

**DECLARATION OF
NANCY DALTON and SARAH DEYOUNG
ON
BEHALF OF AT&T CORP.**

ATTACHMENT 9

Accessible



**“Final Minutes for October 12, 1999 Change Management Process Meeting –
Arkansas, Kansas, Missouri, Oklahoma, Texas”**

Date: November 12, 1999

Number: **CLEC99-170**

Contact: Southwestern Bell Account Manager

This Accessible Letter serves to distribute the Final Minutes from the October 12, 1999 Change Management Process Meeting. We apologize for the delay in distributing these minutes.

In the attachments you will find the Final Minutes, the Attendees List for those in attendance either in person or via conference bridge, and the Action Item Log. Draft minutes were distributed to participants for comment. Comments received were incorporated into the Final Minutes.

Please direct any questions to your Account Manager. -

Attachments

SWBT Change Management Process Meeting
One Bell Plaza, Room PC 32/34, Concourse Level
Tuesday, 12 October 1999 ~ 9:00am – Noon
FINAL MINUTES

Welcome and Introduction

SBC opened the meeting by welcoming all participants to the Change Management Process (CMP) meeting. A list of attendees is included as Attachment 1 to these minutes.

Changes to the agenda were reviewed. There were no additional items for the agenda from participants. Randall Lynch announced that this would be the last 5-State CMP meeting he will be leading. He has accepted another position in the company. In the interim, Kathy King will lead the CMP meetings until Randall's replacement is on board. SBC does not anticipate a lack in continuity since there are a number of other SBC participants who have been involved in the CMP meetings for some time.

8-State Change Management Process Update

SBC provided a draft of the 8-State CMP document. CLECs were requested to review the document and be prepared to approve it at the November CMP meeting. SBC gave a brief history of the development of the draft document. It is essentially the same as the 5-State document that was distributed via Accessible Letter (CLEC99-130). Changes from "SWBT" to "SBC" were made throughout the document, along with correcting typos.

AT&T asked if we still need to go through the approval process with the 2-State CLECs and what the process is for getting the document approved. SBC stated that the next steps are to:

- 1) provide a copy of the document to the parties of the Joint Settlement Agreement prior to the next 2-State QCMP meeting scheduled for 10/27;
- 2) distribute the document to the 2-State CLECs prior to its QCMP meeting, requesting that it be reviewed and to be prepared to approve the document at that meeting; and
- 3) file the document with the CPUC.

GTECC asked if changes to the document made by the 2-State CLECs would be communicated prior to the next 5-State CMP meeting. SBC responded that all changes would be communicated to the 5-State CLECs.

AT&T asked if this 5-State CMP is the process under which we have been operating. SBC replied that it is. Some items have already been implemented, and the remaining ones will become effective in concert with the timing of certain activities, such as versioning.

MCIW asked about the status of SNET. SBC responded that a CMP meeting with SNET is scheduled for next week, and plans are to review the CMP at that time. MCIW asked

how to get on the distribution list to receive information regarding CMP for SNET region. SBC advised MCIW to contact its Account Manager.

AT&T asked about the timeline for the CMP process to be adopted by SNET. SBC responded that there is no definitive target date and it will need to be worked through. There are some parts which can be implemented now, whereas, other parts will need to be delayed. One of the agenda items for the upcoming SNET CMP meeting, which is scheduled for 10/20, is a discussion of the 8-State CMP document.

MCIW asked if the CMP document had been distributed to all SNET CLECs. SBC plans to distribute the document with the final agenda for the 10/20 CMP meeting.

AT&T asked whether we anticipated a pushback from the 2-State CLECs, or others, such as the Commission. SBC stated that it does not expect there to be any concerns raised. SBC has been working closely with the 2-State CLECs as well as the CPUC regarding the activities with the TPUC. MCIW commented that much of the pushback was handled by the drafting team during its meetings to develop the document. SBC feels that review and approval by the 2-State CLECs is only a formality because representatives have been involved on the drafting team.

The goal is to have the 8-State CMP document in place by the end of November.

ACTION ITEM: SBC will send the 8-State document to those participants on the conference bridge. SBC will also add voting/approval of the 8-State document on the agenda for the November CMP meeting.

Proposal for Flow-Through Release

SBC stated that an Accessible Letter would be sent out this week for an exception process regarding four edits, which currently exist, to be changed. The Letter will ask for CLEC input. The change will shorten the Desired Due Date interval on UNE Loops from 8 to 7 days and from 11 to 10 days. The change corrects the way the days are counted. Currently, the day the order is placed is counted as day 1; then next day is day 2, 3, 4, and so on to day 8. Now, the day of the order is counted as day 0; then day 1, 2, 3, and so on to day 7. This change impacts REQTYP B for 8dB, 5dB and BRI loops.

MCIW stated that it is in a moratorium period for Y2K, so it will not implement the release. AT&T asked what necessitated the need for the change. SBC responded that the problem was discovered during testing with AT&T, that there was an inconsistency between the business rules and the actual way the days were being counted. SBC was counting "today" as day one (1), not zero (0).

AT&T and MCIW stated that a lot of effort was put into developing the CMP, and we should be following the process. They asked for clarification on how this change will be handled, either as a "fix" or an "exception". The process requires a majority vote to OK an exception. SBC's plan was to handle this as an exception.

SBC stated that Accessible Letter would provide more detail and include examples. The Letter will clarify whether the release will require coding changes by the CLECs.

