

Interconnection: Capacity Capacity Constraints

Problems:

- Tandem Restrictions
 - DXC Port Shortages
 - Switch Port Shortages
 - Delayed Provisioning of Interconnection Trunks
 - Refusal to allow combination of special access and unbundled transport
- **Result:** MCI may be forced to postpone turn up of customers due to capacity issues, as it did on several occasions in 1997
 - **Action Needed:** MCI has requested NY PSC to monitor the issue -- due to past poor performance -- to prevent backsliding and to ensure parity
 - **Standard:** Parity -- (1) capacity reports; (2) input on planning cycle ; (3) capacity reserved for BA to be made available for CLECs



Combinations

- **Problems:**
 - BA will no longer provide combinations of elements to CLECs as of 3/4/98
 - Collo required to get access to recombined elements
 - Digital Loop Concentration
 - MCI DA/OS
- **Result:** MCI will be forced to engage in a costly and inefficient process developed by BA to recombine elements via MCI's collos and will be unable to access loops in an efficient manner
- **Action Needed:** MCI has requested NY PSC to enforce interconnection agreements that contain agreed upon provisions regarding the voluntary combination of unbundled elements by BA
- **Standard: Parity**



Summary of Other Checklist Problems

- Transport:
 - Refusal to Provide Leased Transport from Collos to MCI switch
- Reciprocal Compensation for ISP Traffic
- Interconnection:
 - Refusal to Provide Two-Way Direct End Office Trunking
 - Quiet Periods
 - Refusal to Augment Trunk Group Interconnecting MCI at Tandem

The MCI logo consists of the letters "MCI" in a bold, white, sans-serif font, centered within a solid black rectangular background.



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January 30, 1998

The Honorable Jaclyn A. Brillling
The Honorable Judith A. Lee
Administrative Law Judges
New York Public Service Commission
Three Empire State Plaza
Albany, New York 12223

Re: Case 97-C-0721--New York Telephone's Draft Filing Pursuant to Section 271 of the Telecommunications Act of 1996 (Track II Collaborative Efforts: Operations Support Systems for Unbundled Elements).

Dear Judges Brillling and Lee:

MCI Telecommunications Corporation and MCImetro Access Transmission Services, Inc. ("MCI") hereby submit their response to your request of January 23, 1998 in this proceeding. Much has been accomplished through the Track II collaborative efforts of Bell Atlantic-New York ("BA-NY"), the CLEC community, and the Commission Staff. We are much closer today than we were three months ago in establishing workable terms for CLEC access to BA-NY's operations support systems ("OSS") for unbundled network elements ("UNEs"). This process has not, however, produced final agreement on many important issues, and there is currently no procedural mechanism in place for resolving these open issues. Therefore, in addition to discussing substantively the current policy issues and other open issues, MCI, in a separate request, is proposing a process and schedule for resolving these critical questions.

I. Closing Issues

LSOG, Issue 1. Loop
ASOG, Issue 25. Number Portability
ASOG, Issue 61. Network Design Request (NDR) Process

MCI agrees to populate the company code field in accordance with BA-NY's request under Issue 1, and MCI also agrees to restate the Line Information Database information on migration orders for number portability for Issue 25. MCI agrees with BA-NY's proposal to establish custom routing during the NDR process. MCI also agrees to resubmit custom routing translation questionnaires (CRTQ).

II. LSOG Policy Issues

A. Documentation

Issue 196 Baseline Documentation

The two fundamental purposes of the collaborative process are to establish complete and fixed documentation for BA-NY's OSS so that CLECs would no longer be asked to design their systems to a moving target and to agree on certain basic principles of change management to govern future modifications to the systems. In the vernacular of the collaborative, BA-NY was to create a Baseline Document from which changes were to be carefully controlled. While much progress has been made, neither goal has been attained.

First, MCI disagrees in the strongest terms with BA-NY's contention that it has established complete and fixed documentation of the required technical information. For example, BA-NY is still pointing to the LSR 1.1 documentation as the complete set of business rules for its EDI offering. This assertion is absurd. As BA-NY well knows, these rules have undergone various and substantial changes during the collaborative process, and these changes have yet to be incorporated into its LSR 1.1. Moreover, much of the LSR 1.1 document is premised upon BA-NY's policy of requiring collocation for the combination of unbundled elements, a policy that the CLECs find unacceptable and that is currently in litigation.

Second, while the parties have begun to craft a workable change management proposal, it remains incomplete. The parties have agreed to many of the most basic principles of change control, but BA-NY must demonstrate its understanding of those principles in practice.

