

biology major, and then later studied Information Systems Management (ISM) at the University of San Francisco.

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

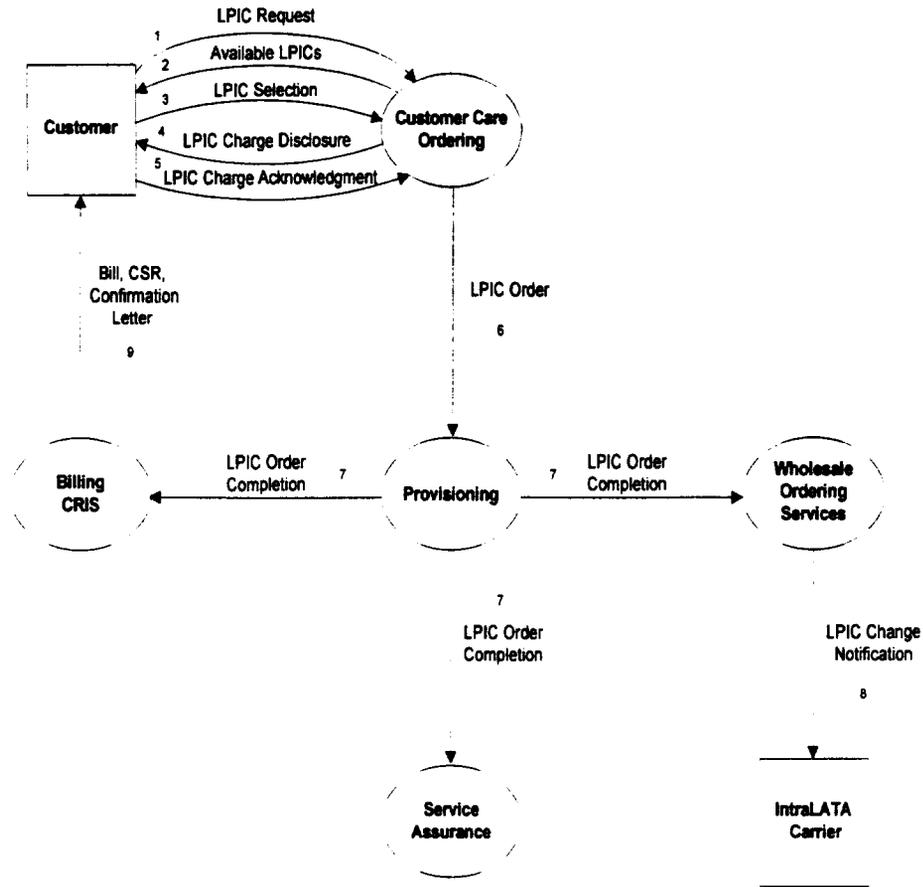
5. Nevada Bell and Pacific Bell require 120 calendar days to implement ILP because there are 41 systems and applications that require changes and testing. That 120 calendar day interval began February 10, 1999, and the work is expected to be complete on June 15, 1999. These changes are complex and are 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