LIDB Special Release

SBC stated that there are two topics for discussion:

1. on 1/15/00, the TPUC ordered a LIDB release for New Connects and Conversions
2. on-going administration of LIDB changes, which the TPUC instructed to be done via CMP by end of year 2000

Accessible Letter 99-137, sent out on 10/8, explained this special release regarding unbundled loop and port combinations. Today LVAS is available to manage LIDB. Each CLEC must notify SBC whether it plans to continue using LVAS or use the LSR for New Connects and Conversion activity.

There are two options available:

1. If a CLEC continues using LVAS (LVAS GUI or file transfer method) on a Conversion, the CLEC can make a change or can convert "as is". On a New Connect, the CLEC will need to populate LVAS NLT within 24 hours.
2. If a CLEC decides to wait for SBC to manage LIDB, on a Conversion or on a New Connect, the CLEC can provide the information on the LSR.

AT&T asked if it can still use the EDI interface for LIDB. SBC answered yes, that it plans to leave the existing interface in place.

MCIW asked what the difference was between Resale and UNE loop, and how the LIDB information for Resale was communicated. MCIW went on to ask why UNE-P is treated differently.

ACTION ITEM: SBC will check into MCIW's questions and explain the differences.

AT&T stated that LVAS performs defaults today, and asked what would be different. SBC asked if it would be useful to have a separate meeting to discuss the defaults and how it is used. More specific documentation and information on Resale vs. UNE-P could be provided prior to a meeting. CLECs agreed that it would be useful to have a separate meeting on this topic.

NextLink expressed concern with prioritizing LIDB over flow-through enhancements and asked if a vote on the prioritization could be deferred. SBC answered that the vote could be deferred until after the meeting on LIDB.

Everyone agreed to hold a separate LIDB meeting on 10/28 from 9:00 AM to Noon, Central Time. Release requirements, default mapping document, and a list of flow-through, in addition, potential items to go in the versioning release will be provided prior to the meeting.

GTECC asked what is ELMS. SBC answered that ELMS is the EDI terminology for the next industry release, as LSOG refers to the industry ordering guideline release. ELMS 4 would correspond to LSOG 4.

SBC stated that there would be no new forms implemented electronically with EDI 9/10. There will be some changes to fields on existing forms.

SBC asked that among the three broad categories, which item was most important:

1. LIDB2
2. EDI 9/10
3. Flow-through.

NextLink stated that flow-through was the most important item to them. AT&T stated that it needs LIDB2 to make the move from LVAS interface, and MCIW stated that it needed more time to review the document before responding.

AT&T and MCIW asked if there is information on what flow-through means; supplement due dates, edits with relating service orders, etc. SBC stated that it would send out a list of enhancement projects for year 2000 by the end of next week.

ACTION ITEM: SBC will send out a list of enhancement projects for the year 2000 by the end of next week.

MCIW stated that in light of the time frame and topics to be discussed, perhaps there is a need to change the date of the next CMP meeting from 11/16 to 11/9, and to extend the meeting to all day. Everyone agreed that the next meeting should be held on 11/9 from 10:00 AM to 5:00 PM.

AT&T asked if there will be uniform interfaces for 13 states, due to the Ameritech merger, to be part of the year 2000 releases. SBC responded that as part of the merger conditions, it would need to look at uniform interfaces where possible.

CLEC Interface Proposals/Recommendations

MCIW expressed concern regarding last minute changes to requirements for SBC's 10/23 release. The changes were issued after MCIW completed its testing, thus invalidating the results of its tests. MCIW thinks there should be a "drop-dead" date in which no further changes can be made. SBC agreed and stated that this is not the way SBC likes to operate. SBC is trying to get out of this mode, but clearly is not there yet. Before the changes were made, input and approval from the CLECs were requested on these exceptions.

AT&T stated that it thought the exception process as outlined in the CMP was supposed to be a more formal process and that there would be opportunity for more discussion. SBC stated that the process, as documented, is being followed.

ACTION ITEM: SBC will provide conference bridge information and release requirements and default mapping documents via Accessible Letter the week of 10/18 for the special LIDB release meeting

MCIW asked why SBC could not open up valid entries that SWBT does not currently use that are OBF standards. SBC asked if there are two issues that the CLECs are addressing:

1. treat Resale and UNE-P the same
2. use LSR OBF files, and not the feature/feature details field

The CLECs responded yes, that there were two issues.

ACTION ITEM: SBC will check into using the LSR OBF fields.

AT&T stated that it will stay on the LVAS interface until all changes made to LSR process are working properly for New Connects, migrations, and changes.

SBC stated that Accessible Letter CLEC99-139 distributed on 10/10, describes two options for the CLECs:

1. total replacement of features information
2. just what needed to be changed

In light of the possible route to be taken discussed earlier in this meeting, these two options may not apply. Further discussion on this topic will be postponed until research is completed on the Resale question.

Proposal for Flow-Through Release

SBC stated that there is a need to discuss release priorities. AT&T asked if priorities are:

- 1) versioning ordered by the TPUC on 1/1/2000
- 2) LIDB ordered for 1/15/2000.

SBC clarified that the TPUC did not require that the special LIDB release on 1/15 be versioned. TPUC requires SBC to include versioning in its first release of 2000, which is a separate release from the 1/15 LIDB release.

MCIW asked to confirm that the first release in 2000 would not occur between 1/1/2000 and 3/15/2000. SBC answered yes, that was correct.

The next topic for discussion was the implementation of EDI 9/10. AT&T asked for clarification because it thought that the plan was to go to LSOG 4 and EDI 10, that EDI 9 would be combined or skipped. SBC clarified that it will implement some changes in EDI 9, which are new to SBC, as well as EDI 10.

