

EX PARTE OR LATE FILED



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June 24, 1999

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW, Room TWB-204  
Washington, DC 20554

Re: Notice of Ex Parte meeting  
Second Application of BellSouth Corporation, BellSouth  
Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision  
of In-Region, InterLATA Services in Louisiana, CC Docket No. 98-121

Dear Ms. Salas:

On Thursday, June 17, 1999, David Eppsteiner, Jamie Hardin, and I, of AT&T, spoke with Bill Agee of the Commission's Common Carrier Bureau. We discussed BellSouth's Third Party Test Plan and the Georgia Commission's approval of the same at its June 15 Administrative Session. At Mr. Agee's request, we are providing a copy of all comments filed with the GPSC on the Test Plan, which are attached.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

cc: B. Agee  
A. Kearney  
C. Pabo

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List ABCDE



Law & Government Affairs

Suite 8100  
1200 Peachtree Street, N.E.  
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June 14, 1999

**BY HAND DELIVERY**

JUN 14 1999

Helen O'Leary  
Executive Secretary  
Georgia Public Service Commission  
47 Trinity Avenue, Room 520  
Atlanta, GA 30334-5701

**Re: Investigation Into Development of Electronic Interfaces for BellSouth's  
Operational Support Systems; Docket No. 8354-U**

Dear Ms. O'Leary:

Enclosed please find an original and twenty-seven (27) copies of AT&T's Supplement to the Motion for Reconsideration of the Commission's Order for Third Party Testing in the above-referenced docket. I have also enclosed a diskette containing the document on Word 6.0. After filing the originals, please return two additional copies stamped "filed".

Thank you for your assistance in this matter.

Very truly yours,

  
Suzanne W. Ockleberry

Enclosures  
cc: Parties of Record

**BEFORE THE  
GEORGIA PUBLIC SERVICE COMMISSION**

**In re: Investigation into Development            )**  
**Of Electronic Interfaces for BellSouth's        )**        Docket No.: 8354-U  
**Operational Support Systems                    )**  
**)**

**SUPPLEMENT TO MOTION FOR RECONSIDERATION  
OF THE COMMISSION'S ORDER  
FOR THIRD PARTY TESTING**

Comes AT&T Communications for the Southern States (AT&T), pursuant to Rule 515-2-1.08, and files this supplement to its previously-filed Motion for Reconsideration of the Commission's Order on Petition for Third Party Testing. In support, AT&T shows this Commission as follows:

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1.

After AT&T filed its Motion for Reconsideration, BellSouth filed its Plan for evaluating certain OSS functions and auditing certain flow-through calculations. The Plan, as written, will not provide the information necessary for this Commission to evaluate the service provided to new market entrants or to compare such performance to that received by BellSouth's retail customers. The Plan, therefore, will not evaluate nondiscriminatory access, which is the primary purpose of rigorous testing by an independent third party, nor will it ensure that CLECs have the OSS they need to compete in the local market. Effective third party testing is essential to opening the Georgia local telecommunications market.

2.

AT&T has identified a number of significant deficiencies in BellSouth's Test Plan, all of which should be corrected in order to ensure the integrity of the test. A brief explanation of some of the most crucial deficiencies is attached hereto and incorporated herein. AT&T expects, however, that the implementation of the two steps requested herein will go a long way toward remedying crucial deficiencies, which include:

- The roles of the testers are limited and they lack independence.
- The test is limited to those circumstances and scenarios prescribed by BellSouth.
- Only a few of the UNEs and interfaces used by competitors will be tested, drastically limiting the test's usefulness to regulators and competitors.
- ~~The test plan provides no way to assess parity.~~

3.

Although BellSouth's Test Plan provides an excellent starting point, this Commission should require modifications to the Plan. The changes, as outlined on the attached matrix, would ensure that the Test Plan meets the needs of competitors for nondiscriminatory access to the operational support systems, of regulators who must evaluate the systems for performance parity, and of consumers, who will be denied competitive options if BellSouth's OSS is insufficient to support true competition. Accordingly, the Commission should remedy the flaws in BellSouth's Test Plan.

The Commission should require KPMG Peat Marwick (KPMG) and Hewlett Packard (HP) to provide a written evaluation of the test plan. In New York, KPMG proved itself an able and independent third party tester, but BellSouth's Test Plan does not appropriately utilize KPMG and HP's considerable expertise and skill. The roles assigned to KPMG and HP, in the Test Plan as proposed by BellSouth, differ significantly from their respective roles in New York. In fact, BellSouth's Test Plan severely limits KPMG's role, such that it acts as a mere auditor of data. BellSouth's plan also fails appropriately to utilize the expertise and skill of Hewlett Packard (HP); rather than build interfaces, BellSouth's plan calls for HP to conduct the test using BellSouth's interfaces, and to fulfill roles outside its area of expertise and beyond those required in the New York test of Bell Atlantic's OSS. KPMG and HP should evaluate BellSouth's plan and modify the test so that it addresses the business needs of CLECs and evaluates BellSouth's obligations to provide non-discriminatory service under the Act. The independent review by KPMG and HP of BellSouth's Test Plan should ensure that it accomplishes three essential tasks. Those tasks are as follows:

- Evaluate BellSouth's retail OSS, supporting processes and measurements so that a determination of parity can be made;
- Evaluate the OSS systems, interfaces and processes offered by BellSouth that CLECs require for entry into the local market; and
- Require BellSouth to correct fully any deficiencies revealed by the test.

