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2 this is Howard Siegel, Office of Policy
3 Development.

4 The main problem here is that
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6 ambiguity or potential ambiguity in the
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10 should treat unbundled the same kind of
11 intervals that resale has, and Southwestern
12 Bell's response is -- appears to be that
13 they don't do unbundled elements for
14 themselves and, therefore, the same
15 intervals don't exist.

16 COMM. WALSH: Never is a
17 good time?

18 (Laughter)

19 MR. SIEGEL: My
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21 was to require the same time periods that
22 were being required for resale and that
23 similar intervals were applicable, but that
24 seems to be the one policy issue that the
25 parties disagree on and are having

1 difficulty. Outside of that there appears
2 to be a lot of cooperation between the
3 parties and the rest of the operational
4 interfaces.

5 CHAIRMAN WOOD: I mean I --
6 I'm not sure if it was exactly the same as
7 resale or not, but Exhibit 15 A or
8 whatever, Nancy Dalton's exhibit -- I don't
9 remember what it was; it had a life of its
10 own -- had a chart. And there were a lot
11 of dates on that chart. And it seemed to
12 me the reason why we did the checkup
13 hearing on June 13th was that not only were
14 the resale things, most of which were front
15 loaded this month and last month and in
16 January were going to be done, was that the
17 provisioning and ordering and reordering
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20 know if any clarification of the award is
21 needed, but, I mean, this deal has got to
22 work. It can't be done by FAX and phone.

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25 electronic interfaces, and I think that

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4 do anything?

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8 so. If the Commission wants to state that
9 their interpretation of the award, that
10 generally the award stands for itself --

11 CHAIRMAN WOOD: And we just
12 clarified that on the record --

13 COMM. GEE: Yeah.

14 CHAIRMAN WOOD: -- with
15 three nods.

16 Anything else on this?

17 Again I appreciate -- to me this
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19 hearing, at least as to AT&T and Bell on
20 the original hearing back in October. I
21 appreciate that personally. I think I
22 speak for the three of us saying we hope
23 you both want to get into each other's
24 business as bad as your marketing people
25 say that you do on TV. I think that the

ATTACHMENT 13



97-1207-114-50
2012
Thomas C. Peltz
Chief Regulatory Counsel

Suite 1500
919 Congress Avenue
Austin, Texas 78701-2444
512 370-2010
FAX: 512 370-2096

April 25, 1997

Ms. Paula Mueller
Secretary of the Commission
Public Utility Commission of Texas
1701 N. Congress Avenue
P. O. Box 13326
Austin, Texas 78711-3326

Re: Docket No. 16226

Dear Ms. Mueller:

SWBT's April 16 filing on electronic interfaces is *deja vu* all over again. Mimicking its approach to production of cost information in the arbitration, SWBT first provided *too little* information on the status of UNE interfaces (February 28 and March 17), then it provided *too much* information (April 16), but in neither case has it provided the right information.

AT&T has seen this movie and knows how it ends -- delay -- when the necessary information is finally provided *too late* for AT&T, other LSPs or the Commission to remedy the situation, except to order an interim solution and establish supplemental proceedings. The good news, however, is that this time it is not too late to avoid unnecessary delay with respect to UNE interfaces, if that becomes the mutual objective of the parties. Unfortunately, that is also the bad news, because electronic interfaces for the UNE platform do not appear to be part of SWBT's present game plan.

At the risk of being redundant,¹ the required order types for TSR (as set forth in AT&T Exh. 15A) are precisely what AT&T has requested for the UNE platform; no more, but also no less.² In other words, "POTS Ordering & Provisioning" functionality, with migration order capabilities, both "As Is" and

¹ See AT&T letters to Paula Mueller dated March 21 and April 7, previously filed in this docket.

² SWBT's letter suggests that it is for AT&T's benefit that it has provided detailed information on the interfaces it has developed for the loop, switch port and interim number portability (INP). While AT&T applauds the additional information regarding EDI interfaces for loops, switch ports and INP provided by SWBT, it is UNE combination functionality that will be most critical initially.

Ms. Paula Mueller

Page 2

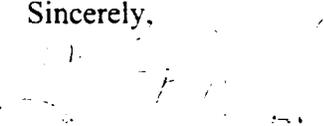
April 25, 1997

"With Change," are what AT&T requested for UNE and was awarded in arbitration, with the same intervals as for these types of resale orders. See Mar. 5, 1997 Tr. at 164-66. Unfortunately, "POTS" functionality and "migration" order types, the specific issue AT&T has twice raised with respect to SWBT's March 17 report, remain missing from SWBT's April 16 report.