SWBT Change Management Process Meeting
One Bell Plaza, Room PC 32/34, Concourse Level, Dallas, TX
12 October 1999 ~ 9AM-Noon (CDT)

Attendees List

Attachment 1

*Brauchle, Rich	AT&T	rbrauchle@ems.att.com
*Desborough, Carol	MCI WorldCom	carol.desborough@wcom.com
*Driscoll, Anne	MCI WorldCom	anne.driscoll@mci.com
*Eslinger, Dee	Telcordia	
*Hazard, Ande	SWBT (Sprint Account Team)	ah2288@momail.sbc.com
*Katz, Bob	Sprint	rkatz@notescc.bellcore.com
*Kendall, Roseann	MCI WorldCom	
*Krabill, Nancy	Nextlink	
*Lane, Erica	MCI WorldCom	
*Mason, John	TPUC - Staff	
*Peat, Ron	Pacific Bell Regulatory	rp1918@msg.pacbell.com
*Pinick, Paul	Birch Telecom	pinickp@birch.com
*Protheroe, Pam	AT&T Mgr Carrier Relations/ Negotiations	protheroe@att.com
*Taff, Steve	Allegiance Telecom	steve.taff@allegiancetelecom.com
*Talbot, Kevin	SBC Communications	kt0210@momail.sbc.com
*Thompson, Cash	GTE Communication Corp. (GTECC)	cash.thompson@cc.gte.com
*Willard, Walter	AT&T	wwillard@ems.att.com
Chanay, Pam	Sprint	pam.chanay@mail.sprint.com
Clarence, Johnson	SBC Communications	cj7402@txmail.sbcom
Clippard, David	SBC Communications	dc7217@txmail.sbc.com
Garcia, Roy	SBC Communications	rg5480@momail.sbc.com
Gritt, Lisa	Sprint	lisa.l.gritt@mail.sprint.com
Gunnels, Mike	AT&T	mvgunnels@att.com
Hardy, Eva	SBC Communications	exhardy@pacbell.com
Hebert, Raymond	SBC Communications	rcheber@pacbell.com

*via Conference Bridge

SWBT Change Management Process Meeting
One Bell Plaza, Room PC 32/34, Concourse Level, Dallas, TX
12 October 1999 ~ 9AM-Noon (CDT)

Attendees List

Attachment 1

Johnson, Jean	SBC Communications	jj4535@momail.sbc.com
Kettell, David	AT&T	dkettell@att.com
King, Kathy	SBC Communications	mkking@pacbell.com
Lasch, Dick	GTE Communication Corp. (GTECC)	richard.lasch@cc.gte.com
LaValle, Lauryl	AM - LPAT SBC	ll7803@txmail.sbc.com
Lee, Judy	SBC Communications	jxlee1@pacbell.com
Lynch, Randall	SBC Communications	rl3960@txmail.sbc.com
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Schneer, Kenneth	Sage Telecom	kschneer@sagetelecom.net
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Viveros, Chris	SBC Communications	cjviver@pacbell.com

*via Conference Bridge

Action Item Log

Change Management Process Meeting

Attachment 2

Current Action Items:

3 – 8/10	AT&T questioned why CLECs need to provide data on supplemental orders. MCIW stated that the Telecordia report on testing had indicated that SBC had a report available that provides data on supplemental orders. SBC agreed to look into a report and respond back at the next meeting. (Combined issue #5 identified on 7/13 – CLECs to provide 6-months of data for SUP type/scenario at the January, 2000 CMP meeting.)	SBC	Open	10/11 – Pending information
4 – 8/10	SBC will check if pre-1998 Accessible Letters sent prior to email distribution would be posted on the web site.	SBC	Pending	9/14 - Target for 4 th quarter, 1999
5 – 8/10	MCIW asked why OSS letters are stored separately. Can all letters, whether OSS or not, be stored together? Can rescinded letters be left on the website and marked as rescinded? SBC will take these items into consideration and will explore if alternatives are feasible.	SBC	Open	10/11 – Will work out details (e.g., where to store letters, etc.).
1 – 9/14	SBC will ask its EDI support group to validate that all mapping of the APPTIME field is compliant with National Standards. Any found out-of-compliance will be changed, following the proper change management process.	SBC	Open	10/11 – Pending confirmation.
1 – 10/12	SBC will send the 8-State CMP document to those participating in the meeting via conference bridge	SBC	Open	
2 – 10/12	SBC will add the review and approval of the 8-State document to the agenda for the November meeting.	SBC	Open	
3 – 10/12	SBC will investigate further the difference with regard to LIDB between how Resale and UNE loop are handled.	SBC	Open	
4 – 10/12	SBC will provide conference bridge information and send out more information on LIDB based on today's meeting as well as default mapping documents via Accessible Letter for the special LIDB meeting scheduled for 10/28.	SBC	Open	
5 – 10/12	SBC will check into opening up the LSR OBF fields that it currently does not use.	SBC	Open	
6 – 10/12	SBC will send out a list of enhancement projects for the year 2000 by the end of next week.	SBC	Open	
7 – 10/12	SBC will find out if there is a document/guide listing the location of the items on the new CMP web site.	SBC	Open	

Closed Action Items

Change Management Process Meeting

Attachment 2

Closed Action Items:

