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

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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.

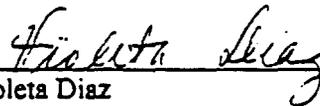
## GLOSSARY

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

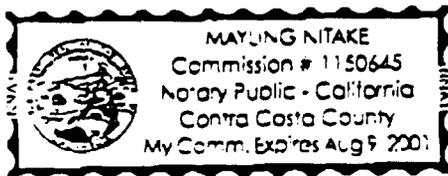
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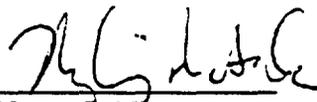
16. I, Violeta Diaz, of lawful age, and being first duly sworn, now state: I am a Technology Engineer in Network Planning and Engineering; and have read the above and foregoing Declaration on behalf of Pacific Bell. I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 1, 1999

  
\_\_\_\_\_  
Violeta Diaz

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



  
\_\_\_\_\_  
Notary Public

My appointment expires: