

BELLSOUTH TELECOMMUNICATIONS, INC.
COMPARABLY EFFICIENT INTERCONNECTION PLAN FOR
IDSU MANAGEMENT INFORMATION SERVICE

I. INTRODUCTION

BellSouth Telecommunications, Inc. (“BellSouth”), hereby posts this Comparably Efficient Interconnection Plan for IDSU Management Information Service pursuant to the Commission’s *CEI Plan Order*.¹ In that *Order*, the Commission eliminated the requirement that Bell Operating Companies (“BOCs”) file and obtain pre-approval of CEI plans prior to offering enhanced services. Instead, the Commission now permits BOCs to provide enhanced services upon the posting of a CEI plan on the BOC’s publicly accessible website.

This plan describes the underlying basic network service that may be used by BellSouth’s IDSU Management Information Service and will be provided to other Enhanced/Information Service Providers (“ESPs/ISPs”) in accordance with the Commission’s nine CEI parameters.²

II. SERVICE DESCRIPTION

The Commission requires all CEI plans to contain a short general description of the enhanced service activity covered by the plan. This section satisfies that requirement.

The IDSU Management Information Service (Service) covered by this plan presents a robust set of enhanced customer network management service capabilities that

¹ *Computer III Further Remand Proceedings: Bell Operating Company Provision of Enhanced Services, 1998 Biennial Review – Review of Computer II and ONA Safeguards and Requirements*, CC Docket Nos. 95-20, 98-10, *Report and Order*, 14 FCC Rcd 4289 (1999) (“*CEI Plan Order*”).

² *See Amendment of Section 64.702 of the Commission’s Rules and Regulations (Third Computer Inquiry)*, 104 F.C.C.2d 958 (1986) (“*Phase I Order*”), *recon.*, 2 FCC Rcd 3035 (1987) (“*Phase I Recon. Order*”)(subsequent history omitted).

provide fault and performance monitoring features and reports to carrier and to other access service customers using specified customer premises equipment (IDSU CPE) owned or otherwise provided by the customer and the customer's private Local Area Network (LAN) and Frame Relay access services connected to the IDSU CPE. The IDSU CPE used in conjunction with the IDSU Management Information Service supports the enhanced alarm and end-to-end service level monitoring of the customer's IDSU CPE and the customer's Frame Relay access circuits from the perspective of the customer's IDSU CPE in addition to standard CSU/DSU functionality.

Alarms are received via SNMP directly from the IDSUs. The alarms are managed in real-time including notifications, Active Alarm displays and Alarm List reports. The IDSU Management Information Service also supports historical performance monitoring data collection and reporting.

The following historical performance monitoring reports are supported by the Service:
Network Summary (Hourly, Daily, Monthly); Interface (Single Lport/PVC - Hourly, Daily, Monthly); Forecast; Capacity Planning; Threshold Exceptions; Top Interfaces; And Service Level

Additional management information service capabilities and reports may be added from time to time as the Service develops.

III. COMPARABLY EFFICIENT INTERCONNECTION

This section of the Plan demonstrates BellSouth's compliance with the nine CEI parameters established in the *Phase I Order*.³

A. Interface Functionality

The Commission requires BOCs to make available to competing ESPs/ISPs standardized hardware and software interfaces that are able to support transmission, switching, and signaling functions identical to those utilized in the enhanced service provided by the carrier. Information and technical specifications for such interfaces must be made available in accordance with the Commission's network disclosure rules.⁴

All entities, including BellSouth's enhanced service provider, may access BellSouth's network through existing standard network interfaces for which information and technical specifications have been made available in accordance with the Commission's network disclosure requirements. If any new basic services are made available to BellSouth's IDSU Management Information Service Component, they will be made available to other ESPs/ISPs at the same time, in the same jurisdictions, on the same terms and conditions, and in accordance with the network disclosure rules.

B. Unbundling of Basic Services

As part of its CEI offering, the basic services and the basic service functions that underlie a BOC's enhanced service offering must be unbundled from other basic service offerings and associated with a specific rate element in the BOC's tariffs.⁵

All of the basic services and functions that will be used by the BellSouth IDSU Management Information Service are already unbundled from other service offerings and are available through BellSouth's tariffs. The following is a list of tariffed services that may be

³ *Phase I Recon. Order*, 104 F.C.C.2d at 1039-43

⁴ 47 C.F.R. §§ 51.325-51.335

⁵ *Phase I Recon. Order*, 104 F.C.C.2d at 1040

utilized by any other ESP/ISP or its customers in the same manner as BellSouth uses them in the provisioning of its IDSU Management Information Service.⁶

