DECLARATION OF

NANCY DALTON and SARAH DEYOUNG

ON

BEHALF OF AT&T CORP.

ATTACHMENT 1

Sandy Kinney
President-
Industry Markets

SBC Telecommunications, Inc.
One Bell Plaza, Suite 5705
Dallas, Texas 75202
Phone 214 464-5111
Fax 214 464-0510

July 1, 1999

VIA FACSIMILE

Mr. Rian Wren
Regional President – Southwest
AT&T
5501 LBJ Freeway
Suite 800
Dallas, TX 75240

Dear Rian:

First of all let me apologize for the service disruption experienced by you and the other customers of AT&T. Customer service is extremely important to SWBT and we treat all service matters with a great deal of care. As you know, we offered several months ago to work with you to move to unbundled network elements the embedded base of resale customers that AT&T has built over the last 3 years in Texas. Unfortunately, AT&T has not sought to work with SWBT to move those customers as a coordinated project.

The situations you have experienced during your Service Readiness Testing (SRT) illustrate the very reasons our companies cooperatively pursue and work through tests such as these. Joint testing allows our companies to identify issues and resolve them collaboratively. Our teams are holding weekly calls to ensure that these issues receive the proper attention. We are supportive of the testing process and will continue to work with AT&T to resolve issues. The key to progress will be for our teams to continue working together to address issues as they arise, using the processes that we have jointly developed in other arenas.

The specific situation that prompted your phone call to me has been investigated. The service disruption experienced was related to the provisioning of SWBT's AIN platform, which is associated with the customized routing feature of AT&T's resale services. A process was in place to address AT&T's specific situation of

moving resold accounts with customized routing to UNE; however, the process did not work as intended. An improved interim process has been implemented leading up to our deployment of a long-term solution in mid-August.

The specific order type AT&T submitted during this SRT is unique to AT&T. With AT&T's stated intention to abandon the resale market, the scope of this type of order will in all probability be limited to AT&T's project of moving its embedded base of resold customers. It was probably in recognition of the uniqueness of this order type that neither AT&T nor anyone else in the industry identified this as a scenario that required provisioning in the functionality portion of the OSS test. In any event, the problems you experienced were not a result of our OSS interface.

Despite the uniqueness of your embedded base of resale customers, we reiterate our offer to help coordinate this project of moving your existing resale customers to unbundled network elements. In the event you instead desire to utilize this unique order type as part of a coordinated test prior to the next phase of your service readiness assessment, we will be glad to provide the necessary coordination on that as well. As you move forward with your market expansion plans, please do not hesitate to request our assistance when a project of this nature arises again.

I am fully confident that SWBT will continue to provide AT&T with a high level of customer service. Our commitment to this belief is backed by the myriad of performance measures and associated damage provisions currently in place, which were sought by AT&T and approved by the Commission. These measures will provide more than adequate information regarding our performance for AT&T to pursue its analysis and evaluation.

Rian, as you know, we have literally thousands of employees working with AT&T across a wide variety of fronts. It is inevitable that some failures, such as those you identified in your letter, will occur. We expect that you will inform us on a timely basis of any pattern of service problems that you see developing as they become apparent, so that we can promptly address any generic resolution to such service problems. In fixing every individual service outage as it was identified and promptly improving the processes to avoid these problems on both a short-term and long-term basis, I believe that we demonstrated our commitment to accommodating AT&T's market expansion plans.

Mr. Rian Wren
Page 3
July 1, 1999

I encourage you to continue with your market expansion plans. We are ready to handle all of your commercial orders, including the 4,000 per day you mentioned in your letter.

Sincerely,

Sandy Kinney

DECLARATION OF

NANCY DALTON and SARAH DEYOUNG

ON

BEHALF OF AT&T CORP.

ATTACHMENT 2

PUC DOCKET NO. 19000

RELATING TO THE IMPLEMENTATION OF SWBT'S INTERCONNECTION AGREEMENTS WITH AT&T AND MCI	§ § § §	PUBLIC UTILITY COMMISSION OF TEXAS

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ORDER NO. 5

ORDER ON CHANGE MANAGEMENT PROCESS (Version Control for EDI)

A. Ruling

This order requires Southwestern Bell Telephone Company (SWBT) to implement, as an interim measure, a sunrise-sunset process for electronic data interface (EDI) version control beginning on January 1, 2000. Once the Ordering and Billing Forum (OBF) prepares guidelines for EDI version control, this interim requirement shall be automatically substituted with the new OBF guideline.