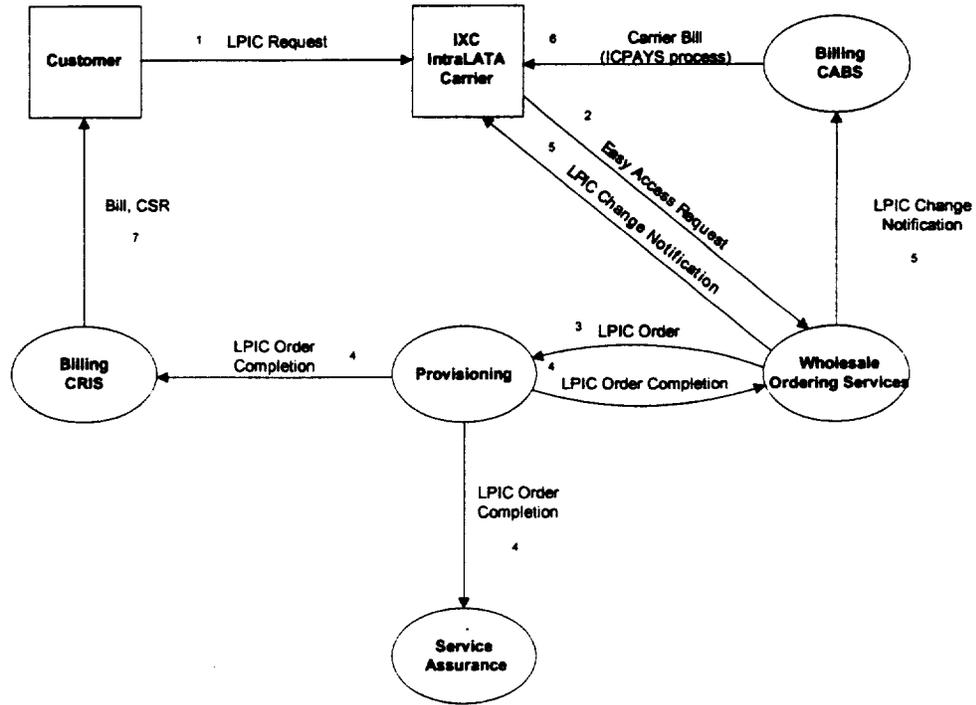
11. IntraLATA Presubscription (ILP) context diagrams, Figures 1 - 4, following, describe the Pacific Bell (PB) and Nevada Bell (NB) IntraLATA Presubscription (ILP) project. Ellipses depict internal organizations, squares are external organizations, and arrows represent information flows. "LPIC" is the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

Figure 1: ILP Context Diagram Retail Business Office Order Channel



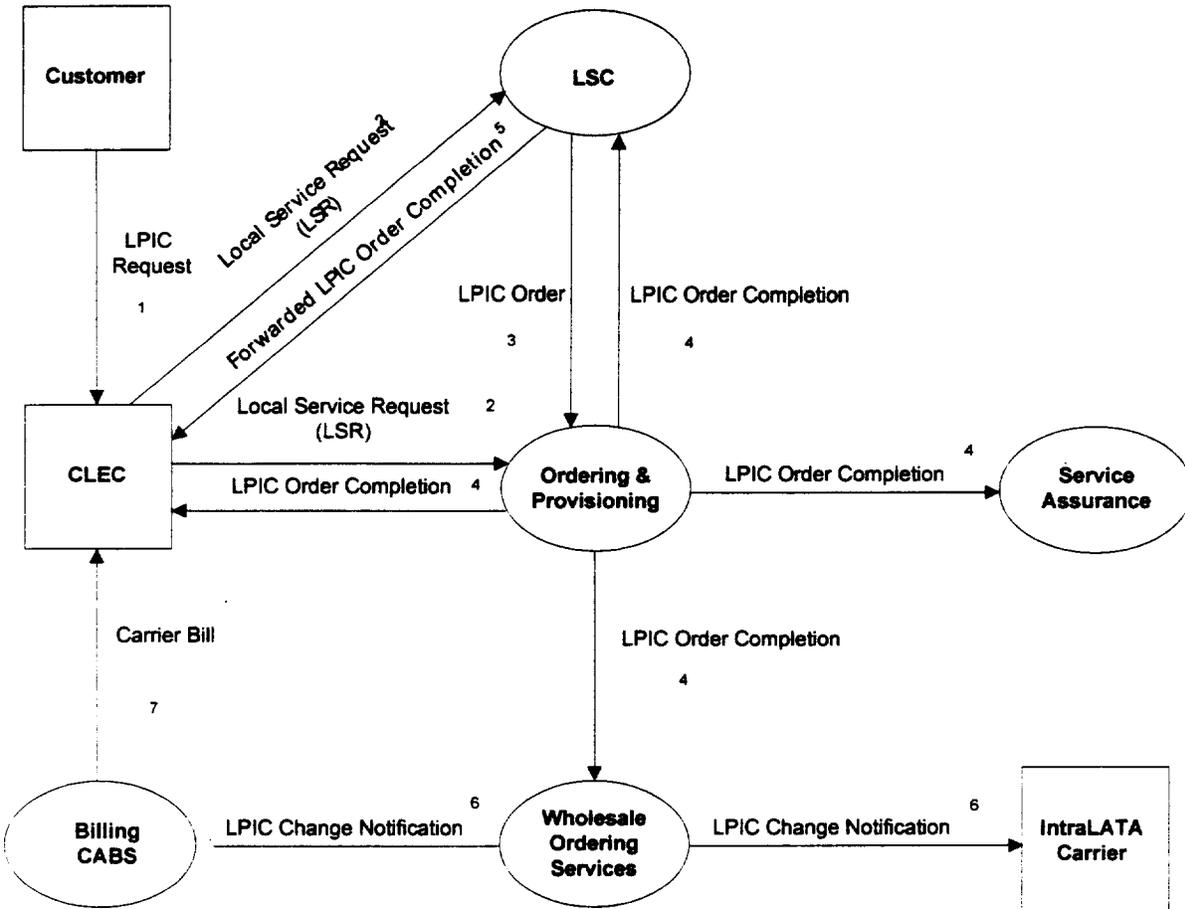
Number	Figure 1 Description
1	A new or existing retail customer makes a request to add or to change IntraLATA carrier and "LPIC 1XXXX" is placed on a Service Order.
2	If the customer has no stated preference for an "LPIC," then the Service Representative presents available IntraLATA carriers from a random 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.

