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Before the  
Federal Communications Commission  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

|  |   |                     |
|--|---|---------------------|
| In the Matter of                         | ) |                     |
|  | ) |                     |
| Implementation of the Local              | ) | CC Docket No. 96-98 |
| Competition Provisions of the            | ) |                     |
| Telecommunications Act of 1996           | ) |                     |
|  | ) |                     |
| Petition of Southwestern Bell Telephone  | ) |                     |
| Company, Pacific Bell, and Nevada Bell   | ) |                     |
| for Expedited Declaratory Ruling on      | ) | NSD File No. 98-121 |
| Interstate IntraLATA Toll Dialing or, in | ) |                     |
| the Alternative, Various Other Relief    | ) |                     |

**PETITION OF PACIFIC BELL AND NEVADA BELL  
FOR ADDITIONAL WAIVERS**

Pacific Bell and Nevada Bell hereby petition the Commission for a waiver of the May 7, 1999 date for intraLATA dialing parity that might be applied to these companies and that is in the Commission's Order dated March 23, 1999. Specifically, Pacific Bell and Nevada Bell request a waiver of the May 7, 1999 implementation date until June 15, 1999, a date well within the time period that the Commission established as reasonable in its Order (i.e., May 7, 1999 through August 6, 1999).<sup>1</sup> As we explain further below, both companies need to perform system modifications to implement full intraLATA toll dialing parity and cannot do so in time to meet the May 7, 1999 date.

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<sup>1</sup> Implementation date as used herein means the date when the Pacific Bell and Nevada Bell systems will be able to accept the intraLATA PIC change orders and to begin processing them.

1. In its March 23, 1999 Order, the Commission established the following schedule for the State implementation:

May 7, 1999 for those LECs with already filed and approved State intraLATA toll dialing parity plans.

April 22, 1999 for plans yet to be filed with the States, which must approve the plans no later than June 22, 1999 and which must be effective 30 days after approval.

August 6, 1999 for those LECs without already filed and approved State intraLATA toll dialing parity plans and who are directed to file such plans with the Common Carrier Bureau on June 22, 1999.

2. Pacific Bell and Nevada Bell previously filed State Plans on intraLATA toll dialing parity in California and Nevada. The State orders on those plans assumed implementation of intraLATA toll dialing parity would not occur until Pacific Bell and Nevada Bell Section 272 affiliates were providing in-region interLATA services.<sup>2</sup> The State orders required that implementation of dialing parity would coincide with long distance entry. The orders implementing those plans were based on settlement agreements that resolved implementation issues and that likewise assumed implementation coincident with long distance market entry.

3. The Commission's Order has changed the implementation deadlines and the implementation assumptions for those State orders and for the two underlying settlement agreements. The State adopted implementation requirements cannot be accomplished by May 7, 1999, and the California implementation plan necessarily will have to be resubmitted and revised to reflect the changed circumstances.<sup>3</sup>

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<sup>2</sup> See, In the Matter of Alternative Regulatory Framework for LECs (IntraLATA Presubscription Phase), Decision No. 97-04-083, 1997 WL 377077 (Cal. P.U.C., April 23, 1997); In Re the Filing by Nevada Bell (Docket No. 97-2010), Modified Compliance Order, December, 1997.

<sup>3</sup> For example, the California plan assumed a longer notification than can be accomplished under the new schedule.

4. More importantly, for operational reasons unique to Pacific Bell and Nevada Bell, they cannot implement intraLATA toll dialing parity in California and Nevada by the May 7, 1999 implementation date.

5. As stated in the attached declaration of Violeta Diaz, in late Fall 1998 Pacific Bell began the process of implementing interstate-only intraLATA toll dialing parity in LATA 730 in California in the expectation that the Commission would require separate implementation of interstate-only intraLATA dialing parity by February 8, 1999. As Pacific Bell and Nevada Bell advised the Commission in their September 18, 1998 Petition for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief, their networks were "already prepared" for full 2 PIC intraLATA presubscription at the time the Petition was filed and that work would have to be "reversed or otherwise modified" in order "to implement interstate-only ILP." Pet., p. 3. Pacific Bell and Nevada Bell also pointed out that, in order to meet the February date, work on their networks would have to commence by October 15, 1998. Id.

6. Pacific and Nevada Bell did just what they advised the Commission would have to be done in order to be in position to implement interstate-only intraLATA dialing parity by February 8, 1999. On or about October 15, 1998, Pacific Bell and Nevada Bell began to modify their forty-one ordering, provisioning and service assurance systems to make these systems capable of identifying an "interstate only" 2 PIC call. See attached declaration of Nancy Forst. As a result, some of the work done in the Fall of 1998 to be prepared for interstate-only dialing parity now must be redone to enable their systems to handle both intrastate intraLATA and interstate intraLATA dialing parity on the same date.

7. Now that the Commission has ordered full statewide implementation of dialing parity and provided projected implementation dates, the systems modifications described above must be reversed to eliminate the "interstate-only" 2 PIC intraLATA capability, and system modifications must be made to reinstall full 2 PIC capability. As the attached sworn declarations demonstrate: Systems project management must ensure that Business Requirements and Systems Requirements for the specific intraLATA presubscription changes are defined. Next, the systems must be designed and the software changes (programming and coding) made. Finally, the modifications must be tested and installed into production operations. Based on our experience in making the changes in the Fall of 1998, the entire process can take as long as 120 days. Although the process is underway, it is still complex and time consuming and cannot be completed on a combined basis before June 15, 1999.<sup>4</sup>

8. Nevada Bell has begun the process of making the necessary systems changes based on discussions with the Nevada Attorney General, Office of Consumer Advocate and the Public Utility Commission of Nevada (NPUC) Staff. Pacific Bell commenced making the network and software changes the week of March 22, 1999 following receipt of the Commission's Order.