<u>Service</u>	<u>Tariff References</u>
Exchange Access Frame Relay Service	F.C.C No. 1, Section 21.1
Network Interface	F.C.C No. 1, Section 21.1
Standard DLCI	F.C.C No. 1, Section 21.1
Standard Committed Information Rate	F.C.C. No. 1, Section 21.1
Manual Backup Capability	F.C.C No. 1, Section 21.1
Network Visibility Service	F.C.C No. 1, Section 21.6
Central Office Channel Interface	F.C.C No. 1, Section 7
Interoffice Channel	F.C.C No. 1, Section 7
Local Channel	F.C.C No. 1, Section 7

BellSouth may amend this plan from time to time to add additional basic services to this list in accordance with the *CEI Plan Order*.

C. Resale

This parameter requires the carrier's enhanced service operation to take the basic services used in enhanced service offerings at their unbundled tariff rates.⁷

BellSouth meets this requirement because its IDSU Management Information Service will take all the underlying basic services from the same tariffs and subject to the same terms and

⁶ Current tariffs for these services may be found on BellSouth's tariff web page at <http://cpr.bst.bellsouth.com/index2.html>

⁷ *Phase I Recon. Order*, 104 F.C.C.2d at 1040

conditions available to other ESPs/ISPs. As noted in the *Phase 1 Order*, this parameter is satisfied through appropriate accounting techniques.⁸

D. Technical Characteristics

Pursuant to this parameter, the technical characteristics of the basic service provided by BellSouth and other ESPs/ISPs must be equal to those used by BellSouth's own IDSU Management Information Service.⁹

As noted above, BellSouth will order the basic services utilized in its IDSU Management Information Service from the same tariffs as other ESPs/ISPs. BellSouth's previously approved nondiscriminatory circuit assignment and installation procedures will ensure that there can be no systematic discrimination in circuit assignment based on identity of the customer or the intended use. Additionally, BellSouth files annual affidavits attesting that its procedures have been followed and, consequently, that no discrimination has occurred. Accordingly, this parameter is satisfied.

E. Installation, Maintenance and Repair

The Commission further requires the time periods for installation, maintenance, and repair of the basic services underlying the carrier's enhanced service to be the same as those the carrier provides to competing ESPs/ISPs.¹⁰

BellSouth's internal procedures for installing, maintaining and repairing all of its basic services are sufficiently uniform that the discrimination against any customers or type of customer in the performance of these functions is prevented. BellSouth detailed these

⁸ *Id.*, n.218.

⁹ *Id.* At 1041

¹⁰ *Id.*

procedures in its original ONA plan (CC Docket No. 88-2) and the Commission approved them in the *BOC ONA Order*.¹¹ This parameter is therefore satisfied.

F. End User Access

Pursuant to this parameter, if a carrier offers end users the ability to use abbreviated dialing or signaling to activate or access the carrier's enhanced services, the carrier must provide the same capabilities to end users of competing ESPs/ISPs. Similarly, end users must have equal opportunities to access basic facilities through derived channels whether they use the enhanced services of the carrier or of a competitor.¹²

BellSouth will be providing this Service to access service customers. BellSouth will not be providing access to its IDSU Management Information Service to its own end users, except possibly to the limited extent that non-carrier customers of its tariffed Frame Relay access services might be considered "end users." Customers will access the Service by using a unique userID/password combination via a customer provided standard dial, direct private line or internet web connection. No abbreviated dialing, signaling arrangements, or derived channel capabilities are uniquely associated with BellSouth's IDSU Management Information Service. Thus, this parameter is also satisfied.

G. CEI Availability

With this parameter, the Commission requires carriers to make the basic services underlying their enhanced service offerings available to competing ESPs/ISPs in the same location and on the same dates for other ESPs/ISPs as for themselves. BOCs also must provide

¹¹ *Filing and Review of Open Network Architecture Plans*, CC Docket No. 88-2 Phase I, *Memorandum Opinion and Order*, 4 FCC Rcd 1, ¶ 467-73 (1988) ("*BOC ONA Order*").

¹² *Phase I Recon. Order*, 104 F.C.C. 2d at 1041.

other ESPs/ISPs reasonable testing opportunities for new basic services used by the BOC's enhanced service.¹³

Because BellSouth's IDSU Management Information Service will obtain underlying basic services pursuant to the same tariffs as other ESPs/ISPs, BellSouth will have access to those underlying services only at the same time and in the same locations as those underlying services are available to other ESPs/ISPs. Further, consistent with the *CEI Plan Order*, if BellSouth introduces a new basic service that is to be used by BellSouth's IDSU Management Information Service, BellSouth will make testing capability for the new service available to competing ESPs/ISPs no later than simultaneously with BellSouth's posting an amendment to this plan and initiating use of the new service.¹⁴ Accordingly, the conditions of this parameter are met.

