

1 certain OSS functions.

2 If that CLEC were then to seek arbitration before  
3 the Nevada Commission, since Pacific Bell is not a Nevada  
4 ILEC, time will tell. Fortunately, we have not been faced  
5 with that circumstance, but clearly, there may be a role for  
6 the FCC in that.

7 I have a question, though, more of an economics  
8 question, in that, are there the economies in OSS function  
9 such that these systems ought to be developed at the holding  
10 company level rather than at the operations or operating  
11 company level? That's my question.

12 MR. FALCONE: I could just answer based on what I  
13 know is happening and it varies by company. Some companies  
14 are having it done at what you're calling, Larry, the  
15 holding company level. Other companies, because of their  
16 Legacy systems and because the holding companies are -- I'll  
17 pick on Bell Atlantic -- if there's any Bell Atlantic people  
18 here, forgive me -- the holding company at Bell Atlantic was  
19 really a compilation of three smaller companies, New Jersey  
20 Bell, Bell P.A. and Diamond State. So, there's some Legacy  
21 systems there that, in effect, somehow prevents some  
22 companies necessarily of having a ubiquitous company-wide  
23 system. I don't know if that's answering your question.

24 MS. LAWSON: From Southwestern Bell's perspective,  
25 with the five states that was in Southwestern Bell's

1 telephone territory, that was the same. For Pacific and  
2 Nevada, those were two, and they did have different systems.  
3 So, as was alluded to, we have different Legacy systems. It  
4 makes it difficult because of the operating environment that  
5 you're in, could drive the type of OSSs to support those.

6 MS. BERUBE: In SNET, our IT organization which  
7 maintains and administers the Legacy systems, is part of  
8 what we would consider the holding company.

9 MR. GUDE: Any other questions?

10 MS. BINGAMAN: I'm just curious what forum and how  
11 are you telling me -- the right to access charges -- on a  
12 network platform?

13 MS. LAWSON: That's a policy decision that I don't  
14 get to make.

15 MS. BINGAMAN: I just meant where?

16 MS. LAWSON: In negotiations.

17 MS. BINGAMAN: Before a convention, right now, do  
18 you know?

19 MS. LAWSON: Not that I know.

20 MS. BINGAMAN: You're not aware of a decision by a  
21 public body?

22 MS. LAWSON: Not that I'm aware of. I'm not aware  
23 of some of the policy issues still in effect. They don't  
24 let me get involved in that, thank goodness.

25 MS. MOORE: I'm Diane Moore from MCI. I have a

1 question from Mary. I understand that you've chosen to use  
2 CRIS for resale billing, and at MCI, I particularly support  
3 CABS for that, but I understand there's a difference.  
4 Whenever companies are choosing CRIS, there is, as Beth  
5 pointed out, a mechanized 811 EDI standard for CRIS. When  
6 SNET mechanized their CRIS, they did not choose that  
7 standard, which therefore caused me extra development work  
8 and cost to receive your bill in automated fashion.

9 Two questions for you. One is, do you know why  
10 you did not go with an established mechanized interface when  
11 you did mechanize your CRIS system, and the second question  
12 is, since your decision to go non-standard caused me excess  
13 work and extra cost. Can you help recover some of that  
14 cost?

15 MS. BERUBE: I think I'll answer your first  
16 question first.

17 (Laughter.)

18 MS. BERUBE: Basically, because one or two of our  
19 customers had asked us for something mechanized, we used  
20 what we had readily available to get something out there  
21 right away, and that is the God's honest truth. Customers  
22 wanted something electronic, we had something that we  
23 provided on the end user side that was electronic in format,  
24 it fit the immediate need.

25 In terms of the 811, that is one of the

1 alternatives we're evaluating. Since we don't offer that  
2 today internally, we don't use it for end user billing  
3 today, it is a new development process for us, so that is  
4 something that, as one of our alternatives, that we might  
5 present to our CLECs when we have done a full evaluation,  
6 but it just wasn't available at the time. It's not  
7 something we had been doing. Had it been, I'm sure we would  
8 have offered it to you.

9 MS. MOORE: So, if you changed back to 811, I'd  
10 have to do more development work to change that to 811.  
11 And, if you're not being consistent with the way  
12 Southwestern Bell and others have done the 811, then I'll  
13 have more development work to receive your mechanized on top  
14 of what I've done to receive it already?

