

interim number portability, and switch ports. In addition, where fairly compensated, SWB is willing to bundle unbundled network elements on behalf of CLECs. LEX supports unbundled network element bundles defined by OBF, including Loop with Port, and Loop with Interim Number Portability. After concluding successful Beta tests with two CLECs for unbundled network elements and resale services respectively, LEX became generally available in November 1997.

78. The first Beta test with a CLEC began July 21, 1997. This test included both unbundled network elements and resale services orders and successfully concluded October 1, 1997. The second Beta test with a different CLEC began August 11, 1997. This test was for resale services orders only and successfully concluded September 12, 1997. As a result of CLEC feedback during the Beta tests, additional enhancements (e.g. ability to copy or template an entire LSR) were added to LEX. The template capability is a feature whereby a CLEC order that passes the system edits can be copied and made into a model. When subsequent similar orders are created, the template can be used and only the fields that changed would need to be populated. The template feature of LEX helps reduce the number order errors. AT&T began an evaluation of LEX on September 22, 1997. Since then, weekly conference calls between AT&T and SWB to discuss the LEX activity began October 6, 1997. The main issues being discussed on these weekly calls are clarification and validation of the process. Six other CLECs began evaluating LEX during December, 1997 after completing training. Of these six CLECs, three have begun

sending "live" orders for processing. In January 1998, two hundred LSRs were input directly into LEX by CLECs. In addition, SWB's own LSC service representatives have begun using LEX for certain manual LSRs submitted by CLECs. This process takes advantage of the mechanized order generator's flow-through capabilities used by LEX. During January 1998, almost 500 of these CLEC LSRs were input directly into LEX by LSC personnel.

79. Internal and external pilot training classes for LEX were held in October. The LEX training classes became generally available to CLECs in November 1997 and are provided separately as a one-half day class at the CFL. Part of the classroom materials given to the CLECs during training is a User Guide that includes in-class work cases, an Instructor's Guide which CLECs can use to design training for their own employees, and job aids SWB has designed to make CLEC users more efficient while using the LEX interface. In addition, once the CLEC is utilizing LEX, an on-line help reference is also available to the CLEC user. SWB offers two free workshops as a prerequisite for CLECs wishing to utilize LEX, which reflect that LEX is based on the industry standard LSR format. One of the workshops is related to completing the LSR forms for unbundled network elements and lasts one and one half days. The second workshop serves the same purpose for resold services and is one half day long. Once the CLEC is familiar with the LSR forms, it will be in a better position to attend the LEX training.

80. C&L reviewed LEX to test the capacity of the application. According to C&L's findings, the current combined capacity for orders originating in EDI and/or LEX is approximately 2,094 orders per hour which equates to 20,940 per day or 439,690 orders per month. The capacity testing involved a data set of 10,527 orders processing separately through LEX. This data set was comprised of orders distributed among orders types in the same proportion as SWB forecasts of CLEC volumes. 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 LEX 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 LEX.

NDM/UNIX Telis

81. SWB accepts orders for local Interconnection Trunks and dedicated facilities electronically using the Access Services Request ("ASR") process. SWB is in compliance with OBF Version 18 of the ASR. Both Network Data Mover ("NDM") and

Unix Telis electronic interfaces have been modified and are available to support this process. The ASR/NDM process is currently being used between SWB and Interexchange Carriers ("IXC") for the ordering of Access Services. If the CLEC chooses not to utilize NDM or Unix Telis, the ASR can be manually faxed to the LSC. Guidelines have been developed that define the ASR process for requesting Interconnection Trunks and dedicated facilities. These guidelines are included in the Workshop for the CLECs on Interconnection that is being offered free of charge through the CFL. To date, there has not been much ASR activity in the local exchange services arena for Interconnection Trunks and dedicated facilities. Much of the CLEC ASR activity has been faxed to the LSC, as few CLECs have chosen to utilize the NDM/Unix Telis electronic process.

Order Status

82. SWB also provides CLECs with a "real time" electronic interface to review pending or posted services orders that have been entered and accepted for processing: Order Status, a GUI from the Southwestern Bell Toolbar platform, is a SWB developed application that is available to CLECs. Order Status enables CLECs to check the status of service orders, view the service order, verify that a service order has been completed, or verify that a pending service order has been posted. Order Status provides the CLEC at least equivalent capabilities for order tracking as SWB's retail operations. With Order Status, CLECs have order tracking capability from a single system, whereas in SWB's

retail operations, service representatives may have to access multiple applications.

