

entire regulatory scheme. The Commission affirmed the right to these unbundled combined network elements in paras. 332-41 of its August 1, 1996 Local Competition Order, properly reading the express language of Section 251(c)(3) of the 1996 Telecommunications Act. Unless the Commission acts promptly and powerfully to drive this process, the entire regulatory edifice the Commission has constructed to support its various decisions in the Telecommunications Act will crumble. It is built upon what today can only be described as quicksand -- the purported availability of unbundled network elements (UNEs).⁸

It is simply a fact that if the track record of the ILECs in the resale environment has been poor, there is no track record in unbundled network elements. LCI has made efforts to institute tests with each ILEC with which it does business for unbundled combined network elements ("UNEs"), so that LCI could gain experience in the important OSS processes underlying them. LCI's experience with OSS for UNEs is set forth briefly below.

⁸ In this regard, although it does not deal with OSS specifically, let me highlight the critical importance of the Commission's transport decision pending now. If the Commission were to grant Ameritech's request on its views on common transport, it would drive a stake through the heart of any chance at the unbundled network element platform being successful. If that were to happen, the FCC's arduous efforts over the last year and a half would have been in vain, for there will be no way out of access charges, short of immediately becoming a full facilities-based carrier. That, of course, cannot happen overnight, even with all the money in the world. The short of it is that the Commission must deny Ameritech's position on the transport issues if the UNE platform is to remain viable, and it must immediately drive the ILECs to establish OSS for the UNE platform so that this procedure can work.

NYNEX

LCI met with NYNEX on March 25, 1997, and asked to order the UNE Platform first for its New York Sales office, and next for friendly customers. LCI was told frankly by Mr. Jack Goldberg, Vice President of NYNEX Wholesale Services, that LCI's test with NYNEX would be the first such test NYNEX had conducted and that NYNEX welcomed the opportunity to gain experience in this new field. [See Ex. Q] LCI continues to work cooperatively with NYNEX, but the test is not far advanced, and whatever comes out of it, the test is in no way, shape or form scaleable to commercial operations. NYNEX, as its Vice President of Wholesale Services readily admitted just two months ago, is simply brand new to OSS in the UNE environment.

Ameritech

LCI's experience with Ameritech has been one of long frustration, until just days ago. The saga began on February 28, 1997, when LCI met with Ameritech and sought to order the UNE platform, first for its Chicago and Detroit sales offices, and next for friendly customers in Michigan and Illinois. [For the complete exchange, see Ex. R-2] LCI's goal was to gain OSS experience in the UNE environment, so that it could take advantage of the network platform promptly. After three months of meetings and letters, in which Ameritech professed not to understand LCI's request, Mr. Neil Cox, President of Ameritech Industry Information Systems (AIIS) told me in a meeting on May 22, 1997 that the only reason Ameritech was not honoring LCI's request to order the network platform in Chicago and Detroit on a trial basis was because it was already

engaged in such a test with AT&T, and that he, Mr. Cox (who is in charge of all wholesale matters including unbundled network elements), simply did not have the resources available to conduct two engineering tests at once. [See Ex. R] If that is the case, LCI questions how Ameritech can possibly be prepared to meet the Department of Justice's comments to the Southwestern Bell application [see Ex. M at p. 28]:

Further, a RBOCs wholesale support processes must offer a level of functionality sufficient to provide CLECs with a meaningful opportunity to compete using resale services and unbundled elements. Thus in general, to satisfy the checklist wholesale support processes must be automated if the volume of transactions would, in the absence of such automation, cause considerable inefficiencies and significantly impede competitive entry. (emphasis added)

BellSouth, PacBell and Bell Atlantic appear to be even less far along. It is simply a fact, to the very best of LCI's knowledge, that no ILEC to date is even close to having any substantial experience whatsoever in providing OSS for unbundled network elements. This critical part of the Telecommunications Act is a gaping hole today, despite LCI's, and apparently others', best efforts to gain understanding and experience in it.

CONCLUSION

This brief history demonstrates the variety of problems facing CLECs today, as they struggle to compete on an equal footing with well-established, powerful monopolist competitors who are fully in control of their own computer systems, and fully able to process orders, send bills, and perform the basic services every telephone consumer has a right to expect without difficulty. It is simply a fact that competitors today cannot do this, even in the relatively simple

resale environment. This Commission's action is urgently needed to set performance standards so that competitors, CLECs and ILECs alike, and most importantly the consuming public, will have quick, speedy and final resolution of the problem of OSS standards.

