Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:	)	
	)	
Implementation of the Local Competition Provisions in the Telecommunications Act) of 1996	)	**CC Docket No. 96-98**
	)	
	)	
Interconnection between Local Exchange Carriers and Commercial Mobile Radio Service Providers	)	**CC Docket No. 95-185**

DECLARATION OF JOHN SIVORI
On Behalf of MCI WorldCom, Inc.

Based on my personal knowledge and on information learned in the course of my business duties, I, John Sivori, declare as follows:

1. My name is John Sivori. I am Senior Manager in MCI WORLDCOM, Inc.=s (AMCI WorldCom≅) Information Technology Organization. My duties include the planning and implementation of electronic interfaces for pre-ordering and ordering operations in support of MCI WorldCom's entry into local telecommunications market in the region served by Bell Atlantic. From 1986 through 1996, I was a member of the Telecommunications Industry Forum (ATCIF≅) Executive Board, and served as chairman of the TCIF Electronic Data Interchange (AEDI≅) Committee and the TCIF Electronic Commerce Committee.

2. Operations Support Systems (AOSS≅) consist of all the manual, computerized, and automated systems, together with associated business processes, needed to pre-order, order, provision, maintain and repair, and bill retail or wholesale telecommunications services or unbundled network elements. These systems, and the up-to-date data maintained in

them, are needed by ILECs and CLECs alike to serve customers in a timely, efficient, and accurate fashion.

3. For years the ILECs have utilized highly complex automated OSS systems to successfully manage their own internal processes and customer interactions, minimizing the need to undertake manual activities, and thereby substantially reducing both labor costs and the time required to perform a function. These well-tested systems ensure, for example, that ILEC customer service representatives have immediate real-time access to all information necessary to respond fully and correctly to customer queries about such things as the variety and prices of services available, or the status of repair calls. They also ensure, among other things, that ILEC retail customer orders are correctly processed and that bills are timely, complete, and accurate.

4. CLECs need access to the ILECs= OSS, whether they are reselling ILEC products, leasing unbundled elements from the ILECs= network, or simply interconnecting to the ILECs= network. But while existing ILEC systems are complete and adequate to serve ILEC retail customers, the ILECs have been slow to develop the interfaces and downstream processes necessary for CLECs to access the ILEC systems to obtain unbundled network elements or resold services in a timely, reliable, and accurate fashion in volumes adequate to satisfy demand. In addition, the ILECs have often refused to implement the industry standards developed under the auspices of the Alliance for Telecommunications Industry Solutions (AATIS≅), choosing instead to deploy proprietary systems and, thereby, imposing millions of dollars in up-front costs in each region on national CLECs who are forced to develop unique interfaces for each ILEC-specific system rather than a single standardized interface.

5. For CLECs requiring ILEC unbundled network elements or resold retail services to provide local services, there is no substitute for the ILECs= information on their own

unbundled network elements and retail services. Access to that information can only occur through the ILECs= own OSS. ILECs must have appropriate OSS interfaces, back-end systems, and business processes in place and fully operational. They also must provide accurate and reliable documentation for their OSS so that CLECs can actually build and use the interfaces. In addition, ILECs must conduct comprehensive carrier-to-carrier testing of the interfaces before they are put into production and adhere to reasonable change control procedures that maintain the reliability of the OSS interfaces while enhancing their capabilities. End-to-end production OSS interoperability testing must use test transactions comprising use case scenarios that represent the full range of business functionalities required by CLECs to conduct business competitively. Finally, ILECs must provide adequate training to its employees and sufficient support for CLECs attempting to implement and use the interfaces. Overall, the ILECs= OSS must be operationally ready to support commercial volumes of traffic.

6. To offer nondiscriminatory access to OSS, ILECs must provide CLECs *parity* relative to their own access, for pre-ordering, ordering, provisioning, maintenance and repair, and billing across five dimensions: scope of information available; accuracy of information supplied; timeliness of communication; reliability of access; and uniform, standards-based interfaces.

