGENT	<input type="checkbox"/> HIGH	<input type="checkbox"/> MEDIUM <input type="checkbox"/> LOW
(19) INTERFACES IMPACTED				
PRE-ORDERING	<input checked="" type="checkbox"/> LENS	<input checked="" type="checkbox"/> TAG	<input type="checkbox"/> CSOTS	
ORDERING	<input checked="" type="checkbox"/> EDI	<input checked="" type="checkbox"/> LENS	<input checked="" type="checkbox"/> TAG	<input type="checkbox"/> LNP
MAINTENANCE	<input type="checkbox"/> TAFI	<input type="checkbox"/> EC-TA Local		
MANUAL	<input type="checkbox"/> Manual			
(20) TYPE OF CHANGE (Check one or more, as applicable)				
<input checked="" type="checkbox"/> Software	<input type="checkbox"/> Product & Services	<input checked="" type="checkbox"/> Documentation	<input type="checkbox"/> Hardware	<input type="checkbox"/> New or Revised Edits
<input type="checkbox"/> Regulatory	<input type="checkbox"/> Industry Standards	<input type="checkbox"/> Process	<input type="checkbox"/> Other	<input type="checkbox"/> Defect
<input type="checkbox"/> Expedited Feature	<input type="checkbox"/> Flow Through			
(21) DESCRIPTION OF REQUESTED CHANGE (Including purpose and benefit received from this change. Include attachments if available)		Remove the current edit within Electronic LMU that prohibits the requesting D/CLEC from receiving loop data on a loop owned by another D/CLEC.		
(22) REQ TYP(s) IMPACTED:				
(23) ACT TYP(s) IMPACTED:				
(24) PROVIDE EXAMPLE OF REQUESTED CHANGE:				
(25) Identify the LSOG versions that are affected by this change				
<i>This section to be completed by BellSouth only:</i>				
(26) Does this request require clarification?		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
(27) Clarification Request Sent				
(28) Clarification Response Due				

Attachment A-1A

Jointly Developed by the Change Control Sub-team comprised of BellSouth and CLEC Representatives.



RF1871
8/00

Change Request Form

(29) Change Request Review Date

(30) Target Implementation Date 1/05/02 –
Release 10.3

(31) Change Review Meeting Results 06/19/01 BellSouth placed this request in Pending Status.
09/06/01 Scheduled for Release 10.3 on January 5, 2002.
09/07/01 Distributed draft user requirements to CLEC.
09/20/01 Draft user requirements walk through meeting with CLECs.
09/28/01 Final user requirements distributed to CLECs.

01/07/02 Implemented in Release 10.3 on 01/05/02.

(32) CANCELED CHANGE REQUEST DUPLICATE TRAINING CLARIFICATION NOT RECEIVED

(33) CANCELANATION ACKNOWLEDGMENT CLEC BST DATE:

(34) APPEAL YES NO

(35) APPEAL
CONSIDERATIONS

SECTION 2

This section to be completed by CLEC/BellSouth- External Explanation of Type 6 Defect Change Request

(36) PON #

(37) ERROR MESSAGE:

(38) RELEASE OR API VERSION
(If applicable)

(39) DESCRIPTION OF DEFECT SCENARIO:

SECTION 3

This section to be completed by BellSouth – Internal Validation of Defect Change Request

(40) DEFECT VALIDATION RESULTS:

(41) CLARIFICATION NEEDED: YES NO

(42) VALIDATED DEFECT IMPACT LEVEL: HIGH MEDIUM LOW

(43) VALIDATION TYPE: DEFECT FEATURE TRAINING ISSUE DUPLICATE

(44) DEFECT IMPACTS OTHER CLECS? YES NO

(45) INTERFACES IMPACTED BY DEFECT: EDI TAG LNP LENS

TCIF 7 TCIF 9

Attachment A-1A



Letter of Authorization (LOA) For Line Splitting

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

CLEC Information Package

(Version 4, October 30, 2003)



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 BellSouth CARE 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
All	10/30/2003 – Version 4	Update to the LOA process flow



Letter of Authorization (LOA) For Line Splitting

Chapter 2.0: Overview

The LOA process for Line Splitting was developed by the CLEC Collaborative members in a unified effort to support and authorize BellSouth's role in the release of the Voice CLEC's end user information to their LOA partner (DLEC). This LOA allows the DLEC to view Loop Make Up (LMU) data, order HFS CO Unbundled Loop Modification and order Line Splitting of an end user's loop that belongs to the Voice CLEC for the purpose of provisioning Line Splitting Service.

