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March 20, 1998

EX PARTE PRESENTATION

RECEIVED
MAR 20 1998
FEDERAL COMMUNICATIONS COMMISSION

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Re: *In the Matter of Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Oklahoma, CC Docket No. 97-121*

Dear Ms. Salas:

Earlier today, SBC Communications Inc. submitted the attached ex parte letter, which was erroneously dated March 19, 1998. In addition, the letter's attachment was not formally requested by Commission staff, but was referenced by SBC during a meeting and offered to staff.

Should you have any questions concerning the foregoing, do not hesitate to contact me. In accordance with the Commission's rules, an original and two copies are submitted herewith.

Very truly yours,

Todd F. Silbergeld

Attachment

cc: Mr. Jennings

No. of Copies rec'd 0+2
List A B C D E

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Re: *In the Matter of Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Oklahoma, CC Docket No. 97-121*

Dear Ms. Salas:

In accordance with the Commission's rules concerning ex parte communications, please be advised that the attached document was hand delivered today to Jake E. Jennings of the Common Carrier Bureau's Policy and Program Planning Division. We are providing the document to Mr. Jennings pursuant to his request. The document explains the change control process that has been established by Southwestern Bell Telephone Company (SWBT) to formally notify competitive local exchange carriers (CLECs) of changes to SWBT's Electronic Data Interchange (EDI) Gateway and Local Service Request (LSR) usage requirements. The change control process document only addresses the ordering/provisioning function for local services via the SWBT EDI Gateway.

Should you have any questions concerning the foregoing, do not hesitate to contact me. In accordance with the Commission's rules, an original and two copies are submitted herewith.

Very truly yours,

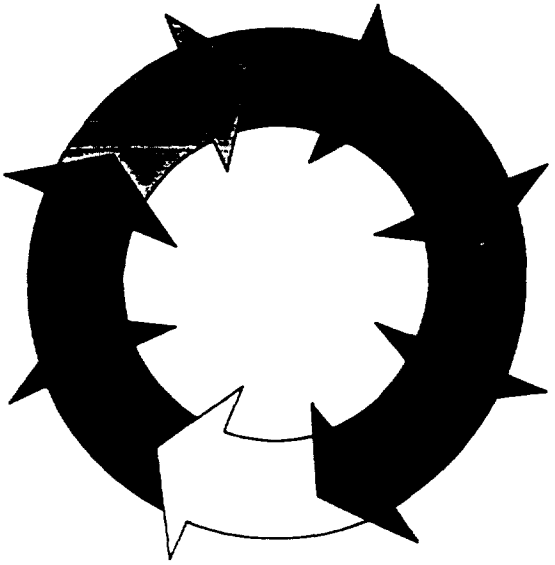
Todd F. Silbergeld

Attachment

cc: Mr. Jennings

SWBT
Competitive Local Exchange Carrier (CLEC)

EDI/LSR
Change Control Process



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I. SCOPE

The purpose of this document is to overview SWBT's Change Control process for notification of changes to SWBT's Electronic Data Interchange (EDI) Gateway and Local Service Request (LSR) usage requirements. This process identifies how SWBT will notify CLECs of changes and provides for the identification and resolution of CLEC issues. This process includes changes that impact CLEC programming and those changes that will not require the CLECs to alter their current programming. The document is limited to the ordering process for local services via the EDI interface.
In summary, SWBT's EDI/LSR Change Control Process provides a formal process between SWBT and CLECs to address the following:

Recognizes Process Differences For

- Changes required to be made by the CLEC to meet the SWBT conversion dates. For Example:
  - Adding/Deleting Required, Optional & Conditional Fields
  - Changing Optional Fields To Required/Conditional
  - Changing a field that is Not Required to Required/Optional
  - Adding/Deleting valid field entries.
- Changes which may be made at the CLECs option on or after SWBT's conversion date. For Example:
  - Adding Optional Fields
  - Changing Required/Conditional or Not Required Fields To Optional

CLEC Notification Of SWBT EDI/LSR Changes

- SWBT Implementation Of OBF/TCIF Initiated Changes
- SWBT Initiated Changes
- Two Notifications To CLECs (Initial & Final) For Changes required to be made by the CLEC to meet the SWBT conversion dates.
  - Initial Provides Intent Of SWBT Changes
  - Final Provides Specific LSOR & EDI Requirements and Implementation Release Date
- Final Notification Of Changes which may be made at the CLECs option on or after SWBT's conversion date.

