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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:	)	CCBPOL 96-25
	)	
Implementation of the Local Competition Provisions in the Telecommunications Act of 1996	)	CC Docket No. 96-98
	)	
Interconnection between Local Exchange Carriers and Commercial Mobile Radio Service Providers	)	CC Docket No. 95-185

SUPPLEMENTAL COMMENTS

MCI Telecommunications Corporation ("MCI"), hereby supplements its comments in opposition to the Petition for Waiver of US West Communications Inc., ("USWC") filed in the above-captioned proceeding on December 23, 1996 with the attached Affidavit of Robert D. Edgerly, Manager III, National Carrier Initiatives Group, MCI Carrier Management. A copy of the previously filed comments are attached herein.

By way of summary, MCI contends, and as the attached Affidavit demonstrates, that USWC's efforts to circumvent and dismiss national guidelines for electronic access to OSS, is an effort to frustrate the development of local competition within its territory. For the reasons stated in its December 23 submission and in the attached Affidavit, MCI respectfully requests that the Commission deny the above-referenced USWC's petition for waiver of the OSS deadline requirements.

Respectfully Submitted,

Amy Zirkle

Amy Zirkle
Roy Lathrop
Lisa Smith
MCI Telecommunications Corporation
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

January 10, 1997

STATEMENT OF VERIFICATION

I have read the foregoing and, to the best of my knowledge, information, and belief, there is good ground to support it, and it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct. Executed on January 10, 1997.

Amy Zirkle
1801 Pennsylvania Avenue, NW
Washington, D.C. 20006
(202) 887 3037

Technical Affidavit of Robert D. Edgerly

I, Robert D. Edgerly, hereby state that the following information is true and correct to the best of my knowledge, information, and belief.

1. I submit this response to the Petition for Waiver and Affidavit filed by US WEST Communications, Inc. (USWC) on December 11, 1996, seeking relief from the Federal Communication Commission ("FCC" or "Commission") mandate under the FCC's First Report and Order requiring that the Incumbent Local Exchange Carrier (ILEC), including USWC, provide electronic interface access to the functionalities of their Operations Support Systems (OSS) to Competitive Local Exchange Carriers (CLECs) by January 1, 1997.

Biographical Information:

2. By way of background, I am an employee of MCI Telecommunications Corporation and have been so since 1991. I currently work as a Manager III in the National Carrier Initiatives Group within MCI's Carrier Management organization. For the past two years, I have been MCI's Primary Contact to the telecommunications industry Ordering & Billing Forum, responsible for managing the development of industry technical interface specifications supporting Operations Support Systems (OSS). My current business address is MCI Telecommunications, dept. 9494/022, 1650 Tysons Boulevard., McLean, VA 22205.

3. By way of education and professional credentials, I received a Bachelor of Science degree in Mechanical/Systems Engineering from the United States Military Academy at West Point in 1985. I am a Licensed Professional Engineer in the State of Virginia (Professional Engineer License # 022357) and completed a Masters of Business Administration (MBA) at Georgetown University in 1992.

Availability of Industry Technical Specification for Local Competition OSS

4. The Alliance for Telecommunications Industry Solutions (ATIS), headquarters in Washington, DC, is an established telecommunications industry technical specifications setting organization. Membership is open to North American and World Zone 1 Caribbean providers of telecommunications services with a plant investment in transport and/or switching equipment, as well as providers engaged in the resale of those services; all manufacturers of telecommunications network equipment used for the provision of telecommunication services in North America and/or World Zone 1 Caribbean countries; and all providers of enhanced services. ATIS' committees address telecommunications issues such as: network interconnection and interoperability standards, ordering and billing of access service for service providers, electronic

commerce and electronic bonding and standards for wood poles. ATIS sponsors 14 open industry forums, with more than 2,000 experts from 300 companies participating.[1]