The executed LOAs will be housed on the Internet for the convenience of all parties involved. The BellSouth Web Master (web master) will create Internet addresses/folders and passwords for each of the CLECs and DLECs participating in LOA partnerships. However, each time that a new Line Splitting partnership is executed, BellSouth must receive an electronically signed LOA from the new Line Splitting Voice CLEC and DLEC partners. The parties agreeing to the LOA must provide electronic signatures on the LOA.

The LOA will be provided via email to the BellSouth CLEC Care Local Support Manager (LSM). The LSM will forward the LOA to the web master via email. The web master will place a copy of the signed LOA document in each party's folder. The folder is password protected. The CLEC for whom the folder has been created will have the password for their respective folder. The only other access to the folder will be a BellSouth Billing Subject Matter Expert.

Changes to folder content may only be processed through the LSM. The CLEC and DLEC will not be permitted to remove documents from the folders. If a newly executed LOA is to be added or if an existing LOA is to be cancelled, the cancellation or new LOA will be provided to the LSM. The same LOA document will be used to notify BST of cancellation. Appropriate fields have been added to make cancellation simple. 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.

Web site for folders:

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



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.

CLEC/DLECs 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.

The LMU (manual or electronic) and Line Splitting Local Service Requests will have three fields associated with executed LOAs. The fields must be populated with the Voice CLEC information as follows:

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

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.

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.



Letter of Authorization (LOA) For Line Splitting

Chapter 4.0: Process Guidelines for LOA

4.1 The Letter of Authorization Process

The CLEC will obtain a copy of a LOA from the Collaborative Web Site, shown below and will obtain an electronic signature from both parties. The signed LOA will be provided to the LSM via e-mail. The LSM will provide all documents to the BellSouth web master who will post a copy in each party's folder. The submitting party/parties will receive a confirmation from the LSM that the LOA has been posted and the date of posting.

http://www.interconnection.bellsouth.com/markets/lec/line_sharing_collab/index.html

4.2 Internet Folder for LOAs

If a folder has not been created for the submitting parties, the LSM will request the web master to create a folder and obtain passwords for the party/parties involved. This will involve a ten (10)-business day turn-around. However, the web master will acknowledge that the document has been received by returning an email of acknowledgement to the LSM. The password will be provided to the new LOA participant/s as soon as the web master has created appropriate folder/s and provided the information back to the LSM. The web master will place a copy of the new LOA in each participating party's folder.



Letter of Authorization (LOA) For Line Splitting

4.3 Electronic Signatures

To Create an Electronic Signature:

To create the electronic signature the computer must be connected to a scanner to complete the following detailed procedure.

How to create and insert a scanned picture on to the LOA form.

- First 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:

- When the image appears in Microsoft Photo Editor, make any changes you want
- For example: you can crop the picture, add special effects to it, and adjust its brightness, contrast and color.
- When finished editing the picture, save changes and then click Exit
Note: If Microsoft Photo Editor is not installed, run the Setup program again and install it.
- Now Open the LOA Word document
- Position the insertion point where you want to insert the scanned signature
- On the insert menu you will point to "picture" and then Click "from file" and this will give you the ability to access the picture that you have saved. You will double click on the signature picture to insert on to the LOA.

4.4 Web Site for LOAs

Users please take caution in selecting your proper folder. If you should mistakenly select the wrong folder, you must clear your browser's history file. These instructions can be found on the Two Party Agreement web site.

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



Letter of Authorization (LOA) For Line Splitting

Chapter 5.0: Acronyms

CLEC	Competitive Local Exchange Carrier
CO	Central Office
DSL	Digital Subscriber Line
DLEC	Data Local Exchange Carrier
Jpeg	Soft Ware for creating pictures
LMU	Loop Make Up
LOA	Letter of Authorization
LSM	Local Support Manager
LSP AUTH	Local Service Provider Authorization
UNE	Unbundled Network Element



**ENCORE USER
REQUIREMENTS FOR
*MECHANIZATION OF LOOP
MAKE-UP FOR CLEC XDSLS***

**ENC7762.DOC
DOCUMENT VERSION 2.0
APRIL 28, 2000**

**Created: 12/06/1999
Revised: 4/28/2000**

PRIVATE/PROPRIETARY: No disclosure outside BellSouth except by written agreement.