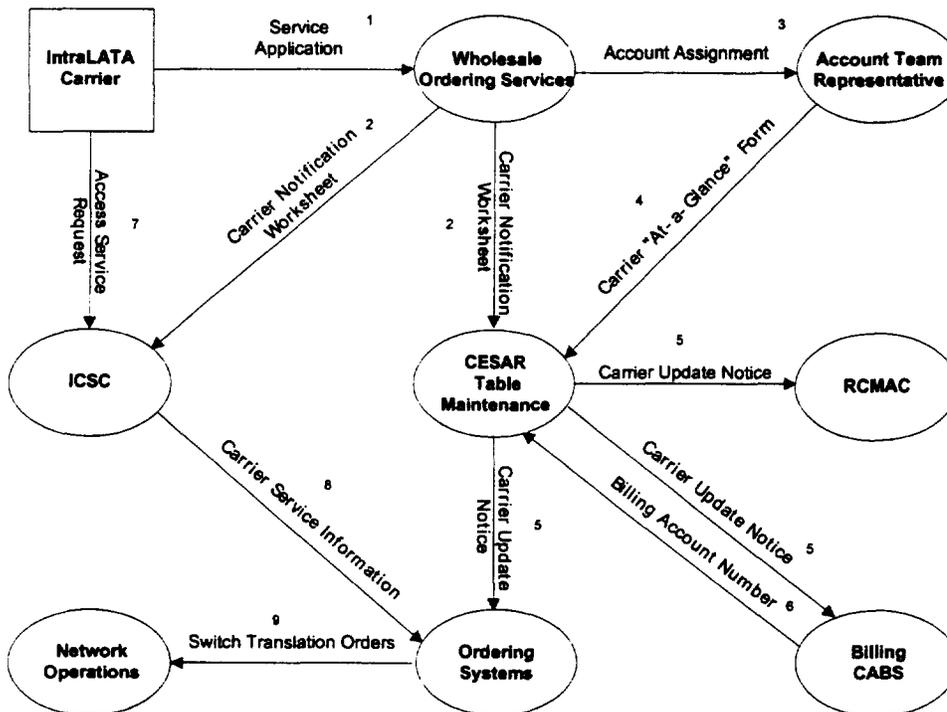
**Figure 3: ILP Context Diagram
Resale CLEC Order Channel**



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.

Service Assurance:

37. Automated Pricing, Terminals Options and Services (APTOS) is a system with tables to identify product and switch availability by geography. It is also a repository for Carrier Identification Codes (CICs).
38. CESAR Table Maintenance is a secondary repository for Carrier Identification Codes (CICs).
39. Exchange Plus is a mechanized on-line job aid, which gets its information from APTOS, and provides carrier availability by geography for service order negotiation.
40. Enterprise Data Warehouse-Exchange Masterfile (EDW-EM) is a repository of product and customer account information from the CRIS Exchange Masterfile (EM), that is used to create reports, and to support company decision support systems.
41. Enterprise Data Warehouse-Posted Service Order Database (EDW-PSOD) is a repository of product and customer account information from posted service orders out of SORD, used to create reports, and as a resource for company decision support systems.