5. The Ordering & Billing Forum (OBF) of the Carrier Liaison Committee (CLC) of ATIS has for the last year been focusing on developing national guidelines for Operations Supports Systems (OSS) specifically for local competition. The mission of the OBF is to provide a forum for customers and providers in the telecommunications industry to identify, discuss and resolve national issues which affect ordering, billing, provisioning and exchange of information about access services, other connectivity, and related matters. The OBF has six standing committees: Billing, Message Processing, Ordering & Provisioning, Subscription, SMS/800 Number Administration, and Telecommunications Ordering Request.[2]

6. For the last year, five of the six standing committees of the OBF have been engrossed in identifying, discussing, and resolving technical OSS issues critical to the deployment of local competition. In particular, the Ordering & Provisioning Committee of the OBF has made significant progress in producing a new Local Service Ordering Guideline (LSOG) Industry Support Interface (ISI) document defining the business process, exchange of information, data elements, and usage rules for CLECs to order resold and unbundled local network services from ILECs. The Ordering & Provisioning Committee manages the development process that addresses the business needs of those companies requesting business processes and inter-company order/processing specifications for telecommunications products and services.

7. On October 24, 1996, at OBF Meeting # 56, the OBF Ordering & Provisioning Committee reached consensus and placed into Final Closure the initial version of Local Service Ordering Guideline (LSOG). This new Industry Support Interface (ISI) document has been available in draft format since August 29, 1996, when it reached Initial Closure at OBF Meeting # 55. This Technical Specification has been expeditiously published by Bellcore as the following Special Reports (SR):

SR STS-471070	Local Service Ordering Overview.
SR STS-471071	Local Service Request Form Preparation Guide.
SR STS-471072	End User information Form Preparation Guide.
SR STS-471073	Loop Service Form Preparation Guide.
SR STS-471074	Interim Number Portability Form Preparation Guide.
SR STS-471075	Loop Service with Interim Number Portability. Form Preparation Guide.
SR STS-471076	Resale Services Form Preparation Guide.
SR STS-471077	Port Services Form Preparation Guide.
SR STS-471098	Usage Rule Table Guide.
SR STS-471099	Local Service Request Confirmation Notice

[1] The ATIS Web Site, www.atis.org
[2] The OBF Web Site, www.atis.org/clc/obf

Form Preparation Guide.

8. This initial Local Service Ordering Guideline document addresses order/processing requirements for Interim Local Number Portability, Unbundled Local Loops, Unbundled Local Switch Ports and the Resale of Plain Old Telephone Service (POTS) with all Vertical Features. While this LSOG version 1.0 is far from a comprehensive solution that offers the resale and unbundling of every available or required LEC network service, it serves as the fundamental building block for the construction of an "industry standard" Local Service Request (LSR) order/processing Industry Support Interface and system platform between all ILECs and CLECs. This platform is envisioned to support the strategic development of the systems and business process to facilitate the resale and unbundling of all other required LEC network services.

9. All of the above technical specifications included within the LSOG are being mechanized using the OBF and industry approved Electronic Data Interchange (EDI) data format by the Telecommunications Industry Forum (TCIF) EDI Service Order Sub-Committee (SOSC), also an ATIS sponsored forum. This effort is based on EDI Transaction Sets and technical specifications that have been available for years. These include American National Standards Institute (ANSI) Accredited Standards Committee (ASC) X12 Version 3040 Electronic Data Interchange (EDI) Transaction Sets (TS) 850 - Purchase Orders, and TS 855 - Purchase Order Verification. The enhancements to these existing Transaction Sets to fully support all of the OBF approved LSOG documentation has been ongoing for some time and was to be completed by year end 1996.