83. The following table provides empirical data by month and year showing the growth of CLEC use of Order Status for various transaction activities over the last several months. The chart that follows provides the same data in graphical form. Detailed service orders and service orders based on a search by the criteria of Telephone Number have shown the most CLEC transaction activity.

Southwestern Bell - Order Status
Competitive Local Exchange Carrier (CLEC)
Transaction Activity

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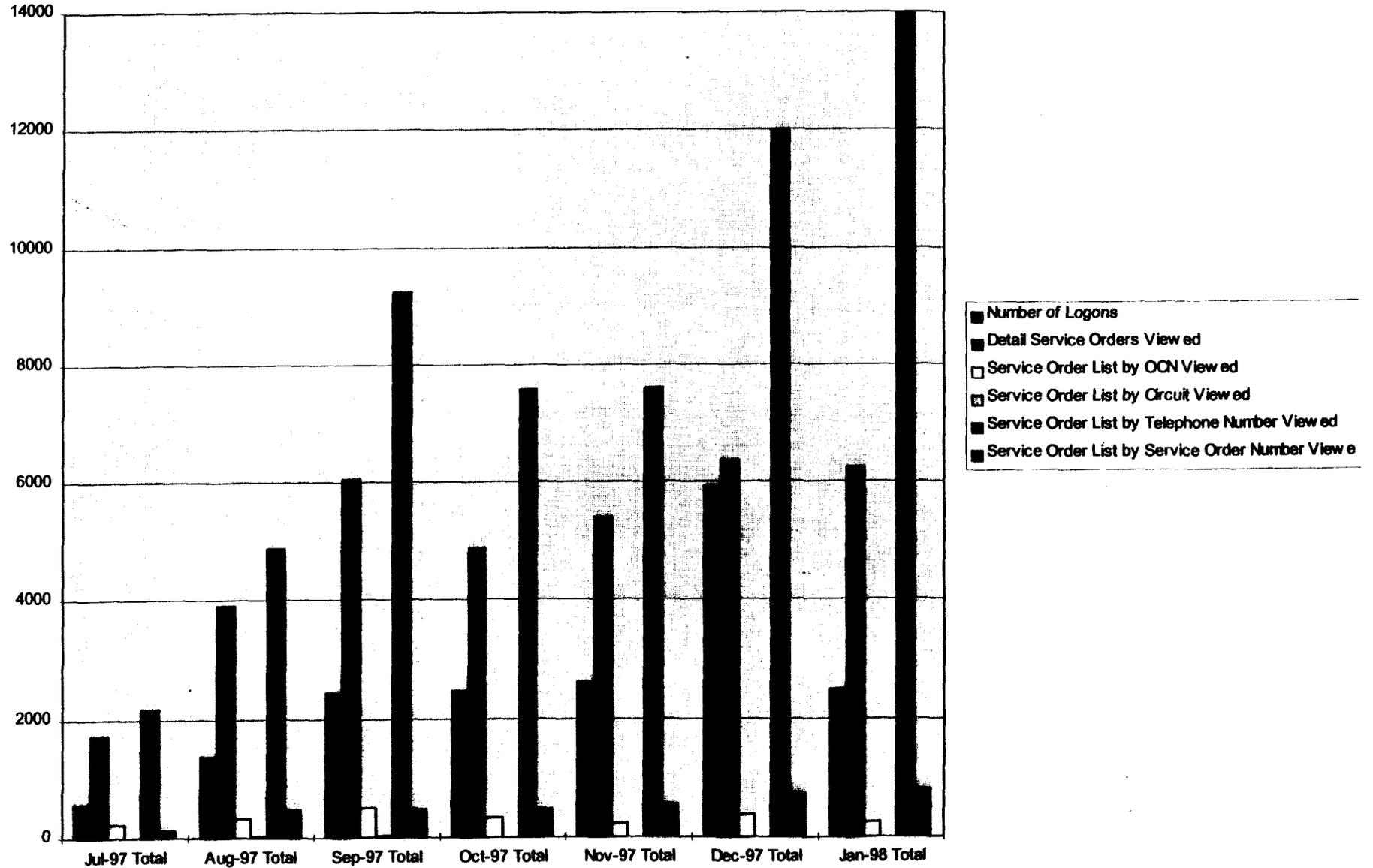
Month-Year	Number of Logons	Detail Service Orders Viewed	Service Order List by OCN Viewed	Service Order List by Circuit Viewed	Service Order List by Telephone Number Viewed	Service Order List by Service Order Number Viewed
July-97 Total	568	1,730	228	2	2,167	136
August-97 Total	1,379	3,911	318	13	4,884	469
September-97 Total	2,438	6,050	490	19	9,231	483
October-97 Total	2,469	4,873	324	1	7,579	472
November-97 Total	2,613	5,409	214	3	7,595	560
December-97 Total	5,924	6,376	377	3	12,002	745
January-98 Total	2,501	6,254	237	5	13,968	787
Grand Total	17,892	34,603	2,188	46	57,426	3,652