15 MS. BERUBE: I think that would be up to you  
16 whether or not you wanted to change. We wouldn't eliminate  
17 support for what we are currently providing.

18 MS. STROMBOTNY: I'm Tracy Strombotny from LCI,  
19 and basically, what I want to use bills from LECs for is to  
20 validate that what was provisioned by the LEC is what I'm  
21 charging my customer for. Because there are manual  
22 interfaces in some places, sometimes we find that what gets  
23 turned up for the customer isn't exactly what it was before  
24 or exactly what we asked for.

25 What I'm wondering is, do you all have any plans

1 to provide some kind of a massive comparison system for the  
2 situation where what we're billing is not what you have  
3 provisioned, if things get truly, largely out of whack,  
4 where what I have asked you to order is not what got turned  
5 up. Do you have any plans to provide those systems to  
6 CLECs?

7 MS. BERUBE: I think that's really part of an  
8 adjustment process, and we have an adjustment process that  
9 we've put in place. It is not fully mechanized at this  
10 point in time. I think it will take awhile before that  
11 process is fully mechanized, but certainly it is in our  
12 interest to make sure that what you've ordered is what's  
13 provisioned, and we would confirm on a service order  
14 completion for those services that have been ordered  
15 electronically, providing back the purchase order number and  
16 service order number that a service has been implemented, so  
17 that is our way of identifying that what you've requested  
18 has been provisioned.

19 Then, that is further supported at the receipt of  
20 your monthly bill. So, to the extent that there is any  
21 discrepancy, we would expect that the adjustment process  
22 would apply.

23 MS. STROMBOTNY: Just to follow up, does that mean  
24 that under -- that's USOC by USOC?

25 MS. BERUBE: No, it's not.

1 MS. STROMBOTNY: So, it's just this service order  
2 is complete and we can't compare service by service? Okay,  
3 thank you.

4 MS. BERUBE: That's correct.

5 MS. LAWSON: Are you looking for any type of  
6 validation back to what you're billing your end user, or are  
7 you just looking at what you ordered to what the ILEC would  
8 bill you? Because there has been some discussion that the  
9 CLEC would like be able to validate from their customer  
10 database the quantity of USOCs they have at a WTM level back  
11 to what I call auxiliary service information that could be  
12 provided with the billing detail. So, at some type of level  
13 of detail, of course, you would have timing differences  
14 there when you service order post it, that I've got 50,000  
15 of USOC one. I've got 250,000 of USOC two, you know, at a  
16 high level.

17 Then, if you want to go down at a WTN level.

18 MS. STROMBOTNY: Yeah, I want to go down at a WTN  
19 level so I don't have a customer paying for a service that  
20 they're really not being provided, because it wasn't  
21 provisioned. So, I want to WTN, and by WTN compare those  
22 services and features by USOC, to make sure that I have  
23 accurately provisioned their order.

24 MS. LAWSON: And, with the EDI 864, that gives you  
25 the auxiliary service information by USOC level of detail,

1 with the WTN, and with the Bill Plus, with the CD-ROM  
2 version, that will include auxiliary service information at  
3 a USOC level by WTN for what Southwestern Bell provides.

4 MS. STROMBOTNY: But, isn't the 864 a free format  
5 transaction?

6 MS. LAWSON: No, it's got the USOC level and would  
7 show the quantity. Then we have an implementation guide  
8 that maps that type --

9 MS. STROMBOTNY: Can I get a copy of your  
10 implementation guide?

11 MS. LAWSON: Yes.

12 MS. STROMBOTNY: Thank you.

13 MR. WELCH: Okay, I think we're about out of time  
14 and we need to wrap this up. I'd like to thank our  
15 panelists on this, Dennis Perkins, Bob Falcone, Mary Berube  
16 and Beth Lawson. Thank you very much.

17 We'll take a short break and reconvene promptly at  
18 noon for our last panel.

19 (Whereupon, a short recess was taken.)

20 MR. WELCH: Okay, why don't we get started with  
21 our fifth and final panel of the forum, please? This panel  
22 will be on maintenance and repair. Before we actually get  
23 into that, I'd like to thank a few people who were  
24 instrumental in helping put this forum together.

