

Ordering/Provisioning

42. Ordering involves the actual transmittal of the service request from the CLEC to SWB with the necessary information for issuance of a service order. Provisioning involves the exchange of information whereby the CLEC has the capability to obtain order confirmation data, service order status, and service order completion information. Ordering/provisioning capabilities include order receipt, the return of acknowledgments, editing for valid information, the return of error information, order confirmation and the return of service order completion status.

43. SWB provides CLECs with a choice of three primary electronic interfaces for access to its OSS ordering/provisioning capabilities: EASE, an EDI gateway, and Local service request EXchange system (LEX). Additional electronic interfaces are also available for the ordering of Local Interconnection Trunks, Unbundled Dedicated Transport, and to check the status of service orders. For those CLECs that do not want to utilize an electronic interface for ordering/provisioning, SWB also accepts service orders by facsimile or telephone.

EASE

44. EASE is available to CLECs for ordering and provisioning resold services. EASE enables the CLECs to perform conversions, new orders, change orders, outside moves and disconnects of residence customers, and most business customers (up to 30 lines).

As noted above, EASE is precisely the same electronic interface that SWB's own retail service representatives use in pre-ordering and ordering/provisioning service for both residence and business customers. EASE provides CLECs electronic access to available due dates, which represents an automatic Firm Order Confirmation ("FOC"), once a given due date is selected. The proven capabilities of the EASE system provide a robust service negotiation /pre-ordering/ordering/provisioning application for CLECs. Use of EASE obviates the need to develop entire new code sets and facilitates market entry for any CLEC, particularly those with limited information services capabilities. EASE contains over 1,000 edits that ensures a high percentage of error-free flow-through for service orders formatted by the system. EASE is offered as a way for CLECs (large or small) to quickly begin to electronically negotiate resale orders and efficiently transmit these orders to SWB. As CLECs utilize EASE, SWB will concurrently continue to work with CLECs on development of interfaces that operate using industry guidelines. This way, the industry standard interfaces will have time to become as robust as EASE to best support significant order volumes over a wide array of services.

45. Training for CLEC users of EASE was developed early in 1997 and was first provided to AT&T methods and procedures ("M&P") developers at SBC's CFL. Numerous smaller CLECs have since attended the training. Beyond the written training documentation provided to CLECs at the CFL, SWB has added more "field help" to the residence EASE screens. This gives CLECs "user guide" type information on-line, which

is something CLECs had indicated they wanted in EASE. Placing the documentation on-line has proven to be more effective than providing the same information on paper. Following formal classroom training for CLEC personnel, the SWB EASE project management team has been available to CLECs and has participated in extensive consultation, questions and answers, and onsite support.

46. SWB personnel have participated fully in AT&T's EASE Service Readiness Testing ("SRT") process. This has been a cooperative effort involving staff from the LSC, EASE project management personnel, the Information Services Help Desk organization as well as the Account Management team. This effort has paid off for AT&T and other EASE CLEC users who have since started to generate significant order volume.

47. The following table provides empirical data by month and year of CLEC use of EASE. The chart that follows provides cumulative monthly data in graphical form. Specifically, the tables describe CLEC entered service orders into EASE. The numbers are conservative, as only service orders that have posted are counted. Posted volumes are actual completed, ready for billing service orders, it does not include orders submitted that may have been canceled, or are pending. In addition, service orders issued to update records only (record orders) are also not included in the EASE volumes below. Nonetheless, CLEC use of EASE, as evidenced by the posted order volumes below has

grown over the last several months. This is not surprising given C&L's conclusion that CLECs can achieve a lower cost per order request using EASE when they reach volume levels between 339 and 521 order requests per month depending on the State in which the CLEC operates. For example, in December 1997, approximately 40% of all CLEC posted orders in SWB territory were input directly into EASE by CLEC personnel. Also, as part of C&L's analysis is the fact that EASE is capable of handling well over one million CLEC negotiations for pre-ordering/ordering/provisioning per month.