Number	Action Item	Owner	Status	Comments
1 – 7/13	CLECs to provide Account Managers by Friday, August 30, 1999 with: <ul style="list-style-type: none"> • intent to test the October Release • test cases for October Release. 		Closed 9/14	
2 – 7/13	SBC to include in the July 28 th California CMP meeting agenda a discussion item on the scope of the drafting team. Clarification will then be provided at the August 10th 5-state CMP meeting.		Closed	Clarification to be provided during the 8-10 CMP meeting. SBC provided status from the July 28 California Change Management meeting, where it was agreed that the California agreement would be used as a template for developing a process that will work for the existing 8 states.
3 – 7/13	SBC will investigate a formal documented CMP in SNET and notify drafting team members.		Closed	There is not a formal documented process.
4 – 7/13	SBC will provide status regarding its investigation to expand versioning to include dot releases at the next CMP meeting.		Closed 9/14	Versioning meeting held on 8-9, Accessible Letter to be distributed by August 31 st 1999.
6 – 7/13	SBC will prepare a written response to Sprint's Change Request by July 20 th . Furthermore, the response will be documented in the Change Request Summary and will be included with these meeting minutes.		Closed	The Feature Availability function is available in both the SWB and PB/NB regions on a feature specific basis. Currently, both SWB and PB/NB provide a validation of one feature at a time, which is how OBF has defined the function in approved Issue 1278. This functionality has been re-defined, however, to provide a list of features by switch and is included in Issue 1671. This issue, however, will not be finalized by OBF in time for SBC to implement in 1999. SBC clarified that the SWB region back-end system cannot utilize NPA/NXX and would require a 10-digit telephone number to be similar, which is not the current industry guideline. To initiate the SWB 10-digit Telephone Number change, SBC will introduce the issue at OBF.
7 – 7/13	A CLEC must notify SBC in writing through its Account Team by August 9 th if it wishes to invoke the voting process for the August Release. If such voting is necessary, the vote will be taken at the August 10 th CMP meeting and SBC will notify all eligible CLECs of the call for a vote.		Closed	SBC was notified that one CLEC called for a vote.
8 – 7/13	An email notice detailing the call-in number for a CLEC testing readiness call on July 23 rd will be sent to CLECs who have confirmed joint testing with SWBT.		Closed	Conference call on 7/23 has been held.

**DECLARATION OF
NANCY DALTON and SARAH DEYOUNG
ON
BEHALF OF AT&T CORP.**

ATTACHMENT 10

Closed Action Items

Change Management Process Meeting

Attachment 2

Closed Action Items:

Number	Action Item	Owner	Status	Comments
9 – 7/13	SBC to verify when pre-1999 OSS Accessible Letters will be available on the CLEC Website.		Closed	These Accessible Letters will be on the website in the 4 th Quarter
10 – 7/13	Draft meeting minutes to CLECs will be distributed on Friday, July 16 th or Monday, July 19 th . CLEC comments are due July 23 rd with Final Minutes to be issued on July 27 th .		Closed	Final Minutes Accessible Letter CLEC99-104.
1 – 8/10	SBC committed to send out an Accessible letter with details on the 2 additional changes for the Oct. 23 rd release and request comments. If no protests are received, then the two additional items will be added and a final Accessible Letter will be sent confirming the additions.		Closed 9/14	Accessible Letter CLECSS99-112 announced proposed changes.
2 – 8/10	SBC will provide the decision on versioning by August 31 in an Accessible Letter.		Closed 9/14	
2 – 9/14	MCIW, GTECC, and Sprint will find out how they are currently handling indefinite end user service addresses (related to modification SBC presented to Final Requirements for 10/23 Release) and provide feedback via their account managers by 9/15 so that a conference call could be held on 9/17.	CLECs	Closed 9/15	All responded. Issue closed.

AT&T asked if the situation was truly a result of a scenario discovered during testing, is it valid to categorize it as an exception. MCIW commented that the 10/23 release had seven changes after the final requirements; final requirements should be considered "final". SBC stated that there were a number of factors leading to the decision to go ahead with the changes after the final requirements were issued.

MCIW has serious concerns regarding this issue, and although it is not suggesting that we revisit the CMP, MCIW does not expect there to be changes after the test window.

AT&T stated that the number of changes for SBC's releases have not gotten better, and that this release is just as bad as the previous ones. SBC noted CLECs' concerns and frustrations and reiterated that this is not the way SBC wants to do business and that steps are being taken to improve in this area.

Prior Action Items/Status/Updates

SBC reviewed the Action Item Log, which was updated and is included as Attachment 2 to these minutes.

Sprint expressed concern regarding the way Action Item #2-9/14 was handled. Sprint stated that it never received notice regarding the conference call, which was to be held by SBC, MCIW, GTECC, and Sprint, to discuss how the indefinite end user service addresses were currently being handled. Sprint stated that it had to follow-up on what was going on with this issue, and subsequently discovered that the conference call never took place. SBC responded that after discussions with Sprint, it thought the issue was resolved; therefore, concluded that a conference call was not necessary. Apparently, there was some misunderstanding between SBC and Sprint regarding Sprint's expectations of how this issue was to be resolved and the need for the call. SBC apologized and stated that it will ensure that action items are followed-up on appropriately and not get dropped.

MCIW asked if there is a location guide for the new items on the SBC's CLEC web site. SBC stated that it did not know, but would find out.

ACTION ITEM: SBC to find out if there is a document/guide listing the location of the items on the new CMP web site.

MCIW asked if there is a record that tracks when error codes were implemented. SBC stated that the Account Manager has this information.

SBC asked if there were any other items needing to be discussed at today's session. There were none. The meeting was adjourned.

Attachments

Federal Communications Commission
Washington, D.C. 20554

September 27, 1999

Nancy E. Lubamersky
Executive Director
Regulatory Planning
U S WEST
11 Upper Ardmore Road
Larkspur, CA 94939

Dear Ms. Lubamersky:

During the course of the last several weeks, members of the Common Carrier Bureau's Policy and Program Planning Division ("Division") have met with representatives from U S WEST to discuss third-party testing of operations support systems ("OSS") and the competitive local exchange carriers ("CLECs") access to those systems. The Commission has previously indicated that for a Bell Operating Company ("BOC") to obtain approval under section 271 of the Telecommunications Act of 1996 to provide in-region, interLATA services, it must demonstrate that it provides to CLECs nondiscriminatory access to its OSS and that its systems are operationally ready and capable of handling reasonably foreseeable demand. A number of companies, including yours, have undertaken or are developing independent third party tests of their OSS.