25 We had some fine help from our Office of Public

1 Affairs, from the Public Service Division, and in  
2 particular, Martha Contee and Susan Szulman, who has been  
3 instrumental in keeping us on time, and we have hit all our  
4 deadlines. So, we thank them and also the folks working in  
5 our audio-visual department, tooling away back in the booth,  
6 have done a great job putting this production together, and  
7 it will result in a videotape, hopefully, that people will  
8 take home from Eros -- Blockbuster Video, excuse me. All  
9 these mergers, I have a hard time keeping up.

10 We're going to now turn to maintenance and repair,  
11 and I harken back to the days of the local competition  
12 rulemaking here at the Commission, the 251 rulemaking back  
13 last summer, where we had this huge debate. One of my  
14 favorite issues that came before us was the maintenance and  
15 repair and how to handle this.

16 There was a suggestion made that when the  
17 incumbents' repairman pulls up in the driveway at somebody's  
18 house, that they should whip out a little velcro badge and  
19 put it over the incumbents' logo and put the new entrants'  
20 logo and then take a panel and cover up the side of the  
21 truck, and put the new logo on. This is one of my  
22 favorites. The topic today, of course, is how that relates  
23 to OSS.

24 So, let me introduce our panelists and then we'll  
25 have brief opening statements from the four of them. Going

1 from right to left we have Gloria Calhoun. Gloria is with  
2 Bell South Corporation. She is the director of Bell South.  
3 Sitting next to Gloria is David Swan. David is from Bell  
4 Atlantic, where he is vice president of carrier services.

5 Next to David is Bob Welborn, and I apologize,  
6 Bob. He is with Sprint Corporation and I think there's been  
7 a substitution here. He is a director. I apologize, Bob.  
8 Then, finally, we have next to Bob, Rod Cox, who is with  
9 Consolidated Communications, Inc. Bob is manager of market  
10 expansion and operations.

11 So, we'll hear from each one of these four folks  
12 briefly, and why don't we start with Gloria? Gloria,  
13 please?

14 PANEL III

15 MS. CALHOUN: Thank you. Non-discriminatory  
16 access requires Bell South to make available information and  
17 functions in substantially the same time and manner as Bell  
18 South's access for its retail customers. Bell South has met  
19 this obligation for repair and maintenance by providing  
20 CLECs with access to the same system used by Bell South's  
21 repair attendants to handle trouble reports for residence  
22 and business exchange services.

23 Bell South also offers CLECs an electronic bonding  
24 gateway for trouble reporting on local interconnection  
25 trunking and other design services. Bell South's retail

1 repair attendants process local exchange trouble reports,  
2 using a system known as the Trouble Analysis Facilitation  
3 Interface, better known as TAFI. TAFI is a common  
4 presentation expert system that provides rapid, consistent  
5 and efficient automated trouble receipt, screening and  
6 problem resolution.

7           It's an interactive system that prompts the repair  
8 attendant with questions and instructions while  
9 automatically interacting with other internal systems as  
10 appropriate. TAFI also provides the queuing of reports,  
11 enabling a repair attendant to work on several customer  
12 troubles simultaneously, and it also provides on line  
13 reference tools.

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

20           TAFI provides electronic access to other Bell  
21 South systems that might be involved in resolving a trouble  
22 report, by automatically interacting with the correct Bell  
23 South system for a given situation, and TAFI also will  
24 execute the appropriate test or retrieve the appropriate  
25 data.

1           For example, if a customer were to report that the  
2 customer's call forwarding feature was not working properly,  
3 the TAFI system would electronically verify that the feature  
4 was programmed in the switch serving the customer's line.  
5 Once the TAFI analysis of the trouble is complete, TAFI  
6 provides the repair attendant a recommendation of what is  
7 needed to correct the problem, and in some cases, actually  
8 implements the corrective action.

9           In the above example, TAFI would correct the  
10 trouble by implementing a translation change in the switch  
11 to add the feature to the line. If the switch translations  
12 had been correct, the repair attendant could provide  
13 instructions on the proper use of the feature, using the  
14 TAFI help feature.

15           Bell South has provided CLECs with non-  
16 discriminatory access to its TAFI system. The CLEC TAFI  
17 system contains all the functionality described above that's  
18 contained in the Bell South TAFI system, including the  
19 capability to view maintenance histories.