The independent input obtained by fully utilizing KPMG and HP's expertise will result in a plan that provides adequate breadth and depth to evaluate the CLEC - BellSouth relationship under realistic conditions.

5.

Secondly, in order to mitigate BellSouth's authority and influence over the test and testers, KPMG and Hewlett Packard should work solely at the direction of the Commission. The value of third party testing can only be achieved if the third parties are truly unbiased and independent. The current scheme - in which the testers are hired by, report to, and work at the direction of BellSouth - seriously compromises the independence of test and the testers.

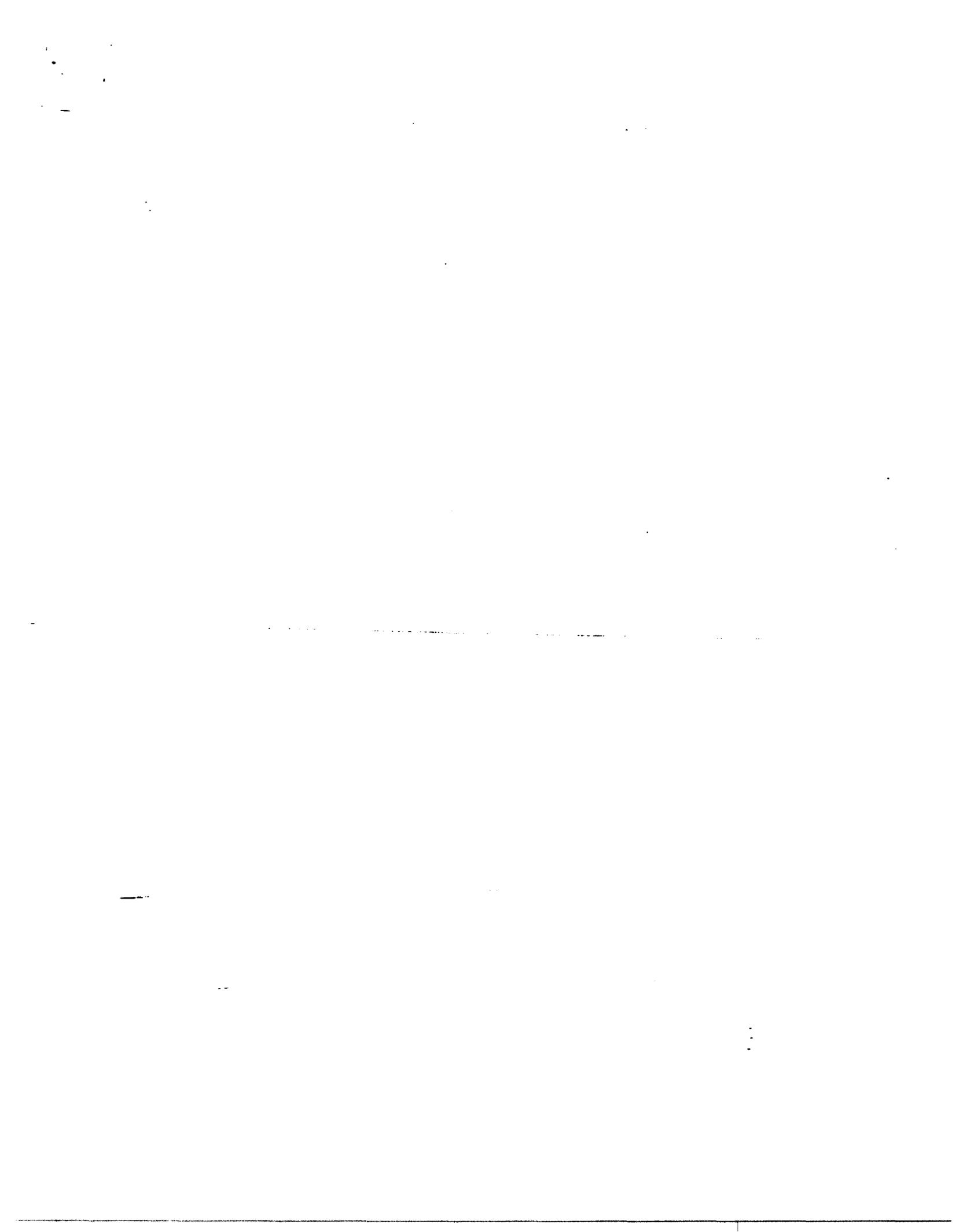
WHEREFORE, AT&T moves this Commission to reconsider its Order dated May 20, 1999 and implement the two steps described herein.

