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**ORIGINAL**

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January 21, 1999

**VIA HAND DELIVERY**

Ms. Magalie Roman Salas, Secretary  
Federal Communications Commission  
Office of the Secretary  
The Portals  
445 Twelfth Street, SW  
Washington, DC 20554

**RECEIVED**

JAN 21 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Ex Parte: CC Docket No. 98-121; CC Docket No. 97-231; CC Docket No. 97-208;  
CC Docket No. 97-121; CC Docket No. 97- 137

Dear Ms. Salas:

On January 20, 1999, Keith Seat, Rob Lopardo, Jason Wakefield and I from MCI WorldCom and Jerry Epstein from Jenner & Block discussed 271 evidentiary issues regarding OSS with Jake Jennings, Claudia Pabo, Claudia Fox, and Andrea Kearney of the FCC's Policy Division. Attached is the agenda which we provided to the FCC prior to the meeting.

In accordance with the Commission's rules, two copies of this notice are being filed.

Sincerely,

  
Karen Reidy

Attachment

cc: Jake Jennings  
Claudia Pabo  
Andrea Kearney  
Claudia Fox

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**PRELIMINARY AGENDA FOR FCC - MCI WORLDCOM MEETING ON  
OSS TESTING  
JANUARY 20, 1999**

- I. Adequate OSS is critical in opening local markets to competition
- II. Commercial experience with significant order volumes may be the best evidence of operational readiness, but significant commercial experience with each order type may not be available at the time a BOC's OSS is being evaluated.

A BOC should not be rewarded with weakened OSS requirements when it has erected or refused to remove barriers to entry that delay wide-scale commercial usage of OSS. A BOC's OSS must be operationally ready to support each mode of entry prior to section 271 entry, whether or not each mode is currently being pursued.

- III. If regulators are not willing to wait for wide-scale commercial usage of OSS after local markets are irreversibly opened to competition, third-party testing can, if properly conducted, provide important evidence that a BOC's OSS is operationally ready.

Proper third-party testing can provide the Commission with an independent, neutral evaluation of the BOC systems and processes.

Third-party testing will not ensure that a BOC's OSS is adequate to handle commercial volume levels for various order types unless the testing is properly planned and configured.

Third-party testing will not ensure that a BOC has written specifications and established business rules to allow any CLEC to compete unless the specifications and business rules are part of the test.

- IV. There are certain elements necessary for the testing to provide evidence of non-discriminatory access. Testing that utilizes interfaces already developed by a CLEC does not provide sufficient evidence.

The third party consultant should be independent, technically skilled and unbiased

The test scenarios should test the full range of OSS functionalities, each mode of entry (including UNE combinations), and business processes, as well as evaluate the change management process

The consultant must rely exclusively on specifications previously provided to CLECs by the BOC to develop the systems a CLEC would be required to develop.

The test should encompass both a stress/capacity test and a functionality test

Prior to testing a performance measurement system must be validated, and the test results must be measured against pre-established performance standards.

- V. Relevant experiences from current testing (New York, Texas)