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Federal Communications Commission
Office of Secretary

1850 M Street, N.W., Suite 1100
Washington, DC 20036

EX PARTE PRESENTATION

February 18, 1997

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: CC Docket No. 96-98

Dear Mr. Caton:

Late in the afternoon of February 14, 1997, Betsy Brady and Gerry Salemme of AT&T, Jim Smith and Genny Morelli of Competitive Telecommunications Association, Ann Bingaman of LCI, Kim Kirby and Jonathan Sallett of MCI, Cathy Sloan of WorldCom, and I met with Regina Keeney, Richard Metzger, Larry Atlas, and Paul Gallant of the Common Carrier Bureau. In the meeting, we informed the staff of a press conference held on Wednesday, February 12 that announced formation of the Local Competition Users Group for the purpose of ensuring that the RBOCs and GTE implement the operations support system interfaces necessary to allow the development of competition in the local market. The attendees discussed how to keep the Commission informed about the efforts of this Users Group. Copies of the attachment were presented to the Bureau staff at the meeting.

An original and one copy of this letter are being filed.

Sincerely,

H. Richard Juhnke
General Attorney

Attachment

c: Regina Keeney
Richard Metzger
Larry Atlas
Paul Gallant

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COMPTEL COMPETITIVE TELECOMMUNICATIONS ASSOCIATION

For Immediate Release
February 12, 1997

Contact: Kathleen Franklin
Director of Communications
(301) 913-9778

FEB 18 1997

COMPETITIVE TELECOM INDUSTRY CALLS ON RBOCs AND GTE TO OPEN LOCAL MARKETS FOR CONSUMERS

Washington, D.C. - A coalition representing over 200 companies and business users who are attempting to give residential and business customers a choice of local telephone service providers today called upon the Regional Bell Operating Companies (RBOCs) and GTE to comply immediately with the Telecommunications Act of 1996. They urged that the FCC and state public utility commissions demand and ensure that the RBOCs and GTE permit local competition to become viable by providing fully effective operations support systems to new entrants.

At a press conference today at the City Club of Washington hosted by the Competitive Telecommunications Association (CompTel) -- an industry group comprising over 200 competitive telecom companies -- representatives of CompTel, AT&T, MCI, Sprint, WorldCom Inc., LCI International and the International Communications Association, an association of business users of telecom services, outlined the dismal record of the RBOCs and GTE more than a year after Congress passed and President Clinton signed the Telecommunications Act, which promised to open all telecommunications markets to competition.

Specifically, the competitive industry representatives described how the RBOCs and GTE thus far have failed or refused to provide the critical operations support systems (OSS) that will determine whether a competitor will be able to provide services that are comparable to those of the entrenched incumbent. Last August, the FCC ordered that these electronic operations support systems be operational by January 1997. Unfortunately, the RBOCs and GTE have not met this requirement. In fact, no electronic operations support systems exist anywhere for ordering and processing of unbundled combined network elements (the "Network Platform"), and only limited and inadequate systems exist for resale.

1900 M Street, N.W. • Suite 800 • Washington, D.C. 20036-3508 • Phone: (202) 296-6650 • Fax: (202) 296-7585

The industry representatives announced the formation of a joint working group, the **Local Competition Users Group (LCUG).** This group, composed of representatives of LCI, WorldCom, Sprint, MCI and AT&T, will ensure that the RBOCs and GTE implement OSS interfaces and processes that will enable a competitive environment, to monitor implementation and to ensure enforcement. In making the announcement today, the LCUG released a 36-page paper entitled, "Foundation for Local Competition : Operations Support Systems Requirements For Network Platform and Total Service Resale." The LCUG will issue a periodic "report card" to apprise the public and policymakers of the status of implementation of these building blocks for effective local telecommunications competition by various of the RBOCs and GTE.

"The RBOCs and GTE, a full year after passage of the Act, still have utterly failed to provide the critical support systems which will enable competitors to hook customers up to their vast networks to compete effectively with the monopolists," said James M. Smith, President of CompTel.