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Respectfully submitted this 14<sup>th</sup> day of June 1999.

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**A Brief Overview of BellSouth's GA Test Plan:**

**Benefits and Concerns**

<b>Essential Elements of a Third Party Test Plan</b>	<b>Benefits of BellSouth's GA Plan</b>	<b>Concerns with BellSouth's GA Plan</b>
<p><b>There should be a neutral, independent tester. The value of third party testing can only be achieved if that party is seen as credible and its evaluation will be seen as objective and unbiased.</b></p>	<p><b>BellSouth has selected skilled testers. KPMG Peat Marwick and Hewlett-Packard conducted the well-respected test of Bell Atlantic's New York OSS.</b></p>	<p><b>The roles of the testers are limited and lack independence.</b></p> <ul style="list-style-type: none"> <li>• <b>BellSouth engaged the third party testers (TPTs) and prepared the test plan, eliminating independence. The TPTs merely follow BellSouth's plan.</b></li> <li>• <b>The roles of the TPTs are different – and more limited – than in the NY test.</b></li> <li>• <b>In NY, for example, KPMG prepared and managed the test, and also fulfilled the functions of the pseudo-CLEC's marketing, sales and customer service organizations, preparing and making all test case inputs for the interface systems. In contrast, the GA plan does not provide for a Test Manager other than BellSouth, and KPMG functions as an auditor.</b></li> <li>• <b>In NY, HP's role was that of the pseudo-CLEC's Information Technology group, building and maintaining the interfaces and inputting the KPMG-prepared test cases when required. The GA plan calls for HP</b></li> </ul>

		to conduct the test using BellSouth's interfaces, rather than building its own, and to fulfill roles outside its area of expertise and beyond those played in NY, including acting as a surrogate marketing, sale and customer service organization by preparing and constructing test case inputs.
<b>The neutral, independent third party should develop the test plan. The third party responsible for monitoring and evaluating BellSouth's performance should be the party responsible for developing the test plan, after taking input from all parties, including BellSouth.</b>	<b>The GA test plan incorporates elements of the NY plan, which was prepared by a neutral, independent third party.</b>	<b>E&amp;Y appears to have developed the test plan on BellSouth's behalf. There was no input to the plan development from the named testers, or the CLEC community. Therefore, the parties responsible for implementing the plan or who would benefit from a comprehensive plan have not been involved in its design.</b>
<b>The test must be conducted by the third party, not just monitored by it. Using existing new entrants to conduct the test, with their specific market plans and interfaces, will not test the broad range of functionality and support required of an RBOC, nor will it test the RBOC's current state of readiness.</b>	<b>HP, rather than BellSouth, will initiate test orders.</b>	<b>The roles of the TPTs are circumscribed by the plan, limiting the test to those circumstances and scenarios prescribed by BellSouth. Additionally, the plan includes conflicting information regarding whether HP will build an interface or use BellSouth test facilities.</b> <ul style="list-style-type: none"> <li>● <b>KPMG's assigned roles are to approve the test plan and to audit, monitor, evaluate and report, while HP is to conduct feature, function and volume testing using BellSouth's interfaces. These are not the roles performed by these parties in the NY test, and the assigned roles fail to utilize their expertise.</b></li> <li>● <b>The test plan does not address the test manager role.</b></li> </ul>