7. If CLECs fail to receive parity on just one of these dimensions, their ability to provide telecommunications services in competition with the ILEC will be seriously impaired. If their customer service representatives do not have access to the full scope of information under ILEC control that is needed to provide one or more of the key functions needed to serve customers X pre-ordering, ordering, provisioning, repairs and maintenance, or billing X their ability to provide service comparable to that of the ILEC will be severely compromised. The

same is true if the CLEC customer service representatives do not have access to equally accurate information or timely status notices or usage information needed for billing. Also, if the access is less reliable, the CLECs will be placed at a severe marketing disadvantage. Finally, if CLECs are forced to create OSS interfaces to ILEC systems that are not based on the industry standards and are not uniform from one region to another, they will face artificially inflated up-front development costs and be denied economies of scale.

8. These measures of parity have little relevance in the abstract. Performance measures must be developed to provide a concrete process for determining whether an ILEC is meeting its statutory responsibilities. At a minimum, performance standards must address quantitative measurements of parity (such as time per transaction, transaction error rates, disruption of service rates) and qualitative measurements of parity (such as customer support and satisfaction, ease of use, cause and mitigation of errors, cause and mitigation of disruptions). These performance standards must be applied to actual market situations, at commercial levels of demand on the systems, not just to third party tests. There also must be an automatic process in place for an ILEC to rectify the situation if it is not meeting a performance standard in an actual market situation.

9. Outlined below are the specific requirements for each of the discrete business functions.

Pre-Ordering

10. The pre-ordering process involves gathering the information necessary to complete a customer=s order and reserving certain aspects of that service prior to placing the order. Pre-ordering consists of a number of key sub-functions, each of which provides information needed by the provider (whether ILEC or CLEC) to proceed with the ordering

function. These sub-functions are: (1) address validation; (2) feature and service availability; (3) Primary Interexchange Carrier (APIC≅) availability; (4) directory listings information; (5) telephone number availability, reservation, and cancellation; (6) appointment availability, reservation, and cancellation; (7) customer service information, including the customer service record (ACSR≅), and PIC information; (8) loop qualification; and (9) unbundled network elements providers inquiry. Where the customer=s service configuration demands it, CLECs also will need (10) direct inward dial (ADID≅) number availability, reservation, and cancellation; and (11) DID trunk inquiry.

11. The ILECs themselves use their OSS to perform each of these information gathering and service reservation pre-ordering sub-functions in order to provide services to their customers, and CLECs cannot provide local service to their customers unless they have the same access to the ILEC OSS.

12. Because the pre-ordering process occurs while the customer is on the line with a CLEC customer service representative, all of the queries must be processed in real-time or very close to real-time. Any failure or delay in communications between the ILEC and CLEC at this critical juncture has an immediate negative impact on the CLEC=s ability to provide quality service in a timely and efficient manner. Moreover, the pre-ordering phase is a CLEC=s first interaction with a customer, so it is crucial that the CLEC demonstrate its ability to work quickly and efficiently. Any delays or problems during the pre-ordering process adversely affect the customer=s perception of the CLEC, which can be devastating to the CLEC=s ability to compete.

13. While the requirement of real-time access holds for every sub-function, there are two acceptable modes of handling the transactions. For sub-functions involving dynamic

information, on-line access is critical. CLECs= systems must be connected directly with the appropriate ILEC systems. For other sub-functions that involve relatively stable information, immediate on-line access is not usually necessary, and an ILEC should simply transfer the data in bulk to the CLEC to be loaded into the CLEC=s system. Even where a CLEC receives the data in bulk, however, it must also have the capacity to access the information directly from the ILEC=s systems. This is so because there will be instances in which the information provided in the bulk transfer is dated, incomplete, or inaccurate. When this occurs, ILEC systems will reject the CLEC=s orders, and the CLEC must have the ability to remedy the errors and resubmit the orders without waiting for the corrections or updates to be made to the main database. Thus, nondiscriminatory access requires that the CLEC have on-line, direct access to all sub-functions, with additional access to downloaded data for a subset of sub-functions.