The ILECs have refused or have been unable to provide the kind of data and measurement criteria that would be needed for the CLECs to determine if they are being provided parity of OSS access. [See, e.g., DOJ Evaluation at 60-61 (“[S]BC has not established a sufficiently comprehensive set of performance standards, nor supplied its own retail performance information, to permit such a comparison”) and Friduss affidavit [Ex. M-2, attached to the DOJ filing]. In view of that vacuum, LCI asks this Commission to detail what would constitute a fully-functioning OSS accessible to competitors on an adequate basis. If an ILEC could meet these suggested criteria, it then reasonably can be assumed that parity has been achieved (or, if true parity of access has not been achieved, at least sufficient access will have been provided so that it can be assured that the CLECs have been provided a reasonable and adequate level of OSS functionality).

The Commission correctly has identified access to reasonable, adequate OSS functions of the ILECs on a nondiscriminatory, parity basis as an “essential,” “absolutely necessary” predicate for CLECs to be able to compete in local telephone markets. In adopting LCI's suggestion that the Commission establish performance standards for OSS, the Commission would be providing heightened clarity that will benefit everyone in the industry, and ultimately -- and

most importantly -- the American consumer. Until ILECs meet their burden under Section 251 of the Telecommunications Act of 1996, by showing that they are providing workable, functioning OSS, the consumer will not enjoy the benefits of lower prices and enhanced quality that true local telephone competition promises to bring.

I wholeheartedly endorse the policy, theoretical and practical considerations which underlie the Commission's emphasis on the network platform. The Commission is right as a matter of policy, as a matter of antitrust law, and as a matter of interpretation under the Telecommunications Act. Everything the Commission has done to date in this respect has been laudable, appropriate and correct. But let me send a large red warning signal of real and impending danger that the Commission's arduous efforts will crumble and come to naught if the Commission does not help the industry and help consumers now by immediately coming to grips with the OSS issues, both for resale and for the all-important UNE platform.

This Commission should take immediate and meaningful action to douse the flames which threaten to consume the rights guaranteed and promises made to consumers and competitors alike in the Telecommunications Act of 1996.

GLOBAL FAILURES OF RBOCS AND GTE AND NEED FOR IMMEDIATE FCC ACTION

- **RBOCs and GTE will not give CLECs parity with what they give themselves for their own retail customers**
- **No RBOC or GTE will reveal its internal performance measurements. Therefore, FCC, DOJ and CLECs cannot determine what "parity" is**
- **RBOCs and GTE will not agree with CLECs on performance standards**
- **FCC should immediately set performance standards and reporting requirements to give consumers benefits of robust local competition as ongoing benchmarking of RBOC and GTE performance**

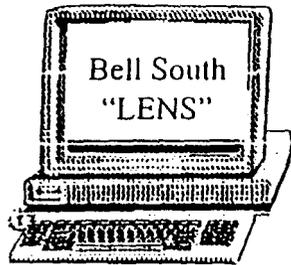
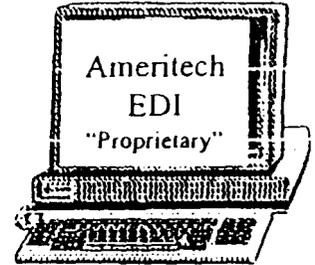
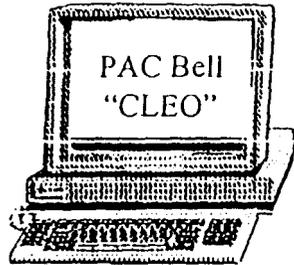
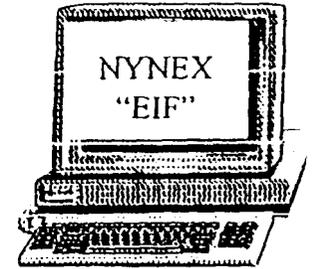
RBOCs AND GTE OSS STILL REQUIRE MANUAL INTERVENTION AND ADDRESS ONLY THE RESALE ENVIRONMENT

