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interface between the systems and the databases that contain the stored information. In this way, the gateway performs the functions of formatting, translating, validating, and routing information between the CLEC's systems and databases and those maintained by the incumbent LEC.

18. Finally, both OSS interfaces and gateways must be capable of handling -- again, on a "real time" basis -- large numbers of potentially complex transactions. Before AT&T can begin to offer services broadly in the marketplace, all systems and procedures not only need to be operational but also must have the proven ability to handle significant traffic volumes, with response times that are at least comparable to what SWBT provides its customers. Accordingly, SWBT must be capable of demonstrating, using reliable and objective performance measurements, that OSS access is, in fact, being -- and will continue to be -- provided in a nondiscriminatory manner.

C. Effective OSS Implementation Is Far From Complete, And Much Essential Development Work Still Lies Ahead

19. As discussed in detail below, SWBT cannot claim that it has made access to its OSS available on a nondiscriminatory basis. SWBT's OSS interfaces have not reached the prerequisite state of operational readiness, let alone proven to afford CLECs parity OSS access through actual marketplace experience at competitive volumes. An interface between two systems is operationally ready only when the two systems are working together satisfactorily to deliver the capabilities for which they are designed. Thus, operational readiness cannot simply be unilaterally declared by SWBT (or for that matter, AT&T), because each company is only one end of the interface.

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20. For this reason, operational readiness necessarily requires a thorough systems development effort. It is achieved when systems are providing useful, reliable results under marketplace conditions, in accordance with their intended functions and designs. Leading up to operational readiness are seven stages -- (1) detailed interface negotiations, (2) systems impact, (3) systems requirements definition and specification development, (4) systems development, (5) system testing, (6) inter-system testing, and (7) operational readiness testing and implementation. Currently, as discussed in detail below, none of SWBT's electronic OSS interfaces is even at the final stage of operational readiness testing and implementation. Development of such interfaces is merely in the detailed interface negotiations stage (stage 1) for the UNE platform, and in various intermediate stages of analysis, coding, and testing for resale.

1. Development of OSS Interfaces and Gateways Requires Joint Effort To Complete Seven Basic Stages, Which Remain Ongoing

21. The development of operationally-ready electronic interfaces between two LECs' OSS requires extensive and ongoing cooperation between carriers, the completion of deployment and testing to ensure accurate, reliable, and timely inter-carrier communications, and marketplace implementation and experience. As noted above, a systems-development effort of the magnitude required to support the OSS functions of pre-ordering, ordering, provisioning, repair, maintenance, and billing requires seven distinct stages. If any of these steps is skipped or abbreviated, serious problems, such as rejection of orders (which has, in fact, occurred repeatedly when AT&T has tried to link its OSS with those of other incumbent LECs), are likely to arise between the two carriers. The following

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is a description of the seven stages of development, identifying each stage that SWBT and AT&T have attained with respect to the various OSS functions.

22. Stage 1: Interface Negotiations. In the interface negotiations stage, the goals necessary for implementation are analyzed and discussed in detail to define specific processing needs at the transactional level. Determination of the business functions that the interfaces and underlying systems must address are made here, as are preliminary decisions as to which interfaces are to be computerized and which ones require manual processes or support. Business needs drive the analysis of interfaces and overall systems. This inevitably raises questions about what "business rules" and data definitions apply, when information is required or optional, and whether information must be obtained from databases, supplied by customers, validated, or accepted as is.

23. Business rules are an especially important facet of the negotiation process, because they define valid relationships in the creation and processing of order transactions. SWBT's business rules are not simply a document, but are the amalgamation of SWBT's unique methods and procedures, system design parameters, and other policies and practices. These business rules are not generally reflected in SWBT's specifications and will remain unknown to AT&T unless shared by SWBT. In order for AT&T to communicate effectively with SWBT's OSS and have its transactions processed, AT&T must be informed of and understand the unique business rules that are programmed into those internal SWBT systems.

24. In all, literally hundreds of questions about how data are defined and used must typically be answered in Stage 1. These questions ordinarily are reviewed with

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the suppliers of the input and output transactions. As regards the UNE platform, AT&T is currently in this initial stage, negotiating OSS interfaces with SWBT on a region-wide (i.e., five-state) basis. As discussed below and in Rian Wren's Affidavit, virtually no progress has been made in AT&T's negotiations with SWBT concerning the OSS capabilities required for the platform. This lack of progress is a direct result of the extreme policy positions SWBT has taken in a systematic effort to make the platform uneconomical and unusable.