9. Thus, neither Pacific Bell nor Nevada Bell can operationally meet the May 7, 1999 deadline for implementing full intraLATA toll dialing parity and waivers of that deadline for them are not only necessary, but required.

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<sup>4</sup> Nevada Bell can complete the work somewhat earlier, i.e., on June 9, 1999, but it is more efficient for implementation in California and Nevada to occur on the same date (June 15, 1999) since they have common ordering, provisioning and billing systems.

10. The waiver requests of Pacific Bell and Nevada Bell in this regard are within the zone of reasonableness of the Commission's modified schedule. As noted, both companies have already commenced efforts to make the necessary changes in their systems. Pacific Bell and Nevada Bell can implement full intraLATA dialing parity in California and Nevada on June 15, 1999, which is only six weeks longer than for States with already approved State plans and a week before the June 22, 1999 date, for the States without such plans, to approve them.

11. Granting the waiver would be in the public interest for the further reason that it would allow additional time to train service representatives and to educate customers so as to avoid problems such as cramming and slamming. Conversely, implementing intraLATA dialing parity before there can be the required system modifications would not be in the public interest since it would impact service quality and seamless transitioning and would likely generate complaints to this Commission and to the California and Nevada PUCs.

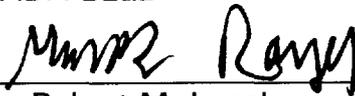
12. Pacific Bell and Nevada Bell request a response to their waiver requests by April 15, 1999. A response by that date is necessary for Pacific Bell and Nevada Bell to do the advance work necessary to provide reasonable customer notice of the date when they can make a selection, to avoid confusion and potential slamming abuses through customer education and to minimize complaints and calls to the business office.

**CONCLUSION**

WHEREFORE, Pacific Bell and Nevada Bell request the Commission to grant Pacific Bell and Nevada Bell an additional waiver of the intraLATA toll dialing parity rule such that they will not be required to implement full intraLATA toll dialing parity in California and Nevada before June 15, 1999. For all of the above reasons, such an additional waiver is unavoidable and in the public interest.

Respectfully submitted,

PACIFIC BELL  
NEVADA BELL

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April 2, 1999

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D. C. 20554**

In the Matter of

Declaration by Pacific Bell for the Provision of IntraLATA  
Presubscription in LATA 730 in California.

CC Docket No. 99-54

**DECLARATION OF VIOLETA DIAZ  
ON BEHALF OF PACIFIC BELL**

STATE OF CALIFORNIA

COUNTY OF CONTRA COSTA

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I, Violeta Diaz, being first duly sworn upon oath, do hereby depose and state as follows:

1. My name is Violeta Diaz. My business address is 2600 Camino Ramon, Room 3S700L, San Ramon, California 94583. I am a Technology Engineer in Network Planning and Engineering for Pacific Bell, a subsidiary of SBC Communications Inc. ("SBC").

2. I earned my Bachelor of Science in Chemistry from the College of the Holy Spirit in Manila,

Philippines.

3. In my position, I am responsible for the approval of products and services in the SBC network. I am currently responsible for the network planning, engineering and implementation of IntraLATA Presubscription in Pacific Bell.

4. Prior to assuming this job, I served with Pacific Bell in various capacities including Technology Engineer in the Switch Planning District, responsible for the approval for use of products and services, the review of technical documentation and writing and the provision of switch technical requirements for switch feature development. I was also responsible for the network implementation of converting all switches from permissive to mandatory 7-digit Carrier Access Code (CAC) dialing in all seven states in SBC. Prior to the merger, I also served as DMS-100 Technology Engineer in the Switching Technology Introduction and Support District, responsible for the approval for use of products and services, the review of technical documentation and writing and the provision of switch technical requirements for switch feature development. I also served as DMS-100 Translations Manager providing translation guidelines and technical support on DMS-100 products and services. In my early years in Pacific Bell, I served as Translations Supervisor in the Switching Control Center (SCC) and also served as Assistant Dial Service Manager in the Network Administration Center (NAC) in San Francisco. I have been employed by Pacific Bell in Network Organizations (Planning, Engineering and Operations) for 27 years.

5. In my capacity as a Technology Engineer, I have provided an affidavit on the implementation process in converting the SBC switches from permissive to mandatory 7-digit Carrier Access Code (CAC) dialing. It provided the time necessary to complete the various tasks of converting to 7-digit CAC dialing including the call through tests. It provided in detail the cumbersome process of converting the DMS100 switches to 7-digit CAC dialing.

## PURPOSE OF DECLARATION

6. The purpose of this declaration is to identify the work that will be required to implement IntraLATA Presubscription (ILP) in the LATA 730 switches in California that are currently conditioned for Interstate only ILP. This declaration will provide a brief background and outline the specific work to be accomplished in 152 switches in LATA 730 by switch type.