10. Efforts are currently underway within the Ordering & Provisioning Committee to produce a version 2.0 of the LSOG by March 1997, that should address the resale of design services such as Integrated Services Digital Network (ISDN) Basic Rate Interface (BRI), ISDN Primary Rate Interface (PRI), Private Lines, IntraLATA Frame Relay, and the implementation of Local Routing Number (LRN) Portability and Directory Services Requests. The following OBF OSS technical specifications addressing Directory Services reached Initial Closure in the OBF on October 24, 1996, and are already available in draft format as Bellcore Special Reports (SR):

SR STS-471101	Directory Service Request Form Preparation Guide.
SR STS-471102	Directory Listing Form Preparation Guide.
SR STS-471109	Directory Service Request Confirmation Notice Form Preparation Guide.

11. To date, over 70 separate pre-ordering, ordering, and provisioning issues are currently being worked in the OBF Ordering & Provisioning Committee. Issues are submitted by companies according to their business needs, are prioritized for work and development without discrimination in an open industry forum, and industry consensus is reached on the final technical resolution.

12. MCI has and continues to advocate compliance with the established industry guidelines supporting local competition as collectively developed and agreed to by the telecommunications industry through the ATIS sponsored forums. MCI is investing its development monies for OSS in the technical interface solutions developed by the industry through the OBF. MCI, other IXCs, all of the RBOCs, and major CLECs have been full participants within the ATIS sponsored forums, such as the OBF, charged with developing these OSS technical specifications in an effort to ensure local competition in the provision of local service.

National Requirements for electronic ordering interfaces would reduce the time and resources required fore new entrants to enter and compete in regional markets.

13. In the FCC's First Report and Order addressing Operation Support Systems, the FCC sought comment on whether national requirements for electronic ordering interfaces would reduce the time and resources required for new entrants to enter and compete in regional markets. The FCC concluded:

> "528. In order to ensure continued progress in establishing national standards, we propose to monitor closely the progress of industry organizations as they implement the rules adopted in this proceeding. Depending upon the progress made, we will make a determination in the near future as to whether our obligations under the 1996 Act require us to issue a separate notice of proposed rulemaking or take other action to guide industry efforts at arriving at appropriate national standards for access to operation support systems."[3]

14. Within the Ordering & Billing Forum, companies from all industry segments have reached consensus on a standard set of data elements and data format needed to process an order between CLECs and ILECs. However, CLECs also have regional negotiation teams working their way to a consensus with each ILEC regarding access to OSS. MCI's teams try to keep the order processes they work out with each ILEC national in scope, in accordance with agreed ATIS or OBF guidelines. Meanwhile, many ILECs are attempting to force these teams to agree to provide different data elements and data formats other than those agreed to through an industry consensus process. Many ILECs are attempting to adopt non-standard and proprietary ordering and provisioning methods, separate and distinct from one another. If allowed to continue, this could mean that new entrants with a national presence, such as MCI, as well as the smaller national local providers, would be forced to set up 20 or more different ordering systems to interface with the different proprietary ILEC systems. This would be further complicated if ILECs develop different ordering requirements for each state within their region. The state public utility commissions, with their unique regulations governing telecommunications businesses, could reinforce these differences. There could potentially end up being 50 different processes and/or 50 different data formats for ordering local services depending on the outcome in each state.

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[3] FCC First Report and Order

15. The required time and incremental capital investment for the development of non-standard Operational Support System interfaces by a CLEC to conduct business with ILECs electronically represents a considerable barrier to entry into a regional local market. Both the high development cost and uniqueness of a proprietary ILEC interface have the effect of forcing a would-be competitor elsewhere. ILEC's that are successful in deploying non-standard and proprietary interfaces will not only delay, but will succeed in impeding the emerging market of CLECs' ability to compete effectively within their territories. If one ILEC is successful at developing independent OSS specifications, this will also be to the detriment to most other ILECs that chose to follow national guidelines.