H. Brian Thompson, Chairman of CompTel and Chairman and CEO of LCI International Telecom Inc., explained that local competition cannot succeed as long as the RBOCs and GTE refuse to provide electronic operations support systems that would allow new entrants to obtain customer information and process their orders.

"Although a few RBOCs have established different and partially manual systems for resale operations, no RBOC to date has established the systems required by the Act and the FCC to support the Network Platform. The Platform is crucial for new entrants to compete head-on with the RBOCs and GTE, and reduce costs, on the way to full facilities-based competition," said Thompson.

The Congressional authors of the Telecom Act recognized that the monopoly local telephone networks built over the last 100 years, which now comprise millions of route miles and over

140 million subscriber lines, cannot be duplicated overnight by new competitors. Congress directed the monopolies to give new competitors full and fair access to the established local networks at cost-based rates. In return, Congress mandated that the Bell Companies could provide long distance services after they fully opened their local networks to effective competition by, among other things, providing "nondiscriminatory access to unbundled network elements".

The industry group observed that the key real-world question is: **"Can a customer order and receive the same type and quality of service from a competitor that it can from the RBOCs and GTE?"** "Without fully functioning OSS provided, as required by law, to new competitors by those companies, the answer is a resounding NO, and real competition simply will not happen on a broad scale," asserted CompTel's Smith.

The industry representatives presented a set of five questions that consumers and policymakers should use to ensure that consumers benefit from the competitive local markets envisioned by the Telecommunications Act. These questions can only be answered in the affirmative when the RBOCs and GTE begin providing fully functioning OSS for the Network Platform, as well as resale, to new entrants.

One: **Can the Customer Easily Order Service from the New Competitor?**

- Can the customer place an order and have installation dates confirmed on the initial call?
- Can the competitor have immediate access to the information needed to create the order?

Two: **Will the RBOC or GTE Promptly Accept the Order from the Competitor for Processing?**

- Will they accept orders from competitors electronically, without manual intervention?
- Do they have adequate ordering systems?
- Will they promptly accept customer changes?

Three: **Does the Customer Get What He/She Ordered On Time?**

- Is customer service implemented without disruption of service or dropped features?
- Will the change order be completed as quickly as the current standard for long-distance carrier changes?

Four: **Will the Customer Receive a Timely, Accurate Bill?**

- Will the RBOC and GTE provide data to competitors electronically and immediately, to avoid customer backbilling?

Five: **Is the Service Satisfactory and Will the RBOC or GTE Fix It When It Breaks?**

- Is the quality of service the same for ALL customers served over the network?
- Is trouble reporting and restoration response the same?

In addition to urging FCC and state PUC action to compel compliance with the Telecom Act and the FCC's implementing orders, the industry representatives pointed out that since these systems and functionalities are an absolute prerequisite to effective local telecommunications competition, no RBOC should be authorized by the FCC to provide long distance services as long as it fails to provide fully functioning OSS which it controls.

# # #

The Five Interface Questions for Operations Support Systems Benchmarking

1 - Can the customer order service from the CLEC? (pre-order)