25. Stage 2: Systems Impact. During the systems impact stage, the agreements resulting from interface negotiations are assessed in order to determine which existing systems, architectural designs, and interfaces will be affected, how they will be affected, and how long it will take for the necessary coding and development work to be completed. The overall result of the work done in stage 2 is a comprehensive system and interface design that takes into account the technical environment for the affected systems; any specific regional or local exceptions; the daily, weekly, or monthly processing issues; and various other considerations. The system design is broken down into modules, each of which constitutes a logical component for the development of computer-processing or manual methods and procedures.

26. Systems design is extremely complicated. Knowledge of the technical specifications of an interface is not enough for effective communications and interactions between systems. As noted earlier, a thorough grasp of the business rules (i.e., internal company practices and procedures) programmed into each pre-existing system is also required. For example, AT&T must have a full understanding of SWBT's existing service-order format as well as the numerous edits SWBT will perform on an order it receives from

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AT&T. In order for AT&T to design its systems so that orders transmitted to SWBT will not be rejected because fields are not populated in accordance with SWBT's edits, AT&T must be told more than that a 4-digit field has been provided for the primary interexchange carrier ("PIC") code; a list of the valid PIC codes assigned and used in SWBT's systems must also be provided.

27. **Stage 3: Systems Requirements Definition and Specifications**

Development. In this stage, the details and definitions established through the interface negotiations are documented through a series of system and interface requirements, and specifications are developed for each of the affected systems and interfaces. These requirements and specifications are later used by programmers to write and execute code both to modify existing systems and architectural designs and to develop new systems and interfaces as deemed necessary in the systems impact phase. The need to modify or develop requirements or specifications may arise at any stage. For example, in order for an Electronic Data Interchange ("EDI") to be developed in support of resale ordering and provisioning, it took several months to negotiate an interface for the field-to-field mapping necessary to support transmittal of simple residential single-line orders for new customers with all components (e.g., services and features, directory listing information, etc.). The process of requirements definition and specification development can take several iterations before the parties find that all questions are resolved. Specifications are only considered final when systems can be built to those specifications to provide useful, reliable results in accordance with their function and design.

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28. Stage 4: Systems Development. Once an interface is designed, requirements defined, and specifications developed, actual systems development (programming) can begin. Systems development is the stage where programmers and database developers code the systems and database modifications. This stage also includes manual activities required to develop methods and procedures as well as training materials. Analysts work with job or task designers to place these manual activities into logical sequences. These efforts result in the design of forms, screens, and reports. The merging of computerized modules and manual procedures is later followed by testing, which, as discussed below, is best accomplished through a structured and disciplined controlled environment.

29. Although all OSS and OSS interfaces are important, the ordering and provisioning interface is the most critical interface required to provide local services to customers, because even the smallest of errors can cause an order to be rejected or cause service to be provisioned incorrectly. Either outcome requires rework and causes customer dissatisfaction. AT&T and SWBT are now in the midst of the Stage 4 systems development work necessary to address certain critical issues that were only recently resolved with respect to this interface for resale.

30. Stage 5: Internal Company Systems Testing. Systems testing occurs in three distinct stages. The first of these three stages is internal company systems testing. Here, each company's objective is to confirm that the design and programming it has completed are correct. It is essential to validate the construction and development of each individual module, program (which comprises many modules), and system (which comprises

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many programs). This stage of testing serves to demonstrate that every system and system component performs separately in accordance with the system design, requirements, and specifications.

31. Stage 6: Inter-System Testing. The second stage of testing is inter-system testing. Such testing is necessary to ensure that each end of an interface can, on an integrated basis, effectively communicate and facilitate interaction of the OSS of both entities in accordance with the applicable design, requirements, and specifications. This stage, which typically requires several weeks to complete, does not yet entail complete, end-to-end testing of all systems in simulated commercial operations. Rather, it only involves joint testing of different combinations of interrelated programs and modules using smaller numbers of transactions.

32. Stage 7: Operational Readiness Testing and Implementation. The seventh and final stage of development comprises operational readiness testing ("ORT"), which is performed just prior to commercial implementation, as well as implementation itself. During ORT, a production environment is simulated to test the entire spectrum of systems interactions, without any risk of adversely affecting actual customers in the marketplace. ORT enables the parties to identify problems or inadequacies in system or interface designs or interface specifications on an end-to-end, integrated basis. In some instances, early warning signs can be detected during ORT with respect to potential capacity or volume constraints that may be experienced after implementation. It is important to recognize, however, that such constraints may only become apparent after implementation (i.e., during commercial operations), which has unfortunately proven to be the case in other

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states, such as California, where AT&T has entered local markets. The ORT and implementation stage also includes testing of methods and procedures materials, as well as training of each entity's personnel so they can confidently operate all necessary systems and interfaces, fully understand and work with the information presented on a screen, handle exception processes, and gather other critical information to make the interfaces viable. Stage 7 is complete when final system modifications have been made and tested to address inadequacies identified through the various phases of testing and systems and interfaces have actually been implemented (i.e., are being used to serve commercial customers). Only when commercial implementation at competitive volumes has been successfully completed can it truly be said that systems and interfaces are operationally ready. And, as discussed more fully in the accompanying Affidavit of C. Michael Pfau, only when the systems and interfaces are operationally ready will there be sufficient data to determine whether CLECs are receiving OSS access that is truly nondiscriminatory -- that is, the same as or equal to what the incumbent provides to itself.

