

**C O N T R I B U T I O N**

**TITLE:** FG3 Recommendation #5 – Line Sharing Test Access  
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**ABSTRACT**

This document contains a Recommendation from NRIC V Focus Group 3 on Line Sharing Test Access. It is provided for distribution to the members of the NRIC V full council in preparation for its approval at the February 27, 2001 NRIC Council meeting.

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Regarding Rule 47 CFR 51.319(h)(7)(i):

1. While some manually accessed, direct physical test points (provided solely for the purpose of manual test access) have been made available by some loop providers, it is the view of FG3 that this is not a scaleable solution and should NOT be required. While it is presumed that such access will continue to be made available by some loop providers to some service providers, we believe that it should be driven by private negotiation between loop owner and loop user ONLY as a matter of business convenience, and not required by rule. Further, such implementations currently in existence should be grandfathered as meeting the requirements of 51.319(h)(7)(i).
  
2. FG3 feels that the rule, and moreover, its underlying purpose, is sufficiently met with an automated data interchange (e.g. via terminal emulation, web-based interfaces, electronic bonding, etc.) using the voice switch-based mechanized loop testing system, assuming the following conditions:
  - 2.1. The loop provider should assure that the line-shared loop, when provisioned, is unloaded (See 47 CFR 51.319(h)(5)).
  
  - 2.2. Some mechanism shall be provided to indicate that a line sharing provisioning order has been completed. One means of satisfying this requirement is to show that the wiring between the voice switch and splitter is completed, which may be accomplished by recognition of the ADSL splitter signature (as provided for in T1.413-1998, Annex E), via the voice switch-based mechanized loop testing system. It is important to note that other means to achieve this end may be available.

It is recognized that not all voice switch-based mechanized loop testing systems are currently capable of detecting and reporting splitter signature information. It is understood that such capability would require upgrades to the software for the test heads as well as for the operational support systems of the providers involved. Software upgrades for the most commonly deployed test heads are understood to be currently available. For successful implementation and utilization of this method, it is necessary that the costs of these upgrades be recognized and that the loop provider's need to recover these costs be addressed by the FCC and state commissions.
  
3. DSL service providers can optionally provide their own test access, using their own POTS splitters, and their own access equipment, and their own test equipment. In any case, the DSL service provider's testing shall not interrupt an active telephone call without the end-user's permission.