B. Discussion

The issue of EDI version control is a subset of the change control process that was identified in the Commission's implementation order in this docket.[1] An orderly change control process can be used to manage the implementation of updates to SWBT's EDI systems. The parties through negotiations developed a comprehensive change control document. These efforts by all parties are consistent with the federal

[1] *Relating to the Implementation of SWBT's Interconnection Agreements with AT&T and MCI*, Docket No. 19000, Order Approving Implementation Schedule and Establishing Docket No. 19000 Regarding Implementation Issues, Attachment A at 4 (March 17, 1998) (Implementation Order).

Telecommunications Act's (FTA[2]) preference for negotiated outcomes. However, the version control issue is one of two outstanding issues.

1. Authority to Rule on the Version Control Issue in this Docket:

As stated above, version control is a subset of the change control process. Issue 4b of the implementation schedule identified the milestone as "EDI/Corba Change Control (New Release Administration)."[3] SWBT argued that the issue of version control was outside the issues to be addressed in this docket because it was not specifically arbitrated.[4] Although "version control" is not specifically identified in the implementation schedule, "version control" is a component of "New Release Administration " which is identified on that schedule As such, the undersigned finds that resolution of this issue falls within the parameters of this docket.[5]

2. What is Version Control?

As stated above, version control is the process by which new versions of EDI are implemented. In briefs and in oral argument, three general proposals were presented:

A. A Flash-Cut process:

SWBT proposed a flash-cut process. With the flash-cut process, on a timetable consistent with the change control document, SWBT would simultaneously turn up the

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[2] Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, *codified at* 47 U.S.C. §§ 251 *et seq.* Hereinafter, all citations to FTA will be to the 1996 Act as codified in the United States Code. (FTA).

[3] Implementation Order, Attachment A at 4.

[4] See Southwestern Bell Telephone Company's Brief on EDI Change Control Process - Multiple Versioning at 6 (SWBT Brief).

[5] During the initial workshops in which the implementation schedule was developed, Staff clarified that the breadth of the implementation docket should include issues necessary to implement the agreement being approved by the Commission and should not be limited by whether a narrow issue was specifically arbitrated.

new version of EDI and turn off the version of EDI being replaced. SWBT supported the process on a couple of grounds. First, SWBT argued that a phase-out approach is not necessary because users of EDI would have a long notice period. SWBT referred to the timetables in the change control document as well as the fact that the EDI users would generally be participants in the OBF and would thus have notice through the OBF process. Second, SWBT argued that the other options, discussed below, were far more costly than a flash-cut approach, and that the cost studies used to develop service order charges did not contemplate those costs. Finally, SWBT argued that it would be imprudent to move ahead on multiple versioning or a sunrise-sunset approach before the OBF determines the proper method for new version administration.

B. Multiple Versioning (Indefinite):

Multiple versioning can take many forms. As discussed in briefs and oral argument over a number of telephone conferences, when a new EDI version is implemented the existing EDI version would be maintained indefinitely. When a second new version is implemented, the oldest version is phased-out over a definite time period while the second oldest version is maintained indefinitely. MCI supported this option because it provided EDI users the flexibility to avoid upgrading existing EDI versions if it was determined that the latest version did not provide sufficient benefits to justify the costs of upgrading. By way of example, with the release of Windows 98, computer users must determine whether an upgrade is worthwhile. A Windows 95 user may determine to wait for Windows 2000 if Windows 98 is not thought to provide sufficient benefits to make an upgrade worthwhile. SWBT opposition was greatest to this option because multiple versioning was the most expensive of the options presented. SWBT alleged that multiple versioning could double SWBT's EDI costs.[6]

C. Sunrise-Sunset Approach:

Although there was some confusion as to the precise nature of the sunrise-sunset

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[6] SWBT brief at 7.

approach, the undersigned's understanding of that approach for purpose of this order is as follows: Pursuant to the sunrise-sunset approach, when an new version of EDI is implemented, the preexisting version is maintained for a definite period thus providing EDI users a change-over period.

C. *Analysis Supporting Sunrise-Sunset Approach:*

1. OBF v. Commission Resolution:

Once it was determined that this issue was properly before the presiding officer in this docket, the first issue was whether the Commission should forebear from ruling on this issue until the OBF provides an industry guideline on this issue. All parties agreed that national guidelines are preferred, and each party agreed to be bound by any OBF guideline developed. However, the parties disagreed as to whether the OBF will develop a guideline on this issue. MCI raised concerns over the likelihood that OBF will address this issue. Moreover, MCI also suggested that it could take years before OBF addresses these issues.[7] SWBT countered that it would not be appropriate for Texas to mandate a version control process ahead of the industry's development. Moreover, SWBT argued that MCI's requests are not appropriate given the high level of change and development in EDI for local service requests.