The purpose of the discussions between Division staff and interested parties has been to provide guidance on important elements that a third-party test should include to assist our determination that a BOC is providing nondiscriminatory access to its OSS. These views represent the current thinking of the Common Carrier Bureau and are in no way binding on the Commission. Any final determination concerning whether a BOC is providing nondiscriminatory access to its OSS will be made based upon the record in a section 271 application. It is my hope, however, that the Bureau's views on these issues will be helpful to you and other Bell Operating Companies in formulating successful section 271 applications.

1. Performance Measure Evaluation

A thorough and well-documented independent assessment of the data collection and calculation processes for performance data will considerably facilitate the Commission's review of a section 271 application. An independent review of the performance measurements is crucial in determining the accuracy and validity of performance data. In particular, the staff believes that such an independent review would include the following qualitative and quantitative aspects.

- An evaluation would include an assessment of whether the raw data being collected by the BOC is accurate, which could be tested by observing the raw data collection processes and by comparing the BOC's raw data to independently-collected data.
- The evaluation would assess the processes by which the raw data is filtered and transformed into final, reported results.
- The evaluator would assess whether the BOC's data collection and data processing functions are consistent with the published performance measurement business rules.
- The evaluator would assess the adequacy and functioning of the BOC's internal controls over the data collection processes and the software programs that process the data (such as the controls over personnel access to the databases, and the controls that ensure that the programs and program modifications are properly authorized, documented, tested and approved).
- The evaluation would include an independent quantitative verification of the reported performance data. To accomplish this, the evaluator could be provided with the BOC's raw data and independently process the data, pursuant to the business rules, to ensure that the stated calculations and algorithms have been accurately applied.

We note that a comprehensive evaluation of the BOC's performance measure processes may include elements in addition to those listed above, as determined by the states or by an independent evaluator. Accordingly, we encourage BOCs to make the details of the proposed evaluation available to the Commission, and to the public, as they are developed.

2. Change Management Test

We also believe it critical that there be an independent review of a BOC's change management process and procedures as well as its implementation of these procedures.¹ The change management test should provide information which can be used to evaluate the methods and procedures that the BOC employs to communicate with CLECs regarding OSS system performance and system updates. The independent evaluator should assess the BOC's change management processes and should include, but not be limited to, a review of the BOC's ability to implement at least one significant software release. The following

¹ For purposes of this discussion, we use the phrase "change management process" as referring to the management of changes to OSS interfaces that affect CLECs' production or test environments. Such changes may include: 1) operations changes to existing functionality that impact the CLEC interface(s) upon a BOC's release date for new interface software; 2) technology changes that require CLECs to meet new technical requirements upon a BOC's software release date; 3) additional functionality changes that may be used at the CLEC's option, on or after a BOC's release date for new interface software; and 4) changes that may be mandated by regulatory bodies.

elements would be indicative, but not dispositive, of a satisfactory change management process and should be evaluated by the independent third-party:

- **CLEC Participation:** CLECs would have a role in the development of, and modifications to, the change management process.
- **Release Implementation:** Prior to issuing a new software release or upgrade, the BOC would provide a testing environment that mirrors the production environment in order for CLECs to test the documentation for the new release. The testing environment would be stable (*i.e.*, no changes by the BOC), and would be maintained for an adequate time-period, at least 30 days, for the CLECs to test. To ensure CLECs are not forced to cut over to a new release prematurely, a BOC could adopt a "Go/No Go" vote process to decide whether to implement a new release. Pursuant to this process the new release is delayed if a majority, such as two-thirds, of eligible CLECs vote to delay the release. Similarly, a BOC could maintain a pre-existing version, or versions, of the interface (*e.g.*, Electronic Data Interchange) when issuing a new release rather than switching directly from one version to the next.
- **Memorialization of Process:** The change management process would be clearly memorialized and set forth in one document that can be readily accessed by the CLECs. Any modifications to the change management process would be included with this document.
- **Dispute Resolution:** There would be a dispute resolution process for change management that is separate and apart from any process that is set forth in interconnection agreements. This would provide CLECs a forum specifically designated to resolve any change management disputes.

3. **xDSL Testing**

The third-party test would test significant volumes of xDSL orders (*i.e.*, xDSL capable loops).

4. **Normal, High, and Stress Volume Testing**

- **Normal and High Volume Testing:** The third-party test would test projected normal and high volumes of pre-order and order transactions that flow-through the BOC's systems.² The mix of transactions would replicate expected CLEC

² An incumbent LEC's internal ordering system permits its retail service representatives to submit retail customer orders electronically, directly into the ordering system. This is known as "flow-through." Similarly, a competing carrier's orders "flow through" if they are transmitted electronically (*i.e.*, with no manual intervention) through the gateway into the incumbent LEC's ordering systems. Order flow-through applies solely to the OSS ordering function, not the OSS provisioning system. In other words, order flow-through measures only how the competing carrier's order is transmitted to the incumbent's back office ordering system, not how the incumbent ultimately completes that order. Electronically processed service

ordering patterns by including, for instance, error conditions and change orders, and by covering the process end-to-end (*i.e.*, through the receipt of order confirmation notice or electronic error notice). "Normal" volumes would be based on the BOC's reasonable estimate, with input from CLECs, of daily order volumes. "High" volumes would be significantly greater than normal volumes and based on the BOC's reasonable estimate, with input from CLECs, of forecasted demand.