<p><b>The test should cover all OSS and support processes needed by the new entrant to enter the market. Operations support systems include systems, information and personnel that support network elements or services. They are the automated and manual processes required to make resale services and unbundled network elements, among other items, meaningfully available to competitors.</b></p>	<p><b>UNEs, including some combinations, will be tested. EDI and TAG will be tested.</b></p>	<p><b>The test plan is severely limited in scope and scale, and will only test a few of the UNEs and interfaces used by competitors, drastically limiting the test's usefulness to regulators and competitors.</b></p> <ul style="list-style-type: none"> <li>• Only five UNE products will be tested, although the test plan states that BellSouth offers 80 UNEs.</li> <li>• Functionality testing will occur only within the 2-wire analog world, which represents only 5-7% of the products CLECs currently order.</li> <li>• There is no testing of resale functions, despite the fact that most CLECs currently compete via resale.</li> <li>• There is no testing of manual ordering despite the fact that BellSouth requires that the majority of the products and services it offers CLECs be ordered manually.</li> <li>• The plan does not call for testing interconnection OSS, or the majority of BellSouth information and services that CLECs rely upon to enter the market.</li> <li>• LENS will not be tested, despite the fact that the majority of competitors use it to order service today.</li> <li>• It appears that the 3PT tester will not build an interface to test BellSouth's OSS, but will instead will use BellSouth provided test tools.</li> <li>• It appears that EDI-mainframe will not be</li> </ul>
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<p><b>The test plan should allow the TPT to 'stand in the shoes' of a CLEC entering BellSouth's market, so it will be able fairly to evaluate BellSouth's performance with regard to all tasks normally performed in conjunction with a CLEC's market entry, including such areas as:</b></p> <ul style="list-style-type: none"> <li>• <b>Interconnection, and network planning</b></li> <li>• <b>Account management process</b></li> <li>• <b>Training</b></li> <li>• <b>Interface development, including BellSouth's documentation, with review of such items as technical specifications, business rules, CLEC handbooks, etc.</b></li> <li>• <b>Change Control Processes – all changes to systems, processes and documentation during the test must be made through the established Change Control or Account Management Process, whether initiated by BellSouth or requested by the TPT or a CLEC</b></li> <li>• <b>Test plan should include an evaluation of BellSouth's compliance with its established procedures.</b></li> </ul>		<p><b>tested.</b></p> <p><b>The test plan will not allow the TPT to assess BellSouth's performance on most areas critical to CLECs' ability to enter the local market, which have been the subject of much dispute at state commissions. Unlike the NY plan,</b></p> <ul style="list-style-type: none"> <li>• <b>The business needs of CLECs are not represented in the GA test, since CLECs were not polled during plan development, nor are they a part of the implementation of the test.</b></li> <li>• <b>There is no evaluation (not even a document review) of the processes necessary to establish a CLEC account and business relationship with BellSouth; instead, the testers will be provided with a pre-existing set of identifiers, authorizations and passwords.</b></li> <li>• <b>There is no evaluation of processes necessary to conduct business with BellSouth on an on-going basis through an assigned account team.</b></li> <li>• <b>No test activities address network design, collocation, or interconnection planning, which are areas of great concern to CLECs.</b></li> <li>• <b>HP will use BellSouth's internal systems testing tools, including BellSouth's internal sending and receiving simulators, but the functionality of BellSouth's internal simulators (unlike its interfaces) is</b></li> </ul>
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		<p>not at issue.</p> <ul style="list-style-type: none"> <li>• BellSouth's plan to review change control is inadequate. Not only is BellSouth's decision to "maintain a stable OSS environment for the duration of the test" inconsistent with CLEC's experience of constant change, its change control proposal is designed to ignore the way changes are made. By focusing only on the Electronic Interface Change Control process, the review will not address the manner in which most changes are made to interfaces and related documentation needed by CLECs. Further, the review of the change management process involves only document review and interviews, with no observation or usage of the process.</li> </ul>
<p><b>The test must be designed to determine parity. The test must not only be designed to objectively and accurately capture and analyze performance data that reveals how BellSouth is providing service to new entrants, but also how those results compare to the service BellSouth provides itself and its affiliates.</b></p>	<p><b>Flow-through generated by the test will be audited and test performance data will be reviewed.</b></p>	<ul style="list-style-type: none"> <li>• The test plan provides no way to assess parity.</li> <li>• The plan will not allow an independent assessment of BellSouth's internal performance and does not provide for validation of BellSouth's existing performance measures and results for either retail or wholesale performance. No performance standards are established for the test.</li> <li>• There is no review of or comparison to any aspect of BellSouth's retail operations.</li> <li>• Thus, the test will not allow CLECs or regulators to determine the relative level of</li> </ul>

		<p>BellSouth's performance.</p> <ul style="list-style-type: none"> <li>• The flow-through audit does not comply with the GA PSC's order in that it provides only for a self-contained audit of the transactions generated by the test, rather than an audit of the last three months of the operational flow through data currently reported monthly by BellSouth to the GA PSC.</li> <li>• BellSouth ensures its success by structuring the test so that if it cannot perform the function or perform it effectively, it declares that the outcome to be the expected result, or declares the function outside the scope of the test. For example, billing-; usage accuracy is tested not by whether the data is accurate, but how fast it is sent, the evaluation of the Maintenance and Repair processes does not test the actual maintenance and repair of service, etc.</li> </ul>
<p><b>All Operations Support Systems and OSS versions that actually will be used should be tested. All OSS functions, (i.e., pre-order, ordering, provisioning, billing and repair) must be tested. Omission of any of these items leaves critical gaps in the processes necessary to provide service to the customer. For example, if a service can be provisioned but billing information is inaccurate or untimely, the CLEC receives discriminatory treatment. This comprehensive testing necessarily</b></p>	<p><b>The GA plan will address each of the five OSS areas, including pre-ordering, ordering, provisioning, billing and repair.</b></p>	<p><b>The limited interfaces, processes and product types being tested, discussed above, severely limit the usefulness and effectiveness of the test.</b></p> <ul style="list-style-type: none"> <li>• Additionally, the test does not cover critical improvements needed by CLECs in the OSS 99 upgrade.</li> <li>• LENS is not tested, although it is the sole interface used by the majority of CLECs.</li> <li>• The test covers only a small subset of BellSouth's OSS.</li> </ul>