Because there is a need for national standards and because the parties are all in agreement that Texas should follow any final guideline of the OBF on this issue, any ruling mandating a particular method of version control shall be interim pending an OBF guideline to the contrary. However, because there is uncertainty over whether the OBF

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[7] MCI point outs that the OBF took 5 years to develop a version control guideline for the access service requests (ASR) processes. SWBT countered that the history relating to the ASR process demonstrated that the industry as a whole determined that the ASR operational process had not reached a sufficient level of maturity to warrant a sunrise-sunset process. See Fifteenth Telephone Conference at 25 and 32.

will provide a guideline in a timely manner, if at all, development of a competitive market would be benefited by mandating an interim requirement.

2. Sunrise-Sunset Provides the Best Interim Alternative:

SWBT shall be required to provide EDI version control using the sunrise-sunset approach until the OBF provides guidelines on this issue. In making a ruling in favor of the sunrise-sunset approach, the sunrise-sunset approach was found to provide a best balance between providing sufficient guarantees that competition will not be harmed by periods in which no EDI system will be available, and the additional costs associated with version control methods other than the flash-cut approach.

To prevent competition from being harmed, EDI users must have certainty that EDI interfaces will work continuously. With the flash-cut approach, not only do EDI users have less time to transition from an existing version to a new version, but EDI users run the risk that an unforeseen problem with the new version could impair its ability to pass orders. Both the sunrise-sunset approach and the multiple versioning approach address this concern. The sunrise-sunset approach, however, can perform this function at a lesser cost.[8]

In light of cost and certainty concerns, the sunrise-sunset approach is the best alternative for purposes of this interim ruling. Selection of the sunrise-sunset approach should not be construed as this commission's preferred remedy for new systems administration. Instead, this approach was selected in light of a number of factors

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[8] There has not been substantial discussion over SWBT's cost estimates. SWBT alleges that the additional costs for multiple versioning may be twice that of the sunrise-sunset method. Although the undersigned cannot make a finding as to the magnitude of the difference in costs, it is logical to conclude that the additional systems necessary to implement multiple versioning would create costs in excess of the sunrise-sunset approach.

including the interim nature of the sunrise-sunset requirement.[9]

The duration of the sunrise-sunset period is not determined in this order. Instead, the parties should attempt to negotiate a reasonable period. If the parties cannot agree to a reasonable period, a determination of the proper duration of the sunrise-sunset period will be made.

3. Implementation Date for Sunrise-Sunset Approach:

The implementation date for the sunrise-sunset approach is January 15, 2000.[10] This start date for the interim sunrise-sunset approach is appropriate because: (1) the large number of substantial changes that can be anticipated over the next year and a half makes the necessity of a sunrise-sunset approach less beneficial because EDI users will likely choose to benefit from the new features and functionality; (2) a date further into the future would create additional uncertainty for competitors wishing to invest in their own EDI systems; and (3) as contracts begin to expire, SWBT may incorporate the additional costs relating to these systems into their future cost studies.[11]

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[9] It should be noted that although interim, the interim period expires only upon the occurrence of a contingent event. In other words, if OBF never develops a guideline on this issue, this requirement will continue indefinitely.

[10] During the telephonic hearing, an oral ruling was made setting the implementation start date as January 1, 2000. However, because of the potential for "Year 2000" problems with existing systems, this written order delays the implementation start date to January 15, 2000 to minimize the potential for a violation that would be caused by an unrelated computer problem. Moreover, since the sunrise-sunset requirement is interim until OBF develops guidelines, if the OBF acts prior to January 15, 2000, no specific action must be taken with regard to this requirement. Instead, SWBT would be required to comply with the OBF guideline.

[11] This fact addresses SWBT's cost-recovery concerns.

SIGNED AT AUSTIN, TEXAS the 23rd day of July 1998.

PUBLIC UTILITY COMMISSION OF TEXAS

HOWARD J. SIEGEL
PRESIDING OFFICER

DECLARATION OF

NANCY DALTON and SARAH DEYOUNG

ON

BEHALF OF AT&T CORP.