B. Migration-As-Is

Issue 9. Loop: NC (Network Channel Code), 37 and NCI (Network Channel Interface Code), 38.

Issue 26. Loop-Stand Alone, Reuse Facility: NC 37 and NCI 38.

BA-NY currently is demanding that the CLECs provide the NC/NCI codes for loop migrations under Issue 9 and for stand alone loops under Issue 26. The NC/NCI code identifies the type of loop (e.g. two-wire analog loop) and the equipment to which the loop is connected (e.g. switch port). BA-NY should be responsible for providing these codes in both instances. BA-NY is the carrier who initially provisioned the existing loop, and therefore, is in the best position to quickly and easily provide such information about the loop. BA-NY has agreed in principle to reuse the existing facilities for a migration, but the CLECs have no way of knowing what those facilities are. Forcing the CLECs to populate this field unnecessarily introduces the opportunity for error and the degradation of the customer's service. Moreover, BA-NY should be required to provide this information back to the CLECs for future transactions.

Issue 18. Loop

Issue 55. Migration/Collocation: Port, Port type, 18. Loop, Loop type.

In addition to the NC/NCI fields, BA-NY has added nonstandard OBF fields for loop and port types. As in the case of the NC/NCI codes (which also identify loop type), BA-NY is in a much better position than the CLECs to provide this information.

Issue 25. Number Portability: NP, BA, 19.

The CLECs require additional documentation from BA-NY in order to respond.

Issue 33. Interim Number Portability: NP, CHC.

BA-NY proposes to use variable call forwarding for interim number portability in place of a coordinated hot cut. While MCI finds BA-NY's proposal acceptable for small applications, it becomes impractical in any other context.

C. Collocation

As the FCC recently emphasized in its BellSouth South Carolina decision, "the ability of new entrants to use unbundled network elements, as well as combinations of unbundled network elements, is integral to achieving Congress' objective of promoting competition in the local telecommunications market." In the Matter of Application of BellSouth Corporation, et al. Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region, InterLATA Services In South Carolina, Memorandum Opinion and Order, CC Docket No. 97-208, FCC 97-418, ¶ 195 (rel. December 24, 1997). The issue of network elements and combinations of elements is being addressed by the Commission in Case 97-C-1963 and in individual carrier arbitration proceedings (e.g. Case 96-C-0787--MCI Interconnection Agreement).

For present purposes, BA-NY's insistence on this artificial requirement of collocation for combinations complicates matters because many aspects of BA-NY's documentation for its OSS assumes that this requirement will be adopted by the Commission. This issue ripples through the policy issues discussed below.

Issue 49. LSR: Desired Frame Due Time (DFDT)

BA-NY requires the CLECs to order the loop and port as separate transactions and refuses to coordinate their cut over. First and foremost, MCI takes issue with the requirement that BA-NY can require collocation to combine these elements. Second, even if collocation were justified, BA-NY's refusal to cross reference these service orders is unacceptable and discriminatory. The orders provide for a two-hour window for the cut overs, making it likely that MCI's customer will lose dial tone at some point in this process. At the very least, MCI should

be permitted to order the loop and port in a single transaction with a guarantee from BA-NY that the cut overs will be carried out simultaneously.

Issue 32. LSR: Coordinated Hot Cut (CHC)

BA-NY has declined to coordinate cut overs of live loops and ports when ordered together. Again, this is based on BA-NY policy of requiring collocation for combinations. Moreover, as with DFDTs, BA-NY's refusal to coordinate these hot cuts puts MCI's customers at substantial risk of lost dial tone.

Issue 59. Shared Transport for Port/Loop/OSDA

BA-NY has proposed an expanded shared transport that will include access to OSDA, E911/911 services, intelligent network (AIN), and common trunking between end offices. While BA-NY has agreed to combine the elements on the backend of the switch, it continues to insist on collocation for loop/port combinations. MCI opposes this collocation requirement. BA-NY's proposal is also unacceptable because it does not permit ordering of the loop and port in a single transaction.

D. General Ordering

Issue 53. Line Class Code (LCC): Port, LCC, 13A.

BA-NY requires the CLECs to populate the nonstandard line class code field to identify dialing plans and blocking options. MCI disagrees with this approach. BA-NY should derive the line class code, including the dialing plan and blocking options, from the USOC codes on the service order.

III. ASOG Policy Issues

A. Collocation

Issue 147. ASR: Access Customer Terminal Location (ACTL), 43.

Issue 148. ASR: Additional Point of Termination (APOT), 46.