LEGEND:

TRANSACTION	DEFINITION
Detail Service Orders Viewed	The Detail Service Orders Viewed transaction allows the CLEC to request and view a detailed service order.
Service Order List by Operating Company Number ("OCN") Viewed	The Service Order List by OCN Viewed transaction allows the CLEC to request and view a list of service orders based on a search by OCN.
Service Order List by Circuit Viewed	The Service Order List by Circuit Viewed transaction allows the CLEC to request and view a list of service orders based on a search by Circuit.
Service Order List by Telephone Number Viewed	The Service Order List by Telephone Number Viewed transaction allows the CLEC to request and view a list of service orders based on a search by Telephone Number.
Service Order List by Service Order Number Viewed	The Service Order List by Service Order Number Viewed transaction allows the CLEC to request and view a list of service orders based on a search by Service Order Number.

Southwestern Bell - Order Status
Competitive Local Exchange Carrier (CLEC)
Transaction Activity

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84. There currently exists no means to electronically receive and process service requests for resold services of large business customers (i.e., those with over 30 lines) and certain complex serving arrangements (e.g. those that involve multiline hunting, trunk groups, Direct Inward Dial ("DID") trunks, etc.). SWB's current process to handle these types of service requests for its own retail customers requires extensive manual coordination on the part of SWB service representatives. CLECs will also need to contact the LSC in order to process such service requests (in the same manner as they are handled for SWB customers).

85. Due to the unique and varied arrangements that can be negotiated with the customer, SWB has never developed a front-end interface for its own use for complex business services. Our experiences have determined that quality customer service for these specific types of services can only be provided by individual customer care from specially trained experts. This is what SWB's LSC offers to every CLEC, just the same as we handle these situations for our own retail customers. In the event that SWB develops additional electronic functionality for complex services to be used by SWB's retail operations, these same enhancements will simultaneously be provided to any CLEC using SWB's EASE system.

86. SWB recognized that some CLECs will have their own customer care and billing systems. In an effort to make the EASE and LEX systems as compatible with CLEC systems as possible, SWB makes available to CLECs an electronic file transmission

(known as BU340) each day, reflecting all the previous day's distributed service orders. SWB developed this capability so CLECs could mechanically populate their own systems and not have to perform manual dual entry of data. AT&T has had this capability in a "live" environment for resale services since July 1997. MCI is expected to begin receiving the BU340 in a "live" mode for both their resale services and unbundled service orders by the middle of February 1998.

Maintenance And Repair

87. Maintenance and repair involves the exchange of information which gives CLECs the capability to request repair of resold services and unbundled network elements, and to check on the status of these trouble reports. SWB provides CLECs with several options for reporting trouble, and requesting maintenance and repairs. CLECs can call the LOC, as discussed in more detail by Linda D. Kramer in her affidavit. SWB also provides CLECs with a choice of two electronic interfaces for access to its OSS maintenance and repair capabilities for resold services or unbundled network elements: Trouble Administration application from the SWB Toolbar platform and Electronic Bonding Interface ("EBI").

Trouble Administration

88. The Trouble Administration ("TA") is a SWB developed GUI that has been used by SWB retail business customers and IXC's for maintenance and repair administration.