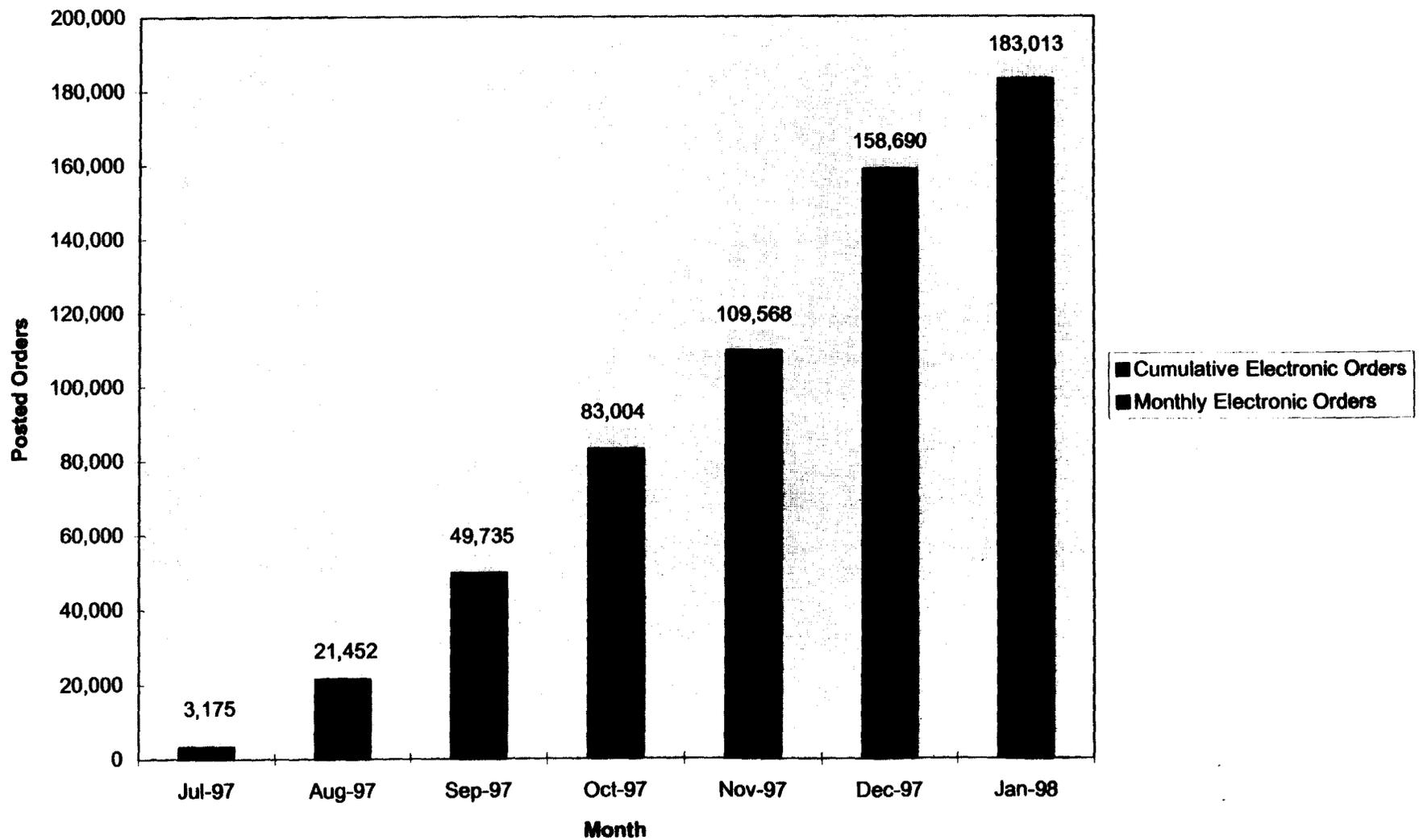
Southwestern Bell - EASE
 Competitive Local Exchange Carrier (CLEC)
 Posted Orders Activity

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Month-Year	EASE CLEC Electronic Orders Entry
July-1997 Total	3,175
August-1997 Total	18,277
September-1997 Total	28,283
October-1997 Total	33,269
November-1997 Total	26,564
December-1997 Total	49,122
January-1998 Total	24,323
Grand Total	183,013

