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3. I was employed by the Bell System in 1966. Since that time, I have held various positions in the Operator Services department. My most recent and current assignment as Director-Operator Services on the Company's Operator Services staff commenced in August 1985.

#### **PURPOSE OF AFFIDAVIT**

4. The purpose of my affidavit is to explain how SWBT is in compliance with the Telecommunications Act of 1996 (hereinafter "the Act), as it pertains to non-discriminatory access to Operator Call Completion Services (hereinafter "OS") and Directory Assistance (hereinafter "DA") Services. (47 U.S.C. §§271(c)(2)(B)(vii)(II) and(III)). Southwestern Bell provides non-discriminatory access to OS and DA Services in several different ways, as required by 47 U.S.C. §271 (c)(2)(B) (hereinafter "Checklist"), FCC 96-333 Second Report and Order and Memorandum Opinion And Order (hereinafter "Second Report and Order"), and CC Docket 96-98, Appendix B - Rules, Amendments to the Code of Federal Regulations (C.F.R), Part 51, Subpart D (hereinafter "the FCC Rules"). I use the phrase "operator services" in the same sense as it is defined in the FCC's Second Report and Order, §III (C)(1)(a) ¶¶108 and 109. The FCC, in that Order, defines operator services as "any automatic or live assistance to a consumer to arrange for billing or completion, or both, of a telephone call through a method other than: (1) automatic completion with billing to the telephone from which the call originated; or (2) completion through an access code by the consumer, with billing of an account previously established with the telecommunications service provider by the consumer."
5. I will address how SWBT has made available access to unbundled facilities and functionalities to provide Operator Services (OS) and Directory Assistance (DA) pursuant to 47 C.F.R. §51.319(g). Further, I will explain how SWBT provides DA, Directory Assistance Call Completion (DACC), and Operator Call Completion Services to Incumbent Local Exchange Carriers (ILECs) and Competitive Local Exchange Carriers (CLECs) in a manner that is equal to which SWBT provides such services to itself. SWBT's standard offerings are described in

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Appendices DA, OS, Direct, and DAL filed as part of the Oklahoma Statement of Terms and Conditions (STC).

6. As outlined in the Second Report and Order, at ¶102, SWBT has a duty to provide “nondiscriminatory access” to operator services, directory assistance and directory listings to competing providers that is at least equal in quality to the access that SWBT provides itself. In the following paragraphs, I will describe specifically how SWBT complies with the requirements of the Act, the FCC Rules and the Second Report and Order in making available such access.

### **DIRECTORY ASSISTANCE SERVICES**

7. DA is a service that allows customers to obtain telephone numbers of other customers. The end-user customer receives this service by dialing 1-411, 1-555-1212, and 1-(Area Code)-555-1212. DACC is a service which allows a DA customer to direct that a call be automatically completed to a number obtained from DA without dialing the number.
8. CLECs who provide local exchange service through resale, over some combination of their own facilities and SWBT unbundled switching, or entirely through their own facilities, have several options with respect to the provision of local directory assistance to their customers. The following outlines the available options:
  - RESALE SERVICES - SWBT will provide CLEC’s end users access to DA services as part of the resold local exchange services; or the CLEC may choose to “customize route” the DA calls to a DA platform designated by the CLEC.
  - UNBUNDLED LOCAL SWITCHING - CLECs providing local exchange service utilizing a combination of their own facilities and SWBT’s unbundled local switching may choose to purchase DA services on a per-call basis from SWBT; or the CLEC may choose to “customize route” the DA calls to a DA platform designated by the CLEC.
  - PURE FACILITIES BASED PROVIDERS - CLECs providing local exchange service solely through their own facilities may choose to contract with SWBT for the provision of DA services to their end users, may opt to contract with another DA provider, or may choose to provide their own local DA services.

The option to "customize route" DA calls to a platform designated by a CLEC is described in the affidavit of William Deere.

9. SWBT currently provides nondiscriminatory access to DA Services on behalf of entities other than its own end user customers that is equal in quality to the services that SWBT provides to its own customers. 47 C.F.R. §51.217 (a)(2). STC Appendix DA. Calls from SWBT end users and end users of other carriers using SWBT DA Services are processed by the Operator Services system in the order they are received. When the OS switch detects a trunk seizure on a trunk carrying DA traffic, it searches for an idle operator position and, if one is available, connects the call to the position that has been idle the longest. If no operator is available, the call is time stamped and placed in the Calls Waiting queue. When an operator position becomes available, the OS switch searches the Calls Waiting queue and connects the oldest call to the idle position. In Oklahoma, SWBT currently provides DA Services under contract on behalf of 36 ILECs. SWBT has implemented DA Services arrangements for two facilities-based and nine resellers pursuant to Interconnection Agreements in Oklahoma. (See Confidential Attachment 1).