In any event, in an attempt to remove all doubt as to exactly what it has been requesting and expecting to see for UNE, based on the Commission's Arbitration Award and the Commission's March 5 clarification, AT&T has attached a proposed UNE Report Format for use in the May 15 report. In addition to providing SWBT with a copy of this letter, AT&T commits to get together with the appropriate SWBT personnel, determine whether there can be agreement on this proposed reporting format, and, if so, work with SWBT to produce another joint report on May 15.

AT&T further commits to report to the Commission on the results of these discussions. To that end, AT&T respectfully requests that this matter be posted for discussion by the Commission on May 6, so that hopefully, any lingering dispute (or malingering dispute, as the case may be) can be resolved, once and for all.

Sincerely,


Thomas C. Pelto
Chief Regulatory Counsel

Attachment

cc: Mr. Pat Wood, III, Chairman, PUC
Mr. Robert Gee, Commissioner, PUC
Ms. Judy Walsh, Commissioner, PUC
Ms. Kathleen Hamilton, Administrative Law Judge, PUC
Ms. Carole Vogel, Director, Office of Regulatory Affairs, PUC
Mr. Stephen Davis, Director, Office of Policy Development, PUC
Mr. Howard Siegel, Chief Attorney, Office of Policy Development, PUC
Mr. Kevin Zarling, Assistant Director, Legal Division/ORR, PUC
Mr. Bill Magness, Chief Counsel, Office of Policy Development, PUC
All Parties of Record to Consolidated arbitration proceedings (facsimile)

**ELECTRONIC INTERFACES FOR
PRE-ORDER AND ORDERING CAPABILITIES FOR
UNE COMBINATIONS (PLATFORM)'**

FUNCTION	ARBITRATION- ORDERED SWBT AVAILABILITY	COMMENTS
PRE-ORDER		
Address Verification	6/1/97	
Service/Features Availability	6/1/97	
Telephone Number Assignment	6/1/97	
Dispatch Schedule	6/1/97	SWBT is proposing not to provide electronically
Due Date	6/1/97	SWBT is proposing not to provide electronically
Customer Service Record (CSR)	6/1/97	
POTS ORDERING & PROVISIONING		
Migration (Convert Customer As Is)	6/1/97	
Migration With Changes (Convert with changes)	6/1/97	
- Add/Disc Class Features	6/1/97	
- Add/Disc Blocking (1+, 0+, 011)	6/1/97	
- PIC and PIC Freeze	6/1/97	
- Add/Disc Essential Lines	6/1/97	
- Add/Disc Additional Lines	6/1/97	
- Directory Listing Changes	6/1/97	
Partial Migration (Line/WTN vs. Account Level)	6/1/97	
New Connects		
- Single Line	6/1/97	
- Multi-Line (Less Than 30 Lines)	6/1/97	
- Projects (Large Job - add'l facilities/ coordinated work effort required - need SWBT criteria)	6/1/97	
Disconnects	6/1/97	
Change Orders		
- Add/Disc Class Features	6/1/97	
- Simple Number Change	6/1/97	
- Add/Disc Blocking	6/1/97	
- PIC and Local PIC Change	6/1/97	
- Add/Disc Essential Lines	6/1/97	

**ELECTRONIC INTERFACES FOR
FOR PRE-ORDER AND ORDERING CAPABILITIES FOR
UNE COMBINATIONS (PLATFORM)**

FUNCTION	ARBITRATION- ORDERED SWBT AVAILABILITY	COMMENTS
- Add/Disc Additional Lines	6/1/97	
- Directory Listing Changes	6/1/97	
- Suspend/Restore Non-Payment	6/1/97	
- Suspend/Restore Vacation Svc.	6/1/97	
Records Only Order	6/1/97	
T&F Order	6/1/97	
NON-POTS SERVICE ORDERS		
PBX Trunks	6/1/97	
DID Trunks	6/1/97	
Plexar	6/1/97	
Digiline/ISDN	6/1/97	
Semi-Public Phones	6/1/97	
MegaLink (T1.5)	6/1/97	
OTHER - SERVICE ORDER COMPONENTS		
Multi-Line Hunting	6/1/97	
Preferential Hunting	6/1/97	
Transfer of Calls - Network Intercept	6/1/97	
Toll Billing Exception (alternatively billed calls)	6/1/97	
Handicap Services	6/1/97	
ComCall	6/1/97	
Future Expected Delivery Date (EDD)	6/1/97	
Conversion When Final Bill Address Is Foreign PO	6/1/97	
DIRECTORY LISTINGS		
Directory Listing (Straight Line)		
- White	6/1/97	
- Yellow	N/A	