Southwestern Bell - EASE
Competitive Local Exchange Carrier (CLEC)
Posted Orders Activity

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SORD Supplement

48. Service Order Retrieval Distribution Supplement ("SORDS") is an interface that provides CLECs that utilize SWB's EASE system the capability of supplementing or modifying pending service orders. SORDS became generally available in January 1998 and is now part of SWB's line-up of OSS interfaces CLECs may access. Specifically, SORDS provides the following electronic capabilities to modify a pending order: Sign-on/Disregard/Sign-off, Inquiry, Delete, Cancel, Change Due Date. AT&T attended SORDS beta training (required for access) at the SBC CFL in October 1997 and in December 1997 successfully tested its capabilities. SORDS is optional for CLEC EASE users. The LSC will still accept and process manual supplements for those CLECs EASE users that choose not to access the SORDS interface.

EDI Gateway

49. SWB's EDI Gateway provides an electronic interface which conforms to the Ordering and Billing Forum/Telecommunications Interface Forum ("OBF/TCIF") national guidelines. As a baseline, SWB's EDI Gateway currently supports OBF Local Service Ordering Guidelines ("LSOG") Version 1 with modifications to accommodate many of the Version 2 enhancements and EDI Releases 6 and 7 for the associated and developed TCIF/EDI guidelines. Further, SWB has developed certain additional requirements in order to expedite CLEC needs in advance of guidelines. For example, Private Branch Exchange ("PBX") ordering was developed in conjunction with AT&T to meet their special needs and these guidelines will not be included until Version 3 of the

OBF LSOG. For the above, SWB's EDI Gateway is available to CLECs for testing with SWB the ordering and provisioning of both resold services and unbundled network elements. This capability enables the CLECs to electronically submit LSRs to SWB, receive acknowledgments, confirmations and completion status utilizing their own user interface.

50. For **resold** services, SWB's EDI Gateway currently enables the CLECs to perform conversions, new connects with basic directory (straight line) listings, changes of service, disconnects, and suspend order requests. The aforementioned resold services have flow through order capabilities. National guidelines which will provide CLECs with an EDI capability for non-straight line directory listings, partial migrations and complex services are being developed. SWB has committed to update its interface to support newly adopted OBF/TCIF guidelines within 120 days of their becoming their final, or within the applicable sunrise/sunset timetables set by OBF/TCIF. Ameritech has been testing the EDI Gateway for resale services in a "live" (employees) production mode since November 1997. Ameritech expects to begin processing end user resale services LSRs in Missouri via the EDI Gateway before the end of February 1998.

51. As previously stated, SWB's EDI Gateway currently supports the ordering and provisioning of certain **unbundled network elements**. While national guidelines have yet to be fully developed for the ordering and provisioning of all unbundled network

elements, SWB has taken a proactive approach to incorporate the completed OBF/TCIF national guidelines into its EDI Gateway. As a result, SWB has developed and is ready for a CLEC to test the capability of its EDI Gateway, to submit conversion, new connect, change, disconnect, outside move, and records change orders for unbundled local loops, interim number portability, and switch ports. In addition, where fairly compensated, SWB is willing to bundle unbundled network elements on behalf of CLECs. SWB's EDI Gateway supports all unbundled network element bundles defined by OBF, including Loop with Port, and Loop with Interim Number Portability. As industry guidelines are defined and approved for other unbundled network elements, SWB will incorporate those guidelines into its EDI Gateway. In fact, SWB has committed to update its interface to support newly adopted OBF/TCIF guidelines within 120 days of their becoming final, or within the applicable sunrise/sunset timetables set by OBF/TCIF. SWB has made its EDI Gateway available for unbundled network elements to CLECs to begin carrier-to-carrier testing and implementation efforts.