FEATURE DESCRIPTION

The mechanized Loop Make-Up Process for CLEC XDSL will provide Loop "Make-Up" detail to the requesting CLEC. The CLEC will use this information to determine if an end user's loop is capable of supporting their implementations of XDSL services.

Relative to CLEC XDSL service, the LM Scope includes the following:

- a) Allowing CLECs' to request Loop Makeup detail on existing facilities, (Telephone Number or Circuit ID, - identified), when the facilities are owned by the submitting CLEC or BellSouth.
- b) Allowing CLECs to request Loop Makeup detail on new/spare facilities owned by BellSouth.
- c) Allowing CLECs to reserve new/spare facilities for a "standard" timeframe.
- d) Allowing CLECs to cancel reservations for new / spare facilities within the standard timeframe.
- e) Allowing CLECs to select or input a NC/NCI/SECNCI "codeset reference" that will be used to "fine tune" the facility types returned in the LM. (This "codeset reference" will NOT be used to "qualify (yes/no)" a facility. It will be used only to return a focused, abbreviated list of facilities that are a best match to meet the NC/NCI/SECNCI codes on the request.)

The CLEC XDSL pre-order LM transaction will allow the user to input / select :

- a) A validated address and Telephone Number, (for requests involving existing facilities).
- b) A validated address and Circuit Identifier, (for requests involving existing facilities).
- c) A validated address only, (for requests involving new / spare facilities).
- d) A NC / NCI / SECNCI codeset OR equivalent that identifies
 - 1) UNE ADSL 2-wire, or
 - 2) UNE HDSL 2 or 4 wire service,
 - 3) UNE UCL-Short (2 or 4 wire)
 - 4) UNE UCL-Long (2 or 4 wire).
- e) Up to ten (10) loops (quantity) for which Loop Make-Up detail is desired. (Applicable to New / Spare facilities only)

The LM process for CLEC XDSL shall respond with detailed information and functionality as specified in the Requirement section of this document.

USER REQUIREMENTS

Requirement #	Description
UR7762.0001	The user shall be able to identify and electronically submit a LM request for CLEC XDSL.
UR7762.0002	The User will receive a positive acknowledgement that the Loop Inquiry and / or reservation request has been completed.
UR7762.0003	<p>The user shall receive common English "message detail" responses, as illustrated below:</p> <ul style="list-style-type: none"> ▪ Account Information Not Found ▪ Address Not Found ▪ CC Not Valid ▪ CCNA Not Valid ▪ TN / Circuit Format Invalid ▪ TN / Circuit ID not found ▪ Insufficient Information To Process Query ▪ Invalid Input Combination (NC/NCI/SECNCI) ▪ Transaction Successful ▪ Not Authorized to access data. (Restricted Service. CLEC/ BST does not own / control the account) ▪ System Unavailable ▪ No Mechanized Information Available For This Request ▪ Not authorized to cancel Reservation request. (Not owner (CLEC) of the reservation).
UR7762.0004	<p>The user shall have the ability to perform a preorder transaction to receive Loop Makeup detail for CLEC XDSL UNES.</p> <p>(The user shall use this detail to evaluate if the loop is capable of supporting their specific XDSL or UCL service implementations.</p>
UR7762.0005	The user shall utilize the Pre-order "address validation" process prior to submitting a request for Loop Qualification / Loop Makeup (LM).
UR7762.0006	<p>The user shall have the data input for Telephone Number and Circuit ID, - FORMAT validated, based upon the following:</p> <ul style="list-style-type: none"> ▪ <u>Telephone Number</u> : The format is valid if it conforms to rules associated with SOER – S&E, TN format 009. ▪ <u>Circuit ID</u>: The format is valid if it conforms to rules associated with SOER – S&E, CLS format 007 or CLT format 007.
UR7762.0007	If the user submission for LM involves an invalid Telephone Number, Circuit ID, and/or Address detail, the user shall receive a message. The message shall identify the invalid element(s) to the user.