33. The point of having explained the work stages necessary to achieve operational readiness is to convey some understanding of the development process and to show where AT&T and SWBT currently stand in their joint efforts. As noted, operational readiness can only be achieved after both AT&T and SWBT have worked together to complete each stage of development. Based on AT&T's experiences to date, while this process can take six months or more following the definition of stable requirements and the development of system and interface specifications, it is not an impossible task. AT&T has now reached the point of implementation with other incumbent LECs, such as Pacific in

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California and Ameritech in Illinois and Michigan, and, with SWBT's cooperation, will expeditiously move forward in SWBT's local markets. Only after the final steps have been taken, however, can SWBT's interfaces be used in the marketplace; and only such actual competitive use of the interfaces can enable the Commission to assess meaningfully whether SWBT has complied with OSS-related nondiscrimination requirements of Sections 251 and 271.

2. AT&T And SWBT Have Reached Conceptual Agreement As To The Types Of Interfaces To Be Developed, But There Are Severe Deficiencies in SWBT'S Provision Of Nondiscriminatory Access To Its OSS

34. For well over a year, AT&T has sought SWBT's cooperation towards implementing electronic interfaces necessary to provide AT&T with nondiscriminatory access to SWBT's operations support systems. From the outset, AT&T and SWBT agreed to conduct OSS interface negotiations on a five-state basis. Although it was understood that there might be some differences from state to state in some of the products and services that can be ordered, the basic idea was to come up with a set of interfaces that would essentially be common throughout SWBT's region. In AT&T's approved interconnection agreement with SWBT in Texas, SWBT agreed to provide DataGate for pre-ordering, EDI for ordering and provisioning, and additional electronic interfaces for OSS repair, maintenance, and billing functions; and the Oklahoma arbitration award is consistent with these SWBT commitments.⁸

⁸ See Report and Recommendation of the Arbitrator, Application of AT&T Communications of the Southwest, Inc., for Compulsory Arbitration of Unresolved Issues With Southwestern (continued...)

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35. Nevertheless, because of SWBT's inability to make good on its commitments, AT&T has had to agree to use inadequate SWBT interfaces that do not comply with Sections 251 and 271 -- such as EASE for pre-ordering, ordering, and provisioning -- on a limited, interim basis. In fact, because of the critical issues that remain outstanding and the numerous issues negotiated to resolution only recently, AT&T has declared that implementation of the key EDI ordering and provisioning interface for resale by the June 1, 1997, deadline set by the Texas Public Utilities Commission ("Texas commission") for implementation of the electronic interfaces that are common across SWBT's five-state serving area, including Oklahoma, is in jeopardy.⁹ Current indications are that implementation of this interface will be delayed by approximately 60-90 days, but this delay could expand further if the operational readiness testing scheduled to begin May 20, 1997 is not completed successfully within the allotted time frame.¹⁰

⁸ (...continued)

Bell Tel. Co. Pursuant to § 252(b) of the Telecommunications Act of 1996, Cause No. PUD 960000218 (Okla. Corp. Comm'n) ("Oklahoma Arbitration"), Nov. 13, 1996, at 7 & Ex. 83; Order Regarding Unresolved Issues, Oklahoma Arbitration, Dec. 12, 1996 at 4 (approving arbitrator's recommendation). The pertinent portions of both the Report and Recommendation and the Order together make up Attachment 1 to this Affidavit.

⁹ See Letter dated February 14, 1997, from Rian Wren to Stephen Carter (Attachment 2). The jeopardy situation for ordering and provisioning (meaning there is a real danger that this "critical path" item will not be completed on schedule) is shown in Attachment 3 in red.

¹⁰ See Letter dated April 4, 1997 from Marcia Weaver to David Young (Attachment 4).