52. The EDI Gateway has been capable of handling the OBF/TCIF approved unbundled network elements since January of 1997. The order process for these unbundled network elements currently requires some manual handling by SWB LSC personnel. SWB's schedule and plans to incorporate flow-through order capabilities for unbundled network elements have been established and shared with the CLECs interested in the EDI Gateway. To the extent possible, SWB is using its proven capability to flow-

through resale orders as a basis for expedited development of flow-through for unbundled network element orders. However, the development of flow-through capability for unbundled network elements requires some new order flows and system development work for SWB as well as the rest of the industry.

53. Since SWB has not received meaningful CLEC forecasts for expected order activity, SWB has established a phased approach for developing unbundled network elements flow-through based upon anticipated CLEC order activity, and SWB's approach is designed to accommodate the most common order types as quickly as possible. Phase 1 focuses on unbundled analog loops and line side switch ports for conversion and new add activity. Systems requirements work has been completed and we estimate an implementation date of April 30, 1998. Of course, EDI flow-through is not possible until a CLEC has fully developed and tested its side of the EDI application.

54. Each subsequent phase will be built upon capabilities established in the previous phase. Therefore, SWB will better be able to estimate completion for Phases 2 and 3 once development of Phase 1 is complete. The timing of these subsequent phases also will be affected by CLEC unbundled network element order activity and the completion of the unresolved unbundled network element issues at the OBF. Attachment G provides a detailed view of the types of orders included in each of the three phases.

55. Unlike the systems that are used by SWB itself, and by its retail and interexchange carrier customers, SWB's EDI Gateway has been developed specifically to accommodate the preferences of CLECs. We believe that a phased approach to systems development, joint testing, independent reviews, and trials are certainly a necessity before "live" activity is allowed to be processed. The development of SWB's EDI Gateway has followed this approach. In SWB's internal testing of the EDI Gateway, programmers first completed simulation testing, corrected any problems encountered during the initial testing period, and re-tested the corrected system. A quality assurance team simulated various ordering scenarios and tested any added new functions. The internal testing involved four main areas as follows: 1) processing of EDI records, 2) perform data and relational edits for the creation of feeds to downstream systems, 3) generation of FOCs and Service Order Completions ("SOC") processes and 4) testing of enhancements to the Mechanized Order Generator ("MOG"). In addition to the initial testing above, three test files containing 10,000 orders each have been successfully created and processed through the EDI interface.

56. It is important to note that the EDI ordering processes are a new development to support an extremely complex task. Implementation of this interface depends on the mutual efforts of CLECs and SWB. For the most part, large CLECs have been the primary proponents of the EDI concept because of their embedded information services systems and the fact that national standards work has focused on EDI for Incumbent

Local Exchange Carriers ("ILEC") and CLECs to exchange information.

57. In that regard, some CLECs have claimed before the FCC that SWB has delayed the provision of information needed to begin development of interfaces to SWB.¹ The OSS negotiation and implementation progress with each CLEC varies; SWB's provision of OSS documentation to CLECs ranges from simple brochures to complex technical interface requirements, depending on the negotiation phase, type of interface and level of interest demonstrated by the CLEC. These assertions that SWB has withheld information are simply not true for any of SWB's electronic interfaces and this includes providing sufficient information for CLECs to begin development of any interface to interact with the EDI Gateway.

58. AT&T has demonstrated the most interest in our EDI Gateway of any CLEC. Over the past year and half, SWB has held countless meetings with AT&T on OSS interface development and provided AT&T all documentation it has requested. AT&T and SWB began interface planning in July 1996 for AT&T's use of EDI. In system integration meetings, SWB provided AT&T its field requirement definitions, universal service order practice, gateway edits, business rules, etc. During these meetings, SWB developed business processes flow charts and defined order scenarios for AT&T. This process led to data mapping and the subsequent development of "Eye charts" by AT&T.

59. Eye charts developed by AT&T for their internal processing requirements identified in minute detail every single field form requirement for every service, LSR activity type, and business scenario. As early as March 1996, Eye charts for resale services were provided by AT&T to SWB. SWB, both separately and jointly with AT&T, used these charts to verify field mapping and product rules. SWB provided AT&T its Business Rules for various local exchange services. From SWB's Business Rules, AT&T developed their own Business Rules Documentation and provided them to SWB for separate and joint review. Subsequently, by June of 1997 the same Eye charts were completed for unbundled network elements.