TA has been enhanced and made available to CLECs so that they may electronically submit and check on the status of trouble reports. In addition, TA has the capability of initiating a mechanized loop test ("MLT") and receiving the test results for resold POTS lines without initiating a trouble report. This capability has now been enhanced to allow MLT testing of a bundled analog switch port and 2-wire 8db analog loop (POTS like unbundled network element bundled). TA also provides trouble history to the CLEC for POTS lines and unbundled network elements.

89. The TA test results provide a direct current ("DC") test which will reflect the ohms readings of the Tip to Ring, Tip to Ground, and Ring to Ground, and the Alternating Current ("AC") readings for the same 3 measures. These readings allow the CLEC to verify that the loop is balanced or determine that trouble is in the loop or wiring and equipment beyond the network interface device at the end user's premises. The test also provides a capacitance reading so that the CLEC can determine how far out of the central office the loop is going. The test results also provide the MLT test verification code and an English statement, such as "Test OK".

90. SWB makes the training documentation and leader guide available to the CLECs who attend TA training at the CFL. This is an instructor-led class that walks the student through the use of all of the TA functions and capabilities. SWB also makes available to CLECs a TA User Guide. The User Guide displays copies of all the screens that the user

will see while using the TA package. It walks the user through "Logging On ..." to the Toolbar platform and TA, and describes in detail each of the functions that are available with the TA application, complete with copies of screen prints. The User Guide will be updated as necessary by SWB to document enhancements to the TA application.

91. The TA application flows-through electronically to SWB's back office systems. When the CLEC issues a trouble report or requests the current status of an existing trouble report, the TA application interfaces directly to the back office systems to perform that function. There are no manual interventions in the trouble administration process for the creation of trouble reports for resale services or unbundled network elements, provided CLECs utilize the TA interface.

92. TA is a SWB proprietary interface. However, the interface utilizes many of the fields and definitions as defined by ECIC and the American National Standards Institute ("ANSI") T1.227 and T1.228 standards. These include Trouble Report Format Definitions, Trouble Type Codes, Trouble Status and Trouble State Codes. The capability of requesting and viewing MLT tests on POTS and POTS-like unbundled network elements bundled is in advance of the development of standards by ECIC with regards to test results. This proves once again that SWB has developed its interface capabilities and made them available to CLECs ahead of national standards.

93. There has been a steady increase of CLEC use of Trouble Administration. To date, most CLECs have opted to submit trouble reports by calling the LOC. However, CLECs are using other features of TA more extensively, particularly the MLT transaction. The following table provides empirical data by month and year regarding CLEC use of TA over the last several months. The chart that follows provides the same data in graphical form. In addition to "logons", the table and chart display data for eleven transactions CLECs can utilize electronically to administer their maintenance/repair services.

**Southwestern Bell - Trouble Administration
Competitive Local Exchange Carrier (CLEC)
Transaction Activity**

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Month-Year	Logons	Circuit Inventory Lists Viewed	Circuit Trouble Ticket Status Request	Closed Circuit Trouble Tickets List Viewed	Closed Telephone Number Trouble Ticket List Viewed	Issue Trouble Ticket on a Telephone Number	Issue Trouble Ticket on a Circuit	Initiate MLT	Open Circuit Trouble Tickets List Viewed	Open Telephone Number Trouble Tickets Viewed	Telephone Number Ticket History Request	Telephone Number Trouble Ticket Status Request
May-97 Total	46	1	0	0	4	0	0	18	0	2	38	1
Jun-97 Total	147	6	0	1	11	6	0	90	1	49	50	42
Jul-97 Total	412	22	2	3	108	60	0	385	2	98	144	211
Aug-97 Total	761	81	2	4	65	110	0	769	0	135	391	262
Sep-97 Total	1,575	48	3	24	104	746	0	2,942	1	364	1,937	515
Oct-97 Total	1,875	83	0	7	11	1,358	0	4,954	0	213	2,525	637
Nov-97 Total	2,847	5	1	4	45	1,061	0	3,782	0	137	3,210	549
Dec-97 Total	4,249	30	19	16	71	1,336	0	4,991	2	298	6,395	1,522
Jan-98 Total	4,920	89	18	40	30	1,960	3	5,936	2	108	7,833	1,774
Grand Total	16,832	365	45	99	449	6,637	3	23,867	8	1404	22,523	5,513