7. In September 1998, approximately 430 Pacific Bell switches in California were preconditioned for full PIC2 capability. At the time, LATA 730 contained 157<sup>1</sup> (of the total 430) switches that were preconditioned for full PIC2 capability. On or about November 1, 1998, in light of no Commission action on its Petition, as stated, Pacific Bell began to remove the intrastate intraLATA switch translations to permit *interstate only intraLATA* PIC2 capability by February 8, 1999. With the advent of requiring only a subset of the intraLATA toll calls namely the interstate intraLATA toll calls subject to presubscription, Operations had to “undo” the ILP translations on the intrastate intraLATA toll calls so that those calls would continue to be handled by Pacific Bell (unless dialed with 101XXXX), while the interstate intraLATA toll calls would be handled by the presubscribed carrier. It was the consensus of the field Operations group that translation work had to begin no later than November 1, 1998, to meet the February 8, 1999, FCC date. By February 8, 1999, despite best efforts, only 93% of the switches were converted. (See paragraph 14.) Three 5ESS switches were not completed due to a conflict indexing problem. This experience provided us with the knowledge that a full three months was and will be required to complete switch translations in LATA 730.

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<sup>1</sup> Currently LATA 730 has 152 switches due to replacement of 1AESS switches.

## DETAILED SWITCH INFORMATION

### SWITCH TRANSLATION WORK

8. The following are the details on the translation work required in each switch type to change end office translations from interstate only ILP to full ILP:

- **DMS100:** In ConnectVU-ATP, we must search LATA XLA field EATYPE for ILEC reserved calls which is datafilled as 'privilege' in the DMS100 switch. We must delete all the codes and add back the codes that continue to route to the Local Exchange Carrier (LEC). In table LATA XLA, we must remove all LATA 730 ILEC codes that were added when we modified the switches to implement the interstate only intraLATA Dialing Parity.
- **5ESS:** In 5300-3 form (9.3 RCV), we must change the CI CALL TYPE of all intraLATA intrastate toll codes from 'INTRA' to 'TOLL'. This step must be completed for every Rate Center LDIT. In 5300-7 form (9.9 RCV), we must search for intraLATA toll codes and change any conflict entries associated with RDIT type CI CALL to TOLL.
- **1AESS:** In 1305-2 form, we must add the ICLATA indicator on each Rate and Route pattern that is intrastate intraLATA toll. All intraLATA toll codes with the ICLATA bit set will route to the PIC2 carrier. In 1304 form (Rate and Route Chart), we must add the SICLATA bit for all intrastate intraLATA toll screening codes that route via a special route index for call types 7 and 10 so that these call types will route via the PIC2 carrier.

### TESTING

9. A routing test is required immediately following all of these translation changes.

- On the 5ESS, we must assign the PIC2 feature to the test line and make the required routing test calls to ensure that calls are routed correctly. We must complete the Automatic Message Accounting (AMA) test package and forward the test results to Automatic Message Accounting Control Center (AMACC) for AMA verification.

- On the 1AESS, we must assign the PTC feature to the office test line, verify both the telephone number and the office equipment using the switch verify messages. We must verify the rate and route pattern (RATPAT) to ensure the ICLATA bit has been added, and make a routing test call for each RATPAT that was changed to ensure that the calls are routed correctly. Then, we must complete the AMA test package.
- On the DMS100, we must add the LPIC option to the test line via SERVORD and make the required routing test calls to ensure that the calls are routed correctly. We must test each NPA added or changed, and then complete the AMA test package and forward the results to AMACC for verification.

#### **TIME REQUIRED TO COMPLETE SWITCH TRANSLATIONS**

10. In determining the amount of time it will take to complete the switch translations, the following assumptions were used:

- Number of NPAs in LATA 730 equalled 10 NPAs in 1998; currently there are 12 NPAs in LATA 730.
- Number of codes in an NPA equals 800
- Number of intraLATA codes in an NPA equals approximately 50% or 400 codes
- Number of rate centers in an office is from 1 to 5 rate centers

11. Currently, there are 152 switches in LATA 730: 19 1AESS, 58 5ESS and 77 DMS100.

12. The time required to complete ILP translations for each switch by switch type is the average amount of time that was required to complete the interstate only intraLATA Dialing Parity is as follows:

- 1AESS - 19 switches at 16 hours per switch (304 estimated total hours)

- DMS100 - 77 switches at 4 hours per switch (308 estimated total hours)
- 5ESS - 58 switches at 240 to 440 hours per switch for the medium to large type switches (19,720 estimated total hours). There were three small 5ESS switches with one rate center that took 16 hours per switch to complete.

Switch translation work in various switch types will be done concurrently. While we estimate that the 1AESS and DMS100 translation work will be ready by May 7, 1999, we cannot complete the translation work in the 5ESS switches by May 7, 1999. The translations work in the 58 5ESS switches will take approximately 90 days from March 15, 1999, to complete.

13. The following is an example of the magnitude of the work required in the 5ESS switch: In one switch that was surveyed in LATA 730 in California, there were 14,000 messages that were required to be changed when the switch had 10 NPAs. It takes approximately 30 seconds to process a message in the switch. There are currently 12 NPAs in LATA 730. With 12 NPAs in the LATA 730, it has taken four days to perform translations on one NPA and work is still not complete on the one NPA. It took 45 days to complete this one switch with multiple LDITs which at that time had 10 NPAs in LATA 730.