60. In January of 1997, SWB provided AT&T the Field Form Matrix, which provides detailed Field Definitions for the LSR and Directory Service Request ("DSR") Field Definitions. These documents list fields on the LSR and DSR along with data values and field edits. To incorporate the information contained in the Eye charts and the Field Form Matrix and provide other enhancements, SWB developed the Local Service Order Requirements ("LSOR"). Version 1 of the LSOR was provided to AT&T in July 1997, while version 2 was provided to AT&T in early October 1997. An electronic version of the LSOR became generally available to CLECs on January 15, 1998. This electronic LSOR allows CLECs to not only receive the LSOR in a more timely manner, it also

¹ Department of Justice d.2 at 59 in evaluation of SWB application for 271 relief in Oklahoma

eliminates the manual filing of paper copies. Additionally, SWB has documented business rules by product type, for use in conjunction with SWB's LSOR to assist CLECs in determining the appropriate codes (i.e. USOCs, FIDs) to populate on the LSR. These business rules have also been provided to AT&T as they have been developed.

61. Another document available for CLECs is the EDI Technical Specifications. This document outlines the programming requirements for CLECs to make on their side of the EDI Gateway. Specifically, it outlines the OBF LSR field to the EDI mapping displayed in a matrix format. Detailed information regarding the 850, 855, 860, 865, 997 transaction types is also included in the document. Prior to developing the EDI Technical Specifications document, SWB proactively worked with AT&T and utilized their documentation (dated October 1996) as a basis for the development of the SWB specifications. SWB's first publication of the EDI Technical Specifications was published in May 1997 and the specifications were updated in August and October of the same year. AT&T was provided a copy of SWB's EDI Technical Specifications in August 1997.

62 Although AT&T and SWB began interface planning in July 1996, and SWB's EDI gateway was ready to test on January 1, 1997, AT&T did not initiate joint testing until late-April, 1997. AT&T and SWB have been performing "live" service testing of the gateway since April 24, 1997. Phase 0 and Phase 1 of the SRT were completed on

May 19, 1997. On May 20, 1997, joint testing moved into a production environment, starting with select AT&T accounts in a live test mode. The SRT was originally scheduled to end in July. However, on August 5, 1997, AT&T determined that the trial would continue until the end of September 1997. A recent discussion with AT&T indicated that they now anticipate the trial extending until mid-first quarter 1998. AT&T has experienced considerable system and training problems within its own operations which have impaired its ability to send correct service orders. AT&T is currently in the process of completing the SRT for Plain Old Telephone Service ("POTS") and is initiating SRT for PBX and Interim Number Portability.

63. Since the carrier to carrier trial began, over 75 documented joint group conference calls (including approximately 20 participants from each company) have been held to discuss status of the SRT and particular questions/issues. Numerous smaller calls (greater in number than the group calls) have been held to clarify specific issues/problems and to ensure that AT&T fully understands EDI requirements, business rules, etc. AT&T has demonstrated an inability to correct known order entry problems which have unduly extended the SRT time-frames. Examples of these repetitive order entry problems include orders submitted with past due dates, orders submitted with invalid Purchase Order Numbers ("PON"), etc. In December 1997, AT&T raised EDI implementation issues with SWB related to changes SWB made to its EDI interface, which may have affected AT&T's EDI implementation efforts. The changes to SWB's EDI interface that

have been implemented largely result from changes to the OBF guidelines. However, SWB agrees with AT&T that an effective change control process for EDI needs to be established between our companies. We want to work jointly with AT&T to accomplish this objective, which is why we participated in meetings on December 9 and 17, 1997. In fact, SWB has sponsored an issue at OBF to define an industry wide process that would ensure all EDI participating companies would have equal input to defining the release schedules for future EDI changes; SWB has asked AT&T to assist SWB in championing this effort. Ahead of OBF industry guidelines, SWB has developed a change control process plan and has provided it to AT&T for their review and input as a starting point to establish a change control process between our companies. In sum, SWB has worked diligently with AT&T from the very beginning and continues to do its part to facilitate AT&T's deployment of EDI.

