

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

ATTACHMENT 14

1 STATE OF MISSOURI
 2 PUBLIC SERVICE COMMISSION
 3
 4 TRANSCRIPT OF PROCEEDINGS
 5 Hearing
 6 March 5, 1999
 7 Jefferson City, Missouri
 8 Volume 8

9
 10 In the Matter of the Application of)
 11 Southwestern Bell Telephone Company)
 12 to Provide Notice of Intent to File) Case No. T0-99-227
 13 an Application for Authorization to)
 14 Provide In-Region InterLATA)
 15 Services Originating in Missouri)
 16 Pursuant to Section 271 of the)
 17 Telecommunications Act of 1996.)

18 NANCY M. DIPPELL, Presiding,
 19 SENIOR REGULATORY LAW JUDGE.

20 SHEILA LUMPE, Chair,
 21 HAROLD CRUMPTON,
 22 CONNIE MURRAY,
 23 ROBERT G. SCHEMENAUER,
 24 M. DIANNE DRAINER, Vice-Chair
 25 COMMISSIONERS.

26 REPORTED BY:

27 KELLENE K. FEDDERSEN, CSR, RPR
 28 PATRICIA A. DURBIN, CM, CSR, CCR, RPR
 29 ASSOCIATED COURT REPORTERS, INC.
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34 APPEARANCES:

35 PAUL G. LANE, General Attorney-Missouri
 36 KATHERINE C. SWALLER, Attorney at Law
 37 LEO J. BUB, Senior Counsel
 38 One Bell Center, Room 3520
 39 St. Louis, Missouri 63101
 40
 41 FOR: Southwestern Bell Telephone Company.
 42
 43 W.R. ENGLAND, III, Attorney at Law
 44 SONORA B. MORGAN, Attorney at Law

7 Brydon, Swearngen & England, P.C.
 8 P.O. Box 456
 9 312 East Capitol Avenue
 10 Jefferson City, Missouri 65102-0456

11 FOR: Alltel Missouri, Inc.
 12 BPS Telephone Company.
 13 Cass County Telephone Company.
 14 Citizens Telephone Company of
 15 Higginsville, Missouri, Inc.
 16 Craw-Kan Telephone Cooperative, Inc.
 17 Ellington Telephone Company.
 18 Farber Telephone Company.
 19 Fidelity Telephone Company.
 20 Goodman Telephone Company, Inc.
 21 Granby Telephone Company.
 22 Grand River Mutual Telephone
 23 Corporation.
 24 Green Hills Telephone Corp.
 25 Holway Telephone Company.
 Iamo Telephone Company.
 Kingdom Telephone Company.
 KLM Telephone Company.
 Lathrop Telephone Company.
 Le-Ru Telephone Company.
 Mark Twain Rural Telephone Company.
 McDonald County Telephone Company.
 Miller Telephone Company.
 New Florence Telephone Company.
 New London Telephone Company.
 Orchard Farm Telephone Company.
 Oregon Farmers Mutual Telephone Co.
 Ozark Telephone Company.
 Rock Port Telephone Company.
 Seneca Telephone Company.
 Steelville Telephone Exchange, Inc.
 Stoutland Telephone Company.

1200
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 TOLL FREE - 1-888-636-7551

1 MATTHEW D. TURNER, Attorney at Law
 2 Andereck, Evans, Milne, Peace & Baumhoer
 3 P.O. Box 1438
 4 305 East McCarty Street
 5 Jefferson City, Missouri 65102