14. A problem was encountered in the 5ESS switch while performing the work for interstate only intraLATA Dialing Parity. Some of the 5ESS switches experienced capacity problems on conflict indexes. The conflict indexes are used for ambiguous codes. A Lucent tool was used in the 5ESS switch to recover 1,000 conflict indexes at a time. This is a manual process and must be performed during low traffic periods. For this reason, this function can only be scheduled during evening/night shifts. It takes two hours to run the tool to recover 1,000 conflict indexes at a time. The tool was run several times to complete the switch translations for interstate only intraLATA Dialing Parity.

## CONCLUSION

15. In summary, in light of the foregoing activities that need to be conducted to implement intraLATA presubscription in California, Pacific Bell cannot complete such activities in all switches in LATA 730 until June 15, 1999.

## GLOSSARY

|               |   |
|---------------|---|
| AMA           | Automatic Message Accounting                          |
| AMACC         | Automatic Message Accounting Control Center           |
| CAC           | Carrier Access Code                                   |
| ConnectVU-ATP | ConnectVU Automated Translation Provisioning          |
| ILEC          | Incumbent Local Exchange Carrier                      |
| ILP           | IntraLATA Presubscription or IntraLATA Dialing Parity |
| LATA          | Local Access and Transport Area                       |
| LEC           | Local Exchange Carrier                                |
| LDIT          | Local Digit Interpreter Table                         |
| LPIC          | Used in DMS100 for Local Primary IntraLATA Carrier    |
| NAC           | Network Administration Center                         |
| NPA           | Number Plan Area                                      |
| PIC2          | Used in 5ESS for Primary IntraLATA Carrier            |
| PTC           | Used in 1AESS for Primary Toll Carrier                |
| RATPAT        | Rate and Route Pattern                                |
| SCC           | Switching Control Center                              |
| SERVORD       | DMS100 Service Order message format                   |

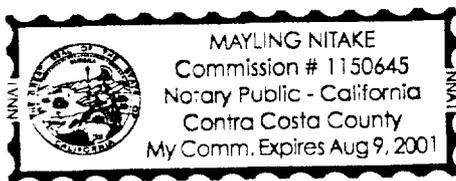
VERIFICATION

16. I, Violeta Diaz, of lawful age, and being first duly sworn, now state: I am a Technology Engineer in Network Planning and Engineering; and have read the above and foregoing Declaration on behalf of Pacific Bell. I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 1, 1999

Violeta Diaz  
Violeta Diaz

Subscribed and sworn to before me this 1 day of April, 1999.



Mayling Nitake  
Notary Public

My appointment expires:



2. I retired from Pacific Bell in 1996. From 1996 to 1999 my consultant projects have included broadband Unix batch billing risk assessment and intraLATA presubscription project management. In addition to this declaration, I have provided expert testimony regarding intraLATA presubscription systems processes to the Public Utilities Commission - Nevada (PUC-N).
3. Before retiring, the last position I held at Pacific Bell was Program Director, Broadband Systems Cross Domain Functions, Advanced Communications Network (A C N). That project combined the delivery of video and telephony services over hybrid fiber optic and coaxial cable. Other experience includes Operator Services and Marketing at Pacific Telephone, AT & T Long Lines, and AT & T National Account Management. I served in the U.S. Navy as a petty officer, QM3, in the Defense Mapping Agency Hydrographic Center during the Vietnam Era. After military service, I then returned to Pacific Telephone where I worked as a Business Office Supervisor and Area Vice President's Staff Manager. I next worked in Product Marketing at Pacific Bell, and, after Product Manager assignments on Residence Access, Universal Lifeline Telephone Service, and Bill Format products, I moved from Marketing to Information Technology. From 1986 to present I have held positions as Systems Analyst, Project Manager, and Program Director. My projects included Billing and Ordering software development, and systems reengineering on a joint venture between Andersen Consulting and Pacific Bell for Deutsche Bundespost Telekom, where I worked for six months in Darmstadt (Frankfurt), Germany.

#### **PURPOSE OF DECLARATION**

4. The purpose of this declaration is (1.) to explain why at least 120 calendar days are needed to accomplish the necessary Operational Support Systems (OSSs) modifications to implement intraLATA dialing parity in Pacific Bell and Nevada Bell territories, and (2.) to describe the necessary modifications to Pacific Bell and Nevada Bell OSSs.

#### **ILP OSS Changes Prior to March 23, 1999 FCC Order**

5. Nevada Bell and Pacific Bell require 120 calendar days to implement ILP because there are 41 systems and applications that require changes and testing. That 120 calendar day interval began February 10, 1999, and the work is expected to be complete on June 15, 1999. These changes are complex and are described below using diagrams and charts where appropriate. Between 1997 and 1999, four different sets of requirements were provided to systems organizations. Each set was