SWBT provides DA services to CLECs in the same manner as provided to ILECs. SWBT offers CLECs the same terms and conditions for DA Services that SWBT offers to ILECs. The prices shown for DA Services in Appendix Pricing Schedule are the same that are offered to ILECs in Oklahoma today, and are cost based, as described in the Affidavits of Charles Cleek and Mike Moore. As outlined in STC Appendix DA, the Directory Assistance Services provided to requesting carriers include:

Directory Assistance, which consists of providing subscriber listing information name, address, and published telephone number or an indication of "non-published" status) to CLEC's end users who dial 411 or NPA 555-1212.

Directory Assistance Call Completion, a service in which SWBT completes a call to the requested number on behalf of a CLEC's end user, utilizing an automated voice system or with operator assistance.

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**Call Branding**, which is the procedure of identifying the CLEC's name audibly and distinctly to the consumer at the beginning of each DA Call, and prior to completion of a DACC request. 47 C.F.R. §51.217 (d).

**Call Rating/Reference Information**, which is a service where SWBT will quote the CLEC's DA rates to the end user upon request. It is the CLEC's responsibility to provide SWBT it's current DA rates. 47 C.F.R. §51.217 (c)(3)(iv).

Attachment 1 provides a summary of DA Services provided by SWBT in Oklahoma and in the five-state area to CLECs. As indicated on this Attachment, in addition to the two facilities-based CLECs referenced above, SWBT has implemented DA Service arrangements for nine resellers in Oklahoma, and a total of 99 CLECs companywide.

10. The CLEC is billed the contracted rate for each call handled by SWBT or, in the case of DACC, each call completed by SWBT. The access arrangements enable all requesting carriers to offer their subscribers the ability to gain access to Southwestern Bell's DA Services through prevailing dialing arrangements with no unreasonable dialing delay. 47 C.F.R. §51.217(b). SWBT provides nondiscriminatory access to Directory Assistance Services pursuant to 47 U.S.C. §251 (b)(3) of the Federal Act and the FCC's Rules issued in CC Docket 96-98. 47 C.F.R. §51.217(c)(3)(i).

SWBT's ability to furnish and correctly bill for DA services is well established. Facilities-based CLECs are served and billed in the same way that ILECs have been for years. Resellers purchase on behalf of their end user customers retail services that include access to DA services. Resellers thus obtain access services in the same manner as for SWBT's retail customers. Billing is accomplished through the resale bill.

Performance measurements in place to confirm DA Services are being provided on a non-discriminatory basis are covered in the Randy Dysart affidavit.

#### **DIRECT ACCESS TO DA DATABASE**

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11. Direct Access to the DA database allows a CLEC's operator to obtain listing information by searching the same DA database used by SWBT DA operators. This method is described in the FCC Second Report and Order, §143. As outlined in STC, Appendix DIRECT, Direct Access allows CLECs access to SWBT's DA database for the sole purpose of providing voice DA to CLEC end users. SWBT has ordered, purchased, and installed upgrades to make this direct access available in Oklahoma and the other four states at a cost of approximately \$2M. Extensive acceptance testing with SWBT's vendor has been conducted and indicate that the feature will perform properly. No CLEC has yet requested Direct Access to SWBT's DA database. Upon receipt of an order from a CLEC for Direct Access, SWBT will work with the CLEC to activate this service, based on the CLEC's specifications. This service will allow CLECs nondiscriminatory access to the same directory listing information available to SWBT DA operators. 47 C.F.R. § 51.217(c)(3)(ii).

#### **DIRECTORY ASSISTANCE LISTINGS**

12. If a CLEC chooses to provide its own DA service, SWBT will negotiate a reciprocal licensing agreement, whereby a CLEC can receive SWBT listings in a mutually acceptable format, for use in providing DA services to its customers. 47 C.F.R. §51.217 (c)(3)(ii). As outlined in STC Appendix DAL, the CLEC would furnish to SWBT the directory listings for the CLEC customers. The price structure is on a per-listing basis. A listing is defined as customer name, address and published telephone number, or an indication of "non-published" status. The Companies will exchange listing information to maintain the completeness of their respective DA databases. This is consistent with the FCC's rule that any customer should be able to access any listed number on a nondiscriminatory basis, notwithstanding the identity of the customer's local service provider or the identity of the telephone service provider for the customer whose directory listing is requested. 47 C.F.R. §51.217 (c)(3)(i). In Oklahoma, three CLECs have included in their Interconnection Agreements with SWBT terms for the exchange

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of directory listings. (See Confidential Attachment 1). Company-wide, 13 CLECs have included Appendix DAL for the exchange of directory listings in their Interconnection Agreements with SWBT. (See Attachment 1). In addition, SWBT will license directory assistance listing data to any telecommunications provider who desires to purchase SWBT DA listings for the purpose of providing DA services. Metro One Telecommunications, Inc. and Listing Services Solutions, Inc., have entered into such a licensing agreement with SWBT. Also, SWBT has a reciprocal DA listings licensing agreement with an ILEC, GTE of the Southwest, that has been in effect since 1995.