LEGEND:

TRANSACTION	DEFINITION
Circuit Inventory Lists Viewed	This transaction allows the CLEC to input a partial Circuit Identification ("Circuit Ids") and the program will search the database for Circuit Ids and display these back to the CLEC. The CLEC can then select the desired Circuit Id. After a Circuit Id is highlighted by the CLEC, the CLEC has three possible options that can be performed from this screen. Report Trouble, View History and View Circuit Legs, if the circuit is a multi-point circuit. The View Circuit Legs will display a list showing all end user CLEC locations for a multi-point circuit. This display will show the Leg Number, the End User Address, and the Customer Name.
Circuit Trouble Ticket Status Request	When a valid Circuit Trouble Ticket number is provided by the CLEC, TA will go to SWB's back office system and retrieve the current status of that trouble report. The trouble report will reflect up to 4 current types of status (i.e., Dispatched In, Dispatched Out, Analyze - Craft Loaded), which could all appear on the trouble report at the same time. The TA user documentation provides a description of each of the available types of status. The status screen also displays a list of trouble log functions to allow the CLEC to see a chronology of status changes during the life of the trouble report.
Closed circuit Trouble tickets List viewed	This transaction allows for a CLEC to request to see a list of circuit trouble reports that have been closed out within the past 120 days. Because of the quantity of data, this query will only bring back 7 days of data. The CLEC can specify the 7 day range or default to the current 7 days. The CLEC can also specify the Circuit Id if data is needed on a particular Circuit Id.

TRANSACTION	DEFINITION
Closed Telephone Number Trouble Ticket List Viewed	This transaction allows for a CLEC to request to see a list of Telephone Number trouble reports that have been closed out within the past 120 days. Because of the quantity of data, this query will only bring back 7 days of data. The CLEC can specify the 7 day range or default to the current 7 days. The CLEC can also specify the Telephone Number if data is needed on a particular Telephone Number.
Issue Trouble Ticket on a Telephone Number	The CLEC will be prompted to provide the 10 digit Telephone Number to be reported. TA will query the back office system and retrieve premises data. This will be the Listed Name and address for the Telephone Number provided. The CLEC must provide the Trouble Type (uses industry standard trouble type codes), additional information, Contact Name and Phone number and hours when access is available to the premises.
Issue Trouble Ticket on a Circuit	The CLEC will be prompted to provide the Circuit Id. This screen will also allow the CLEC to provide a partial circuit id and perform a circuit search as previously defined. When a circuit id is provided / selected, TA will query the back office system and retrieve premises data. The CLEC must provide a Trouble Type (uses industry standard Trouble Type codes), additional information, premises contact persons name and phone number, premise access hours and circuit available hours if Intrusive Testing is not available at the time trouble is reported.
Initiate MLT	This transaction allows the CLEC to specify a 10 digit POTS number and the TA will generate an MLT test. The MLT test result can be viewed by the CLEC in order to see the verification test code and its English translation along with DC and AC measurements for the Loop.
Open Circuit Trouble Tickets List Viewed	This transaction allows the CLEC to request to see any trouble reports that are still open and pending for Circuit Ids. The CLEC can specify a trouble ticket number, a partial or full circuit id, the reported by person or a date range when the report was opened.
Open Telephone Number Trouble Tickets Viewed	This transaction allows the CLEC to request to see any trouble reports that are still open and pending for Telephone Numbers. The CLEC can specify the Telephone number, the reported by person or a date range when the report was opened.
Telephone Number Ticket History Request	This transaction allows the CLEC to specify a Telephone Number and TA will query the back office systems and display the history of previous trouble reports.
Telephone Number Trouble Ticket Status Request	This transaction allows the CLEC to specify a Telephone number and TA will query the back office system and display the status if there is an open trouble report. The status information will provide the date of the last status and display the status in terms of the industry standard status codes and the English description.