<p>includes all operational support systems, including all procedures, processes and systems offered by BellSouth for use by new entrants.</p>		
<p><b>The test must cover the full range of products, including services BellSouth offers or is required to offer, but is not providing today. Any limitation on testing runs the risk of favoring one market entry mode over another. As BellSouth is required to support all forms of market entry, all forms should be tested. And because these processes constantly being modified, BellSouth's change control processes must also be subject to review.</b></p>	<p><b>The test provides for some functionality testing.</b></p>	<p><b>Functionality testing is limited to 2-wire analog loops and ports, separately and in combination with number portability.</b></p> <ul style="list-style-type: none"> <li>• Testing of these limited numbers of UNEs is further limited in that they will not be tested over the full range of pre-ordering, ordering, provisioning, billing, maintenance and repair processes.</li> <li>• Since BellSouth will "maintain a stable OSS environment" during the test, the test results cannot be extrapolated to predict BellSouth's continued ability to process even these limited types of orders unless its change control process is reviewed.</li> </ul>
<p><b>Test the ability of BellSouth to provide non-discriminatory support at commercial volumes. The goal of testing is not simply to confirm that a particular functionality or new methodology exists, but to determine if new entrants can use these items to create meaningful competition. Therefore no test is complete without simulating the demands of a robust marketplace on BellSouth's operations support systems, including its procedures and its people who perform the work.</b></p>	<p><b>The test includes volume testing of some interfaces.</b></p>	<p><b>The test plan allows BellSouth to determine what constitutes normal and peak transactions of volumes and numbers of users.</b></p> <ul style="list-style-type: none"> <li>• The plan is extremely vague on this subject.</li> <li>• Additionally, the test clearly is not "blind", so BellSouth would be well able to prepare for test dates and volumes/types of orders that will arrive on any given date. Thus, it cannot neither simulate nor test BellSouth's performance in a production environment.</li> </ul>

<p><b>Don't just test it, fix it.</b> The purpose of the test is to facilitate market entry. BellSouth therefore should be required to promptly correct all deficiencies uncovered by the test.</p>	<p><b>The plan requires re-testing of program failures or defects that reach a specified severity level.</b></p>	<p><b>The plan only requires re-testing of failures or defects related to program errors.</b> Thus, if the program works as designed, but the design is flawed, no re-testing is required. Similarly, if the program works as designed but BellSouth's documentation is incorrect, no re-testing is required.</p> <ul style="list-style-type: none"><li>• The test plan is designed to "prove the existence" of specified functionalities, with no provision for correction of deficiencies unrelated to program or system errors. Basic design or execution flaws would be neither detected nor corrected.</li></ul>
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**CERTIFICATE OF SERVICE** - Docket No. 8354-U

This is to certify that a copy of AT&T's "Supplement to the Motion for Reconsideration of the Commission Order for Third Party Testing" has been served upon the parties of record by depositing a copy of same in the U.S. Mail, postage prepaid, addressed as follows:

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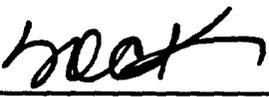
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This 14th day of June, 1999.

  
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Suzanne W. Ockleberry

*Handwritten initials/signature*

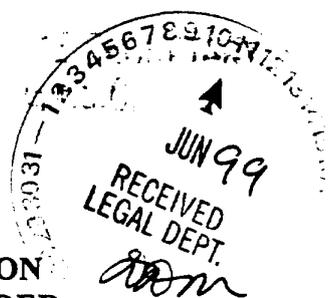
BEFORE THE

GEORGIA PUBLIC SERVICE COMMISSION

JUN 08 1999

In Re: Investigation Into Development )  
Of Electronic Interfaces for BellSouth's )  
Operational Support Systems )

Docket No. 8354-U



**RESPONSE OF MCI WORLDCOM TO AT&T'S MOTION  
FOR RECONSIDERATION OF THE COMMISSION ORDER  
FOR THIRD PARTY TESTING**

MCI WorldCom, Inc. ("MCI WorldCom") hereby files its response to the Motion for Reconsideration of the Commission Order for Third Party Testing filed by AT&T Communications for the Southern States ("AT&T"). MCI WorldCom agrees with AT&T that the Commission should reconsider its Order. Specifically, MCI WorldCom submits that the Order should be more specific. Now that BellSouth Telecommunications, Inc. ("BellSouth") has filed its proposed Georgia OSS Evaluation Master Test Plan & Flow-Through Audit Plan ("Test Plan"), it is clear that certain modifications should be made to the plan before the Commission approves it. These modifications should be required by Commission Order.