ATTACHMENT 3

Accessible

Southwestern Bell

SOUTHWESTERN BELL - EDI/LSR Ordering Release Announcement for July 22, 2000

Date: January 24, 2000

Number: **CLECSS00-006**

Contact: Southwestern Bell Account Manager

This Accessible Letter serves as the Release Announcement for EDI/LSR Ordering. The Release is currently targeted for July 22, 2000. Southwestern Bell is planning enhancements in the following areas:

- Flow-Through
- Implementation of LSR Versioning
- Additional edit changes

Details will be provided in the Initial Requirements in a future Accessible Letter.

Per the Change Management Process, CLEC responses to this Release Announcement are due to your Account Manager by January 31, 2000.

Please direct any questions to your Account Manager.

DECLARATION OF

NANCY DALTON and SARAH DEYOUNG

ON

BEHALF OF AT&T CORP.

ATTACHMENT 4

Accessible

Southwestern Bell

"Notification of Changes to the Daily Usage Extract – Arkansas, Kansas, Missouri, Oklahoma, Texas"

Date: January 18, 2000

Number: **CLEC00-016**

Contact: Southwestern Bell Account Manager

This letter is to provide information concerning an emergency change to one of the records on the Daily Usage Extract. This change which will be effective January 25, 2000, will impact UNE CLECs purchasing Unbundled Local Switching (ULS). A value currently being used by Southwestern Bell in the Rate Class field of the EMI record on some Sent Paid 100131 messages provided to UNE CLECs may result in the CLEC billing the messages incorrectly to its end-users.

Today, Southwestern Bell populates some 100131 EMI records with a '2' in the Rate Class field, even though it is a Sent Paid message. The 100131 EMI record indicates UNE based Originating Local Usage. Due to the way some of these records are created, the Rate Class is defaulted. The value of '2' is not used at SWBT and was viewed to be a safe default. SWBT generates and transmits these 100131 EMI records to CLECs purchasing ULS as a part of the daily usage extract feed.

Southwestern Bell intends to use the value of '4' in position 79 of the 100131 record for Sent Paid messages. The implementation of this change is scheduled for January 25, 2000.

SWBT considers the value of '4' to be a more appropriate value in this field based on OBF guidelines. OBF representatives from SWBT will work jointly in the industry group to clarify the industry language with values associated with Rate Class.

Please direct any questions to your Account Manager.

DECLARATION OF

NANCY DALTON and SARAH DEYOUNG

ON

BEHALF OF AT&T CORP.

ATTACHMENT 5

Dalton, Nancy M, NLSSS

From: BANNECKER, BOB G (SWBT) [rb5422@txmail.sbc.com]
Sent: Tuesday, September 28, 1999 3:54 PM
To: Hall, Lori L, NLSSS
Cc: Kettell, David P, NLSSS; Dalton, Nancy M, NLSSS
Subject: RE: EDI Availability Time Change

Lori:
An Accessible Letter was not sent out (we will do so in the future). The Website was updated around July 22, 1999 to reflect the revised hours of operation. This change was made as we went to event driven.

Thanks,
Robert Bannecker

Account Manager - Industry Markets
Southwestern Bell Telephone Company
311 So. Akard, Rm. 630.08
Dallas, TX 75202
214-464-1053 - Office
214-858-0281 - Fax
888-352-4701 - Pager
rb5422@txmail.sbc.com - E-Mail

-----Original Message-----
From: Hall, Lori L, NLSSS [mailto:lorilhall@att.com]
Sent: Friday, September 24, 1999 9:14 AM
To: BANNECKER, BOB G (SWBT)
Cc: Kettell, David P, NLSSS; Dalton, Nancy M, NLSSS
Subject: EDI Availability Time Change

Bob,

In the meeting on Tuesday in Austin, you were going to check to see when an Accessible Letter was sent announcing the change in EDI provisioning timelines to be less than 24X7. Have you found any information on this issue? If an Accessible Letter was not provided to CLECs, can you document when and why a change was made?

Thanks,

Lori

DECLARATION OF

NANCY DALTON and SARAH DEYOUNG

ON

BEHALF OF AT&T CORP.