94. The SWB EBI was developed to incorporate national standards, based on ANSI T1M1.227/228 for trouble reporting and obtaining status updates. EBI enables CLECs to submit trouble reports, receive trouble status updates and closure information. SWB's EBI provides flow-through capability for CLECs. For example, when a request to create a trouble report is sent by the CLEC, the trouble report will be opened in SWB's back office system with no manual intervention by SWB. Due to the complexity and the information technology resource requirements of developing an EBI, the SWB EBI most likely will be utilized by the larger CLECs. Small and medium size CLECs tend to remain in a manual mode or utilize the TA application.

95. EBI is in operation today for trouble administration of interexchange access services and is being utilized by AT&T and MCI. In 1996, EBI successfully processed over 24,000 trouble reports which amounted to approximately 288,000 transactions based on an average of 12 transactions per trouble report. In 1997, EBI successfully processed 28,222 trouble reports which amounted to 362,521 transactions based on an average of 12.85 transactions per trouble report. This equates to about 109 trouble reports per work day. EBI has been successfully "stress tested" in a prototype environment to allow the creation of 4,000 trouble reports per day. Although there is not a limit on the number of transactions EBI can handle, response times for back-office systems that EBI accesses could be affected by greatly increased transaction volumes. Therefore, transaction volume increases and any corresponding impact on response time will continue to be

monitored by SWBT to determine when system capacity should be increased.

96. After a CLEC has expressed interest in establishing an EBI interface for local exchange service, SWB requests the EBI functional requirements from the CLEC so that all attributes can be verified and operational issues can be identified. EBI's information flow differs from EDI in that the CLEC, as the first step of the process, provides their functional requirements to SWB. A Joint Implementation Agreement ("JIA") is then developed to document any differences that cannot be accommodated between the functional requirements of the CLEC and SWB's back office system limitations. Once the JIA is developed, the next step is for SWB and the CLEC to agree on a time-line and begin the process for the following: 1) Installation of Circuits between the CLEC Gateway and SWB's Gateway, 2) Network Testing, 3) Stack to Stack Testing, 4) Gateway to Gateway Testing, 5) End to End Testing, 6) Network Verification Test, 7) Operational Readiness Test, and 8) Live Production.

97. The aforementioned process is complex and merits further explanation. The Installation of Circuits is the date established to install the physical facility between the CLEC Gateway and SWB's Gateway. Network Testing or Circuit validation is testing that is performed to verify that the connection between the CLEC and SWB computers is operational. Stack to Stack tests validate the interoperability of the upper layers of the Open Systems Interconnect ("OSI") stack, Session, Presentation, and the Association

Control Service Element ("ACSE"). Gateway to Gateway tests validate the interoperability of the Guidelines for Definitions of Managed Objects ("GDMO") interface between the manager (CLEC) and agent (SWB) over the Common Management Information Protocol ("CMIP"). End to End is the execution of an agreed upon set of cases to test from the CLEC's back office OSS through the EBI and to SWB's back office OSS. This is performed to "test" the OSSs and it is not in a "live" production system. Network Validation tests the connectivity of the circuits and connectivity in a live production environment. Operational Readiness is a subset of tests from the End to End test cases that are now performed in the production environment. Production is the actual date established for the CLEC to begin sending "live" trouble reports over the EBI.

98. CLECs have yet to establish an EBI with SWB for local exchange service. However, SWB has been involved in different levels of negotiations with AT&T, MCI and Sprint for the development of an EBI for local service. AT&T will initially deploy its EBI for resold local services only. AT&T could not meet the agreed timetable and is currently scheduled to complete testing with SWB and be in production by March 30, 1998. Sprint intends to deploy EBI for interexchange access services first, before attempting to deploy EBI local exchange services. In January 1998, SWB and MCI negotiated a timeline for MCI to be in production mode for local services EBI by March 16, 1998.

99. SWB has been working with AT&T and their preliminary functional requirements since November 1996 to establish a EBI for local service. AT&T negotiated in their interconnection agreement with SWB that testing of the EBI would begin in April 1997 and would be in production by August 1997. These dates were based on the delivery of AT&T's revised functional requirements to SWB in January. AT&T, did in fact provide their revised functional requirements to SWB on January 13, 1997. In a meeting on April 16, 1997, AT&T informed SWB that they would not meet their negotiated date for EBI because of their back office systems. Also at this meeting, AT&T indicated that there was a new version of their functional requirements, Version 3.1, dated March 7, 1997, which had not been transmitted to SWB. New dates were negotiated with AT&T, which would conclude with AT&T's controlled introduction / ramp-up from December 16, 1997 to February 9, 1998. Based on this negotiated timeline, the JIA was to be completed and signed by both parties by August 8, 1997. SWB signed and forwarded the JIA to AT&T on August 4, 1997. Several discussions were held regarding unbundled network elements and after some changes, AT&T signed the JIA on September 4, 1997.