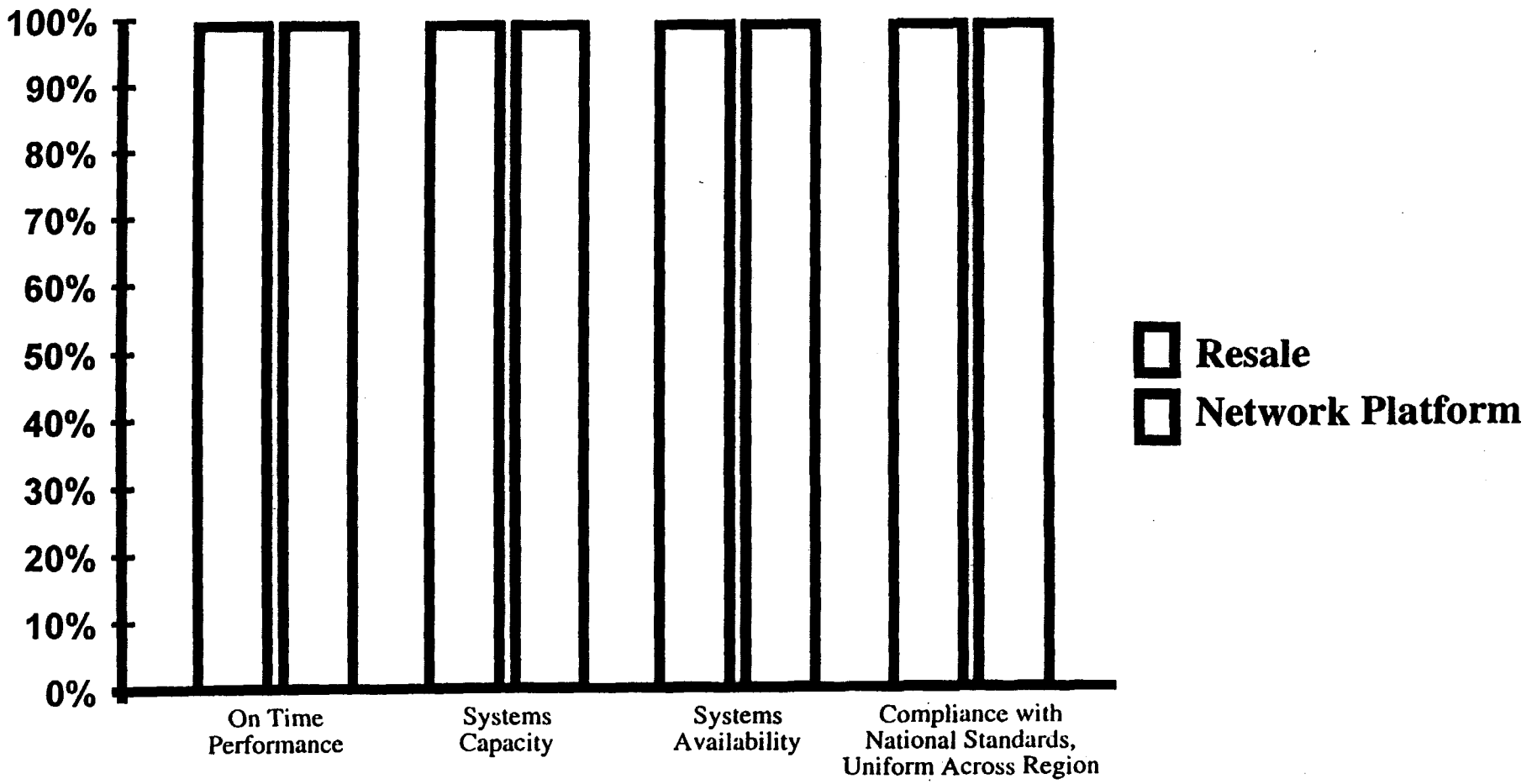
2 - Will the ILEC promptly accept the CLEC'S order for processing? (ordering)

3 - Does the customer get what he/she ordered on time? (provisioning)

4 - Will the customer receive a timely, accurate bill? (billing)

5 - Is the service satisfactory and does ILEC fix it when it breaks? (maintenance and repair)

Customer Service Must Be Available, Accurate, and Timely



On Time Performance

- Services orders filled within 24 hours
- Firm order confirmation returned on time (4 hours)
- Telephone numbers available immediately
- Billing information provided within 24 hours
- Service restored on time (< 24 hours)

System Capacity

- All processes (pre-order, order, provisioning) to support new orders for 5% of customer base per month