UR7762.0008	As a part of the LM process <u>for new/spare facilities</u> , the user shall be able select / input a NC/NCI/SECNCI “codeset <u>reference</u> ” that will be used to “fine tune” the facility types returned in the LM.
UR7762.0009	As a part of the LM interface <u>for new/spare facilities</u> , the user shall be notified that the input / selection of the codeset reference in UR7762.0008 above will be used only to return a focused, abbreviated list of facilities that are a best match to meet the NC/NCI/SECNCI codes on the request. The user shall be further notified that the use of the “codeset reference” should NOT be interpreted as an indication that the returned facilities are suitable or “qualifies” for any specific use.
UR7762.0010	For any given LM query, after initial data is input by the user (to initiate the query process), the user shall not be required to re-key valid data associated with sequential queries in the overall process.
UR7762.0012	In association with a given LM request, the user shall select / input data based upon the following rules : a) A validated address and Telephone Number <u>OR</u> a validated address and Circuit Identifier. (For requests involving existing facilities). b) A validated address only. (For requests involving new / spare facilities). c) A NC / NCI / SECNCI codeset <u>OR</u> equivalent that identifies: 1) UNE ADSL 2-wire, 2) UNE HDSL 2 wire service 3) UNE HDSL 4 wire service, 4) UNE Copper Loop – Short, 2 wire 5) UNE Copper Loop - Short , 4 wire 6) UNE Copper Loop –Long , 2 wire 7) UNE Copper Loop –Long , 4 wire (For new or existing requests.) d) The number of loops (quantity) for which Loop Make-Up detail is desired. (For New / Spare facilities only)
UR7762.0013	The user shall consider their request for LM as valid, when it conforms to one of the following scenarios: A) The request involves existing “ working service” which is owned by the issuing CLEC or BST. <u>Or</u> B) The request involves new/ (BST spare) facilities. <u>AND</u> C) Involves a single premise address on any given Loop Make-up request.
UR7762.0014	If the user request for LM detail is associated with existing working service which is NOT owned by the issuing CLEC or BST, then the user shall receive a

	message. The message shall indicate that the submitting user is not authorized to receive the requested data for the specified account..
UR7762.0016	As a part of the LM process for <u>new/spare facilities</u> , the user shall be able to indicate up to ten (10) loops for which Make-up is desired.
UR7762.0017	As a part of the LM process for <u>new/spare facilities</u> , the user shall be able to reserve up to ten (10) loops for which Make-up is desired.
UR7762.0018	As a part of the LM process for <u>RESERVING new/spare facilities</u> , the user shall be notified that the facilities will be reserved for 4 days (96 hrs).
UR7762.0019	Not electronically supported for Phase 1. Restated as assumption. (5.7) to establish intent regarding future release.
UR7762.0020	Not electronically supported for Phase 1. Restated as assumption. (5.8) to establish intent regarding future release.
UR7762.0021	<p>The users' response from the CLEC XDSL Loop Make-Up request shall include loop data currently available in the BST LFACs system, - based upon whether an individual loop conforms to service specific conditions listed in UR7762.0065 through UR7762.0070.</p> <p>This returned detail includes the list of items shown below in the LFACs Loop Data section, in addition to any items shown in the OTHER section, which are not implied / referenced by data in the LFACs section.</p> <p><u>LFACs LOOP DATA Section</u></p> <pre> LOOP{ LPSTAT [7] Loop aggregate, 1 per loop Status of assembled facility RTF [1] Receive/Transmit Indicator SSC [1] Single Subscriber Carrier Indicator FN{ CA [10] Cable identifier PR [4] Pair Identifier ABP [4] Assignable Binding Post TEA [50] Terminal Identifier TRMED[9] Transmission Medium Type LMU{ LMSTAT [40] Loop Makeup Aggregate, 1 per segment LUNIT [2] Loop Makeup Status NLD [2] Load Point Number, Null if Non-loaded COIL [4] Load Coil Type ES [9] End Section LDSP [15] [9] Load Spacing BO{ BOCAP [5] Build Out Capacity BORES [5] Build Out Resistance BOOFF [9] Build Out Offset } SPL{ GA [7] Gauge LGTH [9] Length UBA [1] Type of cable CAPAC [5] Capacitance BTOFF [9] Bridge Tap Offset } } } </pre>