**ELECTRONIC INTERFACES FOR
FOR PRE-ORDER AND ORDERING CAPABILITIES FOR
UNE COMBINATIONS (PLATFORM)**

FUNCTION	ARBITRATION- ORDERED SWBT AVAILABILITY	COMMENTS
Directory Listing Other Than Straight Line		
– White	6/1/97	
– Yellow	N/A	
Directory Order Changes Prior to Publishing		
– White	N/A	
– Yellow	N/A	
Directory White Pages (Non-SWBT Areas)	N/A	
Directory Expedite	N/A	
– White	N/A	
– Yellow	N/A	
POST SERVICE ORDER EDI TRANSACTIONS		
Supplemental Orders	6/1/97	
Firm Order Confirmation (FOC)	6/1/97	
Jeopardies/Missed Appointments	6/1/97	
Rejects	6/1/97	
Order Completion	6/1/97	

¹ Availability of these ordering and provisioning capabilities for UNE combinations (platform) will also necessarily address the capabilities required for ordering and provisioning individual elements.

ATTACHMENT 14

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BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

APPLICATION OF AT&T COMMUNICATIONS)	
OF THE SOUTHWEST, INC. FOR COMPULSORY)	CAUSE NO PUD
ARBITRATION OF UNRESOLVED ISSUES WITH)	960000218
SOUTHWESTERN BELL TELEPHONE COMPANY)	
PURSUANT TO SEC. 252 (b) OF THE)	
TELECOMMUNICATIONS ACT OF 1996)	

TRANSCRIPT OF PROCEEDINGS

October 14, 1996

OFFICIAL REPORTERS:

Bertha McMurry, LSR
Rita D. Hejny, CSR

rdh-169

1
2 (Whereupon, the witness was sworn.)

3 THE COURT: Mr. Long, your witness.

4 MR. LONG: Thank you, Your Honor.

5 JAMES R. WATTS,

6 called as a witness on behalf of the Respondent, having first
7 been duly sworn, testified on his oath as follows, to wit:

8 DIRECT EXAMINATION

9 BY MR. LONG:

10 Q. Mr. Watts, will you state your full name, tell the Judge
11 who you are, and what you do, please.

12 A. James R. Watts. I'm General Manager -- Corporate Call
13 Center, Southwestern Bell Telephone.

14 Q. You have filed prepared prefilled direct and rebuttal
15 testimony in this cause, have you not?

16 A. Yes, I have.

17 Q. And do you wish to adopt it as your sworn testimony at
18 this time?

19 A. Yes.

20 Q. And you also have prepared a summary of your testimony
21 to present to the Arbitrator at this time, have you not?

22 A. Yes, I have.

23 Q. Do you have a copy of your summary?

24 A. Yes.

25 Q. Would you present it to the Arbitrator at this time,
please? Just go ahead and read it.

rdh-170

1
2 A. Cause No. PUD 960000218. Summary of Testimony of James
3 R. Watts. My name is James R. Watts. I am General Manager --
4 Call Center Operations for Southwestern Bell Telephone Company.
5 My testimony concerns electronic interfaces for the functions
6 of pre-ordering, ordering, provisioning, maintenance, repair
7 and billing for those services which Southwestern Bell
8 Telephone will make available to AT&T. This is referred in my
9 direct testimony, pages 2 through 10. With respect to resold
10 services, Southwestern Bell Telephone and AT&T have agreed on
11 all the necessary interfaces and have agreed on a schedule for
12 implementing most of them. This is in my rebuttal testimony,
13 pages 1 through 2. We have not yet reached agreement on a
14 schedule for implementation of the necessary interfaces for
15 unbundled elements, although there is no dispute that
16 interfaces will be designed and implemented for those services
17 as well. And this is in my rebuttal testimony, pages 4 through
18 6.

19 Concerning resold services, Southwestern Bell Telephone
20 and AT&T have reached agreement on a schedule for the design
21 and implementation of necessary interfaces for the functions of
22 pre-ordering, provisioning, maintenance, repair and billing.
23 In addition, Southwestern Bell is willing to meet AT&T's
24 schedule for interfaces to order most resold services. The
25 ordering for those few services that we have not agreed on is
very complex because of the complexity of the underlying

rdh-171

1 service. Although Southwestern Bell intends to proceed
2 diligently, we are simply unable to commit to a date by which
3 these complicated interfaces can be designed and implemented.
4 And this is my rebuttal testimony, pages 1 through 3.