ATTACHMENT 6

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TABLE OF CONTENTS

DOCKET NO. 19000

RELATING TO THE	§	PUBLIC UTILITY COMMISSION
IMPLEMENTATION OF SWBT'S	§	
INTERCONNECTION	§	OF TEXAS
AGREEMENTS WITH	§	
AT&T AND MCI	§	

AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.'S LETTER TO HOWARD SIEGEL

	PAGE
Letter	2

List of Files:
g:\law\mark\txpldgs\19000 – Reply to Change Control Response_1.doc

Original + 22

cc:
Pat Wood, Chairman
Judy Walsh, Commissioner
Brett Perlman, Commissioner
All Parties of Record

217

AT&T

Mark Witcher
General Attorney

Suite 900
919 Congress Avenue
Austin, Texas 78701-2444
512 370-2073
FAX: 512 370-2096

June 21, 1999

Mr. Howard Siegel
Public Utility Commission of Texas
1701 N. Congress Avenue
Austin, Texas 78711

Re: Project No. 19000

Dear Howard:

As you will recall, on May 20th, AT&T filed a Request for Expedited Order seeking implementation of an interim change control process that permits AT&T an effective opportunity to test and participate in the implementation process for future Southwestern Bell Telephone Company (SWBT) EDI releases. The expedited nature of the request was necessary in light of SWBT's impending June 26th EDI Release. The primary relief requested by AT&T was that, pending the implementation of versioning in the change control process, SWBT be directed to implement improvements which include at least the following minimum conditions:

1) successful completion of SWBT internal testing of the release (including regression testing) prior to start of intercarrier testing;
2) unless otherwise agreed, a minimum four week testing period, with longer test periods (60 to 90 days) for significant releases;
3) agreement that the testing period will be extended, if necessary, to meet exit and success criteria and a commitment to delay implementation of new releases until completion of testing;
4) SWBT's commitment to implement and test solutions for errors found in testing;
5) agreement to participate in cooperative regression testing;
6) documentation of entrance, exit and success test criteria; and
7) a joint go/no go determination before the release is implemented into the production environment.

SWBT's May 28th Response included an agreement to delay the June 26th Release to August 14th and to provide for 14 days of testing with 5 days to resolve any problems that arise in the testing before the release is implemented. SWBT also suggested that the requests by AT&T for minimum additional conditions would be discussed at subsequent change control process meetings. AT&T has now attended 2 change control meetings since its May 20th filing. In those meetings SWBT, has focused exclusively on the "permanent" change control

process to be implemented after January, 2000, and has not been willing to discuss modification of the existing change control process to address the issues raised in AT&T's May 20th motion. There has been no additional progress on the change control process for the August 14th Release, yet that Release date rapidly approaches.

SWBT has not committed to modify its approach to the August 14th release in any fundamental way, either in its filing or in the change control meetings. The process SWBT intends to employ after its May 28th filing is one-sided, with all critical decisions to be made by SWBT alone, regardless of the possibly adverse impact of others (including AT&T) that are in the market and reliant on the operational capabilities of those same systems at that time. SWBT has not agreed to retest solutions to errors that are identified during the 14 day period or to extend the testing period if issues remain unresolved or solutions untested at the end of the 5 day correction period. SWBT has not agreed to participate in cooperative regression testing to ensure that either the initial provisions of the Release or changes resulting from initial testing do not impact previously functioning aspects of the OSS systems. SWBT has not agreed to let CLECs have a say in the final go/no go decision with respect to implementation of the Release, nor has SWBT even agreed to come to agreement with the CLECs on the entry, exit and success factors that form the basis for that go/no go decision.

AT&T intends to be in the market utilizing the EDI OSS systems before the August 14th Release. AT&T's May 20th filing describes how, had AT&T been in the market during the May 1st Release period, its market entry would have been crippled by the defects in that Release. AT&T should not be faced with the possibility of such consequences at this critical time in its local entry plans. The modifications proposed by SWBT in its May 28th letter are cosmetic at best and do not address the underlying problem that SWBT intends to reserve for itself the critical decisions as to whether to go operational with a Release, even if testing has not adequately resolved known problems.

AT&T requests that you issue an order adopting the minimum conditions proposed by AT&T so that those conditions may apply to the implementation of the August 14th Release.

AT&T further requests that SWBT be ordered to expedite the introduction of versioning and sunrise-sunset provisioning for its EDI releases. Since the time the issue was first presented to the Commission at least two developments have occurred.

First, SBC recently has expressed support in OBF meetings for a "flash cut" approach to implementation of EDI releases, an approach which would be devastating to the carriers who rely on EDI to serve consumers in SBC territory. AT&T is concerned that SBC will use its influence to establish industry guidelines

hostile to versioning and hostile to interoperability, thus necessitating a strong statement by this Commission that versioning will be required.