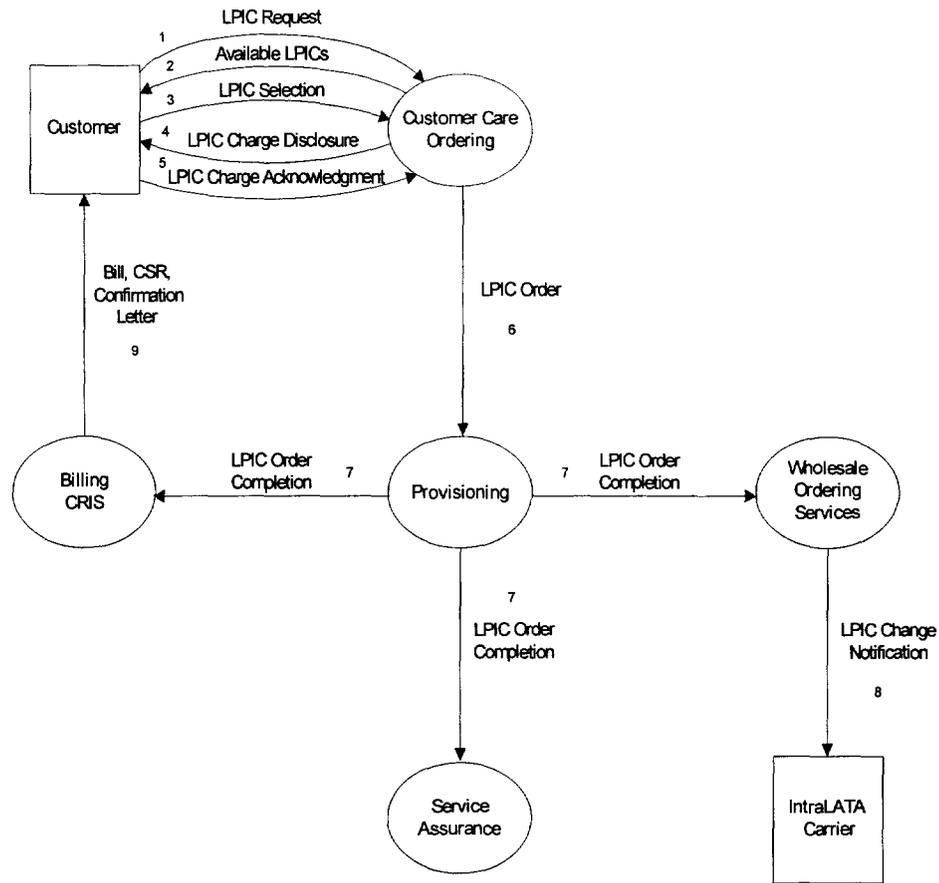
designed to meet changing regulatory obligations to provide ILP in California and Nevada.

6. The first set of intraLATA PIC business rules, provided in 1997, were designed to implement intrastate-and-interstate ILP, on the same date, throughout California and throughout Nevada. There was no requirement to implement first in one state and later in the other. Therefore, systems did not need to discriminate between geographic locations; systems did not need to be programmed to enforce whether to require- or to prohibit intraLATA PIC in certain areas. Before this work could be completed, it was preempted by a second set of requirements.
7. The second set of requirements to the systems organization, provided in 1998, specified implementation for only interstate ILP. Systems were modified to implement interstate ILP in the two Nevada LATAs, in combination with one California LATA, on the same date. The LATAs in California that did not have interstate-intraLATA territories were excluded. Again, before this work could be completed, it was preempted by another set of requirements.
8. During February 1999, in light of PUC-N hearings, a third set of requirements for systems organizations separated Nevada and California implementations, that is, implement Nevada Bell intrastate-and-interstate intraLATA dialing parity on one date, and implement Pacific Bell intrastate-and-interstate intraLATA dialing parity on a different date than that for Nevada.
9. During March 1999, a fourth change, resulting from the 3/23/99 FCC Order, requires systems to implement ILP in both Nevada and California on the same date.
10. One hundred twenty days are necessary to make certain, for each of the two states, that requirements are complete, that the correct modifications are designed and coded, and that the new modifications are tested. Regression testing is essential to confirm that preliminary work done in 1997 and 1998 performs correctly with the 1999 changes.

#### **ILP OSS Functional Areas Context Diagrams**

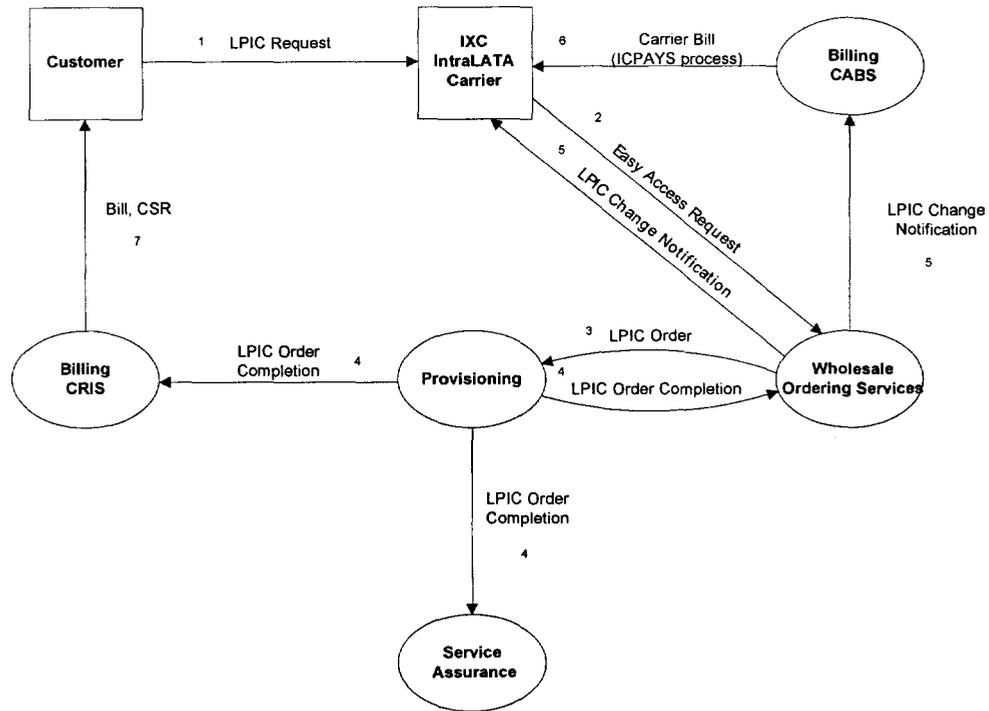
11. IntraLATA Presubscription (ILP) context diagrams, Figures 1 - 4, following, describe the Pacific Bell (PB) and Nevada Bell (NB) IntraLATA Presubscription (ILP) project. Ellipses depict internal organizations, squares are external organizations, and arrows represent information flows. "LPIC" is the Pacific Bell and Nevada Bell term used to describe intraLATA presubscribed carrier.

