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**BellSouth Interconnection Services**

675 West Peachtree Street  
Atlanta, Georgia 30375

**Carrier Notification****SN91082588**

Date: August 27, 2001

To: Competitive Local Exchange Carriers (CLECs)

Subject: CLECs – Misuse of the Local Exchange Navigation System (LENS) Ordering Systems

BellSouth has observed that some wholesale CLEC customers have been utilizing the LENS ordering feature, ACT of W, Switch as Is, for the purpose of submitting requests for conversion of a single resale or BellSouth retail account to Unbundled Network Elements – Platform (UNE-P). This practice currently conflicts with the BellSouth Business Rules regarding the conversion of a single resale or retail account to UNE-P. The ACT of W, Switch as Is, LENS ordering Resale/Retail-to-UNE-P conversion process was not designed for the purpose of submitting requests for conversion of single accounts when changing class of service from Resale/Retail (flat rate) to UNE-P (measured rate).

However, BellSouth has taken the use of this ordering process under advisement to determine whether this can be accepted for general use. At present, BellSouth is developing a testing plan to ensure that its use will work in a consistent and predictable manner and will cause no billing or provisioning issues.

There is currently no system edit to prevent the use of this ordering process, the use is not yet endorsed by BellSouth, and the use is not compatible with, at a minimum, retail or resale accounts with Digital Subscriber Line (DSL) service or any grandfathered service. Any use of the Resale/Retail-to-UNE-P conversion process for single orders will be at the risk of the CLEC.

Neither a CLEC nor BellSouth has presented a proposal to Change Control to change the current Business Rules to allow the use of Act of W when changing class of service for the purpose of conversions from Retail/Resale to UNE-P. However, BellSouth will present this option at the earliest possible Change Control meeting.

Thank you for your assistance and cooperation.

Sincerely,

**ORIGINAL SIGNED BY JIM BRINKLEY**

Jim Brinkley – Senior Director  
BellSouth Interconnection Services