Second, AT&T has learned that testing performed with SWBT in a test environment does not adequately permit identification and diagnosis of the impact of the new release on flow through performance. Only when SWBT introduces versioning will adequate pre-release testing of flow through to SWBT's down stream systems be possible. Confining testing to an artificial environment that does not replicate end-to-end functionality, followed by SWBT's flash cut introduction into of a new release into a production environment creates unacceptable risks. If SWBT cannot simultaneously support in a production environment both its current release and a test version of its impending release, then each new release will introduce a new version of commercial anxiety. Accordingly the absence of versioning has implications beyond those relating to the impact of a forced transition on a schedule that may or may not be compatible with a particular CLECs development and operational plans. Because the absence of versioning limits the range of testing that can be completed prior to implementation of a new release, the Commission and CLECs are justified in urging SWBT to reaffirm its commitment to, and accelerate the introduction of, versioning for EDI.

Sincerely,

Mark Witcher

Mark Witcher

DECLARATION OF

NANCY DALTON and SARAH DEYOUNG

ON

BEHALF OF AT&T CORP.

ATTACHMENT 7

MAY 21 1999

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TABLE OF CONTENTS

DOCKET NO. 19000

RELATING TO THE	§	**PUBLIC UTILITY COMMISSION**
IMPLEMENTATION OF SWBT'S	§	
INTERCONNECTION	§	**OF TEXAS**
AGREEMENTS WITH	§	
AT&T AND MCI	§	

AT&T COMMUNICATION OF THE SOUTHWEST INC.'S REQUEST FOR EXPEDITED ORDER REQUIRING IMPLEMENTATION OF CHANGE CONTROL PROCESS

	PAGE
Request for Order	2

List of Files:
g:\Law\mark\txpldgs\19000 Change Control Process pleading.doc

Original + 22

cc: Patrick Wood III, Chairman
Judy Walsh, Commissioner
Brett Perlman, Commissioner
Howard Siegel, Chief Attorney
Katherine Farroba, Administrative Law Judge, PUC
All Parties of Record

214

DOCKET NO. 19000

RELATING TO THE IMPLEMENTATION OF SWBT'S INTERCONNECTION AGREEMENTS WITH AT&T AND MCI	**§ § § § §**	**PUBLIC UTILITY COMMISSION OF TEXAS**

AT&T COMMUNICATION OF THE SOUTHWEST INC.'S REQUEST FOR EXPEDITED ORDER REQUIRING IMPLEMENTATION OF CHANGE CONTROL PROCESS

AT&T Communications of the Southwest Inc. (AT&T) submits this request for an expedited order directing implementation of a change control process that permits AT&T an effective opportunity to test and participate in the implementation process for future Southwestern Bell Telephone Company (SWBT) EDI releases. The relief requested is essential to minimize the potential for customer impacting system and process failures as AT&T and other competitive local exchange carriers (CLECs) move into the live EDI production environment.

BACKGROUND

1.

AT&T has consistently manifested its intention to begin providing local service to customers utilizing combinations of unbundled network elements (UNEs) in the third quarter of 1999. AT&T has committed substantial resources to readying its systems to support the scheduled market entry. Successful implementation of interactive Operational Support Systems (OSSs), however, depends on SWBT's ability to create a stable EDI environment in which new releases, both those that require EDI programming by CLECs and those that do not, are properly announced, tested, and introduced. SWBT's inability to adhere to its own published change control process raises serious

concerns about whether SWBT's OSS are accessible under standards defined by the Federal Communications Commission (FCC). Moreover, because AT&T is in the systems readiness testing (SRT) process today, SWBT can no longer claim that its departures from proper change management processes are somehow tolerable because no CLEC is using EDI in production.

2.

SWBT has scheduled a new EDI release for June 26, immediately prior to AT&T's commercial UNE-P entry date. If there is a repeat of any of the problems experienced with SWBT's two most recent EDI releases (December 19, 1998 and May 1, 1999), the establishment, conversion and support of live customer accounts will be negatively impacted. AT&T in particular and local competitors in general cannot afford to rely on SWBT systems that are subject to change with inadequate or inaccurate notice, incomplete testing, and uneven implementation. Immediate relief is necessary to obtain SWBT's commitment and adherence to an effective change control process. Even well managed releases can require a CLEC to perform system programming, develop new methods and procedures, and engage in internal and intercarrier testing. Releases that are poorly managed – those that implement modifications inconsistent with prior announcements or that introduce modifications without adequate time for CLECs to make corresponding programming and development changes or that are not tested successfully before implementation – devalue the steep investment made by those committed to industry standard gateway solutions and render unreliable the systems that all agree are essential to the viability of local competition.

CRITICAL DEFECTS IN THE CHANGE CONTROL PROCESS ASSOCIATED WITH THE MAY AND DECEMBER RELEASES

3.