20           In addition, by providing access to TAFI, Bell  
21 South is making available to CLECs the functionality  
22 inherent in the many systems with which TAFI connects. The  
23 only difference between the CLEC TAFI system and the Bell  
24 South TAFI system is a security step that occurs  
25 electronically and nearly instantaneously. This security

1 screening step is required because the CLEC TAFI system will  
2 be used by repair attendants for multiple CLECs. Therefore,  
3 TAFI identifies each CLEC's repair attendants by company,  
4 and allows each CLEC's repair attendant to access only that  
5 customer's records.

6           Once that validation check has been performed, the  
7 CLEC repair attendant has access to the full range of TAFI  
8 functionality that's available to Bell South's retail repair  
9 attendants for both business and residence exchange  
10 services. Other than the security check described above,  
11 TAFI functions identically for CLECs and for Bell South.  
12 TAFI has been used by three CLECs in the Bell South region,  
13 and Bell South is in discussion with nine other CLECs on the  
14 use of its TAFI system. That concludes my remarks. Thank  
15 you.

16           MR. WELCH: Just for the record, could you spell  
17 that acronym, TAFI?

18           MS. CALHOUN: It's T-A-F-I.

19           MR. WELCH: Okay, next we'll hear from David Swan.  
20 I love these acronyms. David, if you're going to tell me  
21 that your system acronym is SALT, I'll buy you lunch today.

22           MR. SWAN: I guess I won't get lunch today. Good  
23 afternoon. I'm going to address my comments to three areas  
24 related to the subject of CLEC access to operating  
25 supporting system repair and maintenance functions.

1           They are the quality of the access we're providing  
2 to our CLEC customers. The standards we've adopted to  
3 insure that the service provided is on par with what we  
4 provide to our end user and access services customers, and  
5 finally, the types of interfaces we have already deployed to  
6 make sure that high quality and dependable OSS access repair  
7 and maintenance is given.

8           First, Bell Atlantic is committed to providing  
9 equivalent access to our CLEC customers, and that is the  
10 same or nearly the same access that we provide to our  
11 current customers. Currently, our end user customers call a  
12 Bell Atlantic trouble administration call receipt center to  
13 report troubles. POTS customers are connected to a voice  
14 response unit for trouble analysis and call clearance  
15 direction, and to close out as many reports initially as  
16 possible. Our design services customers call our centers  
17 that handle these services.

18           Our access services customers may also call Bell  
19 Atlantic with their trouble reports or use either of our two  
20 electronic means for trouble reporting and repair and  
21 maintenance administration. These two include electronic  
22 bonding open systems interconnect or our communications  
23 gateway that we refer to as ECG. For our CLEC customers,  
24 Bell Atlantic will provide the same repair and maintenance  
25 capabilities. CLECs may call their trouble reports to our

1 regional CLEC maintenance case team, a dedicated regional  
2 center designed and staffed to support the CLEC repair  
3 maintenance administration.

4 The CLECs may also choose to use one or both of  
5 our electronic means for trouble reporting, electronic  
6 bonding, OSI or ECG for both design services and POTS and  
7 this interface will be administered by the same regional  
8 CLEC maintenance case team.

9 Both electronic bonding, OSI and ECG, provide  
10 direct access to the operating support system that  
11 administers the particular service. Almost for POTS type  
12 services and WFA, Work Force Administration for design  
13 services. Electronic bonding OSI allows a CLEC to create a  
14 trouble ticket, establish POTS appointments, change and  
15 receive status and close out information automatically. ECG  
16 provides the same automatic capability, except that it  
17 requires manual query from the CLEC for statusing.

18 So, whether the CLEC calls or electronically sends  
19 a trouble report to Bell Atlantic, they will receive the  
20 same repair commitment.

21 Regarding standards, Bell Atlantic has designed a  
22 repair maintenance process for our CLEC customers that is  
23 nearly identical to the process that is in place today for  
24 our own end user customers. There are no national standards  
25 at this point for CLEC POTS and design services trouble

1 report processing. There is, however, a national standard  
2 for the electronic interphase for access services customers,  
3 trouble report administration and electronic bonding open  
4 systems interconnect, which Bell Atlantic provides.

5 Bell Atlantic additionally has developed an  
6 alternative electronic gateway capability previously  
7 mentioned, ECG, to also support this process. The ECG  
8 process is more cost effective and requires only a dial up  
9 or direct dedicated connection.