100. Ironically, in September 1997, AT&T informed SWB that their current EBI would be used for resale services only and would not include unbundled network elements, again due to AT&T's back office system limitations. AT&T's back office system is not expected to be operational to handle unbundled network elements until late 1998. The project is currently delayed and did not meet the production date of December 16, 1997

for resale services. Network circuit validation testing was completed on September 30, 1997. Stack to Stack testing was completed on October 8, 1997. Both Network and Stack testing were completed ahead of schedule. Gateway to Gateway testing began on October 15, 1997 and End to End testing was to begin December 1, 1997. Both were scheduled to be completed by December 12, 1997. However, on November 26, 1997, AT&T verbally informed SWB that End to End testing would not begin on December 1, 1997 as planned because of problems with a software release within their back end OSS. AT&T proposed a new timeline and SWB has agreed with an AT&T EBI production date of March 30, 1998 for resale services. As demonstrated above, SWB has done everything in its power to enable AT&T to establish an EBI for local exchange services. The delays in the process have been caused by AT&T.

101. In November 1996, during negotiations of one of the interconnection agreements, Sprint indicated that they wanted EBI for local service and negotiated with SWB to begin testing by September 1997 and be in a production mode by December 1997. On April 29, 1997 Sprint informed SWB that they would not meet their negotiated EBI dates. On May 14, 1997, Sprint notified SWB that it would not consider working on EBI for local service until after they had completed the EBI for their interexchange access services. Sprint had negotiated a July 1997 production date for the interexchange access EBI. Sprint then requested that the production date for interexchange access services be changed to August 25, 1997, due to back office system problems. On July 23, 1997,

Sprint again requested that their production date for interexchange access services be changed, this time to October 13, 1997. On October 7, 1997, Sprint and SWB agreed to again slip the interexchange access services production date for the EBI due to Sprint's back office system problems. At that point, weekly conference calls to discuss Sprint's interexchange access services deployment were canceled. In late January 1998, Sprint proposed a new timeline for completion of their Access EBI to SWB for consideration. A negotiated agreement for Access EBI will be established within the next few weeks. SWB still has not received Sprint's functional requirements for local exchange service EBI. As a result, Sprint has yet to have taken the first step necessary to begin the establishment of a trouble administration EBI for local exchange services.

102. MCIIm indicated during negotiations of one their interconnection agreements and again in an OSS demonstration meeting held on March 20, 1997, that they wanted an EBI for local exchange service. On May 7, 1997, MCIIm again reiterated their desire to utilize the EBI for local exchange service and indicated they would utilize their existing interexchange access EDI gateway for local exchange service. At this meeting, SWB asked MCIIm to send their functional requirements for EB local exchange service, stating that review of these requirements would be the next step in the process. Subsequently, between May and the end of June 1997, SWB repeatedly asked MCIIm for their functional requirements. MCIIm's functional requirements were received by SWB on July 16, 1997. The first meeting to discuss MCIIm's EBI functional requirements for local service was

held on August 20, 1997. SWB developed a draft JIA for local exchange service EBI and transmitted it to MCI on September 12, 1997 for review. A subsequent conference call was held on October 9, 1997 to discuss the draft JIA. A meeting was held on November 6, 1997 to again review items associated with the JIA. MCI was to provide SWB a copy of their EBI test cases for review by November 12, 1997, but were not received by SWB until December 19, 1997. In January 1998, MCI and SWB agreed on a timeline for completion of the EBI for local services. The MCI EBI local services production date is scheduled for March 16, 1998. Just as with AT&T and Sprint, SWB has been ready and willing to work with MCI to enable it to deploy an EBI for local exchange services.