### **OPERATOR CALL COMPLETION SERVICES**

13. Operator Call Completion Services refer to a variety of call services that are obtained by dialing "0-" (dialing only the digit 0), 0+ a local number, or 0+ a toll number. These services include access to alternate billing services (i.e., billing to a telephone calling card, credit card, third number or collect), assistance in dialing a call which is billed to the originating line (i.e., customer has encountered trouble dialing a 1+ call or customer wishes to place a person-to-person call), busy line verification (BLV) and emergency interrupt (EI).
14. CLECs who provide local exchange service through resale, over some combination of their own facilities and SWBT unbundled switching, or entirely through their own facilities, have several options with respect to the provision of Operator Call Completion Service to their customers.

The following outlines the available options:

**RESALE SERVICES** - SWBT will provide CLEC's end users access to Operator Call Completion Services as part of resold local exchange services; or the CLEC may choose to "customize route" the calls to an Operator Services platform designated by the CLEC.

**UNBUNDLED LOCAL SWITCHING** - CLEC's providing local exchange service utilizing a combination of their own facilities and SWBT's unbundled local switching may choose to purchase Operator Call Completion Services from SWBT; or the CLEC may choose to "customize route" the calls to an Operator Services platform designated by the CLEC.

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**PURE FACILITIES-BASED PROVIDERS** - CLECs providing local exchange service solely through their own facilities may choose to contract with SWBT for the provision of Operator Call Completion Services to their end users, may opt to contract with another Operator Services provider, or may choose to provide their own call completion services.

The option to "customize route" Operator Call Completion (0-, 0+ Local) calls to a platform designated by a CLEC is described in the affidavit of William Deere.

15. SWBT currently provides nondiscriminatory access to Operator Call Completion Services on behalf of entities other than its own end user customers that is equal in quality to the services that SWBT provides to its own customers. 47 C.F.R. §51.217 (a)(2). STC Appendix OS. Calls from SWBT end users and end users of other carriers using SWBT Operator Call Completion Services are processed by the Operator Services system in the order they are received. When the OS switch detects a trunk seizure on a trunk carrying OS traffic, it searches for an idle operator position and, if one is available, connects the call to the position that has been idle the longest. If no operator is available, the call is time stamped and placed in the Calls Waiting queue. When an operator position becomes available, the OS switch searches the Calls Waiting queue and connects the oldest call to the idle position. In Oklahoma, SWBT currently furnishes Operator Call Completion Services under contract on behalf of 33 ILECs. SWBT has implemented Operator Call Completion Services arrangements for two facilities-based and 9 resellers pursuant to Interconnection Agreements in Oklahoma. (See Confidential Attachment 1).

SWBT provides Operator Call Completion Services to CLECs in the same manner that it provides these services to ILECs. SWBT offers CLECs the same terms, conditions and pricing for Operator Call Completion Services that are currently offered to ILECs. The prices shown for Operator Call Completion Services in STC Appendix Pricing Schedule are the same that are offered to ILECs in Oklahoma today and are cost based, as described in the Affidavits of Charles Cleek and Mike Moore. As outlined in STC Appendix OS, the specific Operator Services furnished to requesting carriers include:

Fully-Automated Call Processing. This allows the end user to complete a call utilizing equipment without the assistance of an operator. End users may bill fully-automated calls to a telecommunications calling card, a third number, or collect.

Operator Assisted Call Processing. This includes the following types of services:

**Semi-Automated** - An end user dials 0+ the telephone number and the call is completed with the assistance of an Operator. This may include Station to Station or Person to Person send paid, calling card, collect or bill to third number calls.

**Station-to-Station Operator Handled** - An end user dials only the digit "0" and places either station-to-station or person-to-person sent paid, collect, third number or calling card call using an Operator's assistance.

**Line Status Verification** - A service in which the caller requests that the Operator determine whether an access line is in use. See ¶¶ 26 and 27 for a complete description of how this service works.

**Busy Line Interrupt** - A service in which the caller asks the Operator to interrupt a conversation in progress to determine if one of the parties is willing to speak to the caller requesting the interrupt. See ¶¶ 26 and 27 for a complete description of how this service works.

**Operator Transfer** - A service in which a caller dials zero and desires to place an InterLATA call using an Operator's assistance. At the caller's request the operator transfers the call to an Interexchange carrier participating in an offering of the CLEC similar to SWBT's "Operator Transfer" service. The contracting CLEC will make necessary arrangements between CLEC and participating Interexchange carriers.