**I. INTRODUCTION**

Third party testing is critical to opening local markets. MCI WorldCom is providing local residential service today in New York in large measure because of third party testing that has led to substantial improvement in Bell Atlantic's Operational Support Systems ("OSS"). MCI WorldCom offers local residential service throughout New York and to date has won more than 75,000 local customers. MCI WorldCom is adding approximately 5000 residential customers per week and plans to increase that pace once development of the New York EDI pre-ordering interface is complete. This

experience demonstrates that effective third party OSS plays a crucial role in opening the doors to local competition.<sup>1</sup>

This Commission has again proven its leadership in opening local exchange markets by ordering third party testing of BellSouth's OSS. And BellSouth, to its credit, has proposed a test plan that incorporates a number of features from the successful New York plan. In particular, BellSouth should be commended for its choice of HP and KPMG as the third parties that will conduct and audit the test. Based on MCI WorldCom's experience in New York, it has confidence in HP's and KPMG's ability to carry out the test fairly and effectively, provided the test is structured properly. MCI WorldCom believes that if certain critical revisions are made to the proposed Test Plan, it can serve to bring BellSouth's OSS up to the standards required to support local entry in Georgia on a broad scale. Without these changes, however, testing will not give the Commission a true picture of BellSouth's OSS and will not drive the enhancements necessary to enable CLECs to compete in the local market and meet customers' needs.

To achieve the objectives of properly evaluating BellSouth's OSS and making necessary improvements to it, the Commission should (1) ensure that BellSouth's OSS interfaces are fully tested; (2) require that the UNEs to be tested be clarified and expanded; (3) adopt the performance measurements and standards to be applied with input from all parties, and require auditing of all performance measurement reporting; and (4) adopt a schedule that ensures the test can be conducted thoroughly and methodically.

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<sup>1</sup> Other factors also must be present. The most critical of these are cost-based pricing and the availability of UNE-P, which the Commission will address in Docket No. 10692-U.

The changes proposed below will ensure that everyone's resources are used wisely and that their objectives are achieved in an efficient and productive manner. Specifically, when the third party testing process is completed, BellSouth will have its OSS validated; CLECs will have the OSS they need to compete in the local market; and the Commission will have made substantial progress in carrying out its responsibilities under Sections 251 and 271 of the Telecommunications Act of 1996. These objectives can be achieved without significantly extending the third party testing process.

## **II. INTERFACES MUST BE FULLY TESTED**

Third party testing must ensure that BellSouth's interfaces can process the full range of OSS transactions at expected normal and peak commercial volumes. To achieve that goal, BellSouth's Test Plan must be modified in a number of ways: (A) CLECs should be able to submit test scenarios to be processed by the testers; (B) new releases of BellSouth's interfaces (especially those based on OSS 99) should be tested; (C) testers should be required to use BellSouth's documentation to build to BellSouth's ordering interfaces; (D) change management procedures should be observed and tested in action, not just based on documentation and interviews; and (E) CLECs should be permitted to comment on the exception report process as well as the exception reports issued during testing. These modifications are addressed below.

### **A. CLECs Should Be Able to Submit Test Scenarios to Be Processed by the Testers**

BellSouth appears to have hand picked test scenarios that it believes will enable it to pass the test. BellSouth did not, for example, choose any scenarios designed to test upgrades to its systems that were to have been made by April 1, 1999. These upgrades relate to orders migrating all or part of a customer's lines to a CLEC while leaving the

customer's directory listing information as is. Obviously, the ability to migrate a customer without jeopardizing its directory listings is critical to customer satisfaction and sustainable market entry by CLECs. This functionality should be tested. More generally, CLECs should be able to submit test scenarios to the testers for processing. Such participation by CLECs will ensure that a broad range of scenarios encompassing a variety of products and market entry strategies is used. It also will provide a more realistic view into the conditions CLECs face when trying push orders through BellSouth's systems.

**B. New Releases of BellSouth's OSS Interfaces Should Be Tested**

BellSouth should be required to test upgrades to interfaces that are released during the test period. In particular, the testers should test OSS 99, which includes enhancements to be made to the EDI and TAG ordering interfaces.<sup>2</sup> The release of OSS 99 initially was scheduled for next month, but has been pushed back by BellSouth to September 1999. The business rules for OSS 99 have been under development since November 1998 and are believed to be complete so that testers could begin building to the interface now, while BellSouth is developing and testing the interface. OSS 99 would provide the best evaluation of how BellSouth documents, develops, tests and releases its systems. Ordering interfaces based on OSS 99 are expected to be the ordering interfaces of choice for CLECs and are likely to be the interfaces used by CLECs when broad-scale market entry occurs in Georgia. It only makes sense to test the OSS 99 interfaces and work out whatever flaws may exist during the third party testing process. Moreover, OSS

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<sup>2</sup> MCI WorldCom notes that EDI preordering initially was to be included in the OSS 99 project, but eventually was excluded by BellSouth. EDI preordering will be critical to MCI WorldCom's ability to order and provision UNE-P, once it is made available in Georgia. MCI WorldCom respectfully submits that EDI preordering should be included in the third party test.