5 The parties have not agreed to the appropriate
6 electronic interfaces to be used no ordering and servicing
7 unbundled elements because the unbundled elements themselves
8 have not yet been established. Moreover, because no national
9 standard exists for such interfaces and because Southwestern
10 Bell has not offered unbundled elements in the past,
11 Southwestern Bell has no foundation for the design and
12 implementation process. Therefore, Southwestern Bell is unable
13 to predict how long it will take. Southwestern Bell is
14 committed to collaborating with AT&T to undertake and complete
15 this project, but because of the many unknown factors, the
16 schedule demanded by AT&T is simply unrealistic. This is
17 described in my rebuttal testimony, pages 4 through 6.

18 I have several recommendations for the Arbitrator. He
19 should decide that electronic interfaces should be implemented
20 by January 1st, 1997, for those services for which there are
21 national standards established. For other services, he should
22 decide that the parties should diligently collaborate to design
23 and implement the necessary electronic interfaces for resold
24 services and those unbundled elements that are determined as a
25 result of this proceeding. He should not adopt a fixed

rdh-172

1
2 deadline for the implementation of these interfaces because it
3 is simply unknown at this time what deadlines are realistic.
4 Should he wish to monitor progress, he could request monthly or
5 quarterly status reports to be submitted jointly by
6 Southwestern Bell and AT&T. And this was described in my
7 rebuttal testimony, pages 3 and 6.

8 Q. Thank you, Mr. Watts.

9 MR. LONG: Your Honor, I believe Mr. Watts' direct
10 testimony, we're up to Exhibit 80, is that correct? His
11 rebuttal would be 81, and the summary would be 82; and I'd move
12 admission of those three exhibits at this time.

13 THE COURT: Any objections? They'll be accepted.

14 MR. LONG: Tender the witness.

15 THE COURT: Mr. Galt.

16 CROSS-EXAMINATION

17 BY MR. GALT:

18 Q. Mr. Watts, I'm Jay Galt representing AT&T. This morning
19 I had a matrix of electronic interfacing schedule that you've
20 worked with AT&T in developing, I guess, saying when your
21 services would be available and when they requested the
22 service. Are you the appropriate person to go over that
23 schedule that we--that your lawyers committed to have someone
24 from Southwestern Bell go over to see if it was correct on
25 where we are right now in the whole interface negotiating
process?

rdh-213

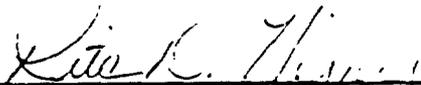
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STATE OF OKLAHOMA)
) ss.
COUNTY OF OKLAHOMA)

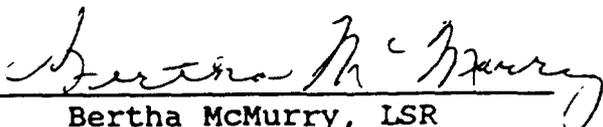
REPORTERS' CERTIFICATE

We, Rita D. Hejny and Bertha McMurray, Official Court Reporters within and for the Corporation Commission of the State of Oklahoma, do hereby certify that the above and foregoing is a true and complete transcript of the record made in Cause No. PUD 960000218,, that came on for hearing before Robert E. Goldfield, Administrative Law Judge, on October 14, 1996.

IN WITNESS WHEREOF, we have hereunto set our hands and affixed our seals as such Official Court Reporters on this, the 15th day of October, 1996.



Rita D. Hejny, CSR



Bertha McMurray, LSR

No. 1586 10/15/96
Oklahoma Licensed Court Reporter
Exp. Date: 10/15/97

ATTACHMENT 15

TRANSCRIPT OF PROCEEDINGS
BEFORE THE
PUBLIC UTILITY COMMISSION OF TEXAS
AUSTIN, TEXAS

IN THE MATTER OF THE OPEN MEETING)
IN DOCKET AND/OR PROJECT NOS. 15711,)
16542, 16641, 16851, 16740, 16745,)
16770, 16765, 16789, 16797, 16824,)
16852, 16666, 16404, 15452, 16189,)
16196, 16226, 16285, 16290, 14965,)
16856, 15296, 15840, 16271, 16705,)
16409, 16902, 15861, 16565, 16645,)
16534 AND 17063)

OPEN MEETING

MARCH 5, 1997

BE IT REMEMBERED THAT AT 9:25 a.m., on
Wednesday, the 5th day of March 1997, the
above-entitled matters were heard at the Offices of
the Public Utility Commission of Texas, 1701 North
Congress Avenue, Commissioners' Hearing Room,
Austin, Texas 78701, before CHAIRMAN PATRICK HENRY
WOOD III and COMMISSIONERS ROBERT W. GEE and JUDY
WALSH; and the following proceedings were reported
by William C. Beardmore, Cindy Mercer and Lou Ray,
Certified Shorthand Reporters of:

KENNEDY

REPORTING

SERVICE

a record of excellence

1 felt like they were making progress. I
2 will say at the end of the second day it
3 did appear to me that they are really
4 working pretty hard.