**Miscellaneous** - Includes the following call types: General assistance, 800, 888, and connections to other Toll Free services, Repair Bureau and Business Office requests, credit requests and other 0- No Attempt services.

Call Branding, which is the procedure of identifying the CLEC's name audibly and distinctly to the consumer at the beginning of each call, and to the billed party, if different from the calling party.

Call Rating/Reference Information - A service where SWBT will quote the CLEC's Operator Call Completion rates to the end user upon request. It is the CLEC's responsibility to provide SWBT its current OS rates. 47 C.F.R. §51.217 (c)(3)(iv).

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Attachment 1 provides a summary of Operator Call Completion Services provided by SWBT in Oklahoma and in the five-state area to CLECs. As indicated on this Attachment, in addition to the two facilities-based CLECs referenced above, SWBT has implemented Call Completion Services arrangements for nine resellers in Oklahoma, and to a total of 97 CLECs companywide.

16. The CLEC is billed for operator assisted calls on an operator work second basis, and for fully-automated calls on a completed call basis. The access arrangements enable all requesting carriers to offer their subscribers the ability to gain access to Southwestern Bell's Operator Services through prevailing dialing arrangements with no unreasonable dialing delay. 47 C.F.R. §51.217(b). SWBT provides nondiscriminatory access to Operator Call Completion Services under contract to CLECs who provide local telephone service, pursuant to 47 U.S.C. §251(b)(3) and the Rules issued in CC Docket 96-98. 47 C.F.R., §51.217 (c)(2).

SWBT's ability to furnish and correctly bill for Operator Call Completion Services is well established. Facilities-based CLECs are served and billed in the same way that ILECs have been for years. Resellers purchase on behalf of their end user customers retail services that include access to Operator Call Completion Services. Resellers thus obtain access services in the same manner as for SWBT's retail customers. Billing is accomplished through the resale bill.

Performance measurements in place to confirm Operator Call Completion Services are being provided on a non-discriminatory basis are covered in the Randy Dysart affidavit.

**BRANDING**

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17. SWBT will provide branding with the CLEC's name for Operator Services and DA calls. 47

C.F.R. §51.217 (d).

18. SWBT is capable of branding calls for a CLEC that establishes a separate trunk group to the SWBT Operator Services switch. Branding is available in this case because the calls are handled first by the contracting carrier's switch, aggregated, and then delivered to SWBT's Operator switch over separate, dedicated trunk groups. These dedicated trunk groups allow the SWBT switch and operator to identify the call and the CLEC and brand appropriately. With a separate trunk group, SWBT will brand all calls with the CLEC's name. SWBT currently provides branded call completion and/or DA Services to two facilities-based CLECs in Oklahoma. (See Confidential Attachment 1). As indicated in Attachment 1, SWBT currently brands for ten facility-based CLECs in the five-state area. In addition, SWBT provides branded Call Completion and DA services to ILECs and cellular companies who desire branding and route calls to the SWBT operator services switch on a separate trunk. These services are typically branded with the contracting carrier's name.

19. SWBT ordered, purchased, and installed upgrades to its Operator Services switches to make branding capability available to resellers in Oklahoma. This feature is now available. Provisions for branding are included in SWBT's OCC approved inter-connection agreements. SWBT has implemented branding for three resellers in Oklahoma, who are listed in Confidential Attachment 1. As indicated in Attachment 1, SWBT has implemented branding for 18 resellers in the five-state area. The installation of this feature gives SWBT the capability in all situations to brand Operator Services and Directory Assistance calls with the name of the carrier, in compliance with the FCC's Rules. 47 C.F.R. §51.217 (d).

20. An initial charge will apply for loading of a CLEC's branding phrase as well as a charge for any subsequent changes to the branding phrase requested by the CLEC. In addition, a per-call branding charge applies when multiple brands are required on a single trunk group. This is

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required to recover costs associated with branding based upon originating telephone number.

The prices for branding are cost based, as outlined in the Affidavits of Charles Cleek and Mike Moore.

21. SWBT also provides non-discriminatory access to CLEC resellers who elect to route DA and call completion requests from their end users to the SWBT OS switch on the same trunk group with SWBT customers. The CLEC end user is provided with access to a SWBT operator and the same Operator Call Completion Services and DA services on a resale basis that SWBT provides at retail to its own subscribers. 47 CFR §51.271 (b).