16. In its First Report and Order, the FCC specifically contemplated the use of nationally recognized OSS standards to further the development of local competition. If the FCC allows one ILEC to develop non-standard or proprietary OSS specifications, it could serve to encourage other ILECs to follow a similar course in future OSS development. ILECs encouraged to seek waivers to develop individualized OSS specifications will force new entrants to incur great time and expense to meet. The FCC expressly recognized the adverse consequences that would ensue from such actions, discouraged such tactics, and considered actions to monitor the progress of industry organizations in implementing OSS.[4]

Specific response to the USWC's Petition for Waiver and Affidavit

17. USWC claims that its attempts to meet the needs of multiple purchasers with a single "general purpose" solution justifies a waiver. However, USWC's request rests not on its inability to meet the January 1, 1997 deadline set in the First Report and Order, but rather on its efforts to develop non-standard OSS interfaces that do not conform to the national guideline, the OBF approved EDI data format. Despite USWC's numerous references to draft OBF processes in its supporting affidavit, nowhere does it state that it is adopting the OBF approved and TCIF maintained EDI data format for order processing, nor does USWC choose to argue against the deployment of this particular data format. Instead, USWC has independently decided to abandon these industry specifications in favor of technologies other than EDI for which it has neither sponsored nor served to develop common technical interface specifications through a recognized open industry forum. In particular, USWC proposes to comply with the Commission's mandate for electronic access to OSS, by deploying a type of electronic interface that is simply a Web page on the Internet. This does not meet any of MCI's or the industry's OBF EDI formatted data requirements for OSS.

18. USWC claims that supporting the provision of unbundled network elements such as "unbundled loops" and "unbundled switching" by January 1, 1997 has proven impossible due to a lack of specific product definition[5]. As demonstrated above, the OBF

[4] FCC First Report and Order at para 528
[5] USWC Affidavit at para 10.

has already reached Final Closure on these issues, defining the ordering and provisioning guideline for both of these unbundled network elements some time ago.[6] USWC's supporting affidavit further states that, "The OBF has completed work on a draft of LSR for Local Service Resale (only)."[7] In fact as discussed above, the OBF Ordering & Provisioning Committee completed work and reached industry consensus of Final Closure for ordering local service resale, unbundled loops, and unbundled ports, all on the same day - October 24, 1996.

19. USWC claims that unbundled network elements lack detailed product definition because they may have two or four wire, voice grade or ISDN-capable.[8] This argument is invalid because there are orderable options associated with the underlying unbundled network element for which industry technical specifications already exist. The existing Network Channel and Network Channel Interface codes published by Bellcore, incorporated into the LSOG, addresses two and four wire arrangements. The ANSI ASC X12 3040 EDI Feature Code Set includes hundreds of orderable options associated with both resold and unbundled local services, including both voice grade services and ISDN capable components. Instead of implementing these approved and available national guidelines, USWC is delaying implementation and concludes, "Thus, much of the OSS access and support functionality awaits the conclusion of negotiations and state action with respect to product definition and price."[9] This amounts to another attempt by USWC to reinforce regional differentiation as a barrier to effective local competition, instead of complying with established industry technical specifications.

20. USWC's proposed OSS ordering interface capabilities requires human intervention and lacks interface design specifications. Specifically, USWC proposes "the CLEC will be able to submit a Local Service Request ("LSR") electronically via the interface, and the software will deliver that request to a USWC order writer who will translate the service request manually into a USWC service order"[10] USWC's proposal therefore requires that every order submitted must be rekeyed by a USWC order writer. This manual link in an otherwise electronic process interjects unnecessary delay and the potential for human error into each and every service order processed by USWC, thereby eliminating the primary benefit of CLECs investing and deploying any electronic interface with USWC. This situation is a direct result of USWC's failure to plan to adopt and implement the OBF and TCIF EDI data format and design methodology for the LSR. This system architecture incorporates an EDI Pre-translator as a data format interface device which serves as a bridge between USWC's proprietary service order system and the universal EDI gateway conforming to OBF and TCIF specifications. Had USWC

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[6] The OBF Ordering & Provisioning Committee defined the ordering process for Unbundled Loop Services in Bellcore SR STS-471073, Loop Service Form Preparation Guide and Unbundled Switching is Bellcore SR STS-471077, Port Services Form Preparation Guide. Both of these specifications reached Final Closure in the OBF on October 24, 1996.