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36. The following table summarizes the status of development between AT&T and SWBT of the agreed-upon OSS interfaces as of the date of this Affidavit, with the numbers indicating which of the seven developmental stages each interface has reached:

Function	Interface	UNE Platform		Resale		Comments
		Consumer	Business	Consumer	Business	
Pre-ordering	EASE	N/A	N/A	6	N/A	EASE will not support the UNE platform. C-EASE will be used for consumer resale on an interim basis until DataGate is operationally ready to handle competitive volumes. B-EASE is not viable even on an interim basis for business resale.
	DataGate	1	1	3	6	Due date assignment and dispatch scheduling capabilities still must be negotiated for the UNE platform, and SWBT has indicated that additional codes may need to be accessed. DataGate will initially be tested only for business resale.
Ordering and Provisioning	EASE	N/A	N/A	6	N/A	EASE will not support the UNE platform. C-EASE will be used on an interim basis for consumer resale until EDI is operationally ready to handle competitive volumes. B-EASE is not viable even on an interim basis for business resale.
	EDI	1	1	3	6	AT&T and SWBT have not agreed on fundamental policy issues regarding UNE ordering capabilities. AT&T will not move to EDI for consumer resale until it is proven to be capable of handling competitive volumes. Therefore, EDI testing will initially be for business resale only.
Repair and Maintenance	CNA	N/A	N/A	6	6	AT&T will not move to EBI for consumer or business until EBI is operationally ready to handle competitive volumes.
	EBI	1	1	4	4	MLT capabilities will not be made available for the UNE platform.
End-User Billing	Usage extract feed in EMI format	1	1	6	6	Usage data content and format negotiations are required for UNE.
Wholesale Billing	EDI-formatted CRIS bill	N/A	N/A	4	4	AT&T conceded to an EDI format as opposed to CABS for resale and has recently conceded to perform additional development to address SWBT wholesale billing limitations.
	CABS	1	1	N/A	N/A	This interface is in the initial negotiation stage.

Although the foregoing table and the discussion below both focus on the development of particular electronic interfaces, none of these individual interfaces, or the problems associated with them, should be considered in a vacuum. In fact, all of the interfaces must function together in order for a CLEC to provide proper service. A graphic illustration of

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the integrated manner in which these interfaces must work together can be found in Attachment 3.

37. What is more, as the above table shows, virtually nothing has been accomplished regarding development of the OSS interfaces required to support the UNE platform. Here, AT&T and SWBT remain in the early stages of negotiations, and many significant policy issues, as discussed in the Affidavit of Rian Wren and the Joint Affidavit of Robert Falcone and Steven Turner, remain unresolved. Inevitably, these issues will significantly affect implementation decisions, development requirements, and timing with respect to the interfaces involved.

3. Development of Electronic Interfaces For The UNE Platform Has Barely Begun, and Thus There Is No Possible Basis to Find That Such Interfaces Are Available, Much Less Used, as Required by Sections 251 and 271.

38. SWBT's purported efforts to provide OSS interfaces to support combinations of unbundled network elements have thus far been patently insufficient for purposes of Sections 251 and 271. In its Local Competition Order, this Commission directed incumbent LECs to provide access to their OSS functions by January 1, 1997.¹¹ The Commission later declined to extend that date and made clear that incumbent LECs could be subject to enforcement proceedings if, at a minimum, they did not establish and make known to requesting CLECs the interface design specifications that the incumbent would use to provide OSS access.¹² SWBT still has not done this for the UNE platform. Hence, it is

¹¹ Local Competition Order, ¶¶ 316, 516-17, 525.

¹² Second Order on Recon., ¶¶ 1-2, 8.

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inconceivable that electronic OSS interfaces for the platform will be implemented by the June 1, 1997 date ordered by the Texas commission, or even in accordance with the slightly longer timetable proposed by SWBT and adopted by the Oklahoma commission.¹³ There are a number of reasons why this is so.

39. First, AT&T and SWBT are still in the early stages of negotiations regarding UNE interfaces. As noted above, AT&T has repeatedly asked SWBT to provide AT&T, in accordance with the Act, with the capabilities to order UNEs individually and in combination, including in the form of the UNE platform. However, SWBT has consistently refused to provide the platform, contending that it is not obligated to do so under the Act. These positions are largely responsible for delays in commencing negotiations and the lack of progress to date.

40. Second, as shown by the February 28, 1997 joint status report filed with the Texas commission,¹⁴ AT&T and SWBT disagree significantly over the functionality

¹³ Arbitration Award, Petition of AT&T Communications of the Southwest, Inc. for Compulsory Arbitration to Establish an Interconnection Agreement Between AT&T and Southwestern Bell Tel. Co., Docket No. 16226 (Tex. Pub. Util. Comm'n) ("Texas Arbitration"), Nov. 7, 1996, ¶ 25 (the relevant portions of which are Attachment 5 to this Affidavit); Report and Recommendation of the Arbitrator, Oklahoma Arbitration, Nov. 13, 1996, at 7 & Ex. 83 (see Attachment 1); Order Regarding Unresolved Issues, Oklahoma Arbitration, Dec. 12, 1996, at 4 (see Attachment 1) (approving arbitrator's recommendation). Although the dates approved by the Oklahoma commission extend all the way from January 1, 1997 through July 1, 1997 (with further allowance for a two-week grace period following each due date), SWBT has committed to develop a set of electronic OSS interfaces with AT&T on a five-state basis; and therefore it has been AT&T's expectation that SWBT would also attempt to be ready to implement the agreed-upon interfaces in Oklahoma by the Texas commission's June 1 implementation deadline (or as soon thereafter as possible).