10 This leads to my final comments, the types of  
11 electronic interfaces that we have currently deployed. As  
12 previously mentioned, the only national standard for  
13 interface in this area is the T1M1 guidelines for electronic  
14 bonding for access services using OSI, which Bell Atlantic  
15 provides. In fact, Bell Atlantic was the first ILEC to  
16 connect in OSI application to both AT&T and MCI for trouble  
17 report administration for access services. Bell Atlantic  
18 has agreed to use nearly the same electronic bonding  
19 application for repair maintenance for AT&T for local  
20 service, and is ready to meet AT&T's requirements in this  
21 area.

22 Bell Atlantic has offered the same capability to  
23 MCI and any other CLEC who is interested. In addition, Bell  
24 Atlantic has developed, as we mentioned, a 3270 screen  
25 immolation process, dedicated or ECG, which offers much the

1 same functionality as electronic bonding OSI, but at a much  
2 more reasonable cost. ECG has been enhanced to fully  
3 support CLECs for most local services.

4 Thank you very much for this opportunity to  
5 provide these comments regarding Bell Atlantic's efforts to  
6 provide CLEC access to its repair and maintenance OSS  
7 functions.

8 MR. WELCH: Thank you, David.

9 Next we'll hear from Bob Welborn at Sprint.

10 MR. WELBORN: Good afternoon, it's a pleasure to  
11 be here and share a few thoughts on maintenance and repair.  
12 Before we start, though, I'm afraid Richard might have  
13 everybody at the ballpark, so I'd like to bring you back to  
14 reality. It's a rainy day, game's been canceled, you have  
15 to go to work. You're now in a repair bureau for the CLEC,  
16 and knowing your next call is going to be a customer in  
17 distress. Now we set the stage, let's go ahead and continue  
18 with the comments here.

19 Repair and maintenance support systems is  
20 considered the most critical support element after service  
21 provisioning. End user customer problems require immediate  
22 action, especially if the customer has an out of service  
23 condition. Setting and satisfying customer expectations can  
24 only be accomplished through proper diagnosis of the  
25 problem, dependable appointment setting, timely dispatch,

1 accurate and timely correction of the problem, and constant  
2 customer communications.

3           There are three components of repair and  
4 maintenance. They are prevention, detection and correction.  
5 Many times, we only look at the correction side of this and  
6 not the other two elements that are essential. Real time  
7 Operational Support System integration between the ILEC and  
8 CLEC are essential in providing these capabilities, whether  
9 it be total service resale or unbundled elements.

10 Electronic bonding platform is a solution that may satisfy  
11 integration requirements. EB is currently being implemented  
12 in the access environment, however, EB must be enhanced or  
13 provide capability that will assist in testing customer  
14 troubles.

15           Key elements to keep in mind, the "Big C" customer  
16 is the end user in all cases. Customers want their problems  
17 solved in a timely manner and accurate manner. They want to  
18 speak with informed and empowered customer repair  
19 representatives, who will solve their problems. These  
20 expectations cannot be satisfied without seamless  
21 operational support systems that provide the information and  
22 scheduling capabilities. Unfortunately, CLECs' repair and  
23 maintenance performance will be no better than the  
24 performance of their weakest network provider.

25           Currently, many ILECs have established GUIs,

1 trouble handling that allow varying degrees of capabilities  
2 that differ markedly from ILEC to ILEC. MLT is an example  
3 of an essential tool that diagnoses trouble and can  
4 eliminate needless dispatches. Some ILECs have elected not  
5 to provide access to or provide only limited access to their  
6 MLT systems. Denying MLT access is an example of an area  
7 where an ILEC may have a service that differs from a CLEC.

8           Sprint has been in the local market in California  
9 since the latter part of 1996 and has been purchasing  
10 service from PacBell and GTE on a resale basis.  
11 Communications of troubles have been through PacBell's LI  
12 Office GUI interface and manual telephone calls to GTE.  
13 Although Sprint currently has only a small number of local  
14 service resale customers, Sprint is experiencing an  
15 unacceptable level of inaccurate, incomplete and misplaced  
16 service requests. This has led to customer complaints,  
17 dissatisfaction, and in some cases, actual loss of the  
18 customer account to their previous carrier, who is the ILEC.