[7] USWC Affidavit at para 34.

[8] USWC Affidavit at para 10.

[9] USWC Affidavit at para 10.

[10] USWC Affidavit at para 18.

conformed to this industry approved systems architecture, there would be no need to re-key any data.

21. USWC's efforts to circumvent national guidelines supporting local competition make it more expensive for CLECs to conduct business with USWC by forcing carriers to develop non-standard interfaces for which no industry technical documentation exists. The need for a manual link in USWC's OSS capability does not allow any CLEC from establishing a true electronic interface to its ordering system.

Conclusion

22. The FCC should act as it had envisioned in paragraph 528 of its First Report and Order by "taking action to guide industry efforts at arriving at appropriate national standards for access to operation support systems." Specifically, MCI recommends that USWC, and all ILECs, be required to report regularly on the status of their implementation of electronic access to OSS functions, including compliance with national standards. Incumbent LECs should be required to submit monthly reports showing on a qualitative basis that requesting carriers are obtaining non-discriminatory access to ILEC's OSS functions.

23. For the above reasons, I believe I have demonstrated "good cause" to deny USWC's waiver request.

Robert D. Edgerly

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:	)	
	)	
Implementation of the Local Competition Provisions in the Telecommunications Act of 1996	)	CC Docket No. 96-98
	)	
Interconnection between Local Exchange Carriers and Commercial Mobile Radio Service Providers	)	CC Docket No. 95-185

OPPOSITION TO US WEST COMMUNICATIONS INC.'s REQUEST FOR WAIVER

MCI Telecommunications Corporation ("MCI"), hereby files its Opposition to the Petition for Waiver of US West Communications Inc., ("USWC") filed in the above-captioned proceeding on December 11, 1996. In its petition, USWC seeks a waiver of the Commission's requirement that incumbent local exchange carriers ("ILECs") provide electronic interfaces to their Operational Support Systems ("OSS") functions by January 1, 1997. As MCI will discuss below, grant of this waiver would not be in the public interest and would only serve to delay the development of competition in the local markets now served by USWC. MCI therefore urges the Commission to reject this request.

I. BACKGROUND

In its First Report and Order[1] (the "First Order"), the Commission concluded that an incumbent LEC ("ILEC") is required to provide access to OSS functions pursuant to its obligation to offer access to unbundled network elements under section 251(c)(3), as well as its obligation to furnish access on a nondiscriminatory basis to all unbundled network elements and services made available for resale under section 251(c)(3) and (c)(4). The Commission further concluded that access to OSS functions is technically feasible, necessary for meaningful local competition, and that failure to provide such access would significantly impair the ability of requesting telecommunications carriers to provide competitive local telephone service.[2] Importantly, the Commission also concluded that an ILEC that provisions network resources electronically does not discharge its obligation under section 251(c)(3) by offering competing providers access that involves human intervention.[3]

On December 13, 1996, the Commission issued its Second Order on Reconsideration ("Reconsideration Order"), declining to extend the January 1, 1997

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[1] Implementation of the Local Competition Provisions in the Telecommunications Act of 1996; Interconnection Between Local Exchange Carriers and Commercial Mobile Radio Service Providers, CC Docket Nos. 96-98 and 95-185, First Report and Order, FCC 96-325 (released Aug. 8, 1996).

[2] *Id* at para. 520 - 522.