¹⁴ See Attachment 6. As a result of the arbitration proceeding between AT&T and SWBT,
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required for the UNE platform and the appropriate time frames for development. For example, AT&T's position is that, in offering the platform, it should have the same capability to assign service due dates and schedule installation dispatch appointments as SWBT has. SWBT, on the other hand, contends that it is not obligated to provide such functionality with respect to the platform. In addition, SWBT says it is waiting for clear definitions from the Ordering and Billing Forum ("OBF")¹⁵ to define and design the processes for ordering and provisioning of the UNE platform, instead of working with AT&T to implement an agreement between the companies pending the availability of OBF standards. SWBT's rationale is disingenuous given its agreement to work without such standards for resale.¹⁶

¹⁴ (...continued)

the Texas commission ordered SWBT to file status reports regarding the implementation of OSS consistent with its Arbitration Award. SWBT filed its first OSS status report on January 15, 1997 (Attachment 7). AT&T found several inaccuracies in SWBT's initial report and filed a response to it on February 12 (Attachment 8). SWBT filed a further status report on February 18 (Attachment 9). The Texas commission then ordered the parties to file the aforementioned joint status report, which was submitted on February 28 (Attachment 6). SWBT has since filed further status reports on March 17 and April 16 (Attachments 10 and 11, respectively); and AT&T has submitted responses to those reports on March 21 and April 25 (Attachments 12 and 13, respectively). These status reports deal with each interface for both resale and UNEs.

¹⁵ The OBF is an industry body, composed of members from interexchange carriers, CLECs, and all of the incumbent LECs, including the Bell Operating Companies ("BOCs"), that determines the standards necessary for communication between entities.

¹⁶ SWBT's James R. Watts similarly testified before the Oklahoma commission on October 14, 1996, that, in his view, SWBT and AT&T should "diligently collaborate to design and implement the necessary electronic interfaces" for both UNEs and resale, even where national standards were lacking. Tr. of Proceedings, Oklahoma Arbitration, Oct. 14, 1996, at 171 (Testimony of James R. Watts) (see Attachment 14).

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41. Third, as discussed below, details necessary to complete the systems impact analysis and to develop requirements and specifications to support resale ordering and provisioning transactions have only recently been resolved for most critical issues, and some such issues remain unresolved. (For instance, issues concerning processing of multiple-line orders were not fully resolved until February 20, 1997, nor were issues associated with directory listings for even the simplest orders, e.g., new single-line orders.) These same types of detailed issues eventually will have to be resolved to support ordering and provisioning transactions for the UNE platform as well, so that AT&T and SWBT can proceed to analyze systems impact, define system and interface requirements, and develop system and interface specifications. Yet, this time-consuming negotiation process has barely begun with respect to the platform, and talks thus far have only addressed the limited set of UNE conditions to which SWBT has agreed. Most notably, as shown by the status report filed with the Texas commission by SWBT on April 16, 1997 (Attachment 11), SWBT has refused to provide AT&T with any specifications for ordering and provisioning of either "as is" or "with change" migrations of SWBT accounts to AT&T by means of either the UNE platform or any other UNE combination. SWBT is maintaining this position even though, on March 5, 1997, the Texas commission reiterated its intent to require OSS interface functionality for UNEs similar comparable to that for resale.¹⁷

42. Fourth, although AT&T and SWBT have reached conceptual agreement that the same pre-ordering DataGate interfaces under development for resale (see below) will

¹⁷ Tr. of Proceedings, Texas Arbitration, Mar. 5, 1997, at 163-66 (see Attachment 15).

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also be used for the UNE platform, SWBT does not intend to provide AT&T with the same level of functionality for the platform as it does for resale. As explained in the Affidavit of Messrs. Robert Falcone and Turner, SWBT has made an internal policy decision to treat UNEs as "design circuits." As a result, AT&T will not have electronic access to assignment of earliest available dates for prospective customers to be switched to AT&T service, or to scheduling (when required) of dispatches of personnel to the customers' premises. Instead, AT&T will be forced to quote standard intervals provided by SWBT for service establishment dates and will be required to call SWBT to obtain the necessary information to give to the customers for dispatch scheduling when dispatches are required.