**CALL RATING/REFERENCE INFORMATION**

22. SWBT will provide CLEC-specific rate information for Operator Services and/or DA Services to end users of a CLEC, when SWBT is providing Operator Services and/or DA services on behalf of that CLEC. 47 U.S.C. §226 (b)(1)(C).
23. Because §226 (b) of the Act requires that each provider of OS must immediately disclose to the consumer, upon request, a quote of rates, SWBT has deployed new technology (External Rater) that enables SWBT's operators to provide the CLEC's rates to an end user upon request. Based on the originating telephone number, SWBT will provide the information that is appropriate for that end user's CLEC. This new technology also enables SWBT to maintain and provide to a CLEC's end user customers the Business Office and Repair telephone numbers of the CLEC.
24. Today, SWBT operators provide rate information 24 hours a day, 7 days a week, hundreds of times daily in Oklahoma to its retail customers. The loading of a CLEC's rates is therefore necessary so that SWBT can quote rates to CLEC end users in the same manner SWBT quotes rates to its own retail customers. Rate information is also required to provide

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Hotel/Motel resold service and to process requests for Time and Charges (T&C) calls from CLEC resold lines. Without rate information supplied by the CLEC, SWBT cannot provide the same service to CLEC customers as SWBT provides to its retail customers. Rate information is also needed to respond to CLEC customer requests such as "How much does it cost to call Directory Assistance?" or "What is the price to verify that a line is busy?"

25. An initial non-recurring charge applies for loading of a CLEC's DA/OS rate and reference information as well as a charge for each subsequent change if a change is requested by the CLEC. The prices for this service are cost based, as described in the Affidavits of Charles Cleek and Mike Moore. Currently three CLECs have purchased Call Rating Services from SWBT in Oklahoma. (See Confidential Attachment 1). SWBT operators now respond to these three CLECs' end user questions regarding rates in the same manner as for SWBT end users. As indicated in Attachment 1, SWBT provides Call Rating Services for 20 CLECs in the five-state area.

#### **LINE STATUS VERIFICATION/BUSY LINE INTERRUPT**

26. Line Status Verification is a service that provides capability for the SWBT operator to determine, upon customer request, whether a conversation is in progress on a particular line number. Busy Line Interrupt is a service that provides capability for the SWBT operator, after determining that there is conversation on the line, to interrupt that conversation and request that the line be released so that the party requesting the interrupt can contact the line that was verified. For example, a caller attempts to place a local or intraLATA call on a direct dial basis and repeatedly reaches a busy signal. The caller dials "0" and requests that the operator "check" the line to determine if it is busy. The operator first dials the number and if the line is clear, the call is completed. If the operator also reaches a busy condition the operator will access the verification equipment. The calling customer is still on the line but is on "hold" and cannot hear the verification process. When the operator accesses the verification network, a

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scrambler attaches to the line. This allows the operator to determine if conversation exists on the line without interrupting the conversation and without being able to understand what is being said. The scrambler protects the customer's privacy. The operator will report the result of the verification attempt to the calling customer. If there was conversation on the line, the caller may request that the operator interrupt that conversation. The caller is again placed on "hold." The operator can then interrupt the conversation in progress. At this time the operator can hear what is being said and the parties on the call will be able to hear the operator. To alert the parties that someone has accessed the line, an alerting tone will sound. The operator will advise that "calling party name" has requested that the line be interrupted and ask if the line will be released. The operator will report the outcome to the calling party and if appropriate, complete the call.

27. Operators of ILECs, CLECs, and IXCs who are serving customers who require Line Status Verification and/or Busy Line Interrupt on a SWBT line can access the SWBT Inward Operator for these services. In Oklahoma, four CLECs have included provisions in their Interconnection Agreements with SWBT for this service. (Cox Oklahoma Telecom, Inc. (Cox) 7.2, Appendix ITR VI; IGC Telecom Group, Inc. (ICG) 7.2, Exhibit C, Paragraph C; Intermedia Communications, Inc. (ICI) VI.F, Appendix ITR; US Long Distance (USLD) Appendix ITR C.) The SWBT operator provides a report on line status or, if required, interrupts the call on behalf of the calling party. IXCs and OSPs access the SWBT Inward Operator under the terms of the SWBT Access Tariff. ILECs access SWBT Inward on a reciprocal contract basis. CLECs may choose access to the SWBT verification services using either method. SWBT will provide access to the SWBT Inward operator on a nondiscriminatory basis to any carrier. When an end user served by another carrier requests verification and/or interrupt of a SWBT end user telephone number the operator of the carrier will access the SWBT Inward operator who will perform the service and report the results to the carrier operator. In Oklahoma, SWBT receives approximately 43,000 requests from Operator Service Providers for Inward Operator Assistance each year. On a reciprocal basis, when a SWBT end user requests verification

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and/or interrupt of another carrier end user the SWBT operator will access the Inward operator of the CLEC who will perform the service. FCC Second Report and Order ¶ 111.