99 provides support for several new functionalities, including business UNE-P (non POTS), DS0 and DS1 four wire Digital Loops, complex directory listings, resale complex services, ISDN, hunting, and a new process for partial migrations (initial and subsequent). These important functionalities can be assessed only if the OSS 99 interfaces are tested.

C. Testers Should Be Required to Use BellSouth's Documentation to Build to BellSouth's Ordering Interfaces

Requiring testers to develop the software to build to BellSouth's ordering interfaces will ensure that a CLEC entering the market could use BellSouth's documentation to develop to such an interface without handholding by BellSouth. When MCI WorldCom and AT&T developed to BellSouth's current EDI ordering interface, they encountered poor documentation that required months of meetings and other communications with BellSouth to clarify. The testers should ensure that this problem has been rectified. The most sensible way to do that is for the testers to use BellSouth's documentation to build to the OSS 99 interfaces.<sup>3</sup> The testers can build to the EDI interface much more quickly and cheaply than a CLEC, because the testers' interface is not integrated into real back-end business operations and need not be as large and robust as actual commercial systems. It is estimated that this development could be done in 30-60 days, well in time for the release of the new interfaces.

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<sup>3</sup> BellSouth apparently plans to test EDI by having orders submitted using EDI-PC, a software package based on the current, but soon to be outdated, EDI version 7.0. This approach is not satisfactory because the testers would not be building to the EDI interface and testing BellSouth's documentation. Further, because EDI-PC is based on EDI version 7.0, rather than OSS 97, using EDI-PC for the test will be of little use for purposes of local market entry.

D. Change Management Procedures Should Be Observed and Tested in Action, Not Just Based on Documentation and Interviews

Having effective change management procedures in place is important because, if they are not observed, OSS (even after it has been tested) would grind to a halt once BellSouth made changes to an interface. The “testing” BellSouth proposes for change management is based solely on documentation and interviews. Developing a theoretical understanding of how change management is supposed to work falls far short of observing change management in action. The testers should be required to observe the release and necessary changes to OSS 99, which should provide them an excellent opportunity to see how well BellSouth’s change management procedures work in practice.

E. CLECs Should Be Permitted to Comment on the Exception Report Process as Well as the Exception Reports Issued During Testing

Testers identify and resolve problems with OSS through an exception reporting process. BellSouth includes defining the exception reporting process in its list of global entrance criteria. BellSouth states that “[a] defined process must be in place by which test defects are identified, assigned, resolved, and escalated. KPMG, HP and BellSouth must agree to this exception reporting process.” (BellSouth Test Plan, p. III-6.) MCI WorldCom submits that the Commission should decide what the exception reporting process will be, based on input from CLECs as well as BellSouth, HP and KPMG. Further, CLECs should be permitted to comment on exception reports issued during the testing process. More specifically, KPMG should lead periodic meetings for the parties’ technical personnel to discuss the progress of the test and exception reports that have

been issued. The closing of all exception reports should be one of the exit criteria of the third party test.

### **III. UNES TO BE TESTED SHOULD BE CLARIFIED AND EXPANDED**

The UNEs that the Commission required BellSouth to test include UNE analog loops (with and without number portability), UNE switch ports and UNE business and residence loop/port combinations. MCI WorldCom respectfully submits that the term "loop/port combination" should be clarified to encompass UNE-P and that xDSL loops and DS1 loop/transport combinations should be added to the list of UNEs to be tested. All three of these products will be key to competitors' local entry plans in Georgia.

The availability of UNE-P<sup>4</sup> (at cost-based prices) is a gating item for widespread entry into the residential market. For example, the availability of UNE-P has enabled MCI WorldCom to launch residential service in New York. Although it is not entirely clear, it appears BellSouth has not included UNE-P in its Test Plan. BellSouth apparently has taken literally the Commission's directive to test "loop-port combinations." In its test scenarios for loop-port combinations (UNE scenarios 420-45), the only elements depicted are the loop and port. Transport, signaling call-related databases, operator services and directory assistance are not included. To make matters worse, BellSouth's diagrams indicate that CLECs must use a collocation space to avail themselves of the loop-port combination, which is discriminatory. If true UNE-P is not tested, much of the utility of third party testing will be lost -- the testing of UNE-P therefore should be required in no

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<sup>4</sup> UNE-P includes all the elements required to provide local telephone service: the local loop, the network interface device, switching, interoffice transmission facilities, signaling networks and call-related databases, OSS and operator services and directory assistance.

uncertain terms. Such testing should include all switch features, including all custom call services listed on page A-18 of BellSouth's Test Plan, plus Memory Call Voice Mail, and all TouchStar features listed on p. A-19. Due to the rapidly developing market for broadband and data services, BellSouth's support for all types of xDSL is vital to the future of competition and should be tested as fully as possible. In particular, access to loop qualification and BellSouth bandwidth management information should be tested, along with other xDSL specific systems.