6 FOR: Mid-Missouri Group.

7 JAMES FISCHER, Attorney at Law
 8 101 West McCarty, Suite 215
 9 Jefferson City, Missouri 65101

10 FOR: Associated Industries of Missouri.

11 PAUL S. DeFORD, Attorney at Law
 12 Lathrop & Gage
 13 2345 Grand Boulevard
 14 Kansas City, Missouri 64108

15 FOR: AT&T Communications of the S.W., Inc. ACI Corp.

16 MICHELLE SLOANE BOURIANOFF, Attorney at Law
 17 919 Congress, Suite 900
 18 Austin, Texas 78701

19 FOR: AT&T Communications of the S.W., Inc.

20 KATHLEEN M. LaVALLE, Attorney at Law

1.252

1 judged by in having that firm order confirmation be
 2 returned to CLECs that gives them the confirmation
 3 that the due date that they've communicated to their
 4 customer will hold?
 5 A. Well, it was agreed to in Texas in the
 6 collaborative process, if you send a mechanized order,
 7 was 95 percent of the FOCs would be returned in five
 8 hours.
 9 Q. In five hours?
 10 A. Yes, ma'am.
 11 Q. Okay. Can you tell us how long it takes an
 12 order to distribute out of SORD? Do you agree with
 13 the estimate provided of ten minutes?
 14 A. That's probably correct.
 15 Q. Okay. And am I also correct that -- and
 16 it's on page 31 of your testimony -- you testified
 17 that with the use of EASE, and that's whether it's a
 18 CLEC or doing a resale order or Southwestern Bell
 19 doing retail, electronic access to available due dates
 20 represents an automatic firm order commitment, that
 21 FOC, once a given due date is selected?
 22 A. Yes, ma'am.
 23 Q. And so that due date that you obtain on
 24 EASE, through EASE using screens that pops up and I
 25 can see it right there in front of me, that's a strong

1.254

1 us that LSC until four o'clock this afternoon, there's
 2 a good chance that due date will be gone, because it's
 3 the very same due date used for everybody. It's the
 4 same for retail as wholesale. There's no difference.
 5 So I can't agree with that.
 6 I think if -- once the Datagate, if a CLEC
 7 were using EDI integrated with the pre-order Datagate
 8 function, it would be fairly quick, but we just can't
 9 control what a CLEC will do.
 10 Q. But you're not willing to commit that if
 11 I -- from the time I actually send the order, if I
 12 send it instantly with an integrated Datagate and EDI,
 13 that I'll return that FOC, that return FOC will be
 14 received within the same time that the EASE system
 15 returns a firm order confirmation?
 16 A. Well, with any of the performance
 17 measurements, I think if there's valid data -- and we
 18 don't have valid data on Datagate and EDI because we
 19 don't have enough usage on it -- that any of the
 20 performance measurements can be adjusted. But with no
 21 data, I wouldn't agree to that today, no, ma'am.
 22 Q. Can we -- let me ask you just in closing a
 23 couple of questions about SORD. You indicated that
 24 access to general availability of SORD will come
 25 April 1, 1999, and that's the subject of DR 36

1.253

1 due date and it's going to hold unless something
 2 happens in that ten minutes before you distribute out
 3 of SORD; is that accurate?
 4 A. Yes. But I would say that's also accurate
 5 if the CLEC would send their pre-order and go ahead
 6 and send their LSR within a reasonable amount of time,
 7 the same thing would be true. When we return 95
 8 percent of the FOCs in five hours, that's all, whether
 9 they were MOGable or not. Certainly those that are
 10 MOGable return a lot quicker than that.
 11 Q. Is Southwestern Bell willing to agree to a
 12 standard of ten minutes for MOGable orders that are
 13 sent electronically over EDI?
 14 A. No, ma'am.
 15 Q. If it takes longer to get the firm order
 16 confirmation back in an EDI environment than it does
 17 using EASE, can you agree that there's at least some
 18 possibility of a greater chance that that due date
 19 will not be available by the time the firm order is
 20 returned and will, in fact, have to be modified? Does
 21 that risk exist?
 22 A. No, I can't agree with that. The firm order
 23 confirmation works fairly well. Again, we cannot
 24 control when a CLEC sends us an order. If they get a
 25 due date this morning at 10 a.m. and they don't send

1.255

1 Accessible Letter?
 2 A. Yes, ma'am.
 3 Q. And am I correct that information has not
 4 yet been distributed to the CLECs defining the
 5 specifics of the SORD offering?
 6 A. No, I don't think that's correct. There was
 7 an Accessible Letter that went out earlier in the
 8 week. I can't remember. March 1st or 2nd, I believe.
 9 Q. So that's been an update since you completed
 10 your DR request?
 11 A. Uh-huh.
 12 Q. So the specifics have gone out, and when
 13 will training be available?
 14 A. We have asked the CLECs to provide to us
 15 what they're interested in. Not all CLECs want
 16 everything that SORD can do. A lot of CLECs are niche
 17 players in the market, and we will develop the
 18 training as we receive those requests back.
 19 And we've asked that they tell us what
 20 they're interested in, and then we've offered to do a
 21 demo of the SORD capability sometime in April once we
 22 get that interest.
 23 Q. And can you tell me that, knowing I've been
 24 through at least a couple of the OSS demonstrations,
 25 can you tell me how long it's going to -- how many