- **No RBOC or GTE has a completely automated end-to-end OSS which does not require manual intervention**
- **RBOC and GTE claims of "technical readiness" ignore need for tested, operationally ready systems which support commercial volumes**
- **RBOC and GTE claims of "readiness" are limited to resale environment and do not address need to expand OSS to support UNEs, including UNE combinations**
- **FCC must drive development of OSS for UNEs, including UNE combinations, due to critical importance of availability of UNEs in recent FCC decisions**

“Current Reality of Pre-Order Interfaces”

Sprint

National Integrated Service Center (NISC)



- Each “GUI” tool provided by the ILECs is different (no two are alike).
- Most tools are not robust and require phone calls to ILECs that adversely effect servicing the customers.
- When CSR information is not available, a call is initiated to the ILEC
- A dedicated number of customer service reps have to be assigned to 1 or 2 ILECs each, due to training and complexity of tools.
- Extensive unit cost increases to Sprint in this environment.
- This picture is identical to the environment in our trouble/repair center.

ANS Customer Service Record
(800) 924-3666

1	NDT/DID 4/TLI 719-6910	20.84	20.84	68
	/DES CONTR DATE 05-23-96			69
1	TJB/DID 4/TLI 719-6910	.00	.00	70
1	NALSA/DID 4/TLI 719-6910	12.37	12.37	71
1	AS32X/DID 4/TLI 719-6910	.00	.00	72
	/CLT 5.DINC.630.719.6910.D4			73
	/RTI 0997/TGP 234			74
1	9ZR/DID 4/TLI 719-6910	4.01	4.01	75
1	TKJCK/DID 5/TLI 719-6910	.00	.00	76
	/LSO 630 719			77
1	NDT/DID 5/TLI 719-6910	20.84	20.84	78
	/DES CONTR DATE 05-23-96			79
1	TJB/DID 5/TLI 719-6910	.00	.00	80
1	NALSA/DID 5/TLI 719-6910	12.37	12.37	81
1	AS32X/DID 5/TLI 719-6910	.00	.00	82
	/CLT 5.DINC.630.719.6910.D5			83
	/RTI 0997/TGP 234			84
1	9ZR/DID 5/TLI 719-6910	4.01	4.01	85
1	TKJCK/DID 6/TLI 719-6910	.00	.00	86
	/LSO 630 719			87
1	NDT/DID 6/TLI 719-6910	20.84	20.84	88
	/DES CONTR DATE 05-23-96			89
1	TJB/DID 6/TLI 719-6910	.00	.00	90
1	NALSA/DID 6/TLI 719-6910	12.37	12.37	91
1	AS32X/DID 6/TLI 719-6910	.00	.00	92
	/CLT 5.DINC.630.719.6910.D6			93
	/RTI 0997/TGP 234			94
1	9ZR/DID 6/TLI 719-6910	4.01	4.01	95
1	TKJCK/DID 7/TLI 719-6910	.00	.00	96
	/LSO 630 719			97
1	NDT/DID 7/TLI 719-6910	20.84	20.84	98
	/DES CONTR DATE 05-23-96			99
1	TJB/DID 7/TLI 719-6910	.00	.00	100
1	NALSA/DID 7/TLI 719-6910	12.37	12.37	101
1	AS32X/DID 7/TLI 719-6910	.00	.00	102
	/CLT 5.DINC.630.719.6910.D7			103
	/RTI 0997/TGP 234			104
1	9ZR/DID 7/TLI 719-6910	4.01	4.01	105
1	TKJCK/DID 8/TLI 719-6910	.00	.00	106
	/LSO 630 719			107
1	NDT/DID 8/TLI 719-6910	20.84	20.84	108
	/DES CONTR DATE 05-23-96			109
1	TJB/DID 8/TLI 719-6910	.00	.00	110
1	NALSA/DID 8/TLI 719-6910	12.37	12.37	111
1	AS32X/DID 8/TLI 719-6910	.00	.00	112
	/CLT 5.DINC.630.719.6910.D8			113
	/RTI 0997/TGP 234			114
1	9ZR/DID 8/TLI 719-6910	4.01	4.01	115
1	TF8/TN 963-1776/TER 1/PIC ATX	.00	.00	116
	/PCA BB, 01-30-86/ZPIC A13			117
	/LPCA SQ, 04-07-96			118
	/TLI 963-1776/HML 0122/GST			119
	/BUS			120
1	TFB/TN 963-1776/TER 1	.00	.00	121
	/TLI 963-1776/HML 0122			122
1	NALSA/TN 963-1776/TER 1	12.37	12.37	123
	/TLI 963-1776/HML 0122			124
1	UXTBT/TN 963-1776/TER 1	.50	.50	125
	/TLI 963-1776/HML 0122			126
1	9ZR/TN 963-1776/TER 1	4.01	4.01	127
	/TLI 963-1776/HML 0122			128
1	TF8/TN 963-1777/TER 2/PIC ATX	.00	.00	129
	/PCA BB, 01-30-86/ZPIC A13			130
	/LPCA SQ, 04-07-96			131
	/TLI 963-1776/HML 0122/GST			132
	/BUS/DES BTN 1777			133
1	TFB/TN 963-1777/TER 2	.00	.00	134