Identification & Documentation Of CLEC Concerns

- Opportunity Following Every Notification
- 14 Day Interval For CLECs To Respond To SWBT
- Including Concerns Surrounding
  - Implementation Dates
  - SWBT LSR Usage Rules

Documentation Of SWBT Reply

- 14 Day Interval For SWBT To Respond To CLECs

EDI Interface Testing

Emergency Situations

Changes To The Document

II. OBF & TCIF/EDI ALIGNMENT

SWBT's Change Control process addresses changes resulting from OBF issues. However, it is not intended to circumvent SWBT's nor the CLEC's responsibilities to manage changes to the LSR through the OBF.

To better align the two processes (OBF & TCIF/EDI) and improve the coordination of the release content and packaging, a common release schedule for the OBF LSR releases (LSOG) and the EDI releases should be established. As a result, SWBT has submitted an issue before the OBF to establish such a process. Once an industry guideline is developed to establish national conversion dates for LSOG and EDI conversions, that process will be incorporated into this document.

Non-EDI affecting OBF issues or changes would also be included as part of a common release schedule. As of now, the actual timeline and packaging of the issues has not been resolved by these two organizations.

SWBTs EDI/LSR Change Control Process adheres to OBG LSOG Usage Definitions as follows:

- Required - is defined as the field must be populated. Data is edited.
- Optional - is defined as the field may or may not be populated. Some optional fields may be required in specific scenarios based on business or product requirements. If data is entered it will be edited.
- Prohibited - is defined as the field should not be populated. If the data is entered it will be ignored.
- Conditional - is defined as the field is dependent upon the relationship to another entry as specified in the usage statement and is dependent upon the presence, absence or combination of other data entries.
- Not Required - is defined as not required or not applicable in a scenario. If the data is entered, it must be valid and will be edited.

III. CHANGES REQUIRED TO BE MADE BY THE CLEC TO MEET THE SWBT CONVERSION DATE

This process addresses all EDI/LSR changes that would require programming changes for the CLECs.

These include, but are not limited to:
EDI Releases
Adding a required or conditional field.
Changing LSR field usage from optional or conditional to required.
Deleting a field to replace it with another field.

OVERVIEW

Issue Acceptance
As issues are accepted at the Ordering and Billing Forum (OBF) or internal change requests are submitted, the SWBT representatives to the OBF Telecommunications Ordering Requirements (TOR) committee will log them.

The requests will be reviewed by SWBT to determine the SWBT LSR Usage requirements.

SWBT OBF TOR representatives will continue to track the issues from their introduction and acceptance through Final Closure or Request resolution.

SWBT will monitor compliance to contract and OBF/EDI implementation commitments as well as track for adequate notification of systems changes to the CLECs.

These issues/requests are reviewed internally in order to define the preliminary LSR usage requirements for SWBT. SWBT is responsible for defining LSR Usage requirements according to SWBT business processes in accordance with applicable OBF LSR Guidelines and to facilitate mechanized flow-through within SWBT systems. SWBT will also establish a projected date for the implementation of the new Version/Release changes.

SWBT anticipates concurrence and use of OBF Guidelines, however SWBT reserves its right on how to incorporate applicable LSR Guidelines in its LSR/EDI interfaces.

This is in accordance with General Section 1.0, paragraph 1.4 of the practices in the OBF Local Service Ordering Guidelines (LSOG), which state that "Options described in this practice may not be applicable to individual providers tariffs; therefore, use of either the field or valid entries within the field is based on the providers tariffs/practices."

Initial Notification to CLECs
Initial Notification in the form of an Accessible Letter will be sent to the CLECs. It will communicate in advance SWBT's intent to make changes to SWBT's EDI Gateway and/or SWBT LSOR.

Initial Response by CLECs
The CLECs may provide a written response to SWBT's Initial Notification to ask for clarification or identify issues with SWBT's intended changes via their SWBT Account Manager. See Section on Process Intervals for CLEC interval to provide Response.

Initial SWBT Reply to CLEC Issues
SWBT will review all requests for clarification or issues raised and provide a written response to each responding CLEC. See Section on Process Intervals for SWBT interval to provide Reply.