** NOTES **

** NOTES **

1.256

1 hours it's going to take for me to learn how to use
2 SORD?
3 A. Well, Ms. LaValle, for you to learn it I'm
4 sure would be very small.
5 (Laughter.)
6 Q. Thank you, Ms. Ham. Thank you.
7 A. No, I don't know.
8 Q. What's your average service representative?
9 A. Probably a week or two. I'd think that's
10 about right.
11 Q. So it's --
12 A. I'm thinking it may be longer than that.
13 SORD's pretty ugly.
14 MS. LaVALLE: Thank you, Ms. Ham.
15 THE WITNESS: Thank you.
16 JUDGE DIPPELL: Is there cross from MCI?
17 MR. MORRIS: Yes, your Honor. Just a few
18 questions.
19 CROSS-EXAMINATION BY MR. MORRIS:
20 Q. Ms. Ham, on page 39 of your surrebuttal
21 testimony.
22 A. Surrebuttal? Okay.
23 Q. I'll give you a second to get there.
24 A. Yes, sir.
25 Q. You state that Southwestern Bell made

1.257

1 changes but didn't -- without following the Change
2 Management Guidelines due to the fact that MCI was not
3 in production mode with EDI; is that correct?
4 A. Yes, sir.
5 Q. Isn't it true that MCI as a result of that
6 actually had botched orders because MCI had been in
7 EDI production as of December 19th?
8 A. No, I wouldn't agree with that. MCI sent
9 one local service request that contained the -- did
10 not contain the directory page, what's called the DR
11 page, the directory record page, and there was -- it
12 was rejected incorrectly. But I wouldn't say there
13 were orders. There was one order.
14 And part of the -- out of the collaborative
15 process in Texas, the Texas Commission indicated that
16 in order to get work done for the carrier-to-carrier
17 test, that a lot of these things would be done outside
18 of change control, and this is an instance of one of
19 them.
20 Q. Well, Ms. Ham, I'm going to refer you to
21 page 27 of your surrebuttal testimony, the first
22 question where you state, as of October 15th, which
23 predates the December 19th letter, you say that MCI
24 has successfully tested EDI and is in a live
25 production environment.

** NOTES **

1.258

1 A. Yes, sir. They have their production system
2 up, but they are not sending us volumes. They're not
3 sending us very much at all over the EDI interface.
4 And part of the carrier-to-carrier testing
5 that we're doing in conjunction with MCI will be, I
6 guess, further getting them ready. Their back office
7 systems, from what I understand, were not ready.
8 Q. Well, Ms. Ham, let me just say, regardless
9 of the number of orders, as to those customers who
10 were impacted as a result of the December 19th action,
11 I think you would agree, will you not, that those
12 customers, however few or however many there were,
13 were, in fact, impacted as a result of that?
14 A. No, sir. I know of no customers of MCI that
15 were impacted by the 12/19 release. The only thing
16 that I know of is the one LSR that they sent that the
17 directory record was not on there. But there were no
18 customers of MCI that I know of that were impacted at
19 all with the 12/19 release.
20 Q. Let me refer you to page 22 of your
21 surrebuttal testimony where you talk about sending via
22 electronically firm order confirmations. Are you
23 suggesting that 100 percent of all EDI orders result
24 in 100 percent of FOCs being returned electronically?
25 A. Yes, sir. I believe that if it's sent in