Conclusion

13. In summary, these are the steps Pacific Bell and Nevada Bell must take to be able to receive, process, and implement orders for intraLATA PIC changes from interexchange carriers (IXCs), Competitive Local Exchange Carriers (CLECs), and end-user customers to the Pacific Bell and Nevada Bell business offices, with the minimum number of days necessary to implement.

Task #	Systems Tasks ILP for Pacific Bell and for Nevada Bell	Business Days Required
01-1	ILP PB and NB Requirements Phase	22d
02-1.1	Request Entry	4d
03-1.1.1	Systems Letter acknowledging Client Request	1d
04-1.1.2	Change Request (CR33) & PMT entry	1d
05-1.1.3	Requests to system tests for Level 3	1d
06-1.1.4	Requests to ETEPVV for Level 5 testing	1d
07-1.2	Requirements	20d
08-1.2.1	Business Requirements	8d
09-1.2.1.1	Cost High-Level Estimate (HLE)	5d
10-1.2.1.2	HLE letter to Client	1d
11-1.2.1.3	Draft Business Requirements	3d
12-1.2.1.4	Walk-through draft Business Requirements	1d
13-1.2.1.5	Revise draft Business Requirements	3d
14-1.2.1.6	Walk-through draft Business Requirements	1d
15-1.2.1.7	Final Business Requirements	1d
16-1.2.2	Systems Requirements	12d
17-1.2.2.1	Draft Systems Requirements	4d
18-1.2.2.2	Walk-through draft Systems Requirements	1d
19-1.2.2.3	Revise draft Systems Requirements	4d
20-1.2.2.4	Walk-through draft Systems Requirements	1d
21-1.2.2.5	Final Systems Requirements	1d
22-1.2.2.6	Revise ILP NB time-line if necessary	1d
23-1.3	Requirements Phase complete	0d
24-2	ILP PB and NB Design & Construction Phase	45d
25-2.1	Systems Design document	5d
26-2.2	Individual systems detailed designs	10d
27-2.3	Individual systems Level 3 test plans	10d
28-2.4	Unit tests by each application Level 1	10d
29-2.5	Chain tests "1-up, 1-down," Level 2	10d
30-2.6	Design & Construction Phase complete	0d
31-3	ILP PB and NB Testing Phase	18d
32-3.1	Testing Billing-CABS CSV Level 3	18d
33-3.2	Testing Billing-CRIS ST Level 3	18d
34-3.3	Testing SORD-IT Level 3	18d
35-3.4	Testing EARS-SIAT Level 3	18d
36-3.5	Testing WSM-SIAT Level 3	18d
37-3.6	Testing Provisioning Level 3	18d
38-3.7	Testing Service Assurance Level 3	18d
39-3.8	Testing Phase complete	0d
40-4	ILP PB and NB Implementation Phase	2d
41-4.1	Pre-release production support and operations activities	2d
42-4.2	Pre-release problem management readiness	2d
43-4.3	Implementation Phase complete	0d
	Total Bus Days	87d

14. Shortening the implementation time to less than 120 calendar days—which accounts for 87 business days—would decrease thorough development and rigorous testing, and substantially increase the risk of errors occurring. In production operations, the greatest error would be to provision an account to a carrier

other than the customer's carrier of choice. Also, incorrectly billed charges could cause great customer dissatisfaction, along with many inquiry calls from customers to business offices and to regulatory commissions. This concludes my declaration.

VERIFICATION

I, Nancy R. Forst, of lawful age, and being first duly sworn, now state: I am a Consultant Systems Project Manager, and have read the above and foregoing Declaration on behalf of Pacific Bell and Nevada Bell. I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 1, 1999



Nancy R. Forst

Nancy R. Forst

Subscribed and sworn to before me this 1 day of April, ~~1998~~¹⁹⁹⁹

M. G. Nitake
Notary Public

My appointment expires:

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