- **Capacity or Stress Testing:** The third-party stress test would assess scalability of the BOC's OSS systems by testing a mix of transactions similar to those in the normal and high volume testing. These volumes would be significantly greater than the high volume test and be sufficient to identify potential weak points in the systems.

5. Pseudo-CLEC

If no CLEC has constructed an interface with whatever OSS system the BOC is relying on to meet the nondiscriminatory obligations set forth in the 1996 Act, the third-party tester should build a pseudo-CLEC. The pseudo-CLEC should build an interface not only to test the quality of the BOC's documentation for such OSS systems but also to ensure that these systems are capable of submitting and receiving valid transactions. The pseudo-CLEC should build the interface(s) using the BOC's documentation and business rules to determine whether any CLEC can build an interface based upon these materials. Third-party testing can be conducted using orders from a combination of existing CLECs and a pseudo-CLEC.

6. Dissemination of Information

A third-party test of OSS should include a formal, predictable and public mechanism for the third-party tester to communicate to both the BOC and the CLEC community issues identified by the third-party tester that arise during the course of testing. Staff proposes the following options for reporting problems:

- Report issues as they arise; or
- Issue reports pursuant to a specified time-frame (*i.e.*, weekly or bi-weekly); or
- Issue an interim report in the middle of the test and a final report at the end.

Combinations of these options could provide optimal balance between frequency and detail.

7. Functionality

- CLECs would be consulted in developing the test scenarios to reflect their market entry and growth and expansion scenarios in a particular region.

orders are more likely to be completed and less prone to human error than orders that require some degree of human intervention.

- **Functionality testing would be conducted for pre-ordering, ordering, provisioning, maintenance and repair, and billing transactions. The transaction mix should replicate CLEC ordering patterns and include, for instance, orders that fall out for manual processing, orders that contain errors, and order changes and supplements. Functionality testing also would test these transactions end-to-end (*i.e.*, orders should be actually provisioned), as applicable.**

This letter is intended to provide a summary of staff views regarding key elements of a third-party test which could assist our determination that a BOC's OSS is operationally ready and capable of efficiently supporting ever-increasing volumes of transactions. It is not, however, intended to be an exhaustive list of the necessary elements for a successful third-party test. Moreover, it is possible that additional issues will be raised by interested parties in future section 271 dockets. I emphasize that any final determinations regarding whether a BOC is providing nondiscriminatory access to its OSS will be made by the Commission based on the record of the BOC's 271 application for a particular state. To this end, Bureau staff is committed to working with all parties to ensure that the section 271 application process is as orderly and predictable as possible.

For information purposes, a copy of this letter will be placed in CC Docket No. 98-121³ and CC Docket No. 98-56.⁴

Sincerely,

**Lawrence E. Strickling, Chief
Common Carrier Bureau**

³ **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, Memorandum Opinion and Order, 13 FCC Rcd 20599 (1998).**

⁴ **Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance, CC Docket No. 98-56, Notice of Proposed Rulemaking, 13 FCC Rcd 12817 (1998).**

**DECLARATION OF
NANCY DALTON and SARAH DEYOUNG
ON
BEHALF OF AT&T CORP.**

ATTACHMENT 11

January 15, 1999

Mr. Tom Hughes
SBC Telecommunications, Inc.
311 S. Ackard
Dallas, TX 75202

Dear Tom,

As you are aware, AT&T has suspended testing of the 12/19 release of EDI. In order to move forward with testing, we would like to document our reasons for the suspension, as well as, outline the principles and expectations to govern the 12/19 release testing on a going forward basis. It is our objective that both companies agree on the principles and expectations before resuming the test.

Reasons for Testing Suspension.

AT&T made a decision to suspend testing for several reasons. We originally sent six conversion orders to SWBT to find that all six orders rejected in the LASR test system due to the fact that AT&T had not populated the BAN. AT&T did not populate the BAN based on the Accessible Letter dated January 7, 1999. In spite of this Accessible Letter, AT&T then agreed to populate the BAN in the interim to ensure that testing could proceed. Hoping that we could now move forward, AT&T became aware that the six conversion orders that were re-generated with the BAN we were advised to use by SWBT rejected in the MOG test system for the same BAN issue. It was at this point, AT&T decided to suspend testing until SWBT could replicate the test systems to mirror the production systems. After conversations with SWBT, it was made evident that SWBT could not program the test systems to mirror the production systems to accommodate the testing of the 12/19 release. Therefore in order to proceed with testing, AT&T will agree to test the 12/19 release in the production database

Testing Principles/Expectations.

As stated previously, AT&T will agree to test the 12/19 release in the production database in order for us to fully test the integrity of the EDI interface and coding that has been implemented based on the LSOR modifications and Accessible Letters. We expect that all orders will be tested through SORD, and all new or modified communicated business rules will be tested. Based on the fact that the production environment is being used, the LSRs generated by AT&T will actually go through SORD, provisioning and all other downstream systems due to the fact that the production environment will not allow for orders to be stopped at the point of SORD. In order to test the directory listing retention modifications, we will incorporate order types to test whether or not retention occurred.

Testing Timeline.

The date that AT&T and SWBT will resume testing on the 12/19 release is still open as there are several issues that must now be resolved to test in the production system (i.e. test volunteers etc.). The test end date originally communicated (February 6, 1999) will be extended for every day we are not moving forward.

Future Release Testing.

AT&T will test future releases only in the test systems. We require that all SWBT systems (LASR, MOG, SORD, etc.) be capable of testing all edits in their associated test systems. Therefore, we expect that all systems and data in the test environment exactly mirror the production systems; and orders will be tested all the way through SORD.