MCI WorldCom and other CLECs use DS1 loop/transport combinations to serve many of their business customers. But BellSouth states that loop/transport combinations are out of the scope of the third party test for ordering, provisioning and billing. (BellSouth Test Plan, p. A-8.) The Test Plan should be revised to require the testing of these UNE combinations.

#### **IV. PERFORMANCE METRICS AND STANDARDS SHOULD BE DETERMINED WITH CLEC PARTICIPATION, AND REPORTING SHOULD BE SUBJECT TO AUDIT**

Performance measurements and standards determine what will be graded and what is required to pass the test. Before testing, a performance measurement system must be validated and test results must be measured against pre-established performance standards. BellSouth acknowledges that these tasks remain to be performed.

BellSouth notes that the Commission already has approved a set of performance measurements, but states that before many portions of the test can begin, metrics must be agreed to and fully defined and "must be fully functional, tested, and operationally ready." (BellSouth Test Plan, p. III-6.) BellSouth states that the Commission, with assistance from the auditors, "will assess the operational readiness of all required

BellSouth measurements and verify that all requirements have been met.” (*Id.*) The metrics BellSouth would like to use are listed in its Appendix D. In essence, what BellSouth is requesting the Commission to do is revise its performance measurement order and adopt BellSouth’s latest SQM reporting system. Although MCI WorldCom agrees that consideration of the performance metrics to be used is appropriate at this juncture, it does not agree that BellSouth’s SQM should be adopted wholesale. Once BellSouth files its detailed metrics (along with their definitions) to the Commission, CLECs should be permitted to submit comments before the Commission makes a final determination of the metrics to be used during testing.

BellSouth is vague about how the third party test will be graded. BellSouth states that “[p]erformance metrics will be developed for each test to determine whether the results deviate from expectations. In those cases where results deviate, statistical analysis will be undertaken to determine the significance of the deviation.” (BellSouth Test Plan, p. III-5.) BellSouth further states that assessing test results will include “comparing expected results files with actual results.” (BellSouth Test Plan, App. D, p. 2.) BellSouth does not explain what it means by “expectations” or “expected results files.” This issue must be clarified. Again, once BellSouth files its proposed performance standards, CLECs should be permitted to comment before the Commission makes a decision.

The Commission’s Order on Petition for Third Party Testing required BellSouth to have its flow-through service report audited by the testers. BellSouth proposes to do this by having the testers compare the flow-through results they gather to the results generated by BellSouth’s reporting system. As part of this process, BellSouth should specify all orders that fall out for manual processing. More generally, MCI WorldCom

respectfully submits that all of BellSouth's OSS reporting should be audited in the same manner as the flow-through reports so the Commission can be assured that these reports are accurate.

#### **V. A REASONABLE TESTING SCHEDULE SHOULD BE ADOPTED**

BellSouth proposes a test schedule that is overly ambitious. For example, BellSouth proposes that a First Interim Report OSS Plan be submitted on June 15, 1999, the date the Commission is likely to vote on BellSouth's Test Plan. Such a schedule evidences a desire to "get this over with," rather than to engage in a serious and thorough test. The schedule also is inconsistent with the global entrance criteria set out in BellSouth's Test Plan at p. III-6. For example, before testing can begin, it will be necessary to define an exception reporting process as well as applicable performance metrics and standards. MCI WorldCom proposes that once the Commission issues orders adopting a test plan, adopting an exception report process and adopting performance metrics and standards, the following schedule would be appropriate:

- 30 days -- Test Set-up
- 60 days -- First Interim Report OSS Plan
- 90 days -- Second Interim Report OSS Plan
- 120 days -- Final Report

Of course, such a schedule would be subject to change depending on test results.

#### **VI. CONCLUSION**

The Commission's Order should be modified to be more specific. BellSouth's proposed Test Plan is a good initial step toward the implementation of third party testing. The modifications proposed by MCI WorldCom provide for necessary CLEC participation and critical enhancements to the plan that will ensure that it provides a true

evaluation of BellSouth's OSS. These modifications will not add significantly to the length of the testing process. MCI WorldCom respectfully requests that they be adopted.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

Docket No. 8354-U

This is to certify that I have served copies of the **RESPONSE OF MCI WORLDCOM TO AT&T'S MOTION FOR RECONSIDERATION OF THE COMMISSION ORDER FOR THIRD PARTY TESTING** upon the following parties of record by first class mail, this 8th day of June, 1999:

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