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Statement of Donald Lynch

Senior Vice President, MCI Local Service Operations
Before the FCC, May 28, 1997

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Federal Communications Commission
Operations Division

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Operational Support Systems (OSS) consist of all of the computerized and automated systems, together with associated business processes, that ensure the carrier can satisfy customer needs and expectations. If OSS systems do not work and interact properly, customers can lose service completely, lose features, receive inaccurate bills or even multiple bills. If a customer has a bad experience with MCI's local services, even though it is because of a LEC OSS problem, MCI's reputation suffers.

MCI is spending great sums of money -- \$1.7 billion through this year-- to build our own local facilities. MCI's strategy also includes use of resale and unbundled network elements. MCI will be an important competitive presence in the local market. This commitment to local competition will be in vain unless operational support systems are developed that will allow instantaneous, seamless interaction at volumes expected in a competitive market.

Unfortunately, MCI today sees what could generally be called "non-operational support systems" or, in the best cases, "barely operational support systems". While the systems adequately support the LECs' own customers, the LEC systems are not working with CLECs. The ILECS are failing to provide systems that are robust. They have refused to adopt many industry standards. The LECs are resisting adequate performance measures. Finally, the systems that do work under low volume, controlled test conditions for some functions are not ready for high volume commercial use for all functions.

A. Functionality and Robustness of ILEC OSS:

The operational support systems must work well and support all service delivery methods that are available to CLECS (resale, UNEs, platform) and must support all business processes, which including pre-ordering, ordering, provisioning, maintenance and repair and billing. For example, customers want more than POTS, so it does MCI little good if we cannot order anything more complicated than POTS service. Ameritech's systems, for example, focus primarily on POTS resale. There is little proof that Ameritech can successfully process orders for ISDN, private lines, Centrex, unbundled network elements or frame relay.

To order unbundled elements from Ameritech, MCI must use a non-standard ASR (access service request) and manual processes (for ILNP and disconnect). This is an industry-wide problem: demonstrated or claimed functionality is based on resale. Unbundled elements are an afterthought. Yet developing OSS for unbundled elements is significantly more complicated than developing OSS for resale -- and it is vitally important. Unbundled elements are essential for CLECs to compete profitably in the local market.

B. Commitment to Industry Standards:

ILECs must comply with industry standards and implement to those standards in time to support the CLEC's ability to provide competitive services. Proprietary interfaces are inferior to standard interfaces. They require CLECs to develop multiple interfaces for different ILECs, to train their representatives on multiple interfaces, and to establish the ability to switch between interfaces. And they inflate ILEC costs -- which are passed on to the CLECs. Proprietary

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interfaces serve as a barrier to entry.

C. Measuring the ILEC OSS Interface:

It is axiomatic that systems have to be thoroughly tested before they go in service. But that is not the end. Once in operation, there must be ways to measure performance -- for overall quality of service and to insure that new competitors are getting parity with the ILEC's own service.

The best way to understand this is to view the LEC as vendors. When we buy switches, for example, we expect it to work to a certain standard and the manufacturer agrees, in a contract to meet those standards. They know MCI can go buy a different switch. Unlike other vendors, the ILECs have resisted negotiating performance standards. The Local Competitive Users Group (LCUG) has developed standards to measure quality and prevent major deviations from parity for use on all of the business processes I mentioned above, and more. The ILECs should conform to those standards across all business processes with enforceable penalties if they fail to meet the standards.

D. Technical Readiness vs. Operational Readiness:

ILEC claims of the readiness of their OSS is based on their view that "technical readiness" equals "operational readiness". Those claims are also based on the view that readiness for one function translates to readiness for other functions.

But successful testing does not automatically translate to successful operation. As a customer service VP for PacBell recently explained, "You can do all the testing you want, but the theoretical world does not translate one-for-one into the real world. Many difficult problems are encountered that cannot be accounted for ahead of time." In addition, just because the electrons may be moving across the interface for POTS resale, this does not imply the interface is "operationally ready" for all service delivery methods and all business process.

Another critical concern is that the systems must be capable of processing large volumes of orders. In PacBell, problems with OSS have increased as the volume of orders has increased. As a result, both MCI and AT&T have scaled back their market entry. A system that severely limits the number of orders that can be processed acts as a brake on competitive losses for the LECs and robs customers of the benefits of competition.

Customers deserve the ability to choose local carriers and to change those carriers in a simple, transparent way. They should not lose dialtone, directory assistance listings, or get features they do not want, just because the LEC systems are inadequate. Most importantly, local competition cannot flourish without adequate OSS systems. The LECs must be compelled to build and maintain systems that have sufficient capacity and provide parity to competitors.

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Common Carrier Bureau OSS Forum
"What is Nondiscriminatory Access?"
May 28, 1997

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Summary of Remarks
John Lenahan
Assistant General Counsel, Ameritech

Federal Communications Commission
Office of Secretary

The Legal Standard is Clear:

- . "Equivalent access" to the electronic OSS information and functions that the ILEC provides to itself, its customers or other carriers. para. 523, para.2, para. 9
- . This access must permit the CLEC to perform these functions in "substantially the same time and manner that an incumbent can for itself ..." para. 518
- . "Ideally" this access would be through "national standards," but national standards are not required. para. 527, para. 13
- . Some modifications to the ILECs systems, however, may be required to accommodate this access. para. 524

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Ameritech has implemented procedures and systems to provide nondiscriminatory access to its OSS functions:

1. Established and published interface design specifications.
 - Technical Specifications
 - Ordering guides and "business rules."
 - One-on-one training and implementation sessions.
 - "Change management process" for future updates
 - Most of the above, about 4,500 pages, is available on Ameritech's Internet Home Page
2. Each of the five OSS functions and all of the sub-functions are operationally ready to process data.
 - Sufficient testing or use to provide reasonable assurance that CLEC can obtain timely OSS access, at anticipated demand
 - Reasonable trouble identification and resolution process: No information technology system is "bug-free."
3. Ameritech's interfaces have sufficient capacity to meet current and six month future demand, and existing procedures are in place to ensure on-going capacity requirements are met.
4. Ameritech measures and reports on a monthly basis the

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performance of its OSS interfaces

- Cycle Time (i.e. response time)
- Reliability (accuracy)
- Availability

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Operations Support Systems - Overview and Current Status

**Kevin Snyder, Assistant Vice President
GTE Telephone Operations**

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Federal Communications Commission
Office of Secretary

Common Carrier Bureau Operations Support Systems Forum

May 28, 1997

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Operations Support Systems - Overview and Current Status

**Kevin Snyder, Assistant Vice President
GTE Telephone Operations
May 28, 1997**

On August 8, 1996 the FCC issued its Interconnection Order requiring Incumbent Local Exchange Companies (ILECs) to provide Competitive Local Exchange Companies (CLECs) with non-discriminatory access to critical operations support system (OSS) functionality.

GTE moved rapidly after receipt of the FCC Order to fulfill its legal and business requirements and put in place the capability to receive and process orders on January 1, 1997.

GTE continues to enhance its capabilities to improve internal productivity, to address expected order volume increases, and to adapt to national standards as those standards are established.

To respond to the FCC Order, GTE developed the Secure Integrated Gateway System (SIGS) to allow two-way electronic communication between CLECs and GTE's data processing systems. SIGS acts as a front-end to GTE's legacy systems, where the critical OSS data and processing reside.

By using SIGS, CLECs have access to the same information, and on an equal basis, as GTE's retail representatives. For example, CLECs are able to view and reserve telephone numbers from the same pool of numbers that GTE's retail representatives choose from. Similarly, CLECs can view and reserve dispatched order due dates from the same list that GTE's own contact centers access to schedule field work.