5 CHAIRMAN WOOD: And I think
6 that's evident from this other report which
7 was, I guess, if you want to move to that.
8 I mean, I recognize there's a way to go and
9 that's why we timed it at the day we did on
10 the electronic interface issue to really do
11 an early check in. It seems to me that as
12 to certainly on the resale side, the time
13 line was relatively as we had hoped when
14 the arbitration award was made in October.
15 I recognize there was still some testing
16 and some additional functionalities that
17 are kind of in progress, but from looking
18 at them line by line -- and maybe missing
19 some key points here, but if I have y'all
20 can let me know -- it appears that we're
21 moving in the right direction here.

22 I was pleased to note at the
23 bottom of this document AT&T's trying to
24 make the EASE, the E-A-S-E system work.
25 That's the way this ought to -- I mean, we

1 can sit around and wait for perfection or
2 we can move forward with the system that
3 exists, and that's the best way to do it.
4 I mean, I think neither one of your
5 companies are going to be -- you're not in
6 this for friendship; I mean, you're in this
7 to make money, but, you know, recognize
8 that there are some basic rules of the road
9 that this Commission and the Federal
10 Commission and other folks have set down.

11 And so I shouldn't thank you for
12 obeying the law, but I do. I appreciate
13 the tone with which this document was
14 written and submitted, and I hope that that
15 can spill over into the costing issues.
16 And also it looks like really we do have
17 some more work to do on UNEs with regard to
18 electronic interfaces, and I don't know if
19 y'all want to visit about that or not.
20 There's still some work I can ascertain --
21 in fact, on Page 10 -- where do you see
22 kind of -- where are we on unbundled
23 network element electronic interfaces? How
24 would you characterize, generally, what
25 we've got here?

1 MR. SIEGEL: For the record,
2 this is Howard Siegel, Office of Policy
3 Development.

4 The main problem here is that
5 there is -- there appears to be an
6 ambiguity or potential ambiguity in the
7 arbitration award. We use the language "to
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16 COMM. WALSH: Never is a
17 good time?

18 (Laughter)

19 MR. SIEGEL: My
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19 hearing, at least as to AT&T and Bell on
20 the original hearing back in October. I
21 appreciate that personally. I think I
22 speak for the three of us saying we hope
23 you both want to get into each other's
24 business as bad as your marketing people
25 say that you do on TV. I think that the

ATTACHMENT 16

Garritson, Debra

From: De la Fuente, Carlos
Sent: Wednesday, April 02, 1997 8:45 AM
To: Garritson, Debra
Cc: Weaver, Marcia
Subject: FW: UNE Test Access Clarification

Debbie,

This is the e-mail I sent to Bob Bannecker (SWBT). The letter from Bob (dated March 31) is in response to this request.

Thanks,
Carlos

From: De la Fuente, Carlos
Sent: Tuesday, March 25, 1997 10:45 AM
To: 'Bannecker, Bob (SWBT)'
Cc: Madole, Gary; Weaver, Marcia; 'Wagner, Patti (SWBT)'
Subject: UNE Test Access Clarification

03/25/97

To : Bob Bannecker
Southwestern Bell Telephone

I want to clarify a couple of issues on your letter to Marcia Weaver dated march 21, 1997:

Your letter stated :

"There will be no interruption of service to the end-user , if AT&T orders UNE elements without test access. A slight disruption of service would be experienced due to the insertion of test points, if AT&T orders UNE elements, with test access."

Please answer the following questions :

1. Since you indicated "no interruption of service when AT&T orders UNE elements **without test access**" , please answer the following:
 - a. Will SWBT still be able to test the loop if the UNE elements (loop & switch port) are ordered without test access?
 - b. **If the answer is no**, why would an order (UNE elements with loop and switch port combination) **EVER** be placed without test access? **SOMEONE**, needs to be able to test! Therefore, **isn't this scenario NON-EXISTENT** and wouldn't we **ALWAYS** have a service disruption when AT&T ordered loop and switch (combination) UNE elements?

Note : We understand that we can order a UNE loop without test access when AT&T provides dial tone and we have our own testing capability!

- c. Assuming this scenario exists (UNE loop & switch port) without test access - **what is the cost of the loop** in this environment? I would assume the cost would be LESS than when we order with test access - is this true?
2. In a scenario where UNE is ordered (loop & switch port) **with test access** - what is the **definition of "slight"**?