Also, we will require that in future releases all communicated business rules are tested. After the Final Notification of the 12/19 release was distributed, there were two subsequent Accessible Letters to announce changes to the final requirements. The LSOR 3.2 was not made available until 12/14/98, and we have since learned that the LSOR is to be revised yet again. SWBT has been consistent with their statements that the LSOR is the document that CLECs are to use for development. However, changes to the Final Notification go against what has been outlined in the Change Control Process. Final Notification should include complete and final LSOR requirements. If for the rare occurrence SWBT should need to make a change to requirements after Final Notification, SWBT should solicit input from the CLECs on the development impact of the schedule.

As you are aware, AT&T is extremely disappointed in the 12/19 release testing that has taken place. We hope that you will take the responsibility to communicate our dissatisfaction, and ensure that testing in the future will meet our desired expectations.

Sincerely,

David Kettell
District Manager

**DECLARATION OF
NANCY DALTON and SARAH DEYOUNG
ON
BEHALF OF AT&T CORP.**

ATTACHMENT 12

TRANSCRIPT OF PROCEEDINGS
BEFORE THE
PUBLIC UTILITY COMMISSION OF TEXAS
AUSTIN, TEXAS

INVESTIGATION OF SOUTHWESTERN)
BELL COMPANY'S ENTRY INTO THE) PROJECT NO.
TEXAS INTERLATA) 16251
TELECOMMUNICATIONS MARKET)

HEARING ON THE MERITS
TUESDAY, NOVEMBER 2, 1999

BE IT REMEMBERED THAT AT approximately
8:40 a.m., on Tuesday, the 2nd day of November
1999, the above-entitled matter came on for
hearing at the Offices of the Public Utility
Commission of Texas, 1701 North Congress Avenue,
William B. Travis State Office Building,
Commissioners' Hearing Room, Austin, Texas
78701, before KATHERINE FARROBA and DONNA NELSON,
presiding; and the following proceedings were
reported by William C. Beardmore, Kim Pence, Evie
Coder and Steve Stogel, Certified Shorthand
Reporters of:

1 JUDGE NELSON: Ms. Lavalley, this
2 will be your last question.

3 MS. LeVALLE: I promise this is my
4 last question.

5 Q In that same document, there's some
6 tables in the back that give you assigned house
7 number fields in DataGate, and they talk about
8 status fields, and originally the documentation
9 said assigned house number status. Now, it's
10 been changed to give you some detail to show you
11 that it's got working TN information and pending
12 TN information and not working TN information
13 and all that. There's an assigned house number
14 field under that that says telephone number
15 proprietary. Do you see that sir?

16 A (Bannecker) Yes, I do.

17 Q Why is it that Southwestern Bell is
18 marking that DataGate field as a proprietary
19 field, which I understand, relates the telephone
20 number to the service address for a particular
21 customer, and is Southwestern Bell willing to
22 make that field accessible to CLECs for their
23 pre-order inquiries?

24 A (Bannecker) I don't know, and I really
25 -- at this point, I can't answer that question.

1 I don't know.

2 MS. LaVALLE: Is there anyone at
3 Southwestern Bell that can answer why that field
4 is proprietary and not accessible to a CLEC that
5 relates to the telephone number to the service
6 address that matches the two?

7 A (Sirles) This is Glen Sirles. No, I
8 can't really directly answer your question. I'm
9 aware of changes we made to assigned house
10 number, which I was under the impression were
11 correcting the problem, and that we should be
12 beyond that issue, but I'll be happy to follow
13 up on that.

14 MS. LeVALLE: This is not a
15 nonspecified address. This is a more general
16 question about assigned house number, but we'd
17 appreciate a follow-up response in the record.
18 Thank you.

19 JUDGE NELSON: Okay. Ms. Murray,
20 does Southwestern Bell intend to cross the CLEC
21 witnesses on this panel?

22 MS. MURRAY: Your Honor, we have
23 no cross-examination for the AT&T witnesses.
24 It's our understanding that the only other
25 witness on the panel should be the AT&T

**DECLARATION OF
NANCY DALTON and SARAH DEYOUNG
ON
BEHALF OF AT&T CORP.**

ATTACHMENT 13

3B

OPEN MEETING

DOCKET NO. 16251

COMPRESSED TRANSCRIPT

APRIL 7, 1998

KENNEDY REPORTING SERVICE, INC.

(512) 474-2233

TRANSCRIPT OF PROCEEDINGS

BEFORE THE
PUBLIC UTILITY COMMISSION OF TEXAS
FORT WORTH, TEXAS

IN THE MATTER OF THE)
THE INVESTIGATION OF)
SOUTHWESTERN BELL'S ENTRY) PROJECT NO.
INTO INTERLATA LONG) 16251
DISTANCE PROVISION PURSUANT)
TO THE FEDERAL TELECOM ACT)
SECTION 271)

OPEN MEETING

BE IT REMEMBERED THAT AT approximately
9:20 a.m., on Tuesday, the 7th day of April 1998
the above-entitled matters came on for Final
Order at the Local Service Center, Fort Worth,
Texas, before CHAIRMAN PATRICK HENRY WOOD III,
COMMISSIONER JUDY WALSH and COMMISSIONER PATRICIA
A. CURRAN; and the following proceedings were
reported by Lou Ray, William C. Beardmore and
Randall N. Finch, Certified Shorthand Reporters
of:

fellow Commissioners and my Commissioner
who is coming and the staff, but also the
participants in the project, to please at
the appropriate time ask questions, and we
do have a pretty ambitious schedule for
today, and I think our goal is to stay here
until we get done today and not have to
carry over until tomorrow. So if we can
keep focused on that, then I'll let --
Donna, do you have anything you want to --
Kathy?