Systems Availability

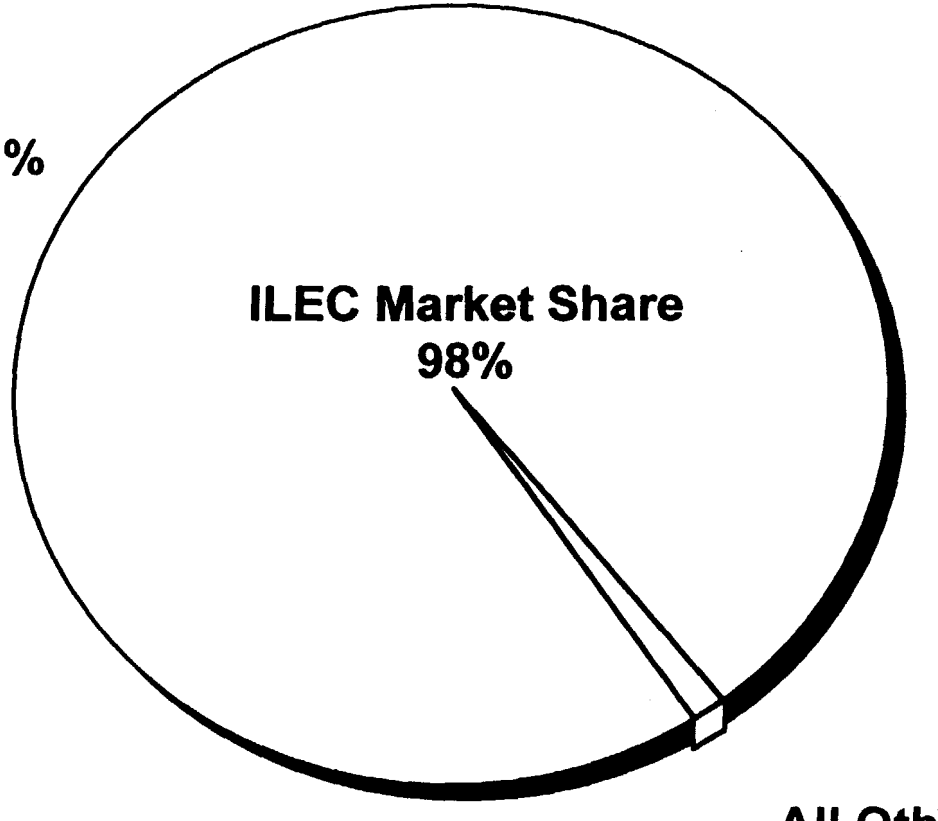
- Systems operational 99.7% of time
- Accurate data provided

Compliance with National Standards, Uniform Across Region

- Supports all existing national standards
- Uniform systems within each ILEC territory

The Incumbent LECs have a Monopoly on Local Service

Market Shared By %



All Others' Market Share 2%

IDC Release 1996, Year End Summary of Telecommunications Market

Foundation For Local Competition: Operations Support Systems Requirements For Network Platform And Total Services Resale

February 12, 1997

Prepared By: Local Competition Users Group (LCUG)
Membership: AT&T, MCI, Sprint, WorldCom and LCI

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Core Principles of Interconnection Agreements

Service Parity

- ILEC must provide interconnection services that enable the CLEC to provide services to its customers at least equal in quality and timeliness to that offered by ILECs to their customers

Notification of Change

- ILEC must provide sufficient advance notification of all changes in operating procedures, service offerings, etc., to afford the CLEC opportunity to respond

Performance Measurement

- Service levels and cycle times must be established that enable the CLEC to provide its customers with expected levels of service

Electronic Interfaces

- ILECs must provide CLECs with real-time electronic interfaces to ILEC systems that are seamless and transparent to users and facilitate ordering, provisioning, and maintenance activities

Systems Integrity

- Interfaces between ILEC and CLEC systems must be developed according to industry standards, tested and accepted by CLECs. Adequate controls must be established to ensure data transfer integrity

Standards Adherence

- ILECs must adhere to all current and future industry standards [e.g., (OBF), (ECIC)], and comply with all reasonable interim solutions as appropriate.

1 General Business Requirements

Definition

This section describes the basis of the general business relationship between the ILEC and CLEC for the delivery of local access interconnection services (e.g., developing working procedures, training, etc.).