GTE's SIGS application makes doing business with GTE easy and inexpensive by utilizing state-of-the-art web technology. All that is required for access to SIGS and its resident functionality is a personal computer, a web browser, and a digital certificate for security purposes. CLECs who wish to display a common screen format to their employees, regardless of the ILEC they are doing business with, can build application program interfaces (APIs) to SIGS. GTE's SIGS application addresses all pre-ordering and repair processes ordered by the FCC.

For the ordering and provisioning processes, GTE uses an existing data transmission method already widely used within the telecommunications industry. GTE uses Network Data Mover (NDM) to allow CLECs to electronically submit orders and for GTE to communicate back electronically any errors or jeopardies, as well as service activation information.

Systems and electronic processes are only a piece of the puzzle. Along with the systems developed in 1996, GTE opened the National Open Market Center to process CLEC orders. GTE also revised procedures and trained all impacted front-line personnel on the handling of the new wholesale activity.

Kevin Snyder - GTE Telephone Operations

Page 2

Workshops to explain "how to do business with GTE" have been held in four sites across the country. Attendance by over 200 participants representing 60 CLECs yielded many favorable comments.

"...great reference workbooks were provided"

"...I appreciate the in-depth review"

"...it was a great opportunity to question GTE Subject Matter Experts"

"...thorough and thoughtful review"

One-on-one meetings and demonstrations of SIGS have been held with CLECs, upon request. Currently, five CLECs are using SIGS in a start-up environment.

Reference material presented at the workshops is currently being migrated to a user accessible web site and will be available in June, 1997 via the Internet.

GTE's operational performance has been good during the start-up period. Key statistics indicate over 95% of the committed due dates are being met and provisioning intervals are at parity with GTE's retail channels.

GTE, like other ILECs, faced and overcame many challenges in the development of its OSS applications. Among those challenges were the development of new processes, changing older legacy systems, a lack of industry standards, little or no forecast of activity, diverse customers with differing needs, and a very short development cycle.

Significant changes to legacy systems were required to allow external business entities to access and use GTE's data.

Industry standards, although being aggressively worked through various committees such as the Ordering and Billing Forum (OBF), were yet to be developed. As such, GTE and others have built applications that will require revision after standards are fully developed.

GTE built capacity in its systems and processes for what was thought would be a large volume of CLEC order activity during the first quarter of 1997. With the existence of over 100 effective contracts, GTE now expects order volume to grow rapidly in the third and fourth quarters of 1997.

The CLEC community is diverse, with very small and very large companies participating. It has been a challenge to build processes and applications to serve the needs of all.

Finally, the Order on August 8 left very little time for GTE to develop the required system functionality and to have it tested and ready for CLEC access on January 1.

Kevin Snyder - GTE Telephone Operations

Page 3

In conclusion, GTE was ready on January 1 and we are ready now to process orders and related requests of the new market entrants.

GTE has developed processes that reflect our corporate philosophy of being "easy to do business with". We understand that a significant part of our future success depends on meeting the needs of our new wholesale customers.

Finally, GTE continues to move aggressively to provide enhancements to the applications already deployed. As industry standards are developed and approved, GTE will change its systems and processes to accommodate the new standards. More importantly, as we work with the CLECs to better understand their business needs, we will make enhancements to retain their wholesale business.

CC96-98

Consolidated Communications Inc.

**Opening Statement for the Common Carrier Bureau OSS Forum
by Rod Cox / Manager Market Expansion / Operations
May 27, 1997**

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Communications Commission
Office of Secretary

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Brief History of Consolidated Communications:

Consolidated Communications Inc. was started in 1894 as Illinois Consolidated Telephone Company. Today, Illinois Consolidated Telephone Company is the 26th largest local service provider and largest privately held telephone company. Consolidated has continued to grow as a 4th. generation family owned Company into multiple facets of the Telecommunications Industry. Consolidated diversified by entering the IXC business in 1984 and then as a C-LEC in 1996. Our 103 years experience in the telephone industry has proven invaluable.

We were certified in the C-LEC business in 1995 and began the facilities based (unbundled loop) offering in May of 1996. Our goal was to be the FIRST in downstate Illinois to give customers in three chosen markets of Springfield, Decatur and Champaign/Urbana a CHOICE. Our project team was named *Operation First Choice (OFC)* of course. The goal was accomplished but not without a tremendous amount of "pain and fast learning".