43. Fifth, as with pre-ordering, SWBT's internal decision to treat UNEs as "design circuits" will also degrade provisioning and maintenance functions. During the provisioning of customers on an AT&T-requested UNE platform, SWBT says it will disconnect the customer's service for a period averaging as much as 30 minutes at an unspecified time in order to install special circuit test points.¹⁸ In addition to this service interruption, AT&T will not have for repair and maintenance the automated Mechanical Loop Testing ("MLT") trouble-isolation capabilities that the Loop Maintenance Operation System ("LMOS") is capable of providing. SWBT has agreed to provide the LMOS MLT trouble-isolation capabilities to AT&T if AT&T resells SWBT's services, but not if AT&T uses UNEs. This is the capability that SWBT uses for its own service that it provides to end

¹⁸ See E-Mail dated March 25, 1997 from Carlos de la Fuente to Robert Bannecker (Attachment 16); Letter dated March 31, 1997 from Robert Bannecker to Carlos de la Fuente (Attachment 17).

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users. Therefore, AT&T will be dependent on SWBT for manual loop testing and trouble isolation. Moreover, as with installation, repair and maintenance intervals will be lengthened.

4. The Interfaces Offered By SWBT For Resale Do Not Provide Parity OSS Access

44. As explained above, because SWBT will not be able to implement the agreed-upon OSS interfaces in a timely fashion, AT&T has decided to pursue dual entry paths and initially use SWBT's internal proprietary systems -- C-EASE for pre-ordering, ordering, and provisioning, and Customer Network Administration ("CNA") for repair and maintenance -- to provide resold service to residential customers. AT&T has made this decision not because the SWBT systems will provide AT&T parity with what SWBT experiences using these systems -- they will not. AT&T has made this decision in order to ensure the earliest possible market entry, despite the inherent limitations of SWBT's proprietary systems and the additional expense and capital requirements that AT&T will experience as a result of their use. Further, AT&T has agreed to use these systems preliminarily in order to have a back-up capability in the event that it begins to provide service using true electronic interfaces as required by the Local Competition Order and, as has happened with other incumbent LECs (see below), the new systems fail to work properly.

45. The suggestion of SWBT's affiant, Ms. Ham, that SWBT offers a veritable plethora of OSS interfaces sufficient to assure AT&T or any other CLEC of parity access to systems required for pre-ordering, ordering and provisioning, maintenance and

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repair, and billing is misleading at best. AT&T is not intimately familiar with each and every interface that Ms. Ham discusses in her affidavit, partly because there are a number that SWBT has never mentioned during OSS negotiations between our two companies. In some cases, though, it appears from the affidavit that the capabilities of such interfaces are inferior to (or no better than) the capabilities of the alternative interfaces that AT&T and SWBT are already planning to implement -- which themselves have not yet been shown to satisfy the requirements of Sections 251 and 271 of the Act -- or that they cannot handle large volumes of transactions.

46. In the interest of completeness, I will address at least briefly each interface identified by Ms. Ham as purportedly capable of providing nondiscriminatory OSS access. My main focus, however, will be on the specific interfaces that AT&T and SWBT currently plan to implement in order to provide AT&T with access (though not nondiscriminatory access) to OSS.

a. Pre-Ordering Interfaces

47. EASE. As noted above, AT&T has decided to use certain proprietary, internal SWBT systems, despite their inherent limitations and associated excess costs, to provide resold services to residential customers in order to ensure the earliest possible market entry. One of these systems is SWBT's Easy Access Sales Environment ("EASE").¹⁹ AT&T is currently in the process of testing the operational functionality of one type of EASE

¹⁹ AT&T initially informed SWBT on May 9, 1996 that, because of the inadequacies of the EASE interface, AT&T would not use it. AT&T subsequently notified SWBT on January 26, 1997 of its decision to use C-EASE on an interim basis.

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interface, Consumer EASE ("C-EASE"), for pre-ordering activities in connection with resale of services to residential customers (as well as for ordering and provisioning for such residential resale customers, as discussed below). However, EASE will be used only on an interim basis because, as SWBT has acknowledged,²⁰ it is incapable of supporting the UNE platform (or even the ordering of individual UNEs, such as unbundled loops), and because, even for resale, EASE will not allow AT&T to serve business customers adequately and will require excessive manual intervention and redundant operations even where it can be used (i.e., for residential accounts).