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	<p><u>OTHER</u> Loop composition (Copper/Fiber etc., length and wire gauge of each) Bridge taps (total kilofeet) Load coils (Presence) Pair gain devices DAML (Presence) Digital Loop Carrier (DLC) (Presence) Cross Box Identifier</p>
UR7762.0022	As a result of a user LM request, if no loop Make-Up data is found, the user shall receive a message to that effect.
UR7762.0023	Collectively, the user shall be able to submit at least 4,000 LM requests per "busy hour".
UR7762.0024	The user shall receive an average response time of 2 seconds or less, per individual user initiated query associated with the LM.
UR7762.0025	As a result of a user LM request, if <u>any</u> loop make-up data is found, the user shall have the detail referenced in UR7762.0021, returned to them.
UR7762.0027	The users' response from the Loop Make-Up request shall identify (in common English terms) the specific element label, in conjunction with retrieved data values associated with a given element.
UR7762.0028	As a part of the LM process for <u>RESERVING new/spare facilities</u> , the user shall be able to cancel their own reservations.
UR7762.0029	If a user attempts to cancel a reservation which, was initiated by a different user, the user requesting the cancellation will receive a message. The message will indicate that the submitting user is not the owner of the reservation and are therefore not authorized to cancel the request.
UR7762.0030	The user shall NOT be allowed to reserve facilities that are currently reserved.
UR7762.0035	Not electronically supported for Phase 1. Rephrased as assumption. (5.6) to establish intent regarding future release.
UR7762.0041	In association with a user request for New/Spare loop reservations, the user shall receive a Facility Reservation Number (FRN). The FRN will be mechanically generated based upon the following format: CCCCZZZZZZMMDDYYYY With C being the CLEC identified and Z being a per-reservation unique value.
UR7762.0065	User requests involving 2 or 4 wire Unbundled Copper Loops - <u>Short (UCL-S)</u> , shall have facility data returned from LFACS which meet the following criteria (PER PAIR basis):

	<ul style="list-style-type: none"> ▪ The facility loop type/composition is COPPER ▪ The facility meets Resistance Design (RD) spec of 1300 Ohms or less ▪ The facility is non-loaded ▪ The total loop length is LESS than or equal to 18 kft ▪ Less than 6 kft of Bridged Tap is associated with the facility.
UR7762.0071	<p>User requests involving 2 or 4 wire Unbundled Copper Loops <u>-Long</u> (UCL-L), shall have facility data returned from LFACS which meet the following criteria (PER PAIR basis):</p> <ul style="list-style-type: none"> ▪ The facility loop type/composition is COPPER ▪ The facility may have up to 2800 Ohms of Resistance or less ▪ The total loop length is Greater than 18 kft ▪ Less than 12 kft of Bridged Tap is associated with the facility.
UR7762.0105	The user shall be able to print the FRN and results returned from a query.
UR7762.0110	FORMAT EXHIBITS
	<p>ID: CLS - COMM. LANG. CIRCUIT ID-SERIAL NO.</p> <p>007 CLS DATA FORMAT INCORRECT!</p> <p>CLS DATA MUST APPEAR IN THE FOLLOWING FORMAT:</p> <p>/CLS 12.PLNT.123456.66.SB WHERE 12 = PREFIX (OPTIONAL) (1-2 ALPHANUMERICS) WHERE PL = SERVICE CODE (2 ALPHABETICS PRECEDED BY A PERIOD) WHERE NT = MODIFIER (2 ALPHABETICS OR 1 ALPHABETIC AND 1 ALPHANUMERIC) WHERE 123456 = SERIAL NUMBER (1-6 NUMERICS OF 1-999999 PRECEDED BY A PERIOD) WHERE 66 = SUFFIX (OPTIONAL) (1-3 NUMERICS OF 1-999 PRECEDED BY A PERIOD) WHERE SB = ASSIGNING COMPANY IDENTIFICATION (2 OR 4 ALPHABETICS PRECEDED BY A PERIOD)</p> <p>NOTE 1: THE ABSENCE OF THE SUFFIX DATA IS INDICATED BY 2 PERIODS BETWEEN THE SERIAL NUMBER AND THE ASSIGNING COMPANY IDENTIFICATION.</p> <p>EXAMPLE: CLS 12.PLNT.123456..SB</p> <p>NOTE 2: ON CABS ORDERS AND SOUTH CENTRAL BELL NON-CABS ORDERS, THIS EDIT IS ONLY PERFORMED ON INWARD (E,I,T OR X) AND RECAPPED ACTIVITY.</p> <p>NOTE 3: WHEN THE SPECIAL ACTION INDICATOR IS D OR THE FIFTH CHARACTER OF THE BASIC CLASS OF SERVICE IS Q, THE ASSIGNING COMPANY IDENTIFICATION MAY APPEAR AS THREE ALPHABETICS.</p> <p>-----</p> <p>FID: CLT - COMMON LANGUAGE CIRCUIT ID - TN FORMAT</p> <p>007 CLT DATA MUST BE FORMATTED AS FOLLOWS:</p> <p>/CLT 38.SBGS.404.477.3999.T22.123 WHERE 38 = PREFIX (OPTIONAL) (1-2 ALPHANUMERICS) WHERE SB = SERVICE CODE (2 ALPHABETICS PRECEDED BY A PERIOD) WHERE GS = MODIFIER (2 ALPHANUMERICS OF AA-ZZ OR A1-Z9) WHERE 404 = NPA (3 NUMERICS PRECEDED BY A PERIOD) WHERE 477 = CENTRAL OFFICE (3 NUMERICS PRECEDED BY A PERIOD)</p>