Figure 1: ILP Context Diagram Retail Business Office Order Channel



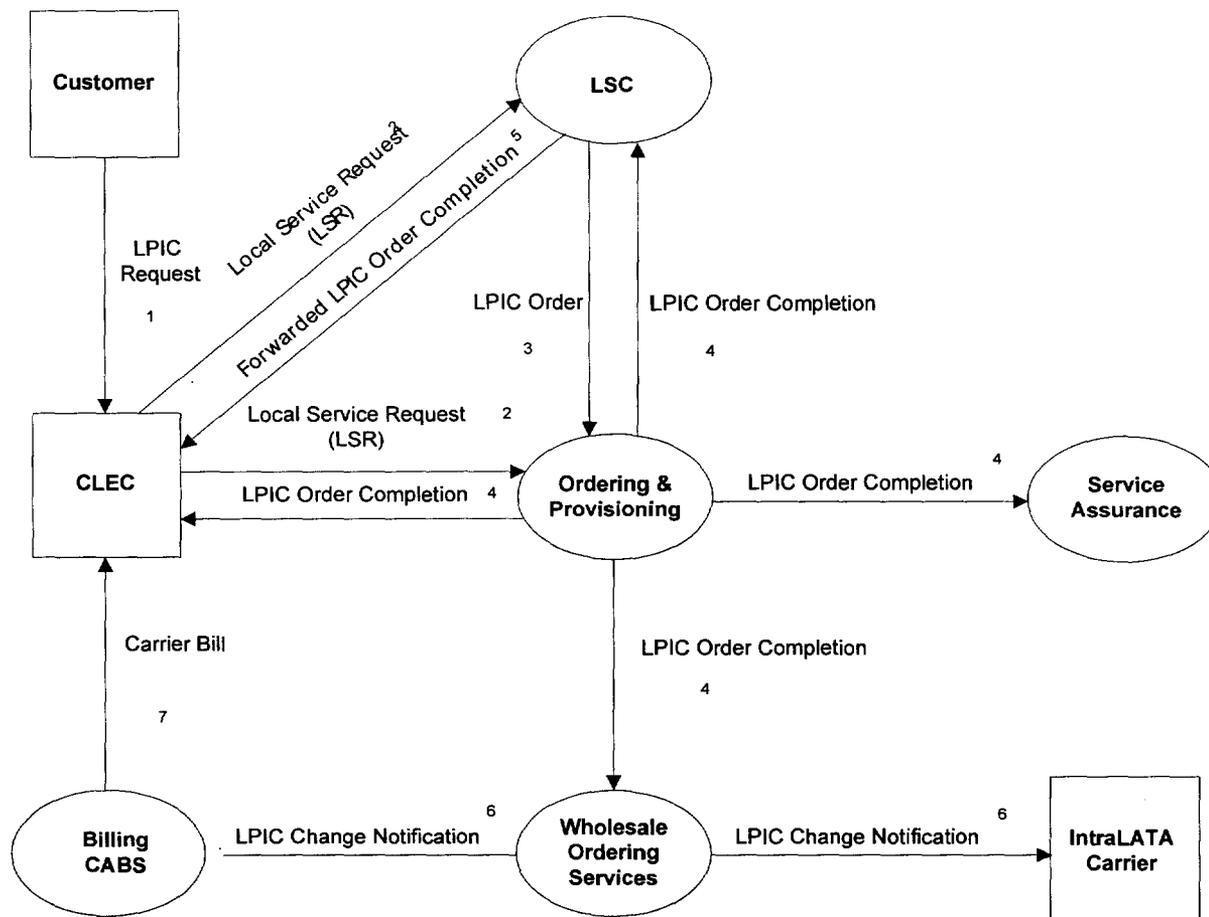
| Number | Figure 1 Description  |
|--------|---|
| 1      | A new or existing retail customer makes a request to add or to change IntraLATA carrier and "LPIC 1XXXX" is placed on a Service Order.            |
| 2      | If the customer has no stated preference for an "LPIC," then the Service Representative presents available IntraLATA carriers from a random list. |
| 3      | The customer selects an "LPIC 1XXXX," or states "no selection," which is "LPIC N."  |
| 4      | The "LPIC" change-charge is quoted, if applicable.  |
| 5      | An acknowledgment of the change-charge is given by the customer to the Service Representative, if appropriate.                                    |
| 6      | Upon completion of the negotiation, the order is submitted for provisioning of the "LPIC 1XXXX" selection.  |
| 7      | Notice of completion of the "LPIC" order is distributed to the appropriate parties.   |
| 8      | The IntraLATA carrier is notified of the change to "LPIC."  |
| 9      | The "LPIC" change is noted on the customer Bill, CSR, and Confirmation Letter.  |