64. SWB likewise has provided documentation and answered MCIIm questions in a very timely manner. Following is summary narrative, developed from correspondence between our companies, describing SWB's efforts to accommodate MCIIm requests over the past several months.

65. MCIIm was made aware, in general terms, of SWB's EDI Gateway on February 3, 1997, and subsequently in March 1997, when MCIIm attended a demonstration of SWB OSSs. However, MCIIm did not show much interest in the EDI Gateway until May 1997,

when it requested and SWB provided EDI documentation for the LSR & DSR format and matrix on May 6, 1997. Interestingly, the very next day, MCIIm informed SWB that it intended to implement electronic ordering of resale services and unbundled network elements at commercial levels via EDI by October 1, 1997.

66. EDI transaction sets 850, 860, 855 and 865 Implementation Guides were provided to MCIIm on May 19, 1997. On June 16, 1997, MCIIm requested a conference call to go over open issues from MCIIm's perspective after they reviewed the documentation previously provided. MCIIm chose not to review a great deal of the documentation since it was in Microsoft Word format (same as used by Electronic Communications Implementation Committee ("ECIC") and other Local Exchange Carriers ("LEC") and they wanted SWB to convert it to EDISM.sef type files. After MCIIm determined it could indeed read the documentation provided by SWB and identified issues for discussions, a conference call was held on June 23, 1997. On June 24, 1997 SWB provided MCIIm with hunting FIDS/USOCs and Business Rules. On June 27 and then again on July 20 and 23, 1997, SWB provided MCIIm responses to additional EDI questions. In addition, technical documentation was also provided to MCIIm on July 23, 1997.

67. SWB did not hear from MCIIm for over a month, until SWB asked MCIIm what their EDI status was and when would they be ready to start joint testing. On August 22, 1997, MCIIm indicated (verbally) that it would not meet their October 1, 1997 target for

launch of EDI ordering and therefore wanted to obtain EASE training and get applicable user identifications activated to allow MCIIm access to the EASE application. (MCIIm received EASE training the week of September 15, 1997.) On September 9, 1997, SWB sent a follow-up request to MCIIm asking where they stood in their EDI development. On September 16, 1997, SWB provided answers to MCIIm's additional questions about SWB's EDI Gateway, but most of these questions had already been answered in the documentation previously provided. MCIIm requested a 3 day meeting with SWB to go over more EDI questions. The meeting was held on September 29, 1997. The scheduled 3 day meeting was completed in one day as it turned out MCIIm already had all the information they needed to answer their questions.

68. During October 1997, SWB provided MCIIm updates to EDI Technical Specifications, implementation documents, and OSS trial process documentation. The latter was intended to assist MCIIm in conducting a trial via EDI. On October 27, 1997, SWB responded to MCIIm's request asking if SWB's EDI Gateway could be used for unbundled network elements, a question answered (affirmatively) by the documentation sent to MCIIm on May 7, 1997. The documentation identified the unbundled network elements that may be ordered via the SWB EDI Gateway, which are the same as may be ordered via the LSR. After months of providing documentation to MCIIm and answering all their questions, requests such as this makes us wonder if MCIIm has taken the time to review the documentation provided them by SWB. In November 1997, MCIIm advised

SWB that they intended to begin EDI testing with SWB by December 15, 1997. Subsequent 855 and 865 transaction sets documentation questions by MCIIm were answered by SWB technical experts and a joint conference call was held in early December to finalize the requirements for the first phase of EDI testing. Documents were exchanged and Phase 1 of the EDI testing began on December 19, 1997. Beginning on December 22, 1997, daily joint conference calls (excluding the holidays) have been and continue to be held to resolve issues and trouble conditions as they arise during the Phase 1 testing process. Phase 1 will be completing soon and the record of understanding issues are currently being discussed for Phase 2.