19           Accuracy and timeliness of service provisioning  
20 has also impacted the repair experience, because customers  
21 have been inadvertently disconnected in the migration  
22 process. While GUI solutions move CLECs beyond the manual  
23 processing, they create nonstandard interfaces that add  
24 administrative and operational burdens. These  
25 proliferations of GUIs will continue to expand to likely

1 unmanageable levels as Sprint enters new markets.

2 In addition to the multiple interface dilemmas,  
3 there is no real time access to the incumbent support  
4 systems to enter the customer service request, directly  
5 access appointment schedules, initiate status reports and  
6 perform full MLT testing in parity with the level of service  
7 that the incumbent provides to its own customers.

8 Interim electronic interfaces are not adequate,  
9 short term or long term solutions, but only a bandage to  
10 meet today's insignificant levels of demand. In addition to  
11 the need for real time interfaces, to insure accurate and  
12 timely handling of customer expectations, there's a need for  
13 the ILECs to self-report performance levels, to insure  
14 consistency of service delivery across all entities.  
15 Standard performance measurements need to benchmark the  
16 ILECs performance and their affiliates performance against  
17 individual and industry CLEC performances. Measures and  
18 calculation methodology have been proposed and the local  
19 competition user groups service quality measurement  
20 documents.

21 In summary, it is essential that real time  
22 interfaces provide a seamless customer experience and  
23 provide efficient, timely and accurate information to the  
24 CLEC customer repair representatives, satisfying customer  
25 expectations, all based upon electronic system-system

1 platform integration. Thank you very much.

2 MR. WELCH: Thank you, Bob. Last we'll hear from  
3 Rod Cox at consolidated communications.

4 Rod?

5 MR. COX: Thank you, Richard, and since I'm the  
6 last panelist, I think it's only appropriate that I can  
7 close with the baseball theme. I would like to start out by  
8 saying that last year in May, Consolidated Communications  
9 felt like a minor league team playing in a major league  
10 stadium. The first six innings were errors, full of errors  
11 and a lot of delays. The innings seven, eight and nine, we  
12 started swinging and reduced the errors. Now, we're in the  
13 12th inning, extra innings, by the way, and we're all tied  
14 up. You can take that literally, if you like, but we're  
15 still in the game.

16 I am confident we're going to win the first game  
17 of many series of games to come. For all you start up LECs  
18 out there, CLECs, practice, continual improvement and keep  
19 swinging. We can win. It's going to be a long season.  
20 That's my game story.

21 Now, I'd like to give you a little brief history  
22 of Consolidated Communications. Consolidated Communications  
23 started in 1894 as Illinois Consolidated Telephone Company.  
24 Today, Illinois Consolidated Telephone Company is the 26th  
25 largest local service provider and the largest privately

1 held telephone company.

2 Consolidated has grown as a fourth generation  
3 family owned company into a multiple facets of the telephone  
4 industry. Consolidated diversified by entering the IXC  
5 business in 1984 and then as a CLEC in 1996. Our 103 years  
6 experience in the telephone industry has proven invaluable.

7 We were certified in the CLEC business in 1995 and  
8 began the facilities based unbundled loop offering in May of  
9 1996. Our goal was to be the first in downstate Illinois to  
10 give to customers a choice in three chosen markets of  
11 Springfield, Decatur and Champaign-Urbana. The goal was  
12 accomplished, but not without tremendous pain and fast  
13 learning.

14 My CLEC experience and my primary responsibilities  
15 for the last year have been to improve our internal  
16 processes, because some of those were broke, and improve the  
17 relationship with Ameritech, and to define and develop  
18 performance measurements that are, in my opinion, key to  
19 this business.

20 I initiated the operational support systems,  
21 interfaced alternatives with Ameritech and personally have  
22 been excited and challenged by this effort and am honored to  
23 be here representing Consolidated Communications on this  
24 panel.

25 What access should incumbent LECs provide for

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1 repair and maintenance? The best case, give us access to  
2 everything you've got. The issue is to us not so much what  
3 you provide, but what it will cost us. We would like to  
4 have trouble ticket information matching real time, both  
5 systems, real time opening and closing of tickets, with  
6 clocks matching, which is not always easy. On line  
7 escalation status and comment fields, test results with  
8 access times and forced to load schedules should also be  
9 available.

