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EX PARTE OR LATE FILED

ORIGINAL

February 3, 1997

Mr. William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street, NW Room 222  
Washington, DC 20554

FILED

FEB 3 1997

Re: Ex Parte Presentation in CC Docket No. 97-1

Dear Mr. Caton:

On Friday, January 31, 1997, Carl Giesy, Kevin Moss, George Ford and I of MCI met with Don Stockdale (CCB), Anthony Bush (OGC), Tom Koutsky (OGC), Michael Pryor (CCB), and Brent Olson (CCB). The purpose of the meeting was to discuss current issues relating to Operation Support Systems (OSS) in the Ameritech Region. The attached document outlines the topics presented.

Due to the late hour of the meeting, two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's rules the next business day.

Sincerely,

*Kimberly M. Kirby*  
Kimberly M. Kirby

Attachment

- cc: Don Stockdale
- Tom Koutsky
- C. Anthony Bush
- Brent Olson
- Michael Pryor

No. of Copies rec'd  
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**OSS - Ameritech  
CC Docket 97-1**

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**MCI Communications  
Corporation  
January 31, 1997**

# **Ameritech Must Provide:**

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- ◆ **Electronic Interfaces Necessary In Order to Obtain Unbundled Network Elements (“UNEs”) From Ameritech**
- ◆ **Electronic Interfaces Necessary In Order to Obtain Resold Services From Ameritech**

# **Resale and UNEs: 5 Stages**

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- ◆ **Pre Ordering**
- ◆ **Ordering**
- ◆ **Provisioning**
- ◆ **Maintenance and Repair**
- ◆ **Billing**

# Manual v. Electronic

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## ◆ **Manual:** Delays Customer Migration/Impedes Service

- (1) CLEC Faxes Order To BOC
- (2) BOC Types Information Into BOC  
Computerized System
- (3) BOC Must Re-Enter CLEC Information Before  
Transmitted Downstream

## ◆ **Electronic:** Allows for Quick/Accurate Response Information Automatically Exchanged Between CLEC and BOC Computers

# **Electronic Bonding Protocols**

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## **◆ Industry Standard:**

Open Systems Interconnect (OSI) Common Management Information Services Element (CMISE) Common Management Information Protocol (CMIP)

## **◆ Ameritech Uses:**

Electronic Data Interface (EDI) and File Transfer

# UNEs - Pre Order

## What Ameritech Claims To Offer:

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- ◆ **Access to Customer service Records**
- ◆ **Ability to select order due date and schedule necessary outside work *while CLEC customer on the line***
- ◆ **Address Validation**

# UNEs - Pre Order

## What Ameritech Provides: EDI

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- ◆ Access To Customer Service Records
- ◆ Ability to Select Order Due Date and Schedule Necessary Outside Work *Manually - Not While Customer On Line*
- ◆ Customer Address Validation

# UNEs - Pre Order

## What Ameritech Provides: (Con't)

- ◆ Non Real-Time Pre-Ordering
  - EDI causes delay in the CLEC's ability to (1) select a number and (2) respond to general questions about the customers account

# UNEs - Pre Order

## Non-Real-Time Pre-Order = Delay

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### ◆ **Number Selection:**

- (1) CLEC agent obtains information from customer
- (2) CLEC agent queries Ameritech's system
- (3) CLEC agent waits for batch interval of EDI transmission to send data
- (4) CLEC agent waits for Ameritech system to process the query
- (5) CLEC agent waits for another batch interval of the EDI transmission to return the response
- (6) CLEC agent calls back the customer
- (7) CLEC agents repeats process if not able to provide customer with suitable number

### ◆ **Same Steps As Above In Order For CLEC Agent To Obtain Data Regarding The Customer's Account**

# UNEs - Pre Order

## What Ameritech Should Provide:

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### ◆ **Interim Solution:**

Dedicated access mechanism for CLECs to gain access to a BOC's pre-ordering functions in precisely the same manner as a BOC's service agent.