69. Preliminary meetings between SWB and Sprint on October 1996 and correspondence between the companies in November 1996 made Sprint aware that SWB would be ready to begin joint CLEC testing of the SWB EDI Gateway by January 1997. During this time frame Sprint also indicated their interest in deploying EDI for the ordering of local exchange services. Subsequently, on February 19 and 20, 1997, a meeting was held in Dallas where Sprint attended a demonstration of SWB's OSSs. At this meeting, a copy of the SWB EDI Gateway interface requirements and all available technical specifications were first provided to Sprint. Additional technical documentation, in the form of SWB's Local Service Request Field Definition Matrix, was provided to Sprint on March 25, 1997. This matrix, along with other EDI technical documentation would later evolve to become the LSOR. SWB provided copies of the

LSOR to Sprint in both July and September 1997 as revisions were made to the documentation.

70. SWB also reviewed Sprint's "Guidelines in Support of Local Service Order via EDI" and responded to Sprint on March 24, 1997, indicating that SWB was taking a similar development approach to EDI and offered to meet with Sprint to further to discuss the distinctions and the technical documentation SWB had provided Sprint. A meeting took place on April 28, 1997, where EDI ordering development and documentation issues were discussed. At this meeting, Sprint shared that their target date for EDI was November 1, 1997. SWB again confirmed which EDI release would be utilized and also answered Sprint's general questions regarding EDI. On May 21, 1997, Sprint provided SWB a list of all outstanding SWB documentation that Sprint had requested, but felt they had not received. As of that time, there were not any outstanding requests for EDI documentation according to Sprint's own list. SWB maintains and provides a weekly action item log to Sprint and meets with Sprint weekly to cover this log. The issues log contains all issues or documentation requests that Sprint considers outstanding. From the time the initial May 21, 1997 list was provided until September 24, 1997, Sprint had asked for no further EDI documentation nor indicated that there was any outstanding issue with EDI that needed to be added to the log.

71. On September 24, 1997, Sprint sent a letter to the SWB General Manager - Regional Sales referring to an August 8, 1997, letter regarding EDI. The August 8, 1997, letter was addressing only issues for Pacific Bell and not SWB. Sprint also referred to an Executive Meeting that was held on August 20, 1997, where EDI specifications were discussed. The only specifications that were discussed at this meeting were for Pacific Bell. In fact, Sprint's own action item list indicated that the only EDI specifications they needed were for Pacific Bell, not SWB. On September 30, 1997, SWB sent a response to Sprint addressing the September 24th letter. In this response SWB clarified that Sprint was referring to Pacific Bell not SWB EDI issues. Again, during this time-frame, Sprint did not add lack of EDI documentation from SWB as an action item to the weekly joint meetings. On October 28, 1997, however, Sprint sent another letter asserting that they had not received any EDI technical specifications from SWB. SWB replied on November 3, 1997, by again providing copies of the EDI technical specifications to Sprint.

72. SWB is puzzled by Sprint's actions and claims that they have not received EDI specifications from SWB. SWB has provided Sprint with all available documentation from the very beginning, has held meetings to answer Sprint's EDI questions and concerns, and holds weekly meetings/conference calls to address any outstanding issues between the companies. SWB believes Sprint, like other CLECs, has underestimated the complexity of the local exchange market and their software development efforts are

taking longer than they had originally planned. In fact, Sprint informed SWB at a meeting on December 15, 1997 that their EDI system is not ready for joint testing and Sprint has now slipped their EDI time frame for joint testing with SWB to the second or third quarter of 1998. As of February 4, 1998, Sprint had yet to provide local service of any kind to any end user customer anywhere in SWB territory.

73. Ongoing changes and enhancements coming from CLEC negotiations as well as from resolution of new issues by the OBF necessitate ongoing documentation changes and updates. In addition, through its discussions with CLECs, SWB continues to learn of better formats to more effectively convey information to CLECs and areas that require clarification. SWB developed the LSOR to communicate LSR ordering requirements based on this kind of input. However, SWB's efforts should not be misinterpreted as indicating that SWB has not prepared or provided specifications about its electronic interfaces to CLECs. The fact remains that OSS interface development is an evolutionary process, as SWB continues to modify and refine its OSS capabilities to meet the ever changing demands and needs of CLECs.