**Figure 2: ILP Context Diagram  
Wholesale IXC Order Channel**



| Number | Figure 2 Description   |
|--------|--|
| 1      | An existing customer makes a request to change IntraLATA carrier.                            |
| 2      | The Interexchange Carrier (IXC) submits an Easy Access Request (EAR).                        |
| 3      | The order is submitted for provisioning of the "LPIC 1XXXX" selection.                       |
| 4      | Notice of completion of the "LPIC" order is distributed to update customer records.          |
| 5      | Notification of the "LPIC" change is sent to the originating IXC.                            |
| 6      | If the IXC is paying for the change, then the IXC is billed for the change. (ICPAYS process) |
| 7      | The customer is notified of the LPIC change.   |

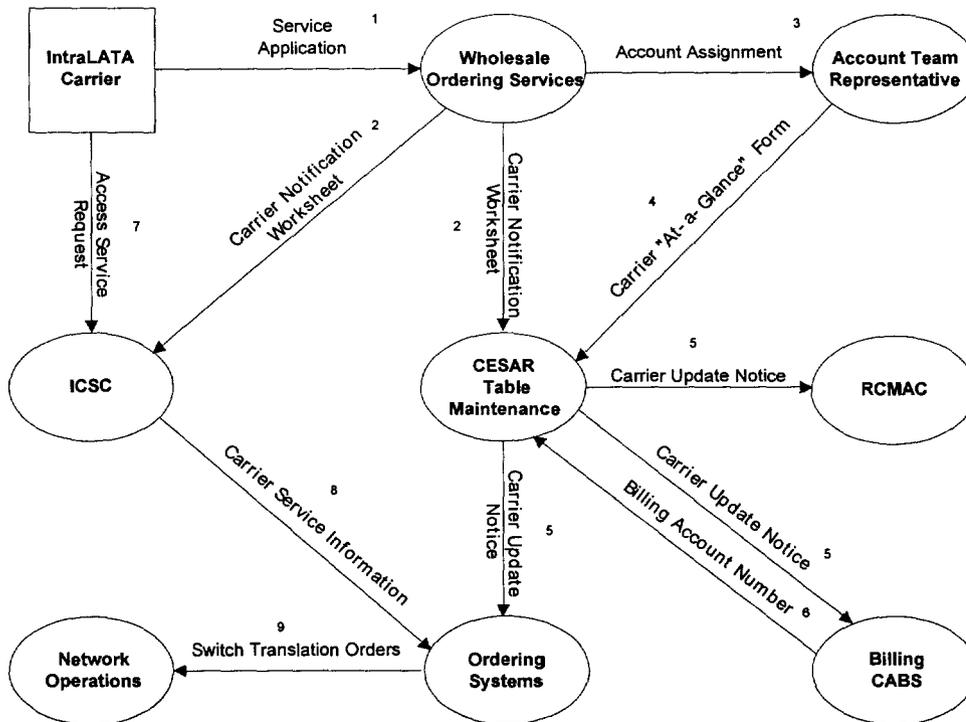
**Figure 3: ILP Context Diagram  
Resale CLEC Order Channel**



| Number | Figure 3 Description   |
|--------|--|
| 1      | A Resale Competitive Local Exchange Carrier (CLEC) customer makes a request to change IntraLATA carrier. |
| 2      | The CLEC submits a Local Service Request (LSR) to the LSC, or, via automatic flow-through.               |
| 3      | An order is submitted by the LSC for provisioning of the LPIC selection.                                 |
| 4      | Notice of completion of the LPIC order is distributed to the appropriate parties.                        |

|   |   |
|---|---|
| 5 | The completion notice is forwarded if the original request was made to the LSC.                 |
| 6 | Notification of the LPIC change is sent. A courtesy copy is also sent to the InterLATA carrier. |
| 7 | The CLEC is billed for the change.  |

**Figure 4: ILP Context Diagram  
Process to Establish a New IntraLATA Carrier**



| Number | Figure 4 Description  |
|--------|---|
| 1      | The carrier informs Pacific Bell or Nevada Bell of its intention to provide IntraLATA toll service.                     |
| 2      | Preliminary notification of a new carrier is sent to the ICSC and to CESAR Table Maintenance.                           |
| 3      | An Account Representative is assigned.  |
| 4      | The Account Representative forwards a carrier information on an "At-a-Glance Form" to the CESAR Table Maintenance Desk. |
| 5      | Appropriate work groups and systems are notified about the new carrier information.                                     |

|   |  |
|---|--|
| 6 | A Billing Account Number is assigned by Billing-CABS.  |
| 7 | The carrier submits an Access Service Request (ASR), which contains detailed information about the geography the carrier intends to service. |
| 8 | The service information is entered into SORD as Translation Orders.  |
| 9 | The work groups in Network Operations are notified of the locations and switches that are to be updated with the new carrier information.    |

### ILP OSS Software Changes

12. This section describes in more detail the systems that require modifications necessary to implement ILP in Pacific Bell and Nevada Bell territories. Systems supporting ILP are grouped according to the business operational function they support - Ordering, Provisioning, Billing, and Service Assurance. Forty-one OSSs require program code modifications, table changes, database (db) conversions, and testing in order to implement ILP.