### ◆ **Permanent Solution:**

Real-Time Electronic Bonding

# UNEs - Ordering

## Ameritech Uses EDI *and* ASR

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- ◆ Ameritech uses EDI Version 5.0 for unbundled local switching and Access Service Request (“ASR”) for other unbundled elements.
- ◆ EDI Should Be Used To Order *all* Unbundled Network Elements
- ◆ ASR Not In Accordance With Industry Guidelines

# ASR: Costly, Burdensome, Does Not Conform To Industry Standards

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- ◆ **ASR is an interface designed to enable IXC's and CAPS to order access arrangements from the LECs**
- ◆ **Industry Guideline specify that EDI formats For All UNE Ordering**
- ◆ **Ameritech Proposes a \$50 Charge For *Every ASR Processed***
- ◆ **Separate Order Processes For Loops and Switching Requires Duplicate Work**

# UNE - Ordering

## What Ameritech Should Do:

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- ◆ Employ a Automated LSR to be Used in Conjunction With the EDI Interface That Will Allow CLECs to Order Unbundled Loops, Switches, and ILNP Together

# UNEs - Provisioning

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◆ **Three Types of Reports The Provisioning ILEC Must Communicate To The Requesting CLEC:**

**(1) Firm Order Confirmation**

**(2) Change In Order Status**

**(3) Order Completion**

# UNEs - Provisioning

## What Ameritech Provides:

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- ◆ **A Mechanism for Firm Order Confirmation *Only***
- ◆ **EDI Is Appropriate, Industry Standardized Interface For Firm Order Confirmation**
- ◆ **ASR Imposes Substantial And Unnecessary Costs For Software And Training**

# **What Ameritech Does Not Do:**

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## **◆ Provide *Any* Form Of Automated Interface For:**

- Change In Order Status**
- Order Completion**

# UNEs - Repair and Maintenance

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- ◆ **MCI supports Ameritech's proposal of an electronic bonding ("EB") solution developed by T1M1 ATIS committee**

*-- However --*

- ◆ **The proposed EB system is not fully operational -- Ameritech acknowledges that no CLEC uses the T1M1 approved solution**

# **UNEs - Billing**

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Billing Encompasses Two Functions:

**(1) Daily Usage Reports**

- Unclear how Ameritech will transmit daily usage information

**(2) Complete Monthly Bills**

- Ameritech uses AEBS Not  
CABS

# **Resale - Pre-Ordering Ameritech Uses EDI**

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## **◆ Not Effective Or Industry Approved Mechanism For Pre-Ordering**

- (1) CLEC agent obtains information from customer
- (2) CLEC agent queries Ameritech's system
- (3) CLEC agent waits for batch interval of EDI transmission to send data
- (4) CLEC agent waits for Ameritech system to process the query
- (5) CLEC agent waits for another batch interval of the EDI transmission to return the response
- (6) CLEC agent calls back the customer
- (7) CLEC agents repeats process if not able to provide customer with suitable number

# **Resale - Pre-Ordering**

## **What Ameritech Should Do:**

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### **◆ Interim Solution:**

(1) Provide CLECs with a dedicated access mechanism in order for CLECs to gain access to a BOC's pre-ordering functions in precisely the same manner as a BOC's service agent

(2) Commit to provide an electronic bonding interface for all pre-ordering sub-functions

# Resale - Ordering

## What Ameritech Offers:

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### ◆ Manual Intervention For:

Centrex

Private Lines

Listing Changes

ISDN

Basic Rate Interface

Primary Rate Interface

Frame Relay

SMDS

ATM

# **Resale - Ordering**

## **What Ameritech Should Offer:**

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- ◆ **OBF Approved Industry Standard EDI Interface Feature Code Listing**
- ◆ **Industry Standard USOC Codes**

# **Resale - Provisioning**

## **What Ameritech Offers:**

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- ◆ **EDI For Firm Order Commitments, Order Status, And Order Completion**
  
- ◆ **EDI Proper Industry Mechanism, However, Problems With Recent Alterations In EDI Version**

# **Resale - Maintenance and Repair**

## **What Ameritech Offers:**

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- ◆ Ameritech's Resale Customers  
Manually Process Maintenance  
and Repair Requests