[3] *Id* at para. 523.

deadline established in the First Order for providing access to OSS functions.[4] The Commission correctly determined that such an extension would delay the development of competition in the local exchange market. Therefore, in its Reconsideration Order, the Commission explicitly mandated that compliance with its obligation to offer access to OSS functions as an unbundled network element by January 1, 1997, requires an ILEC, at a minimum, to establish and make known to requesting carriers, the interface design specifications that the ILEC will use to provide access to OSS functions.[5]

USWC requests a waiver with respect to electronic access to OSS functions for "design services" (services other than Plain Old Telephone Service, or "POTs"), and, if necessary, a waiver for electronic interfaces to OSS functions supporting the provisioning and billing of unbundled network elements. Specifically, USWC asserts that in order to support OSS capabilities for unbundled network elements and resold design service circuits, and for enhanced trouble management for POTS resale, it will need an extension of the January 1, 1996 deadline to July 1, 1997. In addition, USWC has requested an extension to November 1, 1997 for providing electronic interfaces for OSS to support enhanced trouble management for unbundled network elements and design services.

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[4] Implementation of the Local Competition Provisions in the Telecommunications Act of 1996; Interconnection Between Local Exchange Carriers and Commercial Mobile Radio Service Providers, CC Docket Nos. 96-98 and 95-185, Second Order on Reconsideration, FCC 96-476 (released Dec. 13, 1996).

[5] *Id* at para. 8.

II. USWC'S ASSERTION THAT THE LACK OF NATIONAL STANDARDS JUSTIFIES THE GRANT OF A WAIVER OF THE JANUARY DEADLINE IS UNFOUNDED

In the First Order, the Commission indicated that, with respect to access to OSS, it would be "ideal" if national standards were developed and used.[6] USWC contends that its ability to comply with the Commission's deadline is hindered because national standards have not been developed for electronic access to the OSS functions for ordering and maintaining unbundled network elements.[7] Yet, as the Commission recognized in the First Order, industry efforts to develop national standards have made significant progress.[8]

The Ordering and Billing Forum ("OBF") of the Carrier Liaison Committee ("CLC") of the Alliance for Telecommunications Industry Solutions ("ATIS") has, for the last year focused its efforts on developing national guidelines for OSS, specifically to ensure the development of local competition. Interestingly, USWC has served as a full participant in both the monthly and quarterly meetings of the OBF. (Attachment A addresses recent actions of the OBF.)

The Commission must not allow incumbent LECs to use delays in the standards-setting process as an excuse to postpone new entrants' electronic access to OSS functions. If the deployment of electronic interfaces is linked to the progress of standards-setting groups, incumbent LECs will only have further

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[6] First Order at para. 527.

[7] USWC Petition at page 6, Affidavit at para. 20.

[8] First Order at para. 525.

incentive to delay the work of these groups. Moreover, the standards-setting groups have made significant progress in the development and coordination of national OSS guidelines. USWC's contention that its failure to meet its obligation is a result of the nonexistence of a national standard is unacceptable. Further, it should be recognized for what it really is -- a poorly disguised attempt to thwart local competition in direct contravention of Congress's mandate as established in the Telecommunications Act of 1996.

III. USWC's CLAIM THAT ITS ATTEMPTS TO MEET THE NEEDS OF MULTIPLE PURCHASERS WITH A SINGLE "GENERAL PURPOSE" SOLUTION JUSTIFIES A WAIVER IS UNFOUNDED

In its waiver request, USWC asserts that its failure to meet the deadlines set forth in the First Order is attributable to its efforts to devise a single solution for multiple purchasers, which requires it to take into account specific customer needs in terms of interface design and deployment.[9] MCI has and continues to advocate compliance with the established industry guidelines and technical specifications supporting the development of local competition developed and agreed to in ATIS-sponsored forums. MCI is investing development monies for OSS in the technical interface solutions developed by the industry through the OBF. Both USWC and MCI have been full participants within the ATIS-sponsored forums charged with developing these OSS technical specifications in an effort to ensure local competition in the provision of local service.

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[9] USWC Petition at page 4.