The C-LEC Experience:

My primary responsibilities for the last year have been to improve our internal processes, build a stronger working relationship with Ameritech and define/develop performance measurements. Additionally, I initiated Operational Support Systems (OSS) interface alternatives with Ameritech. Personally, it has been very exciting and challenging and I am honored to be representing Consolidated Communications on this panel.

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Panel Issues:

What access should incumbent LEC's provide for repair and maintenance?

Best case ...give us access to everything they have that will get the end user (our customer) better/quicker service. The issue to us is not just what they will provide but also what it will cost us to get that information.

We would like trouble ticket information matching real time on both systems. Real time opening and closing of tickets (with clocks matching) and on-line escalation, status and comment fields. Test results, access times and force to load schedules should also be available. It is very important to understand how duration is measured and who authorizes the clock to stop. Receipt to clear is a two step process in this business. Clearing back to the C-LEC is the second part that should not be taken lightly. Having the ability to communicate the status of a trouble condition back to your customer is critical.

What Standards are necessary to ensure parity?

Consolidated supports standards for the industry that will ensure parity. The key is making these standards efficient and affordable for all. Adhering to standards developed just for large companies with complex needs will drive cost up and force the smaller players to use double entry or inquiry only type systems to compete. Standards should be tiered to meet varying levels of business needs with the flexibility to add functionality as budgets permit.

What types of interfaces are being deployed or proposed?

We are currently testing a Trouble Administration (GUI) with Ameritech. It is a PC, dial up, software application that was provided by Ameritech. We are exploring other alternatives with Ameritech and with external consultants.

Final Comment:

Consolidated's experiences in electronic bonding of Operations Support Systems for maintenance and repair are just beginning. We will continue to test simpler, less costly solutions. We will continue to work with Ameritech in pursuing these simpler solutions and we will openly share our success or short comings with other players in the C-LEC arena.

" Electronic bonding of systems will only be as good as the linked processes that are in place, and the commitment /relationship between the I-LEC and the C-LEC."

FCC Common Carrier Bureau Operations Support Systems Forum

REPAIR AND MAINTENANCE - 5/29/97

Bob Welborn, Director, Operations Planning, Sprint

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Repair and Maintenance systems support is considered the most critical support element after service establishment. End User Customer (Customer) problems require immediate attention, especially if the Customer has an out-of-service condition. Setting and satisfying Customer expectations can only be accomplished through proper diagnosis of the problem, dependable appointment setting, timely dispatch, accurate and timely correction of the problem, and constant Customer communication. Real-time Operational Support Systems (OSS) integration between the ILEC and CLEC are essential in providing this capability. An Electronic Bonding (EB) platform is a solution that may satisfy integration requirements. EB is currently being implemented in the Access environment. However, EB must be enhanced to provide testing capability which will assist in meeting Customer needs.

Key elements to keep in mind: The "Big C" Customer is the End User in all cases. Customers want their problems solved in a timely and accurate manner. They want to speak with informed and empowered customer repair representatives who will solve their problems. These expectations cannot be satisfied without seamless operational support systems that provide the information and scheduling capabilities. Unfortunately, CLECs' repair and maintenance performance will be no better than the performance of their weakest network provider.

Currently, many ILECs have established Graphic User Interfaces (GUIs) for trouble handling that allow varying degrees of capabilities that differ markedly from ILEC to ILEC. Mechanized Line Testing (MLT) is an example of an essential tool that diagnoses trouble and could eliminate needless dispatches. Some ILECs have elected not to provide access to, or provide only limited access to, their MLT systems. Denying MLT access is an example of an area in which CLECs will not have the same capability as the ILEC.

Sprint has been in the local market in California since the latter part of 1996 and has been purchasing service from both PacBell and GTE on a total resale basis. Communications of troubles have been through PacBell's LI Office GUI and manual telephone calls to GTE's repair center. Although Sprint currently has only a small number of local service resale Customers, Sprint is experiencing an unacceptable level of inaccurate, incomplete, and misplaced service requests. This has lead to Customer complaints, dissatisfaction, and in some cases, actual loss of

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the Customer account. Accuracy and timeliness of service provisioning has also impacted the repair experience because customers have been inadvertently disconnected in the migration process.

While GUI solutions move CLECs beyond manual processing, they create non-standard interfaces that add administrative and operational burden. They require additional training, multiple software applications, multiple (dial up or dedicated) communications facilities needing varied login and logout requirements and written documentation. This proliferation of GUI interfaces will continue to expand to likely unmanageable levels as Sprint enters new markets.