28. In summary, SWBT has unbundled facilities and functionalities providing Operator Services and DA pursuant to §251(c)(3) of the Act. SWBT also provides nondiscriminatory access to Operator Services, Directory Assistance Services and related databases pursuant to §251(b)(3) of the Act. SWBT offers to ILECs today access to DA and Call Completion Services. SWBT offers the same services to CLECs on the same terms and conditions as it does to ILECs. CLECs can elect to establish their own operator centers, establish an arrangement with a third party provider or negotiate with SWBT to provide these services. In the event a CLEC chooses to provide its own DA Services, SWBT negotiates a mutual licensing agreement for exchange of directory assistance listings. On a resale basis, SWBT is providing CLECs with nondiscriminatory access to SWBT DA and Operator Call Completion Services in the same manner that SWBT provides these services at retail to its own subscribers. As noted earlier, SWBT has implemented Operator Call Completion Services for 97 CLECs and DA Services for 99 CLECs in the five state area. A complete listing of these CLECs can be found in Confidential Attachment 1.

This concludes my affidavit.

**KEENER  
ATTACHMENT 1**

**THIS INFORMATION IS HIGHLY SENSITIVE CONFIDENTIAL  
AND WILL BE MADE AVAILABLE FOR REVIEW IN  
ACCORDANCE WITH THE TERMS OF THE PROPRIETARY  
AGREEMENT ORDERED IN THIS CAUSE.**



**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the matter of )  
 )  
Application of SBC Communications Inc., )  
Southwestern Bell Telephone Company, ) CC Docket No. \_\_\_\_\_  
and Southwestern Bell Communications )  
Services, Inc., for Provision of In-Region, )  
InterLATA Services in Oklahoma )

**AFFIDAVIT OF LINDA D. KRAMER**

I, LINDA D. KRAMER, being duly sworn, deposes and states as follows:

1. My name is Linda D. Kramer. My business address is 1116 Houston, Room 1500, Fort Worth, Texas 76102. I am Director-Local Operations Center for Southwestern Bell Telephone Company ("SWBT"). In this position, I am responsible for directing the activities associated with daily provisioning and maintenance of interconnection facilities and unbundled elements for the competitive local exchange carriers ("CLECs"). I also am responsible for the maintenance of all resold plain old telephone service ("POTS") lines for the CLECs.

**Education And Professional Experience**

2. I attended Louisiana State University - Shreveport, majoring in Business Administration.
3. I began working at BellSouth in 1966 holding both non-management and management positions in Operator Services. In 1977, I transferred to the Network Operations Department at Bell South. I was responsible for the software translations, capacity determination, and line and number administration for 1 ESS, 1A ESS, and 2B ESS Central Office Switching Machines. In 1979, I transferred to Southwestern Bell as a manager with the same type responsibilities. I worked as a Technical Manager in both Provisioning and Maintenance in the Inter-exchange Carrier Center in Houston, Texas. I was promoted to the position of

Senior Design Consultant-Marketing/Sales in 1985, and in that position I coordinated the implementation of the first Southwestern Bell ISDN installation. I participated in the development of service order methods and procedures to support ISDN, the testing of ISDN customer applications, the development of operations support systems ("OSS") flow-through procedures, and the training of customer and marketing personnel. I was promoted to Area-Manager-Technical/Network Operations in 1988, serving in both staff and line organizations. In 1992, I established the first fully functional Regional Major Account Center in Southwestern Bell. The methods and procedures developed at that center for force sizing guidelines, customized reports, test methods and procedures, were adopted as models by both Southwestern Bell and Telefonos de Mexico. I have developed methods and procedures, as well as provided technical support for CO LANs, SS7, CCO features, and ISDN. I was promoted to the position of Director-Local Operations Center in September, 1996.

#### **Purpose Of Affidavit**

4. The purpose of my affidavit is to describe the operations of SWBT's Local Operations Center ("LOC"), and to demonstrate how SWBT is providing provisioning, maintenance and repair services to the CLECs. As described in detail below, the LOC supports the day-to-day provisioning and maintenance activity for CLECs entering the local exchange market within the five-state territory served by SWBT (Arkansas, Kansas, Missouri, Oklahoma, and Texas). Once the service requests are received and processed by the LSC (as outlined in the affidavit of Nancy J. Lowrance), the LOC is responsible for the coordination of all maintenance and repair activities for the CLECs. The LOC is also responsible for some installation coordination activities. Detailed information is provided regarding these responsibilities is set out below.

5. As my affidavit will further demonstrate:

- As of year-end 1997, the LOC had successfully provisioned more than 2,515 Interconnection Facilities, 65,419 Message Trunks, and 5,998 Special Service Circuits in the five-state area.
- During this same period, the LOC processed 97,668 maintenance reports for the five-state area, 1,406 of which were processed in the state of Oklahoma.
- During this same period 133 CLECs passed service order request to SWBT, ten of which are operating in Oklahoma.
- The LOC also coordinated the interim number portability cut-over of more than 14,000 SWBT subscriber lines to service provided by facilities-based CLECs during 1997. More than 5400 of these INP cut-overs took place in Oklahoma.
- The LOC has established procedures to ensure that maintenance and provisioning services are provided to CLECs on a non-discriminatory, timely and efficient basis. Following these procedures, the LOC met the requirements of a steady increase in transaction volume throughout 1997, including a dramatic escalation in activity during the last quarter.
- The LOC's procedures and staffing are more than sufficient to accommodate CLEC growth.