10 It is very important to understand how duration is  
11 measured, and who authorizes the clock to stop. Receipt to  
12 clear in this business is a two part process. Clearing back  
13 to the CLEC is the second part that should not be taken  
14 lightly. Having the ability to communicate to your customer  
15 what the status of that condition is is very critical to our  
16 business.

17 What standards are necessary for parity?  
18 Consolidated supports standards for the industry that will  
19 insure parity. The key is making these standards efficient  
20 and affordable for all. Adhering to standards developed  
21 just for large companies with complex needs will drive cost  
22 up and force smaller players like us to use GUIs or inquiry  
23 only type systems.

24 Standards should be tiered with varying levels of  
25 business needs, and with the flexibility to add

1 functionality as budgets exist or as budgets can handle it.  
2 What types of interfaces are we today using or proposing?  
3 Today, we are currently using a Trouble Administration GUI  
4 with Ameritech. We have just begun to use this process. It  
5 is a PC dial up software application that was provided by  
6 Ameritech. We are exploring other alternatives with them  
7 and with external consultants.

8 As a final comment, Consolidated's experience in  
9 electronic bonding for operational support systems for  
10 maintenance repair are just beginning. We will continue to  
11 test simpler, less costly solutions. We will continue to  
12 work with Ameritech and other ILECs as we choose in pursuing  
13 these simpler solutions and we will openly share our success  
14 or shortcomings with other players in the CLEC arena.

15 Electronic bonding of systems will only be as good  
16 as the linked processes that are in place and the commitment  
17 and the relationship between the ILEC and CLEC. Without  
18 that, we have nothing. Thank you.

19 MR. WELCH: Thank you, Rod. Now we'll have some  
20 questions and hopefully we can generate some discussions  
21 back and forth among the panelists.

22 Bob, if I could start off with you, please. Rod  
23 touched on this a little bit in his opening comments and I'd  
24 like to get your views on this, as well, from Sprint. This  
25 is a general question. What do you require from an

1 incumbent in terms of access to repair and maintenance  
2 functions in order to effectively serve your customers?  
3 What would you like to see them provide to you?

4 MR. WELBORN: I think that, as Rod had stated, we  
5 need to be able, one, to generate the trouble report on a  
6 mechanized basis. We need to know what an accurate  
7 appointment time is, so that we can talk intelligently to  
8 our customer and build the expectation of when the trouble  
9 is going to be repaired.

10 We also need to test that line while the customer  
11 is, while we have them on line, so we can diagnose whether  
12 it's probable that the customer can be corrected more  
13 immediately and apply the right appointment interval, as  
14 well as we need the communications and the statusing on a  
15 continual basis on line, so that when the customer calls in  
16 or at such time that we deem it necessary to understand the  
17 status of a trouble report that is available to us on line,  
18 as well as we need the communications back to us once the  
19 trouble has been repaired. That's most important, so that  
20 we can communicate with the customer, close it out and  
21 insure that there's customer satisfaction.

22 MR. WELCH: Bob, I think you mentioned you were  
23 talking about your experience in California, that you're  
24 reselling in California at the moment?

25 MR. WELBORN: Yes.

1           MR. WELCH: I imagine at some point, if you're not  
2 already, that you have plans for utilizing unbundled loops?

3           MR. WELBORN: Yes, we do. We are not using  
4 unbundled loops in California. We are doing it in Bell  
5 South territory.

6           MR. WELCH: Okay, this question goes to who has  
7 the responsibility for testing unbundled loops and should  
8 you as the new entrant have the option of testing them  
9 yourself or requesting that the incumbent do so for you and  
10 should the incumbents be required to give you access to  
11 their mechanized loop test systems?

12          MR. WELBORN: In the unbundled environment, I  
13 think that there are several stages. One, when I purchased  
14 the loop, I expect that loop to be a working loop, and  
15 therefore, there is a desire for the incumbent to test that  
16 loop prior to giving it to me in the initial provisioning  
17 process.

18          At the same time, when that loop is in need of  
19 repair, I need to have the diagnostic tools available, which  
20 would include any sort of mechanized testing capability.

21          MR. WELCH: Would anyone else on the panel like to  
22 comment on that? Rod, do you have any thoughts?

23          MR. COX: Yeah, we do our own testing.  
24 Unfortunately, testing is not always foolproof, and we've  
25 made the decision to, if in doubt, we dispatch our own