General Business Requirements

Terms of Business Relationship

- CLEC will be the primary contact and account control for all interactions with its subscribers
- During contact with subscribers the ILEC will ensure that its personnel:
  - provide appropriate CLEC referrals for new and existing customers
  - do not disparage or discriminate against the CLEC, its products, or services
  - do not cross-sell ILEC products and services during a subscriber inquiry about CLEC services
  - do not use the CLEC's subscriber information, orders, or processes/services to aid in the ILEC's marketing or sales efforts
- ILEC will notify the CLEC of any proposed changes in the terms and conditions under which it offers service
- ILEC will train CLEC employees on ILEC system interfaces and processes, and front end gateway interfaces
- ILEC will provide detailed product information

General Business Requirements

ILEC/CLEC Development Responsibilities

ILEC and CLEC agree to:

- Establish escalation and expedite procedures that may be invoked at any point in the ordering, provisioning, maintenance and customer usage data transfer processes
- Establish contingency and disaster recovery plans for situations when normal processes are inoperable
- Develop and implement work center interface procedures for each function/business process
- Develop and deliver CLEC procedural training to all ILEC personnel who may communicate with CLEC subscribers

2 Pre-Ordering

Definition

This section describes the requirements that must be fulfilled by the ILEC before the CLEC is capable of initiating service.

Pre-Ordering

Network Element Foundation

- The ILEC must provide all capabilities of the unbundled network element ordered by the CLEC, including:
  - basic switching functions
  - telephone numbers
  - white page listings
  - dial tone
- The ILEC must provide on-line and timely electronic update of all listings of all custom features currently available from each end office, including:
  - custom calling
  - Custom Local Area Signaling Service (CLASS) features
  - CENTREX features
  - customized routing functions

Pre-Ordering

Service Delivery Prerequisites

- The ILEC must provide the CLEC with baseline and regularly refreshed information necessary to process orders, including:
  - Street Address Guide (SAG) data
  - Due date intervals for use in establishing service installation dates
  - Service and feature availability information
  - Engineering design and layout information
  - USOC codes and English translation.
  - Metropolitan Street Address Guide (MSAG) data
  - Appointment scheduling for service installation
- Until number administration functions are assumed by a neutral third party, the ILEC will:
  - Assign NXXs on a non-discriminatory basis
  - Reserve a block of telephone numbers per NPA-NXX where the CLEC has not obtained its own NXX
  - Provide testing and loading of the CLEC's NXXs on the same basis as performed for the ILEC's NXXs,
  - Provide CLEC with the ability to obtain telephone numbers, vanity numbers, etc., while a subscriber is on the line

Pre-Ordering

Customer Information Requirements

- Subscriber payment history will be provided by the ILEC and CLEC to an independent third-party credit reporting agency
  - information may only be made available to the carrier to which the subscriber has applied
  - ILEC cannot refuse service to the CLEC on the basis of a subscriber's past payment history
- ILEC must provide the CLEC with real-time access to current customer profile, including:
  - subscriber name
  - billing and service addresses
  - billed telephone numbers
  - identification of features and services on subscriber accounts (to include USOC codes and English translation)
- ILEC must meet CLEC requirements and provide real time application to application electronic access to:
  - telephone number reservation
  - due date reservation
  - feature function availability
  - facility availability
  - street address validation
  - customer service records (CSR)

Pre-Ordering

Advance Notification Requirements

- The ILEC must inform the CLEC of all changes to business processes and service offerings, including, but not limited to the following:
  - Services available from each switch
  - CLASS features and all other vertical features, including Centrex
  - List of available intraLATA and interLATA carriers
  - Service coverage area of each switch
  - New ILEC service features, including trial offers and promotions
  - Planning/implementation of NPA splits
  - Method/plan for making ILNP and true LNP available

Pre-Ordering

Performance Measurements

- ILEC must comply with performance standards and provide reporting for the following measurements:
  - Successful query - response interval to obtain the following:
    - Telephone number reservation
    - Due date reservation
    - Feature function availability
    - Facility availability
    - Street address validation
    - Customer service records (CSR)
    - Service availability information
    - Appointment scheduling
  - Query Failure rates
  - Speed of Answer by Support Center
  - Speed of Inquiry Closure
- ILEC must provide reports detailing prescribed performance results on at least a monthly basis with sufficient historical data to allow trending:
  - for the ILEC itself,
  - all CLECs on average, and
  - the individual CLEC

3 Ordering and Provisioning

Definition

This section describes the ordering and provisioning requirements to be followed by the ILEC.