1.259

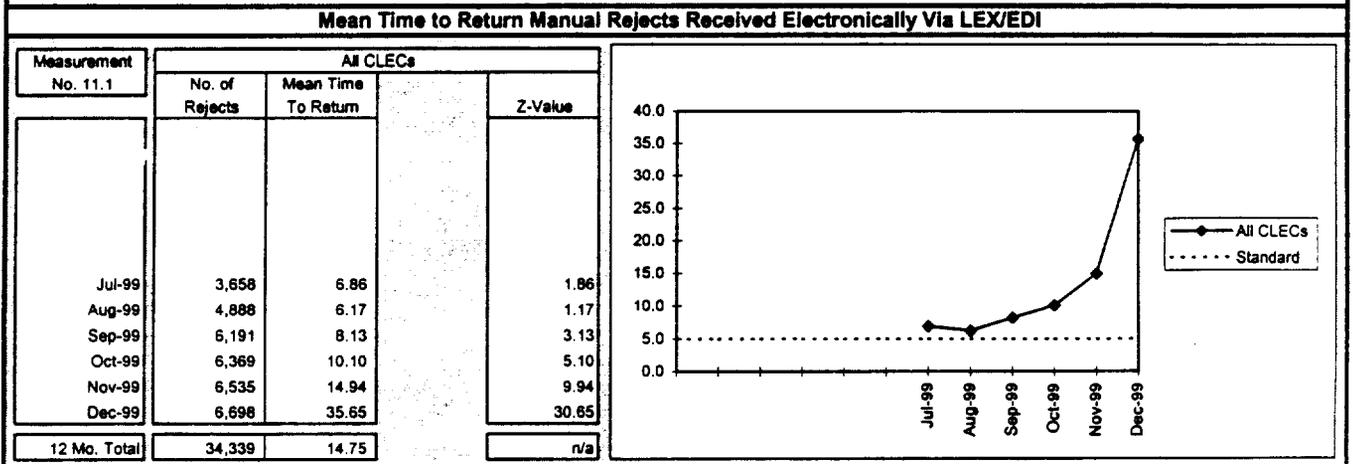
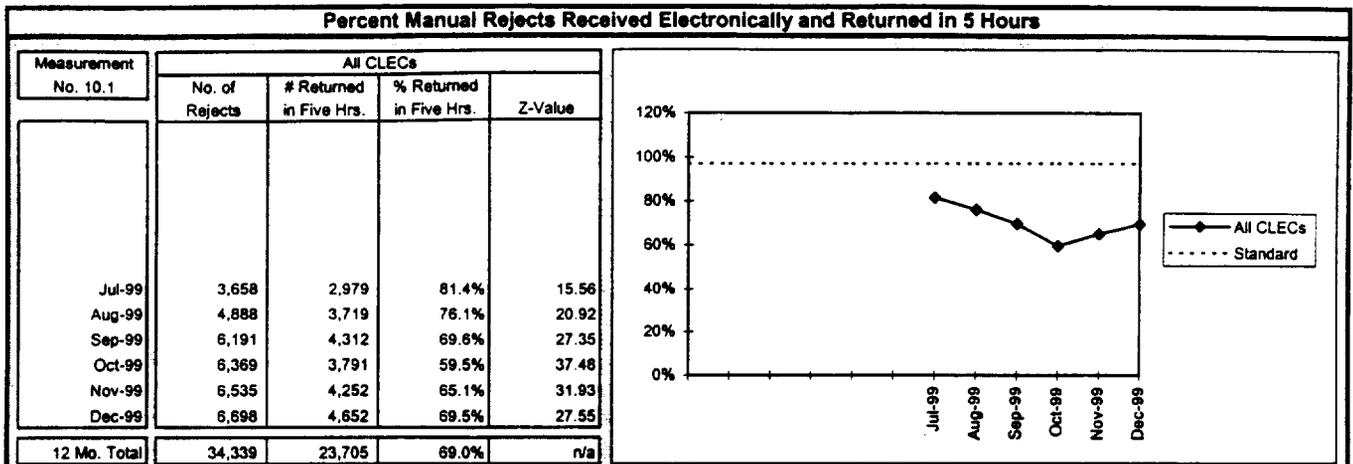
1 electronically, the FOC is going to be returned
2 electronically.
3 Q. And without any manual intervention?
4 A. Well, no. I think we went over that just a
5 few minutes ago with Ms. LaValle. There may be
6 instances where there's manual intervention required,
7 but the FOC will still be returned electronically.
8 MR. MORRIS: I believe that's all I have,
9 your Honor.
10 JUDGE DIPPELL: Thank you. Sprint?
11 MS. LIPMAN: I have a couple questions.
12 CROSS-EXAMINATION BY MS. LIPMAN:
13 Q. Good morning, Ms. Ham.
14 A. Good morning.
15 Q. Ms. Ham, on page 27 of your surrebuttal, you
16 indicated that -- you indicate that the business rule
17 mapping for UNEs is going to be completed by the end
18 of September; is that right?
19 A. I'm sorry. Could you give me the line? Oh,
20 the Sprint plans to have the business rule mapping for
21 UNE loops by end of first quarter 1999. Is that what
22 you're referring to? I'm sorry.
23 Q. No. I believe that you indicate that the
24 business rule mapping for UNEs is to be completed by
25 the end of the third quarter.

** NOTES **

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

ATTACHMENT 15

Pre-Ordering/Ordering



**DECLARATION OF
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ON
BEHALF OF AT&T CORP.**

ATTACHMENT 16

**DECLARATION OF
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ON
BEHALF OF AT&T CORP.**

ATTACHMENT 17

FINAL ORDERS/OPEN MEETING

TELEPHONE ISSUES

PUBLIC UTILITY COMMISSION

OCTOBER 21, 1999 (VOL. 2)

(A.M.)