H. Minimization of Transport Costs

This parameter requires carriers to work to minimize the difference in transmission costs incurred by a BOC's collocated enhanced service to a competitor's non-collocated enhanced service.¹⁵ In the *BOC ONA Order*, the Commission established that this parameter can be met if the BOC charges its own collocated enhanced service an access link rate that is the same as that paid by a non-collocating ESP/ISP. For distance sensitive transmission rates, however, the BOC must charge its own collocated enhanced service no less than it would charge and ESP/ISP located two miles from that central office.¹⁶ BellSouth will comply with this parameter by charging its IDSU Management Information Service for access links as if such equipment were located two miles from that serving office. This parameter is thereby satisfied.

¹³ *Id.*

¹⁴ *CEI Plan Order*, 14 FCC Rcd at 4302-03, ¶ 20.

¹⁵ *Phase I Recon. Order*, 104 F.C.C. 2d at 1042

¹⁶ *BOC ONA Order*, 4 FCC Rcd at 78, 86-87

I. Availability to All Interested ESPs/ISPs

The final CEI parameter requires carriers not to restrict the availability of CEI to any particular class of customer or enhanced service competitor.¹⁷

This parameter ensures that all ESPs/ISPs have the same opportunity to avail themselves of the underlying basic services, and, further, that a BOC does not engage in anticompetitive teaming with one competitive ESP/ISP and against others.¹⁸

BellSouth affirms that the underlying basic services used with BellSouth's IDSU Management Information Service will not be limited to any class of customer or enhanced service competitor. All such services are available on a tariffed basis and accessible by all users for any lawful purpose. If any new arrangements are to be made available for BellSouth's enhanced service provider, they will be made available to all other ESPs/ISPs at the same time, in the same jurisdiction, and on the same terms and conditions. Accordingly, this parameter is also satisfied.

IV. OTHER NON-STRUCTURAL SAFEGUARDS

A. Allocation of Joint and Common Costs

The nonstructural safeguards adopted in the *Computer III* proceeding include the Commission's Part 64 rules for the allocation of costs between regulated and non-regulated activities. These rules were first developed in the *Joint Cost* proceeding¹⁹ and later strengthened in the *Computer III Remand* proceeding.²⁰ BellSouth will comply with these rules and with

¹⁷ *Phase I Recon. Order*, 104 F.C.C.2d at 1042

¹⁸ *CEI Plan Order*, 14 FCC Rcd at 4299, ¶ 13.

¹⁹ *Separation of Costs and Regulated Telephone Service from Costs of Nonregulated Activities, Report and Order*, 2 FCC Rcd 1298 (1987), modified on recon., 2 FCC 6283 (1987)

²⁰ *Computer III Remand Proceedings: Bell Operating Company Safeguards and Tier I Local Exchange Company Safeguards*, 6 FCC Rcd 7571 (1991), vacated in part and remanded, *California v. FCC*, 39 F.3d 919 (9th Cir. 1994).

BellSouth's Cost Allocation Manual as it may be amended from time to time and approved by the Commission.

B. Nondiscrimination Reporting

BellSouth will continue to abide by the Commission's existing nondiscrimination reporting rules, which require BOCs to file quarterly installation and maintenance and nondiscrimination reports. Basic services associated with BellSouth's IDSU Management Information Service will be aggregated with other BellSouth services offered pursuant to CEI plans, and a single report will be filed for all such services.

C. Disclosure of Network Information

BellSouth confirms that interconnection between basic services used by BellSouth's own IDSU Management Information Service or by those of another provider will be achieved through published network interfaces. If BellSouth changes any existing network interface specifications or uses new interface specifications for basic underlying services, it will comply with the Commission's network disclosure rules.²¹

D. Customer Proprietary Network Information

BellSouth will comply with Section 222 of the Communications Act of 1934 and the Commission's rules implementing Section 222 of the Act.²²

IV. CONCLUSION

²¹ See 47 C.F.R. §§ 51.325-51.335.

²² *Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information, et al.*, CC Docket No. 96-115, *et al.*, *Third Report and Order and Third Further Notice of Proposed Rulemaking*, FCC 02-214 (rel. July 25, 2002).

BellSouth's CEI plan for IDSU Management Information Service is in compliance with the Commission's CEI requirements and is hereby posted on BellSouth's publicly accessible website.