6. My affidavit and the affidavits of Elizabeth A. Ham and Nancy J. Lowrance demonstrate that SWBT is in compliance with its obligation under the Telecommunications Act of 1996 and the rules of the Federal Communications Commission to provide nondiscriminatory access to its OSS functions.

### Organization of the LOC

7. SWBT created the LOC in May of 1996 to serve as the single point of contact for CLECs in connection with the provisioning, turn-up and acceptance testing of all interconnection facilities and unbundled elements. The LOC also handles the receipt of maintenance reports and maintenance of all resold POTS services, interconnection facilities, and unbundled network elements. The LOC provides these provisioning and maintenance and repair services to the CLECs 24 hours a day, 7 days a week.
8. The mission of the LOC is to ensure that CLECs receive high quality provisioning, and maintenance and repair services at least on parity with that provided to SWBT's retail operations. In support of that objective, SWBT has committed considerable financial and personnel resources. The LOC's 1997 budget exceeded \$5.4 million for salaries, training, and build-out of the necessary facilities to establish the LOC.
9. As of February 12, 1998, the LOC facility houses a total of 74 employees, including one Director; four Area Managers; one Administrative Assistant; six Managers; 31 Customer Service Representatives (CSRs); 26 Customer Testing Technicians (CTTs); and five clerical support personnel. In 1998, another \$4.2 million will be spent to house, train, and pay an additional fifty eight (56) employees to support the efforts of Southwestern Bell to provide parity service to the CLECs located in SWBT's five-states.
10. The four Area Managers referenced above report to me. The Area Manager-Local Operations Center is responsible for the center operations and personnel. The Area Manager-Local Operations Center Technical Support is responsible for methods and procedures development and training. The two Area Managers-Service Management are responsible for directly interfacing with CLECs on a company-wide basis for service assurance levels and

service improvement plans as required. Other managers within the LOC are specifically assigned to supervise the Customer Service Representatives and Customer Testing Technicians.

11. The LOC Customer Service Representatives work directly with the CLECs to receive maintenance reports, perform trouble testing on POTS lines, dispatch repair teams, and check on the status of repairs. Service Representatives training consist of customer contact skills development, Metallic Line Testing, maintenance report entry process, and various operational support system training. This training takes approximately four weeks.
12. The LOC Customer Testing Technicians also directly interface with the CLECs to perform turn-up, testing, and repair of interconnection facilities and unbundled network elements. The LOC Customer Testing Technicians must pass a complex technical test to fill these positions. In addition, they attend a series of pass/fail schools that must be completed before they are deemed "qualified." These schools include basic electronics, electricity, print reading, and trouble analysis, transmission, and digital technology. Once this training is completed successfully the employee is provided advance training on digital technology, testing and trouble sectionalizing using remote test access processes. Any current employee who does not successfully complete the training will be returned to their former position, and new hires will be terminated. The training period for these employees is approximately 15 weeks at a cost of \$50,000 per employee.

### **LOC Provisioning of CLEC Requests**

#### **A. Provisioning Interconnection and Unbundled Elements**

13. The LOC's role in provisioning CLEC orders for interconnection and unbundled elements is as follows: the CLEC first places its order directly for interconnection facilities and

unbundled network elements through one of the electronic interfaces described in Ms. Ham's affidavit, or manually with the Local Service Center (LSC), as discussed in Ms. Lowrance's affidavit. In either case, SWBT's "back-office" systems produce a work order that is transmitted electronically to the LOC. Upon receipt of the work order, the LOC Customer Testing Technicians perform turn-up and testing on the interconnection facilities, message trunks, unbundled elements, or resold special service circuits requested by the CLEC. Results of these tests, which are performed according to the guidelines of the National Operations Forum (NOF), are provided to the CLEC manually via telephone call. Any CLEC that subscribes to Electronic Bonding will receive these results electronically. These established guidelines are used by SWBT for all CLECs, retail customers, and access customers.