48. SWBT's C-EASE system has such significant inherent shortcomings for pre-ordering that, if it is used for very long, AT&T or any other CLEC will be at a significant competitive disadvantage. AT&T's use of C-EASE on an interim basis for pre-ordering simply does not afford interfaces comparable to those used by SWBT's service representatives when they interact with SWBT's own retail customers. As illustrated in Attachment 18, because C-EASE is a proprietary SWBT system, it requires AT&T's service representatives to learn and use two different sets of screens when interfacing with customers, i.e., SWBT's C-EASE screens and AT&T's internal system screens. SWBT's customer service representatives, on the other hand, can use one process and one set of screens throughout the company to handle customer inquiries. Use of duplicate processes and screens will increase sales execution time as well as operating costs.

²⁰ See Ham Aff. Att. B at 1.

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49. Because of the limitations, constraints, and duplicate or customized work efforts (e.g., use of multiple systems) that this will cause, C-EASE cannot provide nondiscriminatory access to SWBT's OSS pre-ordering functions. Rather, C-EASE will leave SWBT with a decided advantage in competing against AT&T and other CLECs for residential customers. SWBT's own customer-service representatives clearly will enjoy quicker and more reliable access to more complete customer information than AT&T's representatives will receive using C-EASE. Thus, C-EASE plainly does not meet the nondiscrimination requirements of Sections 251 and 271 for purposes of providing access to SWBT's OSS pre-ordering capabilities.

50. SWBT's Business EASE ("B-EASE") system is even more deficient than C-EASE for pre-ordering, to the point where it does not even provide AT&T with an interim solution to address the business market segments. In addition to the shortcomings and constraints described above for C-EASE, B-EASE has other limitations affecting pre-ordering as well. The B-EASE platform (unlike C-EASE, which is Windows-based) uses an OS-2 operating system and will therefore require CLECs such as AT&T to use two terminals (as opposed to the split-screen arrangement for residential customers). Also, B-EASE is limited to Business POTS customers with fewer than 30 lines and does not support complex business services, e.g., PBX/DID trunks, ISDN, or Centrex. These limitations of B-EASE will create a significantly larger volume of manual processing of orders via fax in comparison to that in an EDI environment. EDI is designed to provide electronic processing capabilities for Business POTS with more than 30 lines and should also support electronic processing for PBX and DID trunk orders.

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51. DataGate. As Ms. Ham states in her affidavit, AT&T has now begun testing SWBT's DataGate electronic gateway. Based on the results we have seen to date, our current plan is eventually to use DataGate for pre-ordering functions. Systems interface testing of the pre-ordering capabilities of DataGate for resale has been completed between AT&T and SWBT. However, we have not yet begun to conduct operational readiness testing of DataGate with SWBT under simulated production conditions. Such testing, which is essential for determining whether DataGate can actually provide parity OSS access in terms of timeliness, accuracy, and reliability, is scheduled to start in Texas on May 20, 1997, and our goal is to complete this key phase within a period of approximately two to three months.²¹

52. Verigate. We are less familiar with SWBT's Verigate interface than with either EASE or DataGate, mainly because SWBT has never suggested to us that Verigate can provide parity access to SWBT's pre-ordering functions. To the best of my knowledge, the first we were aware of Verigate was when we saw it mentioned in SWBT's Oklahoma SGAT filing this past January. SWBT has never proposed that we test Verigate or offered to

²¹ Operational readiness testing of DataGate is planned in conjunction with ORT for the EDI and CNA interfaces, discussed below. This integrated end-to-end testing will involve, in addition to pre-ordering activities, the ordering and provisioning of services; customer billing (30 days after initial order); receipt, processing, and application of bill payments; and simulated repair, maintenance, and collections scenarios. AT&T and SWBT will test first in Texas because that is the only state where AT&T has an approved interconnection agreement with SWBT. The time needed subsequently to test in Oklahoma will, of course, depend in part on the number and types of problems identified from the tests in Texas. Moreover, even if the Texas tests go smoothly in certain respects, it is impossible to be sure that the same positive results will later hold in Oklahoma, because Oklahoma-specific conditions may give rise to new problems.

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demonstrate it to us. Our understanding, though, is that Verigate cannot provide any pre-ordering capability that is not obtainable via EASE or DataGate (and may be less flexible than DataGate in terms of the screens that CLECs are able to use). This appears to be corroborated by Ms. Ham's statement that Verigate "was designed for CLECs that do not want to use EASE or to pursue development of their own graphic user interface, and are not ready to use DataGate."²²

b. Ordering and Provisioning Interfaces

53. EASE. As noted above in connection with pre-ordering activities, although AT&T has also decided to use the C-EASE interface on an interim basis for ordering and provisioning for residential resale customers, EASE has a number of serious deficiencies that prevent it from serving as a means to provide CLECs with nondiscriminatory access to those OSS functions as well.