JUDGE FARROBA: Basically I
just have a few instructions for today that
I'd like to talk about, and, first of all,
if everyone would please refrain from
asking questions during the demonstrations,
there is time allotted afterwards for
questioning. And if you would note the
allotted time for questions, I'd request
that individual participants refrain from
monopolizing questioning, to allow others
an opportunity to ask questions, and I'd
also ask that you hold your questions on
the slide presentation until after the EASE
demonstration and then ask those questions
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PROCEEDINGS
TUESDAY, APRIL 7, 1998

(9:20 a.m.)

CHAIRMAN WOOD: I'll go
ahead and call this Open Meeting of the
Public Utility Commission of Texas to order
to consider matters which have been duly
posted with the Secretary of the State of
Texas for April 7, 1998; to wit, Project
No. 16251, the investigation of
Southwestern Bell's entry into interLATA
long distance provision pursuant to the
Federal Telecom Act, Section 271. I want
to thank our host for having us out here
today and appreciate the participation of
all the parties that are interested in this
proceeding.

Our goal today is to get an
understanding of the Local Service Center
operations and get introduced to some of
the operations support systems, which I'm
certain we will continue at our hearing in
Austin later this month on the 21st; and to
encourage, not only the Company and my
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then.
What I'd like to do right now is
to swear in the individuals that are
presenting the demonstration and slide
presentation, as well as any experts and
non-attorneys who will be questioning them
and making statements on the record, and I
think it's easier to do this as a group.
So everyone in the room who is not with the
Commission and is not an attorney, if you
would, please, raise your right hand.

(The witnesses were duly sworn.)

JUDGE FARROBA: And one final
instruction. When you have a question, if
you would please come up front and identify
yourself and whom you represent before you
ask your questions, that would be really
helpful, and I think now we're ready to get
started with the slide presentation.

MS. LOWRANCE: Welcome to
the Local Service Center. I am Nancy
Lowrance, and I'm the Director of the
Center here at Alliance, and what I'd like
to do is have my team come up, and I'd like
to introduce them to you.
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1 Okay. One person at a time, please.

2 MS. HAM: Okay. You've
3 either got to fax it or mail it.

4 MR. BAROS: Thank you.

5 MR. SIEGEL: And then the
6 Bell representative after they receive the
7 fax -- they manually enter it into SORD?

8 Is that --

9 MR. SPARKS: That is
10 correct, and SORD is the system that our
11 service representatives use to process
12 complex services. It's one that's quite
13 antiquated and one that doesn't really fit
14 the bill, but it's what we're trying to
15 strive for in creating interfaces for our
16 CLECs. So we have not made that system
17 generally available for the processing of
18 complex orders, nor have we received a
19 confirmed request for SORD access for the
20 processing of complex orders.

21 There have been a few discussions
22 with CLECs, but nothing that yielded a
23 desire to move forward. They would prefer
24 to work with us on the development of
25 industry guidelines to support complex

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1 confusion around the definition of complex
2 order types, specifically the systems, and
3 I think that can be cleared up with some
4 documentation.

5 I think the thing that I'd like
6 to point out, too, is that it's not
7 Southwestern Bell alone that has manual
8 processing for these types of complex
9 orders. The industry guidelines that
10 Nathan is speaking of -- some of the things
11 that we're talking about now that are not
12 in Business EASE are not in the industry
13 guidelines either because the industry,
14 which includes all of the representatives
15 here, has not been able to work through the
16 details of that because it is complex.
17 It's not only complex from an order
18 perspective, but it's also complex from a
19 process perspective as far as negotiating
20 with the customer.

21 So I just wanted to point that
22 out. It's not like we're in this by
23 ourselves when it comes to manual
24 processing for complex order processing.

25 MS. HAM: Thank you.
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1 orders, and that's where we've been
2 focusing our efforts to work with the
3 establishment of EDI and LEX to support
4 those complex order types.

5 MR. BAROS: Just a word to
6 the contrary, if I may, Nathan. MCI has
7 tendered a formal request for access to
8 SORD, and that request has been denied.

9 MR. SIEGEL: Do you know
10 approximately when that was?

11 MR. BAROS: It was within
12 the last five to six weeks, I believe. I
13 can get a copy of the letter. That's not a
14 problem.

15 MR. SPARKS: I would
16 appreciate seeing that, and I will work
17 with our Account Manager on it.

18 MR. BAROS: Thank you.

19 MR. SMITH: John Smith,
20 Southwestern Bell. I'd just like to add
21 the fact that -- I mean, we've had a lot of
22 discussion here around the nature of
23 complex order types being manual versus
24 mechanical and the fact that it's a manual
25 process for us. There seems to be some

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1 JUDGE FARROBA: Were there
2 any other questions on the EASE
3 demonstrations?

4 MR. SIFUENTES: Yes. I have
5 one question for -- Jesus Sifuentes
6 representing TEXALTEL.

7 I haven't seen the MCI request,
8 the order. Is there anything else on that
9 request that makes it not be able to be
10 processed through Business EASE? You
11 listed the combination of Plexar, I think,
12 and ISDN. Is there anything else on that
13 order that kicks it out of Business EASE?

14 MS. MASEWICH: Well, there
15 could be additional FIDs. It's an
16 identifier that kind of provisions the USOC
17 or the product downstream that EASE doesn't
18 handle, and there could be some old ones
19 left on the account. Maybe they were a
20 Centrex, and they've changed now to a POTS
21 line, and the rep didn't clean up the
22 account, and there's still some old
23 information on the account that we have not
24 put in EASE. So when we try to access the
25 account, it's seeing all this other

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