14. Recognizing these basic pre-ordering needs, the ATIS industry fora have established EDI as an industry standard interface for pre-ordering. Moreover, ATIS has published TCIF 98-006 as its recommended specification for secured transport of local pre-order EDI transactions, which uses Transport Control Protocol/Internet Protocol (ATCP/IP≅) with Secure Socket Layer 3 (ASSL3≅) to provide a secure near-real-time method for exchange of local pre-order EDI transactions.

15. To support the commercial volumes generated during a product launch, CLEC must have access to a working Anear-real-time,≅ application-to-application, EDI interface for pre-ordering. MCI WorldCom=s experience in its mass market launch in New York, for example, shows that the Graphical User Interface (AGUI≅) for pre-ordering is simply too cumbersome and too slow to support commercial volumes of transactions. What=s more,

because the GUI is not an application-to-application interface, all of the information acquired during the pre-ordering process via the GUI must be re-entered during the ordering process, further delaying the process and inviting errors that have resulted in an unacceptably high number of rejected orders.

Ordering

16. When automated, ordering is an extremely low-cost function; when performed manually, it is extremely expensive and subject to delays and errors. Without nondiscriminatory access to OSS systems that provide efficient and seamless flow-through of UNE and resale orders akin to the flow-through capability of the ILEC=s retail systems, CLECs will need more frequent manual intervention than the ILEC, and their ability to provide services competitively using UNEs or resale will be severely impaired. ILEC automated systems, both the interface and its back-end systems, must be technically capable of processing the full array of order types, at commercial volume levels, with a minimal degree of manual intervention, in parity with the functionality provided for the ILEC=s own retail services. In order to foster a meaningful opportunity to compete, ILEC ordering systems must have standards-based application-to-application EDI interfaces that accurately process the CLECs= full range of unbundled element orders on a flow-through basis, in commercial volumes and in a timely manner.

Provisioning

17. The provisioning function has two elements: the accurate and timely issuance of status notices, and the actual installation of service by the ILEC in a timely fashion.

18. Status Notices. Status notifications allow the CLEC to track the progress of an order and to take proactive steps with their customers or the ILEC (in its role as the vendor) in the event the order is in trouble. Status notices include acknowledgment of receipt of orders,

rejects or clarifications, firm order confirmations, service and missed appointment jeopardies, and completion notifications. CLEC customer service representatives must be able to discuss intelligently the status of a customer=s order, conveying such information as when the service will be installed or why and until when service will be delayed. A CLEC that cannot provide its customers timely and accurate status notification will be placed at a significant competitive disadvantage vis-à-vis the ILEC.

19. Therefore, ILECs must process and return status notices electronically for all service delivery methods, whether or not the orders are transmitted and processed electronically. ILECs must have a fully automated system for returning status notices over the same interface that is used for ordering.

20. Installation. Each ILEC must work with the CLECs to develop ways of provisioning services electronically at commercially reasonable intervals. The most significant interval for OSS purposes is the interval from an ILEC=s receipt of an order to its completion, that is, the time it takes to actually install service. Therefore, ILECs must provide reasonable due dates for provisioning services and must meet those dates consistently. Parity requires that it take no longer for a customer to receive service from a CLEC than it does for the customer to receive the same service from the ILEC.

Maintenance and Repair

21. The ability to troubleshoot and to respond to customer service problems quickly and effectively is every bit as important to a CLEC=s success in the marketplace as the ability to obtain a customer in the first instance. Customer retention may be even more important than initial customer acquisition because the cost to retain a customer is significantly less than the

cost to acquire the same customer. Customer satisfaction and therefore customer retention is significantly impaired by poor maintenance and repair systems and processes.

22. To provide maintenance of its wholesale services and UNEs at parity with what it provides for its retail services, the ILEC maintenance interface must be a standards-based application-to-application interface. The current standard for maintenance and repair is Electronic Bonding, based on the ANSI T1.227, T1.227A, and T1.228 standards.

23. The electronic bonding solution must support all trouble handling sub-functions across the service delivery methods, including resale and UNEs. It must be available on a 7x24x365 basis, and it must provide response times identical to those enjoyed by the ILEC. It also must be able to support hundreds of users and process thousands of tickets concurrently.