It appears that USWC's request rests not on its inability to meet the deadlines set in the Order, but rather on its efforts to develop non-standard OSS interfaces that do not conform to the OBF-approved EDI Data Format. It also appears that USWC has independently decided to abandon these industry specifications in favor of technologies other than EDI for which it has neither sponsored nor served to develop common technical specification through a recognized open industry forum. In particular, USWC proposes, as the means to comply with the Commission's mandate for electronic access to OSS, to deploy a type of electronic interface that is simply a Web Page on the Internet.[10] This does not meet any of MCI's or the industry/OBF requirements for OSS.

The Commission specifically contemplated the use of nationally recognized OSS standards to further the development of local competition.[11] If USWC attempts to develop an independent OSS specification, it is certain that other ILECs will seek to follow the same course. Such action would only serve to exacerbate the anticompetitive impact of delay in the local marketplace. ILECs will be encouraged to seek waivers to develop individualized OSS specifications that will force new entrants to incur great time and expense to meet. The Commission expressly recognized the adverse consequences that would ensue from such actions,

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[10] USWC Affidavit, at Attachment C.

[11] Ideally, each incumbent LEC would provide access to support systems through a nationally standardized gateway. Such national standards would eliminate the need for new entrants to develop multiple interface systems, one for each incumbent. First Order at para. 527.

discouraged such tactics and considered actions to monitor the progress of industry organizations in implementing access to OSS.[12]

USWC's efforts to circumvent and dismiss national guidelines supporting local competition is a deliberate attempt to make it more expensive for carriers to conduct business with USWC by forcing carriers to develop non-standard interfaces for which no industry technical documentation exists. Use of this strategy to eliminate potential competitors in the local market must not be condoned by the Commission.

IV. USWC'S PROPOSAL REQUIRES HUMAN INTERVENTION AND LACKS INTERFACE DESIGN SPECIFICATIONS, IN CONTRAVENTION OF COMMISSION ORDERS AND THUS DOES NOT JUSTIFY A WAIVER

USWC's proposed "electronic interface" requires competing LECs to submit a Local Service Request ("LSR") electronically to USWC, after which a USWC order writer will translate the service request manually into a USWC service order. USWC's proposal also requires that similar manual processes will be used for order confirmation and status checking. USWC states that "for some period of time, manual processes will be in place with respect to pre-ordering and ordering functions."[13]

USWC's proposal therefore requires that every order submitted must be re-keyed by a USWC order writer. This manual link in an otherwise electronic process interjects unnecessary delay and the potential for human error into each and every

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[12] First Order at para. 528.

[13] USWC Petition at 5.

service order processed by USWC, thereby eliminating the primary benefit of investing in and deploying electronic interfaces. Ironically, USWC appears to believe that this system fulfills its obligations, despite the Commission's clear statement that LECs provisioning network resources electronically do not discharge their obligations by offering competing providers access that involves human interaction.[14]

In addition to these defects, USWC fails to provide sufficiently detailed information to comply with the Commission's requirement in the Reconsideration Order.[15] Indeed, USWC fails to include any information regarding the elapsed time for completing the manual re-entry of LSRs, the elapsed time for USWC to confirm an entry, and the process and elapsed time for identifying and correcting errors. In addition, USWC fails to include information regarding the conduct of maintenance and repair during the interim period before it expects to make access to electronic OSS functions available for resale of all services as well as for unbundled network elements.

In the end, were USWC permitted to employ the system that it proposes, it would fail to meet the Commission's requirements for providing clear design specifications and eliminating human intervention where the LEC provisions electronically. Further, grant of a waiver to allow USWC its continued use would

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[14] First Order at para. 523.

[15] ILECs must establish and make known to requesting carriers, the interface design specifications that the ILEC will use to provide access to OSS functions. Reconsideration Order, para. 8.

amount to a clear barrier to entry.