In addition to the multiple interface dilemmas, there is no real-time access to the incumbent's support systems to enter a Customer's service request, directly access appointment schedules, initiate status requests, and perform full MLT testing in parity with the level of service that the incumbent provides its own Customers.

Interim electronic interfaces are not an adequate short- or long-term solution, but only a bandage to meet today's insignificant levels of demand.

In addition to the need for real-time interfaces to ensure accurate and timely handling of Customer expectations, there is a need for the ILECs to self-report service level performance to ensure consistency of service delivery across all entities. Performance measurements need to benchmark the ILEC's and their affiliate's performance with individual and industry CLEC performance. Measures and a calculation methodology have been proposed in the LCUG Service Quality Measurements document. Performance expectations are, at a minimum, parity with the performance ILECs provide their own Customers, or PUC standards (whichever is higher), and should change from time to time as required. To understand the measurements and metrics, it is imperative that the calculation methodology be agreed upon and the raw numbers used in the calculation be provided.

In summary, it is essential that real time system interfaces provide a seamless Customer experience and provide efficient, timely and accurate information to the CLEC customer repair representative. Satisfying Customer expectations can only be accomplished through proper diagnosis, accurate appointment setting, timely dispatch, accurate and timely correction of problems, and constant Customer communication, all based upon electronic system-to-system platform integration. Measurements are essential to illustrate levels of performance and ensure continuous process improvement when levels fall below expectations.

Remarks prepared for the:

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Repair & Maintenance Panel

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Repair and Maintenance

Non-discriminatory access requires BellSouth to make available information and functionality in substantially the same time and manner as BellSouth's access for its retail customers. BellSouth has done so for repair and maintenance by providing CLECs with access to the same system used by BellSouth's repair attendants to handle trouble reports for residence and business exchange services. BellSouth also offers CLECs an electronic bonding gateway for trouble reporting on local interconnection trunking and other designed services.

BellSouth repair attendants process local exchange trouble reports using a system known as the Trouble Analysis Facilitation Interface, better known as TAFI. TAFI is a common presentation expert system that provides rapid, consistent, and efficient automated trouble receipt, screening and problem resolution. It is an interactive system that prompts the repair attendant with questions and instructions while automatically interacting with other internal systems as appropriate. TAFI also provides for the queuing of reports enabling

the repair attendant to work on several customer troubles simultaneously, and it also provides on-line reference tools.

TAFI is a user friendly interface that often enables trouble reports to be cleared remotely, by the repair attendant handling the initial customer contact, often with the customer still on the line. With this system, any repair attendant can correctly handle a trouble report on any BellSouth-provided basic exchange service.

TAFI provides electronic access to other BellSouth systems that might be involved in resolving a trouble report by automatically interacting with the correct BellSouth system for a given situation, and will execute the appropriate test or retrieve the appropriate data. For example, if a customer were to report that the customer's call forwarding feature was not working, the TAFI system would electronically verify that the feature was programmed in the switch serving the customer's line. Once the TAFI analysis of the trouble is complete, TAFI provides a recommendation of what is needed to correct the problem, and in some cases actually implements the corrective action. In the above example, TAFI would correct the trouble by implementing a translation change in the switch to add the feature to the line. If the switch translations were correct, the repair attendant would provide instructions on the proper use of the feature using the TAFI 'help' feature.

BellSouth has provided CLECs with non-discriminatory access to its TAFI system. The CLEC TAFI system contains all the functionality described above that is contained in the BellSouth TAFI system, including the capability to view maintenance histories. In addition, by providing access to TAFI, BellSouth is making available to CLECs the functionality inherent in the many systems with which TAFI connects.

The only difference between the CLEC TAFI system and the BellSouth TAFI system is a security step that occurs electronically and nearly instantaneously. This security screening step is required because the CLEC TAFI system will be used by repair attendants from multiple CLECs. Therefore, TAFI identifies each CLEC's repair attendants by company, and allows each CLEC's repair attendant to access only that CLEC's customers' records. Once that validation check has been performed, the CLEC repair attendant has access to the full range of TAFI functionality that is available to BellSouth repair attendants for both business and residence exchange services. Other than the security check described above, TAFI functions identically for CLECs and for BellSouth.

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