Final Notification to CLECs
As soon as EDI/LSR Release requirements are finalized, they are again reviewed by SWBT for final evaluation and a firm date is set for the next release. SWBT's Final Notification will include detailed SWBT LSOR changes. The "EDI Technical Requirements" will be distributed through the existing TCIF/EDI process. SWBT's planned implementation date and requirement specifications are forwarded to the CLECs via an Accessible Letter. Final Notification to the CLECs will take place prior to SWBT's development and SWBT's EDI/LSR Release implementation which will be within any existing contractual commitment time frames.

Response by CLECs
The CLECs may again provide a written response to SWBT's Final Notification to ask for clarification and identify issues with SWBT's intended changes or the planned implementation date via their SWBT Account Manager. See Section on Process Intervals for CLEC interval to provide Response.

SWBT Reply to CLEC Issues
SWBT will review all requests for clarification or issues raised and provide a written response to each responding CLEC. See Section on Process Intervals for SWBT interval to provide Reply.

FLOW DETAIL FOR CHANGES REQUIRED TO BE MADE BY THE CLEC TO MEET SWBT CONVERSION DATE

1. As the EDI/LSR Issue requirements are being determined at OBF, they are reviewed to determine SWBT LSR Usage requirements.

2. A preliminary package of the required issue changes is compiled.

3. The Initial Notification of changes will be via an Accessible Letter. The letter will be distributed to the CLECs and will contain the SWBT plans for issue content and a proposed date of implementation.

4. The CLECs may send a written response through their SWBT Account Manager within 14 days of the letter date if issues exist or clarification is requested.

5. The response will specify elements of contention and detail the CLEC's alternative recommendations for implementation where issues exist. These should be handled through the SWBT Account Manager who will forward them to the appropriate organization within SWBT.

6. These responses will be reviewed and considered by SWBT and appropriate action will be taken.

7. A written response will be forwarded to the CLEC through the Account Manager within 14 days after the cutoff date for all CLEC responses (28 days after date of Initial Notification). Any changes that may occur as a result of the responses will be distributed to all CLECs via another Accessible Letter.

8. Once the LSOG Version or EDI Release Package is finalized it will be reviewed again by SWBT for any alterations that may be necessary.

9. The Final Notification will be sent to the CLECs via an Accessible Letter. The letter will contain the requirements for the new release and the planned implementation date.

10. Again, the CLECs may send a written response within 14 days through their Account Manager. The response will specify elements of contention and detail the CLEC's alternative recommendations for implementation where issues exist, including issues with the planned implementation date.

11. A written response will be forwarded to the CLEC through the Account Manager within 14 days after the cutoff date for all CLEC responses (28 days after date of Final Notification). Any changes that may occur as a result of the responses will be distributed to all CLECs via another Accessible Letter.

12. EDI Interface testing will take place prior to implementation

13. Testing is successfully completed by each CLEC prior to its implementation.

14. CLEC(s) that does not successfully complete testing within the planned time frame may formally request that all EDI interface users delay implementation to a new specified date. If all EDI parties, including SWBT, unanimously support the requested delay, implementation will be delayed. Otherwise, the CLEC(s) that has not completed testing will utilize alternative ordering method(s) until its EDI testing is successfully concluded.

15. The new release or updates are implemented. A CLEC that did not participate in the testing process may result in the inability to successfully order local services from SWBT via the EDI interface.

PROCESS INTERVALS FOR CHANGES REQUIRED TO BE MADE BY THE CLEC TO MEET SWBT CONVERSION DATE

EVENT 1	EVENT 2	TIMELINE
Notification to CLECs of SWBT EDI/LSR changes	Initial Notification via Accessible Letter	Sent when initial SWBT requirements are set
Initial Notification Letter received by the CLECs	CLEC Response of Non-compliance received by SWBT	14 days from date of Initial Notification
Responses received by SWBT	SWBT reply to CLEC issues	14 days after CLEC Response cutoff
Notification to CLECs of SWBT EDI/LSOG changes	Final Notification via Accessible letter	Sent prior to SWBT development beginning
Final Notification Letter received by the CLECs	CLEC Response of Non-compliance received by SWBT	14 days from date of Final Notification
Responses received by SWB	SWBT reply to CLEC issues. Changes issued via Accessible Letter	14 days after CLEC Response cutoff
External Interface Testing Begins	External Testing Ends	3 weeks
Final Requirements Release Date	Implementation of EDI/LSR changes	Within contractual Commitment or a mutually agreed to date

IV. CHANGES WHICH MAY BE MADE AT THE CLECs OPTION ON OR AFTER SWBT's CONVERSION DATE

This process addresses all EDI/LSR changes that would not require CLEC programming changes.