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	<p>WHERE 3999 = LINE NUMBER (4 NUMERICS PRECEDED BY A PERIOD) WHERE T22 = EXTENSION NUMBER/TRUNK CODE (OPTIONAL) (2-5 ALPHANUMERICS PRECEDED BY A PERIOD) WHERE 123 = SEGMENT NUMBER (OPTIONAL) (1-3 ALPHABETICS OR NUMERICS OF 1-999 OR A-ZZZ PRECEDED BY A PERIOD)</p> <hr/> <p>FID: TN - TELEPHONE NUMBER</p> <p>009 TN DATA FORMAT INCORRECT!</p> <p>TN MUST APPEAR ACCORDING TO ONE OF THE FOLLOWING FORMATS:</p> <p>A. I2 1FB /TN 101 555-1234-1235 WHERE 101 = NPA (3 NUMERICS) (OPTIONAL) WHERE 555 = NXX (3 NUMERICS) WHERE 1234 = LINE NUMBER - LOWER RANGE (4 NUMERICS) WHERE 1235 = LINE NUMBER - UPPER RANGE (4 NUMERICS)</p> <p style="text-align: center;">OR,</p> <p>B. I1 1FB /TN 101 555-1234 WHERE 101 = NPA (3 NUMERICS) (OPTIONAL) WHERE 555 = NXX (3 NUMERICS) WHERE 1234 = LINE NUMBER (4 NUMERICS)</p> <p style="text-align: center;">OR,</p> <p>C. I3 1FB /TN 205 555-1111, 4333, 5555 WHERE 205 = NPA (3 NUMERICS) (OPTIONAL) WHERE 555 = NXX (3 NUMERICS) WHERE 1111= LINE NUMBER (4 NUMERICS) WHERE 4333= LINE NUMBER IN A SERIES (OPTIONAL) WHERE 5555= LINE NUMBER IN A SERIES (OPTIONAL)</p>
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ENCORE User Requirements for

Letter of Authorization for LMU to Support Line Splitting

FINAL

ENC15069.DOC

Version 3.0

September 7, 2001

CMVC Version 1.1

Created: 08/17/2001

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1. SCOPE

1.1 Business Implications

1.1.1 Current Process

Current Process	
<ul style="list-style-type: none">• LMU (Loop Make-up) is provided when the Requester or BellSouth is the owner of the voice facility.	
<ul style="list-style-type: none">•	
<ul style="list-style-type: none">•	
<ul style="list-style-type: none">•	

1.1.2 Expected Process

Expected Process	
<ul style="list-style-type: none">• Continue to provide LMU when the requesting Carrier or BellSouth owns the voice account.	
<ul style="list-style-type: none">• LMU will be provided on any request, when authorization is valid that is provided by the requesting Carrier.	
<ul style="list-style-type: none">• Authorization is valid when data in LSP AUTH, LSP AUTHDATE and LSP AUTHNAME fields of the LSR are populated and the LSP AUTH is a valid match to the ownership of the account.	



