

Exhibit No. ____ (WGR-7a)

Docket No. UT-023003



Verizon California Inc.
CA.R93-04-003 et al Whsl Init.03252003
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WHOLESALE NON-RECURRING COST STUDY RESULTS



February 19, 1999

Alcatel USA, INC.
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Mr. Mike Nawrocki
Manager - New Services Technology
Bell Atlantic
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RE: Multi Carrier GR-303 Issues

Dear Mike,

This letter is intended to clarify issues related to GR-303 capabilities in a multi-carrier environment and review industry activity that is investigating and addressing open issues. Although much progress has taken place in the last few years in implementing GR-303 interoperability between different equipment vendors, technologies and operations systems, the industry must continue to work toward solutions for operating and managing GR-303 systems across multiple carrier networks (e.g. A single digital loop carrier remote terminal connected to different switches owned and operated by different carriers). To meet this goal, Alcatel continues to support the Bellcore GR-303 Forum.

Alcatel has taken a lead in the industry in addressing GR-303 issues and has successfully worked with Bell Atlantic for the last several years in resolving interoperability issues between the Litespan product and various equipment vendor switches and operations systems. In terms of product capabilities, the Litespan 2000 product currently supports up to 4 Virtual Interface Groups (VIGs) in each node. This means that Litespan 2000 can be physically connected to up to four Bell Atlantic switches. Each VIG supports the call traffic and processing for any number of voice channels (within the system's capacity) assigned to it. To function, a relationship is thereby established between the Litespan 2000, the switch it is connected to and the carrier's operations systems. Alcatel has successfully demonstrated the operation of multiple VIGs for a single carrier. However, operating GR-303 in a multi-carrier, multiple VIG environment introduces a number of significant additional challenges to the industry that still must be solved. These are summarized in Attachment A

Respectfully,

Bill Pappentick

attachment

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- **Overall Control & Management of the Litespan System Must Be Administered By One Carrier –** The Litespan system supports one X.25 communications channel. Therefore, one company's Support System has visibility to all software loads, configuration changes and maintenance. Alarms and provisioning associated with the overall system can't be managed through multiple GR-303 VIGs, but rather are managed across the single X.25 communication channel. The system control cannot be partitioned across carriers or individual channel banks.
- **Industry groups are still addressing real time dynamic Time Slot Interchange (TSI) functionality in a multi-carrier environment –** TSI is the real time allocation of network capacity between the switch and the NGDLC system for call processing. Dynamic TSI in a multi-carrier environment would require that GR-303 inventory and assignments are pre-assigned when the interface group is initially established. The Bellcore GR-303 Forum has identified the operations flow associated with this issue as an area requiring additional work from an industry perspective.
- **There is only one master database within the Litespan and only one Operating System can maintain complete control –** The Litespan system can only have either the OPS/INE and Switch DLE/SA system (used in Bell Atlantic) or the Alcatel Access Management System (AMS) for provisioning line ports to GR-303 interface groups. Multiple OSs (that would be used by multiple carriers) cannot control a single Litespan system. Database backup and restore process from a remote Network Operating Center (NOC) requires that one backup system be ready and capable of restoring the Litespan database under control of one work group. This same group would be responsible for common equipment upgrades to the system that all GR303 interface groups depend upon, such as power supply cards, battery backup, fans, system communication links, shared ringing and tone cards and Litespan software upgrades.
- **Testing resources and procedures associated with a multi-carrier GR-303 system are more complex and must be coordinated across carriers –** Given that each carrier may have unique Test Systems that they want connected to the Litespan system, separate test devices may be required for each GR-303 interface group. Testing procedures must be developed to avoid either an inability to access specific channels for testing or an invalid attempt to access a channel outside of a given carrier's interface group. For example, this may require that traffic be segregated to separate channel banks or bays on a per carrier basis when a Litespan system is associated with multiple CLECs. The need for unique test systems required by multiple carriers may also result in a limitation in the number of available VIGs that can be supported from a single system.
- **Multiple carriers owning VIGs cannot each monitor system alarms –** The Litespan common control alarms are not carried over a GR-303 VIG, but are sent to a single common Craft interface or element management system. The system controller alarms are an extensive set of alarms that are reported to only one network operations center.
- **Provisioning of GR-303 interface groups between carriers will require development of Detailed Operations Processes between the carriers owning the switches and the carrier owning the Litespan system –** Provisioning of GR-303 channels will require that all carriers agree that the single carrier who owns the Litespan system act as the system administrator for all carriers' switches connected to the Litespan. This system administration function cannot be performed from the switch. Without an automated system, like a separate Element Management system, this function must be performed locally at the digital loop carrier system. A system administrator must build the GR-303 interface groups and associate DS1 cards to GR303 Interface Groups for the individual carrier.