There has been no agreement by SWBT to alter its stated intention to use the same trunkated process to announce, test and introduce EDI interface modifications via its change control process for the upcoming June release as was utilized for the May release. Both that release and the previous release in December 1998 have been afflicted with significant process and implementation issues. Problems have ranged from inaccurate specifications being provided by SWBT to the CLECs to modifications being made by SWBT that were never announced at all. These defects have jeopardized and set AT&T's SRT back, and issues identified during pre-release testing the week of April 26 remain outstanding. Defects such as these could be fatal to AT&T's local entry plans if repeated in the June release on the eve of AT&T's local entry. During change control meetings, AT&T has objected to the expedited process as implemented by SWBT. AT&T has specifically addressed the need for (1) adequate testing timeframes in advance of production implementation (e.g., 30 to 60 days depending on the magnitude of the changes to be introduced in the release), (2) identification of testing entrance and exit criteria in order for all parties to understand the performance levels required for a "go" decision to be made and (3) a formal "go/no go" decision making process to invoke the experiences of all parties prior to implementation.

4.

SWBT has repeatedly bootstrapped the order regarding the January 2000 date for versioning into a claim that during 1999 SWBT must implement expedited releases with short testing timeframes. AT&T did not interpret the Commission's decision allowing

SWBT until January 2000 to implement versioning (also referred to as a "sunrise/sunset" process) to mean that SWBT had a license to implement quarterly releases on an expedited schedule disregarding quality processes and/or gates. Based on the recent experiences with the overly relaxed release program designed by SWBT, AT&T has no choice but to seek dramatically improved adherence to a well-defined implementation and change control processes before AT&T can rely on SWBT's OSS to serve UNE-P customers on a commercial basis.

5.

As previously documented, during the period leading up to and after the May release, AT&T has been in the SRT phase of its preparations for market entry. AT&T attempted to test the May release changes prior to its introduction into production and into the SRT process. AT&T began testing the release changes on the date allowed by SWBT – April 26, 1999 – but was unable to complete the test scenarios as a result of coding errors made by SWBT on its side of the EDI interface. Unfortunately, AT&T learned, at the time that it was escalating the issues and requesting that SWBT not implement a flawed release into production, that AT&T did not even have that full 5-day period to test because the May 1 release was already being loaded into SWBT's production systems during the afternoon of April 30. In contrast, SWBT's published EDI/LSR Change Control Process provides for the testing of a new release to begin approximately 60 days after circulation of final SWBT requirements and at least 30 days prior to the implementation date. Unless mutually agreed to by the parties, SWBT's published change control process timeline calls for three weeks of pre-release testing (adhering to a test plan including criteria for test success), and permits CLECs to request

a delay of implementation if testing is not successfully completed within the planned time frame.

6.

Upon receipt of the release on April 26, AT&T tried to execute 17 test order scenarios to evaluate new SWBT requirements. In spite of multiple attempts to execute those 17 scenarios during the first 4 days of the week of April 26 and repeated assurances by SWBT that the errors were resolved, AT&T was able to complete only one of the scenarios during the 5-day test period. A key concern for AT&T is that the errors AT&T experienced were in areas that ostensibly were not to be affected by the release. During the morning of April 30, AT&T requested that the implementation of the release be delayed to provide an opportunity for SWBT and AT&T to jointly resolve the issues that had been identified and to complete the test to make sure the defects had been eliminated and that the remaining 16 scenarios did not disclose additional problems. SWBT, again assuring AT&T that the defects had been eliminated, refused to delay the implementation.

7.

AT&T asked that an April 30 conference call in this docket be convened to discuss the issue. On that call, AT&T was informed that the release could not be delayed because SWBT had already begun coding it into its production systems. SWBT again assured the participants that it had cleared the only defects raised by the only 2 CLECs in

"production"[1] (SWBT did not count AT&T's SRT or its involvement in the OSS testing in Docket 20000 as a "production" process) and that it was comfortable that the release was ready to go. SWBT gave no indication on that call that it had consulted with any of the CLECs in Texas with respect to whether the release was ready for implementation. In fact, MCI, while in production in Texas, was not included in the go/no go decision made by SWBT. MCI relates that it contacted SWBT late on the afternoon of April 30 and asked SWBT not to implement the May 1 release because of deficiencies uncovered by MCI. Again, SWBT refused on the basis that it had already begun coding the release.

8.

In spite of SWBT's assurances, AT&T continued to encounter the same types of problems after the release had been implemented that it had seen during the week of April 26. Recurring problems included incorrect population of the ECCKTs on electronically generated FOCs and SOCs and association of the wrong REFNUMs to the ECCKTs that were provided. Problems caused by the release again prevented AT&T from completing all test scenarios after the release was implemented. Unexpectedly, AT&T also encountered new problems it had not seen the week before, such as manual (fax) return transactions (FOCs and rejects). SWBT's abbreviated test period does not allow for any regression testing (a recognized method to detect unanticipated downstream and upstream impacts on related processes not directly the subject of new release) nor does SWBT's published change control process adequately address the need for

[1] SWBT, apparently because of proprietary concerns, did not divulge either the names, locations or types of operations of these 2 CLECs, other than to indicate that they were located in California. As its entry date nears, AT&T cannot realistically be expected to rely on undefined tests by unidentified entities in other states that may or may not even be testing the systems that AT&T will be using for its UNE-P entry.

regression testing. If AT&T had been in a live commercial environment at the time of the May release, AT&T's ability to serve its customers would have been seriously disrupted as a result of the deficiencies in SWBT's release. AT&T has subsequently been informed by SWBT that problems such as those AT&T experienced were being found by SWBT after the release was moved into production. Clearly, as was admitted by SWBT's testing manager during the May change control meeting, even SWBT had insufficient time to complete internal testing prior to introducing the release into production. It took until March 11, 1999, to resolve the problems with SWBT's implementation of its December 19, 1998, release and it is unclear how long it will take to resolve the issues that remain unresolved with the May 1, 1999, release. It is unacceptable to continue in an environment which will affect competitive entry in Texas when timelines take priority over quality and customer-affecting issues take months to resolve.

9.

Of further concern, the May release was a relatively narrow release, and yet problems of this magnitude were encountered. The December release implemented much broader changes. The change control process utilized in conjunction with that release suffered many of the same deficiencies as the abbreviated process employed in May. The errors encountered by AT&T as a result of the December release were numerous, including discrepancies between changes as announced in accessible letters, changes incorporated into the LSOR, and changes as actually implemented. The issues were so severe that they caused significant delays in the start of the Texas OSS testing pending the ability of AT&T and SWBT to accurately upgrade the EDI interface to meet the

SWBT requirements. Because the defects caused the rejection of properly completed local service requests (LSRs), a repeat of the problems encountered with the December 1998 release effectively could bring to a halt AT&T's ability to sign up and support new customers.

10.

Both SWBT and AT&T (as well as other CLECs) undoubtedly will experience system development problems. The common goal must be to detect and resolve problems found in new releases before they are rolled out in a live commercial environment. The whole purpose for testing is to debug the new releases before they can impact operations and customers. However, if the process is to work, both parties must have an adequate opportunity to test the release and both must be committed to correcting defects and testing solutions so that a joint go/no go decision can be made before the release is placed into production.

RELIEF REQUESTED

11.

The only way to effectively address the change control issue is to implement the versioning process that AT&T and MCI have urged since the inception of this docket. It is inconceivable to think that all CLECs that are in a production environment should be required to flash cut to a new EDI version without the opportunity to have tested that version in a production mode. SWBT would not expect to create such risk in the introduction or modifications of its own internal processes and systems. Versioning control that is designed to allow commercial orders to be processed in accordance with existing requirements, while new requirements are being tested outside the production

environment, is not scheduled to be implemented until early next year. If the introduction of versioning cannot be accelerated, then proven commitments to change control process principles must be demonstrated. Immediate improvements should include at least the following components:

1) unless otherwise agreed, a minimum four week testing period, with longer test periods for significant releases;
2) agreement that the testing period will be extended, if necessary, to meet exit and success criteria and a commitment to delay implementation of new releases until completion of testing;
3) SWBT's commitment to implement and test solutions for errors found in testing;
4) agreement to participate in cooperative regression testing;
5) documentation of entrance, exit and success test criteria; and
6) a joint go/no go determination before the release is implemented into the production environment.

AT&T requests that the Commission order that SWBT adopt these as minimum conditions to be adhered to in the change control process beginning with the June release and continuing until versioning and a robust test environment are made available by SWBT in January 2000. Additionally, because release dates are rapidly approaching and because SWBT actually began implementing its last release ahead of the scheduled conversion date, AT&T requests that this request for relief be given expedited consideration.

Respectfully submitted,

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Dated: May 20, 1999

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on all parties of record on this 20th day of May, 1999.

_____
Mark Witcher