V. USWC SHOULD BE REQUIRED TO REPORT REGULARLY ON THE STATUS OF PROGRESS IN MEETING OSS DEADLINES

USWC's non-compliance with industry specifications that have been developed is the primary reason why it is not able to meet the FCC mandated January 1, 1997 implementation date for OSS. MCI recommends that USWC, and all ILECs, be required to report regularly on the status of their implementation of electronic access to OSS functions. Incumbent LECs should be required to submit monthly reports showing on a qualitative and quantitative basis that requesting carriers are obtaining non-discriminatory access to incumbent LECs' OSS functions. In light of USWC's waiver request, MCI urges the Commission to adopt such a reporting requirement to ensure continued progress toward the deployment of OSS industry-standard interfaces in the near term.

VI. CONCLUSION

In conclusion, MCI requests that the Commission, for the reasons stated herein, deny USWC's petition for waiver. USWC is engaging in anticompetitive behavior by using individual, non-standard technical specifications as a barrier to entry for new companies to engage in local competition within USWC territory. Its efforts are nothing more than a deliberate and undisguised attempt to impede emerging competition and an attempt to guarantee retention of its competitive advantage as a dominant carrier within its territory for years to come.

Respectfully Submitted,

Roy Lathrop
Amy Zirkle
Lisa B. Smith
MCI Telecommunications Corporation
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

STATEMENT OF VERIFICATION

I have read the foregoing and, to the best of my knowledge, information, and belief, there is good ground to support it, and it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct. Executed on December 23, 1996.

Roy Lathrop
1801 Pennsylvania Avenue, NW
Washington, D.C. 20006
(202) 887 2555

ATTACHMENT A

On October 24, 1996, the OBF Ordering and Provisioning Committee completed its work on the initial version of its Local Service Ordering Guidelines ("LSOG"). This industry support interface ("ISI") document has been available in draft format since August 29, 1996 when it reached Initial Closure at the OBF meeting #55 (third quarter of 1996). These technical specifications have been published expeditiously by Bellcore in final format as Special Reports:

SR STS-471070	Local Service Ordering Overview
SR STS-471071	Local Service Request Form Preparation Guide
SR STS-471072	End User Information Form Preparation Guide
SR STS-471073	Loop Service Form Preparation Guide
SR STS-471074	Interim Number Portability Form Preparation Guide
SR STS-471075	Loop Service with Interim Number Portability Form Preparation Guide
SR STS-471076	Resale Services Form Preparation Guide
SR STS-471077	Port Services Form Preparation Guide
SR STS-471098	Usage Rule Table Guide
SR STS-471099	Local Service Request Confirmation Notice Form Preparation Guide

In addition, the following OBF OSS Technical Specifications are available in draft format from Bellcore:

SR STS-471101	Directory Service Request Form Preparation Guide
SR STS-471102	Directory Listing Form Preparation Guide
SR STS-471109	Directory Service Request Confirmation Notice Form Preparation Guide

All the technical specifications noted above are being mechanized using the OBF and industry-approved Electronic Date Interchange ("EDI") data format by the Telecommunications Industry Forum ("TCIF") EDI Service Order Sub-Committee

("SOSC") of the ATIS.

Importantly, this effort is based on EDI Transaction Sets and technical specifications that have been available for years. These specifications include American National Standards Institute ("ANSI") Accredited Standards Committee ("ASC") X12 Version 3040 Electronic Data Interchange ("EDI") Transaction Sets ("TS") 850 - Purchase Orders, and TS 855 - Purchase Order Verification. Enhancements to these existing Transaction Sets to fully support all of the OBF approved documentation have been ongoing for some time. Completion of these enhancements are scheduled for the end of 1996.

CERTIFICATE OF SERVICE

I, Martha R. Bishop, do hereby certify that on this 23rd day of December 1996, I have caused a copy of the foregoing Opposition to Waiver to be served via hand-delivery upon the persons listed on the attached service list.

James H. Quello**
Federal Communications Commission
1919 M Street NW - Room 802
Washington, DC 20554

Susan P. Ness**
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