Billing

24. Accurate and timely billing, like responsive maintenance and repairs, is essential for maintaining customers. There are three discrete billing sub-functions. First, the ILEC must provide the CLEC with records of the daily usage of CLEC customers over UNEs provided by the ILEC. These daily usage files must provide the customer call detail required for the CLEC to bill its end users for local service. Customers expect to receive bills from a CLEC that are at least as timely, accurate, and informative as the bills they had received from the ILEC. If, however, the CLEC does not receive accurate and timely bills from its primary supplier (the ILEC), it will not be able to prepare and send out accurate and timely bills to its customers. CLECs therefore require parity with the ILEC in access to accurate and timely billing information. To be at parity with the ILEC, this information should be sent by bulk data transfer via Network Data Mover (ANDM≅) in the industry standard Bellcore EMI format, using the most current Bellcore standard practice guidelines.

25. Second, the ILEC must provide the CLEC with monthly wholesale billing records detailing the CLEC=s use of the ILEC=s network, including UNEs and collocation, and the resulting charges. These bills must charge the proper interconnection (not access) rates and must contain sufficient detail for auditing, including quantities and descriptions of each service as well as the relevant USOC codes. The industry has defined in detail the complete development process from the specifications through testing for transmission via NDM in Carrier Access Billing System/Billing Output Specification (ACABS/BOS≅), CABS Auxiliary Report Specification (ACARS≅), Multiple Exchange Carrier Access Billing (AMECAB≅), and Small Exchange Carrier Access Billing (ASECAB≅) specification.

26. Third, as part of its meet point billing arrangement with the CLEC, the ILEC must provide the CLEC with the meet point billing data necessary for the CLEC to bill and collect access charges from interexchange carriers for using the CLEC=s local network to originate or terminate access calls. These records must be transmitted to the CLEC via NDM, and the ILEC must follow the industry standards for exchanging meet point billing data documented in the MECAB guidelines.

Business Processes

27. In addition to the specific OSS interfaces, the ILECs must implement business processes that provide CLECs with the same access to the ILEC=s OSS that the ILEC enjoys, including proper change management procedures, carrier-to-carrier testing processes, and help desk support.

28. Establishing a working interface between two companies is necessarily a collaborative process, so having proper change management procedures in place is crucial. Unilateral OSS development is inappropriate for at least two reasons. First, there will always be

errors, inaccuracies, gaps, and unclear points in any set of interface specifications and business rules. Without collaboration, these gaps will result in two systems that are not interoperable and that cannot provide the necessary flow-through processing so critical for OSS transactions. Second, in the absence of an established change management process, the ILEC could inflict substantial costs on CLECs by making changes to the interface after the CLEC has begun coding its software and constructing the interface.

29. A suitable change management control process must follow the appropriate ATIS guidelines and must require, at a minimum, the following: the implementation of a fully-tested and operational interface, including complete and final documentation, to serve as the baseline from which changes are made; proper notice and documentation of issues under consideration for change to the ILEC and all CLECs; a collaborative decision with CLECs having equal authority to the ILEC to prioritize changes; sufficient time for review, comment, and collaboration between the ILEC and all affected CLECs regarding proposed changes; issuance of specifications for changes with enough time for all parties to develop, implement, and test the changes, including regression testing to ensure that no previously working functions were unintentionally disrupted and testing of the changes themselves; sufficient time for the ILEC and all CLECs to migrate to the changes and retire the previous version of the interface; and complete, updated documentation to reflect the new interface specifications.

30. The ILEC must have processes and procedures for carrier-to-carrier testing based on ATIS guidelines that adequately resembles the production environment for pre-ordering, ordering, provisioning, repair and maintenance, and billing in a commercial product launch. The ILEC must provide accurate and complete documentation of the OSS interface for the CLECs to be as able to construct their side of the interface. Also, the ILEC also must provide CLECs an adequate help desk in parity with what it provides itself. Without these business processes, CLECs will not be able to make full use of the ILECs= OSS at parity with the ILECs.