BA-NY proposes to modify one of the characters in the CLECs Common Language Location Identification (CLLI) code. The change will enable BA-NY to identify the location as a collocation. BA-NY should not be permitted to change these pre-assigned, industry standard codes simply to forward its policy of requiring collocation for combinations.

Issue 158. Feature Group B, C, and D: Secondary Connecting Facility Assignment (SCFA), 27.

BA-NY refuses to permit the CLECs to use the SCFA field to identify the collocation cable connecting assignment. The cable connecting assignments specify the network elements in a combination. BA-NY proposes that the CLECs make this assignment in the remarks field only. This would disrupt the automated order flow and require manual processing of the orders. While the CLECs do not support BA-NY's collocation policy, we should at least be permitted to identify the elements of a combination through the SCFA field rather than through remarks. MCI proposes that the CLECs communicate this information in the SCFA field until a new field can be assigned by OBF. This would eliminate the need for manual processing and, thus, the delay and risk of error in the process.

B. Combinations and Collocation

Issue 135. ASR: Requisition Type (REQTYPE). 17.

BA-NY has defined and restricted the definitions for requisition type (e.g., new, move, change, etc.) to accommodate its collocation policy. This is unacceptable for several reasons. First, as we have said, BA-NY should not be permitted to require collocation for combinations in the first place. Second, BA-NY should not be permitted to change what are the standard OBF codes. Not only must MCI adjust for these unnecessary changes, the modifications are central for ordering and, therefore, may affect other associated orders.

Issue 178. Special, Connecting Facility Assignment (CFA), NC, NCI.

BA-NY proposes to restrict the use of the CFA field and NC/NCI codes to accommodate its collocation policy for combinations. MCI rejects this collocation policy, and, moreover, BA-NY should not be permitted to restrict these industry standard items. The CLECs are currently using this field and these codes and should be permitted to continue.

Issue 182. Specials, SCFA, 24.

This is the same issue as 158. The only difference is that issue 158 relates to switched access orders, and issue 182 relates to special access orders.

C. Migration-As-Is

Issue 137. ASR: Activities (ACT). 18

BA-NY proposes to restrict the CLECs to connecting and disconnecting service. This is done by limiting CLECs to "N" for new installation or an increase in capacity or "D" for disconnection or decrease in capacity. Under this regime, the CLECs could not move or change a customer's service without disconnecting the service and then restarting it. This unfairly discriminates against the CLECs because BA-NY certainly does limit itself to these options.

D. Service v. UNE Definition

Issues 173, 174, 176, 179, 184, 185, 186, 187, 188, 189, and 190. Specials.

For these issues, the problem is the same. BA-NY prohibits the use of a particular field on the grounds that the field designates a service rather than a product or network element. Issue 173 centers on the transfer relay. Issues 174 relates to multipoint circuit designation. Issue 176 deals with the nonsimultaneous transmission of signals and supervisory tones. Issues 179, 184, and 185 relate to channel pair/timeslot, the primary add drop multiplexor, and the secondary add drop multiplexor. Issues 186, 187, 188, and 189 involve timing issues, including the clock source, port speed, link management protocol, and zero logic. Issue 190 relates to meet point billing of unbundled network elements. In each instance, BA-NY mischaracterizes these critical fields and designations. They are not mere services but are necessary and essential aspects for ordering the network elements and combinations of elements provided for under the Act.

IV. Additional Issues to be Addressed

The Policy Issues discussed above only cover the ordering process, and there remain other unresolved issues on the Collaborative Issues List relating to pre-ordering, provisioning, repair and maintenance, and billing. Below we highlight some of the major issues still outstanding.

A. Change Management Control

The CLECs submitted a Change Management Proposal to the Commission on January 28, 1998. While this proposal represents a substantial step forward in the relationship between the CLECs and BA-NY, the parties have yet to develop a process for implementing the change management principles.

B. Directory Listings

Securing a correct listing in the public phone book is, of course, important to all phone users, and it is especially critical for business customers. Unfortunately, the parties did not address many of the complicated issues surrounding access to directory listings in the collaborative process. For example, BA-NY has yet to determine how to process migrations-as-is for customers who wish to retain their listings. Also, although BA-NY is touting its new ATLAS offering for directory listings, BA-NY has not provided the documentation for this system or a date for holding discussions on this question.

C. Order Types

The ordering workshops in November did not address making moves, adds, changes, and disconnects. Also, we need to establish the requirements for placing complex orders like Centrex and ISDN.

D. Provisioning

BA-NY is still not providing notices of completion under LSOG 2. For UNEs, BA-NY currently only provides a copy of its service order. We need further documentation to ensure that our system will be able to process these notices.

E. Billing

BA-NY has provided some additional information on billing, but further clarification is required for populating order fields and for how BA-NY intends to provide the usage and access billing information for UNEs.

F. Repair & Maintenance

BA-NY has still not committed to providing electronic bonding for repair and maintenance. BA-NY is the only Bell Operating Company to not implement electronic bonding for maintenance. Even Bell Atlantic-South is expected to sign a Joint Implementation Agreement with MCI next week to provide electronic bonding for maintenance. This has been the accepted interface in the access world for years, and it is not that difficult to adapt for local service.

G. EDI Mapping

The parties agreed that we would not begin EDI mapping until after completing the data elements. Since we have not completed work on the data element, EDI mapping remains a critical open issue.

H. Reopening Issues

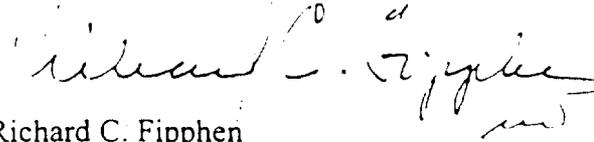
MCI is convinced that the collaborative should reopen Issue 92. BA-NY's current Product and Services Availability listing does not encompass UNEs. The PSA should include the features available for both resale and UNEs. This issue needs to be clarified.

In addition, MCI does not have an objection to AT&T's request to reopen Issues 48, 53, and 44.

VI. Conclusion

MCI respectfully requests that the Commission resolve the outstanding policy issues set forth above as expeditiously as possible.

Sincerely,

A handwritten signature in cursive script, appearing to read "Richard C. Fipphen". The signature is written in dark ink and is positioned above the printed name.

Richard C. Fipphen

cc: All Parties
Bob Soika
John Coleman

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

Petition of New York Telephone Company)
for Approval of its Statement of Generally)
Available Terms and Conditions Pursuant)
to Section 252 of the Telecommunications) Case 97-C-0271
Act of 1996 and Draft Filing of Petition for) Phase II, Track II
InterLATA Entry Pursuant to Section 271)
of the Telecommunications Act of 1996)

MOTION FOR FURTHER PROCESS IN TRACK II

MCI Telecommunications Corporation and MCImetro Access Transmission Services, Inc. ("MCI") hereby request further procedures in Track II of this proceeding. In the Notice Denying Motion to Dismiss but Establishing Amended Procedures, issued November 17, 1997, the Commission contemplated that there would be, following the completion of the current collaborative effort, "procedures to develop a factual record on any unresolved issues regarding operations support systems for unbundled network elements and combination of elements." This motion sets forth MCI's proposal for further procedures in this track of the proceeding.

As the Commission is aware, there are a number of so-called "policy issues" relative to the development of the OSS interfaces for unbundled network elements "(UNEs)" that could not be resolved through collaboration and on which the parties are today making written submissions to the Judges Brillling and Lee. MCI proposes that the Commission resolve these open issues on the following schedule:

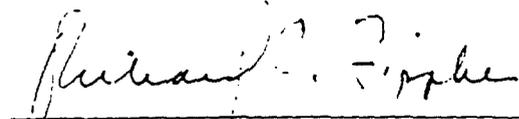
February 9 - 10	Mediation sessions before Judges Brillig and Lee
February 18	Recommended decision
February 23	Exceptions due
March 18	Commission decision
March 31	Filing of final specifications and business rules

Following resolution of the outstanding policy issues, the Commission should direct Bell Atlantic to work with the CLECs toward build-out of the EDI interface for unbundled elements. No third-party testing of the EDI interface, as contemplated by the Commission as well as the Department of Justice and the FCC, should occur until Bell Atlantic has demonstrated that it has adequately worked with CLECs on EDI final specifications to allow for CLEC build-out of their own interfaces. Further, the Commission needs to establish a process for developing a test of the OSS interfaces. MCI proposes that the Commission facilitate bi-weekly meetings between Bell Atlantic-New York, interested CLECs and the staffs of the United States Department of Justice and the Federal Communications Commission on the development of a third-party test. We propose that these meetings be held immediately and through the date of the Commission's decision on the unresolved issues. In the interim, MCI proposes a pre-hearing conference of the parties to address the scheduling of a further technical conference in this docket to create an evidentiary record on the results of implementation of, and third-party and CLEC tests of, the interfaces that are finally deployed by BA-NY. We propose that this pre-hearing conference be held in early February.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION
AND MCI metro ACCESS TRANSMISSION SERVICES.
INC.

By



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