These include , but are not limited to:
LSR Paper only changes
Adding an optional field.
Changing LSR field usage from required or conditional to optional.
Deleting a field that was not required.

OVERVIEW

This process is the same as defined for managing Required CLEC Changes except for the following:

- Since these changes are not expected to require changes on the part of the CLECs, only one notification will be made by SWBT.
- The Final Notification will communicate all of the same details identified previously including detailed requirements and the planned implementation date. This notification is designed to avoid unforeseen impact on the CLEC.
- The same CLEC response and SWBT Reply process will also apply. For these types of optional changes. the CLECs should be able to implement changes according to their internal timetables.

FLOW DETAIL FOR CHANGES WHICH MAY BE MADE AT THE CLECs OPTION ON OR AFTER SWBT's CONVERSION DATE

1. As the EDI/LSR Issue requirements are being determined at OBF, they are reviewed to determine SWBT LSR Usage requirements.

2. A preliminary package of the required issue changes is compiled.

3. Notification will be sent to the CLECs via an Accessible Letter. The letter will contain the requirements for the new release and the planned implementation date.

4. The CLECs may send a written response within 14 days through their Account Manager. The response should specify elements of contention, detail why there is programming impact to the CLEC and if appropriate detail the CLEC's alternative recommendations for implementation, including issues with the planned implementation date.

5. These responses will be reviewed and considered by SWBT and appropriate action will be taken.

6. A written response will be forwarded to the CLEC through the Account Manager within 14 days after the cutoff date for all CLEC responses (28 days after date of Notification). Any changes that may occur as a result of the responses will be distributed to all CLECs via another Accessible Letter.

7. The new release or updates are implemented.

PROCESS INTERVALS FOR CHANGES WHICH MAY BE MADE AT THE CLECs OPTION ON OR AFTER SWBT's CONVERSION DATE

EVENT 1	EVENT 2	TIMELINE
Notification to CLECs of SWBT changes	Notice of changes via Accessible Letter	Sent when initial SWBT requirements are set and prior to SWBT development beginning
Notification Letter received by the CLECs	CLEC response received by SWBT	14 days from date of notification letter
Responses received by SWBT	SWBT reply to CLEC issues. (Changes would be via an Accessible Letter)	14 days after CLEC Response cutoff.

V. EDI Interface Testing

Testing of a new release will normally be scheduled to begin approximately 60 days after the final requirements have been received by the CLEC and at least 30 days prior to the implementation date. Testing of the EDI interface by all EDI participants is mandatory.

Failure to participate in the testing process may result in the inability to successfully order local services from SWBT via the EDI interface.

CLEC(s) that does not successfully complete testing within the planned time frame may formally request that all EDI interface users delay implementation to a new specified date. If all EDI parties, including SWBT, unanimously support the requested delay, implementation will be delayed. Otherwise, the CLEC(s) that has not completed testing will utilize alternative ordering method(s) until its EDI testing is successfully concluded.

Implementation of the release by all participants will then take place on the initially designated date or unanimously agreed delayed date.

All participants will provide a list of contacts and telephone numbers to be responsible for coordinating the test.

The test material will consist of any and all published EDI transaction enhancements affecting the SWBT Local Service Ordering Requirements (LSOR) designated as a part of that Version/Release, as defined in the SWBT Final Requirements package.

The testing may include mandated or processing enhancements not directly affected by an EDI release.

The test will be limited to the EDI Interface transactions and will not apply to any internal processing.

Process and timeline may not allow for exclusive testing.

VI. EMERGENCY SITUATIONS

Emergency releases or emergency conversion date alterations will be handled as special cases.

Emergency releases may include, but are not limited to, major software testing problems, production system failure or interface failure due to system enhancements.

The notification process interval will be handled on a case by case basis and will depend on the type and extent of the changes. Notification to the CLECs will be sent as soon as possible after the situation is recognized.

The emergency notification may not be in the form of an Accessible Letter if there is a need to expedite the process.

VII. CHANGES TO THE DOCUMENT

This document is not a contract, but is rather a statement of SWBTs current procedures and is subject to change as needed. Any changes that may be made by SWBT to this document will be distributed to all CLECs via an Accessible Letter.