2.0 User Requirements

Requirement No.	User Requirement
UR15069.0010	BellSouth will continue to provide LMU (Loop Make-up) on all BellSouth accounts requested by a Carrier (C/DLEC) without requiring the LSP authorization fields to be input.
UR15069.0020	<p>The following new fields are required to provide authorization capability.</p> <ol style="list-style-type: none"> 1. LSP AUTH – 4 alphanumeric. CC of CLEC granting the LOA 2. LSP AUTHDATE – 08 numeric. MMDDCCYY. Date the LOA was granted. 3. LSP AUTHNAME – 15 alphanumeric. Name of the person from the CLEC who signed the LOA.
UR15069.0025	<ol style="list-style-type: none"> 1. When the requirements in UR15069.0020 are not met for the 3 new fields, system will return a message as stated below. LSP AUTH –CC of CLEC that is granting the LOA will be populated, else, return the following message. <p style="text-align: center;">LSP AUTH MUST BE 4 ALPHANUMERIC</p> 2. LSP AUTHDATE – Date the LOA was granted, must be populated as defined (MMDDCCYY), else, return the following message. <p style="text-align: center;">LSP AUTHDATE FORMAT MUST BE NUMERIC</p> 1. LSP AUTHNAME –Name of the person from the CLEC who signed the LOA. Require 15 alphanumeric characters or less, else return the following message. <p style="text-align: center;">LSP AUTHNAME FIELD SIZE MUST BE LESS THAN 16 CHARACTERS.</p>
UR15069.0030	<p>When any one of the 3 new fields in requirement UR15069.0020 is populated, require that all three fields be populated else, return the following message to the Requester.</p> <p style="text-align: center;">LSP AUTHORIZATION COMBINATION INVALID AS ENTERED</p>



Requirement No.	User Requirement
UR15069.0040	When LMU request is submitted for a facility not owned by BellSouth or the requester and valid <u>authorization is provided</u> within the request, LMU will be provided.
UR15069.0050	When LMU request is submitted for a facility <u>not owned</u> by BellSouth or the requester and the field, <u>LSP AUTH</u> , is blank LMU will not be provided. Advise requester that "AUTHORIZATION IS REQUIRED FROM THE OWNER OF THE FACILITY".
UR15069.0060	When LMU request is submitted for a facility <u>owned by the requester</u> , <u>no authorization</u> is required to obtain LMU.
UR15069.0070	When LMU request is submitted and LSP AUTH is populated, <u>validate authorization data matches</u> the facility owner identification before providing LMU.
UR15069.0080	When LMU request is submitted and LSP AUTH is populated and authorization data does not match the facility ownership, advise the requester that "AUTHORIZATION DOES NOT MATCH FACILITY OWNERSHIP". <u>LMU not provided until validation is passed.</u>
UR15069.0090	Include storage capability for new fields, LSP AUTH, LSP AUTHDATE and LSP AUTHNAME along with existing fields.
UR15069.0100	LSP AUTH, LSP AUTHDATE and LSP AUTHNAME are not required to view BellSouth facilities.
UR15069.0110	Requirement deleted 09/-5/01



2.3 New or Revised Error Messages

Requirement No.	Error Message
UR15069.0025	<ul style="list-style-type: none"> • “LSP AUTH MUST BE 4 ALPHANUMERIC” • “LSP AUTHDATE FORMAT MUST BE NUMERIC” • LSP AUTHNAME FIELD SIZE MUST BE LESS THAN 16 CHARACTERS
UR15069.0030	<p>New Message:</p> <p>“LSP AUTHORIZATION COMBINATION INVALID AS ENTERED”</p>
UR15069.0050	<p>“AUTHORIZATION IS REQUIRED FROM THE OWNER OF THE FACILITY”</p>
UR15069.0080	<p>“AUTHORIZATION DOES NOT MATCH FACILITY OWNERSHIP”</p>
UR15069.0100	<p>Deleted 09/05/01</p>

2.4 Service Order Exhibits

	Yes	No
Tested:	N/A	

Service Order Exhibit
N/A



2.5 Impact on LSR Data Fields

2.5.1 LSR Data Fields – To be Added

Field Name	LSR Section	Length (characters)	A AN N	R C O	Acceptable Entries
N/A					

2.5.2 LSR Data Fields – To be Revised

	Field Name	LSR Section	Length (characters)	A AN N	R C O	Acceptable Entries
Current	N/A					
Revised						
Current						
Revised						

2.5.3 LSR Data Fields – To be Deleted

Field Name	LSR Section
N/A	



2.6 Impact on FID

FID	Description	Service Order Section
N/A		

FID	Description	Service Order Section
N/A		

2.7 Impact on USOCs – Additions or Changes to be Implemented with this Feature

USOC	Description	Valid States	Applicable FIDs
N/A			