Billing

103. Billing involves the exchange of information necessary for CLECs to bill their customers, to process the end user's claims and adjustments, and to view SWB's bill for services provided to the CLEC. SWB provides CLECs with a choice of five options for obtaining electronic access to billing information: Bill Plus™, EDI 811 for resale, Carrier Access Billing System ("CABS") Bill Data Tape ("BDT") for unbundled network elements, Bill Information, and Usage Extract feed. Whether CLECs receive their billing information from SWB on paper or electronically, end user customers switching from SWB service to CLEC service have not experienced double billing problems due to SWB errors. SWB has also developed performance measures for billing. The affidavit of

William R. Dysart describes the specific performance measures in detail.

104. Bill Plus™ service is an electronic telephone bill which provides CLECs with the same information contained on their paper bill, plus much more. Bill Plus™ is a user friendly PC software package that is designed to increase the efficiency of managing telecommunications expenses. Although available to all CLECs, Bill Plus™ is typically utilized by small to medium CLECs. Various reporting options allow the CLEC the capability to analyze their billing data within Bill Plus™. In addition, the CLEC can extract the billing data to their internal systems, thus allowing unlimited analysis of the data. Specifically, Bill Plus™ enables CLECs to:

- Receive their monthly SWB bill on diskette or CD ROM.
- View the bill on screen and search for information quickly.
- Receive Account Service Information / 2733 data (CD option).
- Generate a variety of standard, customized, or historical reports.
- Print any portion of the bill or any report generated by this service.
- Track IntraLATA Toll calls.
- Export data to other software programs, word processors, or spreadsheets.

SWB has a dedicated group that provides on-site Bill Plus™ demonstrations for CLECs and maintains a toll free number for customer assistance. SWB made over 93 premises visits and held conference calls with approximately 84 CLECs to demonstrate the capabilities of Bill Plus™ and answer CLECs' questions. Currently, 34 CLECs are receiving their bills via Bill Plus™.

105. EDI for billing provides an interface which enables CLECs to receive their resold services billing data in an industry standard electronic format. The billing data consists of the same information that appears on the CLEC paper bill for resold services. SWB's EDI bill provides the data elements that OBF has defined as industry guidelines for resale billing. EDI billing transmits an 811 Transaction Set that includes flat-rated charges, usage-sensitive charges, and call detail. The EDI 811 Transaction Set is an industry standard and does not vary from ILEC to ILEC. EDI billing enables CLECs the capability to analyze their billing data, generate a variety of reports, track IntraLATA Toll, and export data to their internal systems.

106. A dedicated team of SWB billing specialists is available to provide CLECs with on-site EDI mapping assistance. The purpose is to ensure the CLECs understand and are completely comfortable with the billing data that is transmitted. Twenty-nine premises visits and conference calls have been made by the team to the six CLECs, including AT&T and MCI, that are receiving their bills via EDI. Two other CLECs are currently testing the EDI billing process. In addition, weekly or biweekly conference calls are held with these CLECs to answer questions and resolve any issues that have arisen with regards to EDI billing. EDI billing can be utilized by CLECs of all sizes.

107. SWB makes available to CLECs today a local BDT to receive, in an electronic format from SWB's CABS database, the same information that would appear on the CLEC's paper bill for unbundled network elements. The BDT follows industry standard Billing Output Specifications ("BOS") guidelines as defined by the Technical Review Group ("TRG"). The BDT is offered in several media types: electronic via direct connection, tape, floppy disk and microfiche. While CLECs are not currently utilizing the local BDT, interexchange carriers have been utilizing BDT for years to receive their access services billing information.

108. SWB also makes available to CLECs on-line access to the Bill Information application from the SWB Toolbar platform. Bill Information is a GUI that provides CLECs real-time access to SWB's back office OSSs, making it possible to view billing data and other information regarding a CLEC's resold services or unbundled network elements. CLECs may search by Telephone Number, Operating Company Number ("OCN"), Billing Account Number ("BAN"), or Circuit Identification. Information that can be viewed for local exchange services includes sections of a bill, payments and adjustments, subscription reports, and the CSR. Data is available for the most recent billing period and for a minimum of each of the previous three months for resold accounts and up the past 23 months for unbundled network elements accounts. Billing Information is a new application that replaced the Billing Inquiry portion of the Customer Network Administration ("CNA") system.