74. Prior to February 8, 1996, ILECs were not required on a total company basis to resell their local exchange services nor to unbundle their networks. Consequently, there were no electronic interfaces national guidelines for access to SWB's OSS functions; however, SWB has been active in guidelines-setting organizations and supports the

development of national guidelines for electronic interfaces with its OSS functions. For example, SWB has expended considerable resources to define requirements and to develop an EDI gateway for ordering that conforms to national guidelines. SWB has more than 12 representatives working on national guidelines development specifically related to LSR order formats and EDI data formats at the OBF/TCIF committees. In addition, SWB has had 10 employees working on the requirements for SWB's systems that will process the LSRs received from the CLECs and at least 24 more employees participated in the design/development of this work. As a result of this commitment, SWB has an EDI gateway in place that is capable of processing numerous types of orders for both resold services and unbundled network elements. As noted above, SWB has promptly implemented national guidelines for electronic interfaces within its OSS functions as they have been developed, and has committed to implement new national guidelines within 120 days of their becoming final, or within the applicable sunrise/sunset timetables set by OBF/TCIF.

75. Like many CLECs, SWB does not plan to support multiple versions of the same interface. However, during the period while industry standards are under development for many OSS functions, SWB has attempted to accommodate the needs of CLECs by negotiating the implementation of interim arrangements for a variety of electronic interfaces. For example, because no CLEC, ILEC, or industry group has been able to establish a sufficient and complete definition of feature codes, SWB agreed to use

internal USOCs as a workable solution in order to establish EDI ordering capability ahead of industry guidelines. This was done to meet AT&T's business needs and required SWB to replace programming that was initially developed with the available industry codes. This provides further evidence that SWB is not only committed to industry guidelines, but is also just as committed to the implementation of negotiated interface solutions in advance of guidelines where technically feasible. The important thing to remember is that implementation of these interim arrangements is complicated and requires cooperation between SWB and the CLECs. It frequently requires extensive mapping between SWB and the CLECs, and agreement as to the timing of movement from interim arrangements to emerging industry guidelines.

76. C&L reviewed the SWB EDI Gateway to test the capacity of the application. According to the C&L's findings, the current combined capacity for LSRs originating in EDI and/or LEX is approximately 2,094 orders per hour which equates to 20,940 orders per day or 439,690 orders per month. The capacity testing involved a data set of 10,527 orders processing separately through the EDI Gateway. This data set was comprised of orders distributed among order types in the same proportion as CLEC volume forecasts. The types of orders included the following: residential conversion, residential new connect, residential change, residential record, residential disconnect, business conversion, business new connect, business change, business record, business disconnect, suspend and restoral of service. The data set was submitted through the EDI Gateway

and subsequently processed through the edits and format, order generation, and order retrieval and distribution systems. The processing steps covered by this test include receiving and evaluating incoming orders, returning any error conditions, storing complete and accurate orders, determining the down-stream path for each order, generating service orders, storing completed service orders, generating FOC notices, and sending FOCs out of the system through the edits and format system to the EDI Gateway.

LEX

77. LEX is a graphical user interface developed for CLECs by SWB. LEX was designed to operate on Windows™ and is based upon national OBF/LSR guidelines currently using portions of Version 2. It allows CLECs to electronically create and transmit resale services and unbundled network elements LSRs to SWB. LEX also enables CLECs to receive acknowledgments and notification of error details from SWB, and to track FOC and SOC status of LSRs. LEX is an option for CLECs that wish to utilize national guidelines ordering formats but do not have or wish to establish EDI capability. LEX supports the same types of orders as SWB's EDI Gateway for resale services and unbundled network elements. Specifically, for resold services, LEX currently enables the CLECs to perform conversions, new connects with basic directory (straight line) listings, changes of service, disconnects, and suspend order requests. For unbundled network elements, LEX allows CLECs to submit conversion, new connect, change, disconnect, outside move, and records change orders for unbundled local loops,