#### **Ordering:**

1. Service Order Retrieval and Distribution (SORD) Application Owning Region (AOR) performs validations and edits, and provides mechanized flow of service order information for submission to Provisioning and Billing.
2. SORD Automated Order Generation (AOG) automatically generates service orders for submission into SORD from Nevada Bell systems that are external to SORD.
3. SORD Integrated Tables is a repository for data needed by all other SORD applications.
4. Centrex Management System (CMS) allows end-users to add, change, and delete Centrex line features.
5. CESAR EARS batch receives batch files from carriers several times a day.
6. CESAR EARS on-line receives requests which are input one-by-one into CESAR EARS via a graphical user interface (GUI); the GUI emulates CESAR EARS on the carrier's legacy ordering system.
7. CESAR EARS Electronic Bonding (EB) is an electronic link from the carrier's legacy order entry system that enables a flow of transactions to Nevada Bell without the need to accumulate orders into a batch file or to use a GUI emulating CESAR EARS.
8. Resale Mechanized Interface (RMI)-to-Cleopatra receives Local Service Requests (LSRs) transmissions in batch files from a CLEC via the RMI to Cleopatra. Cleopatra then edits, stores

data, translates LSR-format into Flexible Computer Interface Format (FCIF), and forwards requests to WSM.

9. Electronic Data Interchange (EDI) -to-LASR receives LSR transmissions via the EDI gateway to the LASR server, which translates LSR-format into FCIF, and forwards requests to WSM.
10. LSR Exchange System/Local Access Service Request (LEX/LASR) is a client-server system, with LEX client at the CLEC location, for on-line LSR entry, and LASR server at the ILEC location, for translating the LSR request into FCIF for processing by WSM.
11. Bellcore ServiceGate™ Wholesale Service Manager (WSM) receives requests from LASR and Cleopatra; WSM performs validations with SORD and APTOS, and then submits service requests to AOG.

#### **Provisioning:**

12. Activation Platform (AP) forwards a request to MARCH; MARCH sends it to the network for the PIC translation to be set in the switch; MARCH then sends an acknowledgement which AP forwards to CESAR EARS for completion status to the originating carrier; AP also sends the request to AOG for creation of a service order.
13. Customer Services Features Translator (CSFT) provisions features for ISDN service.
14. Facilities Assignment and Control System (FACS) Service Order Analysis and Control (SOAC) maintains a transient database for service orders that are in progress between Ordering and Provisioning; FACS-SOAC receives service orders from SORD and sends translation messages to MARCH.
15. MARCH (not an acronym, just a name) communicates with the network switches; MARCH converts service order language to switch translation language.
16. Network and Services Database (NSDB) is a provisioning data-layer building block, which provides a shared corporate database for OSSs.
17. Pacific Bell ISDN Test System (PBITS) supports Nevada Bell ISDN; it performs mechanized ISDN testing, digital loop testing, line card verifications, and retrieves translations from the switches.
18. Pacific Bell Operations Dispatch (PBOD) supports Nevada Bell; it is a tool for tracking, scheduling, testing, and analysis of service orders.
19. Single System Image (SSI) provides a MS Windows interface to legacy ordering systems, including SORD.

**Billing-Carrier Access Billing System (CABS) Customer Record Information System (CRIS):**

20. CABS-Access Billing (AB) provides bill-generation functions.
21. CABS-Access Management (AM) provides order-processing functions.
22. CABS-Database (db) is the repository of all data used by the other applications in CABS.
23. CABS-Service Order Front-End (SOFE) serves both CABS and CRIS by converting service order information into billing record formats.
24. CABS-Usage Management (UM) provides usage tracking, rating, and recording.
25. CRIS-Aggregate Invoice Input, Distribute, Reprints (ADR) controls processes that create the Customer Service Record (CSR), which is an account-level listing of products and services.
26. CRIS-Accounts Input and Masterfile (AIM) formerly known as Revenue Management (RM) maintains final account write-off processes.
27. CRIS-Bill Day Interface (BDI) maps charges to the bill, to the CSR, and to Corporate Accounting journals.
28. CRIS-Billing and Order Support System (BOSS) provides account information in support of customer inquiries.
29. CRIS-Customer/Customer Account (C/CA) maintains customer account attributes; C/CA database is updated with service order information provided by SOFE.
30. CRIS-Exchange Masterfile (EM) contains all service information for every account.
31. CRIS-Format, Stack, and Print (FSP) directs "Other Charges and Credits OC&C" phrases and charges to the "Additions and Changes" section of the bill.
32. CRIS-Message Processing (MP) is the usage masterfile that associates calls to accounts by bill-round dates.
33. CRIS-Ratefile is a repository of nonrecurring charge values to associate with USOCs.
34. CRIS-Service Order Front-End (SOFE) serves both CABS and CRIS by converting service order information into billing record formats.
35. CRIS-Taxes and Surcharges (TS) are tables that control application of federal, state, and local taxes for both Nevada Bell and Pacific Bell, and California surcharges for Pacific Bell.
36. CRIS-Usage Processing (UP) has three modules. Usage Assembly (UA) converts usage toll records into proper billing formats; Usage Rating (UR) provides rating to converted toll records; Usage Supervision (US) stores information for routing and processing usage.