14. When the circuit is accepted by the CLEC, the order is completed and billing begins. As previously stated, through December 1997, the LOC has successfully provisioned 65,419 Interconnection Facilities, 65,419 Message Trunks, and 5,998 Special Service Circuits in the five-state area. The Interconnection Facilities provide the paths for the Facility or Switched Based Providers to carry telephone exchange service between their switches and the SWBT central office switches and or tandem offices. The Message Trunks provide the interconnection for the transmission and routing of telephone exchange service and exchange access at any technically feasible point within the carrier's network. Special Service Circuits are those services that can be resold but require additional engineering. Some examples of these services include all digital services, PBX direct inward dialing trunks, ISDN lines, etc. Attachments 4, 5, and 6 provide a breakdown of the facilities successfully provisioned by the

LOC by state and class of service for Interconnection facilities, Specials - Resale and UNE, and Message Trunks.

15. SWBT has not tracked average installation intervals in the past. However, this data will be tracked and provided beginning in 1998 and will be one of the performance measurements that will be provided to the CLECs. The design and scope of this measurement is described in Randy Dysart's affidavit.
16. The LOC acts as the coordination point for turn-up of Interim Number Portability (INP) requests. As set out in detail in the affidavit of Michael Auinbauh, INP is provided to switch-based CLECs, in those instances in which the CLEC has acquired a former SWBT customer and seeks to transfer service. This transfer of facilities-based service from SWBT to the CLEC requires a tremendous degree of coordination and cooperation between SWBT and the CLEC, and between SWBT internal departments and organizations, in order for the transfer to proceed smoothly and without problems.
17. Upon receipt of the order from the LSC, the LOC INP manager places the INP request on the LOC INP Scheduler. This ensures that proper LOC personnel are available for the requested time of cut. Telephone calls are made to the participating SWBT organizations (various other departments and market regions) to coordinate the requested cut. Names and numbers of personnel are documented. Forty-eight (48) hours prior to the scheduled cut, the LOC manager will contact these appropriate work groups to confirm their availability.
18. At the scheduled time of turn-up, all involved personnel are contacted to perform the cut. If SWBT is not ready, the LOC will put the cut in jeopardy and reschedule with the CLEC. If the end user or CLEC is not ready, the CLEC will contact the LSC to reschedule the due

date. The LOC coordinates all INP requests that are over eight (8) telephone numbers after hours (8AM - 5PM, Monday through Friday).

19. Problems relating to INP provisioning have been associated primarily with the service order process. As discussed in the Affidavit of Nancy Lowrance, those problems have been resolved, primarily through making certain that all involved organizations properly follow the procedures in place for associating orders, and for coordinating both internally and with the CLECs. SWBT documents corrections to its methods and procedures for INP by circulating a "Flash" . A Flash is a "quick fix" to make sure all involved organizations are provided the method corrections as quickly as possible. This ensures that the corrected method is in place to eliminate any further problems. One of the updated processes now provides for the LOC to inform the translation organization (the "RCMAC" referenced in Mr. Auinbauh's affidavit) when it is appropriate for the software changes to be made. The LOC generates a test call once the translation work has been performed to ensure that the INP is working properly.
20. Since September of 1997 the LOC has maintained a record of the number of INP orders processed, the number of due dates missed which are attributable to SWBT, and the number of due dates missed which are attributable to the CLEC. From September through January 1998, the LOC has provisioned 12,952 orders relating to INP requests. During that period of time, two due dates were missed which were attributable to SWBT. Both occurred in January, 1998. These misses were due to service order processing problems.
21. However, during this same time frame, more than 4000 due dates were changed or missed as a result of activity on the part of the CLEC. In some cases the CLEC switches were not

ready for the conversion, or the end user requested that the conversions be moved to a later date.

22. As these statistics show, SWBT believes that its INP procedures as outlined above, and in the Affidavits of Ms. Lowrance and Mr. Auinbauh have, for the most part, eliminated trouble conditions in connection with conversion activities. The LOC will continue to work with CLECs to ensure that this service is provided in as smooth and trouble-free manner as possible.

#### **B. Maintenance and Repair Services**

23. The LOC handles all repair and maintenance requests of the CLECs and provides them with the status of maintenance reports on demand. Currently, CLECs may submit trouble reports on all resold POTS lines, interconnection facilities, and unbundled network elements to the LOC through either SWBT Toolbar (as described in the Affidavit of Ms. Ham) or manually via telephone. Electronic Bonding will also be available in the near future.
24. Southwestern Bell Tool bar is an "in house" OSS that is personal computer based. It allows the CLEC to view the status of pending trouble tickets, view circuit history information on telephone numbers, view closed trouble tickets, request a quick test on POTS services, and issue trouble tickets on circuits and POTS lines using a Graphical User Interface (GUI). Toolbar software is being enhanced to provide a list of all orders completed, orders missed, and the reason for the miss, on a daily basis.
25. The Electronic Bonding (EB), (as described in detail in Ms. Ham's affidavit), interface for CLEC trouble administration can be used to electronically open and track maintenance report information to SWBT's system. It has been determined that the ANSI TIM1.5, T1.227, and T1.228 standards best facilitate a common data format for this interface between the CLECs