54. C-EASE is not connected with AT&T's downstream systems as it is with SWBT's downstream systems. As an order is processed through C-EASE in SWBT, pertinent information is distributed automatically to the appropriate downstream SWBT customer account and billing systems. In addition, SWBT's customer service representatives can use one process and one set of systems, terminals, and screens throughout the company to handle customer orders. By contrast, AT&T's customer service representatives will be required to process some transactions through C-EASE, others (i.e., supplemental orders) through SWBT's separate Service Order Retrieval and Distribution ("SORD") system, and

²² Ham Aff. ¶ 23.

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still others (i.e., partial migrations)²³ manually based on fax transmittals. Use of multiple system screens as well as multiple processes for handling of orders (i.e., EASE vs. SORD vs. fax) will create the need for specialized training and complex methods and procedures, and it is sure to lengthen the time a service representative spends making processing decisions, hence taking away from the time available to spend with customers.

55. Likewise, using C-EASE will force AT&T's customer service representatives to perform dual entry of customer-order information both into C-EASE and into AT&T's own ordering system, so that AT&T's customer account information can be stored and fed downstream to billing systems. This would not be the case if SWBT were offering a true electronic ordering and provisioning interface that would allow AT&T's OSS and SWBT's OSS to "talk" to one another electronically, without AT&T's service representative acting as a go-between. Dual entry increases the time to complete an order, thus increasing AT&T's sales execution times as well as costs (also because development is required to implement a split-screen for use by AT&T's customer service representatives).²⁴ In addition, it increases the potential for errors. These problems are underscored by the need for AT&T, in order to use C-EASE, to develop methods and procedures for use of dual systems by its customer service representatives.

²³ "Partial migrations" are instances where customers choose to move some but not all of their lines associated with a given account from one carrier to another.

²⁴ AT&T has analyzed the possibility of using a technique known as "screen scraping," which is designed to move information from one screen to another, as an alternative to dual entry. However, we have concluded that the new and unproven "screen scraping" technology is, at this point, no better an option for the situation we are facing with SWBT than having service representatives perform dual entry.

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56. Using C-EASE also will make it more difficult for AT&T to track pending orders and follow through on questions or problems. C-EASE will not allow AT&T to receive firm order confirmations or order completion notices electronically for particular orders. Instead, AT&T each day will receive a batch file, which it will then have to download and match against its own order records. Once again, this means increased manual intervention, time spent, potential for error, and cost.

57. As for B-EASE, as noted above, its use is limited to Business POTS customers with fewer than 30 lines and does not support complex business services. This has significant ramifications for ordering activities. As Ms. Ham concedes in her affidavit, SWBT currently has no electronic means to receive and process service requests for business accounts involving more than 30 lines and/or certain complex serving arrangements (e.g., multiline hunting, trunk groups, or DID trunks). Instead, CLECs must submit such requests by phone or fax to SWBT's Local Service Provider Service Center ("LSPSC"), whereupon SWBT will rely on "extensive manual coordination" to handle them.²⁵

58. With respect to the processing of large, complex business orders, SWBT has contended that SWBT itself handles such orders manually and that manual processing for CLECs therefore achieves parity treatment. I do not agree. For AT&T, additional manual processing and delay are introduced because two service representatives (one from AT&T and one from SWBT) are needed to write, input, fax, and re-input each order. Multiple personnel and multiple manual entries are not inherent in the SWBT environment. Further,

²⁵ Ham Aff. ¶ 35.

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based on AT&T's experience as a fledgling CLEC during the Rochester trial, it is clear that being dependent on an incumbent LEC's manual processes (e.g., fax machines) can routinely cause problems such as orders being lost or otherwise mishandled.

59. Finally, EASE's lack of partial migration capability is especially detrimental in the business market segments, where (as industry experience with long-distance services teaches) it is more likely that customers will choose to buy services from multiple carriers.

60. In short, SWBT cannot possibly claim that providing EASE to AT&T or other CLECs affords parity OSS access for purposes of ordering and provisioning.

61. EDI. AT&T's current plan is to use SWBT's EDI gateway to access ordering and provisioning functions for resale business customers, based on our understanding of the capabilities that EDI should ultimately be able to provide. However, critical joint testing has not even begun. As Ms. Ham correctly states, "the EDI ordering processes are a new development to support an extremely complex task."²⁶ Use of EDI for ordering and provisioning involves extensive mapping and editing of information on both sides of the interface. Among other things, this means that, for EDI to function properly, numerous data fields must be populated in a manner that is consistent with SWBT's business rules. Because of the complexities inherent in the systems and business rules, there are many possible circumstances that can result in orders being rejected, status reports not being

²⁶ Ham Aff. ¶ 29.