(P.M.)

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Page 465

1 MR. COLISHAW: If I might, that 8
2 percent -- Pat Colishaw for AT&T. I'm sorry. We
3 don't have a direct measurement of the percent
4 of LSRs that fall out to this manual reject and
5 then go to the LASR GUI. They have to kind of
6 put a couple together, and I believe that's
7 where the 8 percent number is coming from, and I
8 believe that's a September number.
9 MS. HAM: Yes, it is.
10 MR. COLISHAW: If you look at
11 Measurement No. 9, which is percent rejects, you
12 there have stated a LEX number and an EDI
13 number, which starts out -- it is labeled number
14 of orders, but I think on this one we are in
15 agreement that these are LSRs.
16 You can look at the total number of
17 LSRs, electronic LSRs, LEX, plus EDI from
18 Measurement No. 9. Nine is where you see the
19 rejects that are kicked out in LASR and sent
20 back electronically, no intervention, and you
21 have that percentage.
22 CHAIRMAN WOOD: And that's all
23 that's in nine?
24 MR. COLISHAW: That's all that's
25 in nine. If you turn over to 10.1, that's

Page 466

1 percent manual rejects received electronically
2 and returned in five hours. That's this
3 universe we are talking about of these rejects
4 that occur after you're through LASR, fall out
5 to manual. And they have then developed this
6 process for returning them electronically over
7 the LASR GUI.
8 There you get a total number of those
9 rejects. The intent of that measure is to see
10 whether they get it back in a timely fashion,
11 but if you look at the denominator of that
12 measure, you get the total number of rejects.
13 CHAIRMAN WOOD: That's the
14 calculation we did yesterday.
15 MS. HAM: Yes.
16 CHAIRMAN WOOD: 9,000 over 7 --
17 MR. COLISHAW: For September it
18 was 6,000-and-some over 72,000 or something like
19 that, and that came out to the 8 percent. Now,
20 you don't know whether -- of that 6,000, you
21 don't know how many are EDI and how many are LEX
22 in terms of trying to figure out where the
23 problem is. But that's what you can do.
24 And the number in July was 12 percent
25 on like 30-plus-thousand. The number in August

Page 465 - Page 468

Page 467

1 was 14 percent. Okay. And this measure we are
2 drawing it from, the timeliness of returning
3 these manual rejects, I think Beth mentioned the
4 idea of putting in this electronic return was to
5 speed up the process.
6 The target for that measure is five
7 hours, 97 percent benchmark. It has been
8 reported for three months. It hasn't been hit
9 yet, and the August and September numbers are 59
10 and 60 percent returned within five hours with
11 an average return time of 13 to 16 hours,
12 raising a concern that even at the volumes we
13 are at presently, this manual fallout and return
14 is having some impact on processing.
15 MR. DYSART: Can I clarify that?
16 One of the issues AT&T raised in their comments
17 had to do with this measure and some of the
18 numbers not matching. When this measurement was
19 implemented, it is on a five-hour basis. The
20 average is actually being calculated as if it
21 was 24 hours. So it is including time not
22 business hours.
23 We have got a correction going to be in
24 place at the end of this month to correct these
25 numbers as far as the average.

Page 468

1 CHAIRMAN WOOD: So the 13 does
2 not back out if you get a reject --
3 COMM. WALSH: -- at 4 o'clock in
4 the afternoon?
5 CHAIRMAN WOOD: -- if you get a
6 reject at 4:00 in the afternoon?
7 MR. DYSART: Correct. With the
8 five hours, it is supposed to be five business
9 hours. And AT&T pointed out an error in the
10 business rule that we are in the process of
11 correcting.
12 CHAIRMAN WOOD: So data has --
13 the data that Pat just mentioned then does not
14 reflect that --
15 MR. DYSART: As far as the
16 percentages and the average. The number of
17 rejects is correct.
18 CHAIRMAN WOOD: Just how long
19 they have been --
20 MR. DYSART: Right. And we are
21 in the process of rerunning that data.
22 COMM. PERLMAN: And if you reran
23 it, what would it show?
24 MR. DYSART: I don't know. We
25 are in the process of doing that right now.

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PUC DOCKET NO. 19000 - VOLUME 23

TELEPHONE CONFERENCE

COMPRESSED TRANSCRIPT

JANUARY 14, 1999

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TRANSCRIPT OF PROCEEDINGS

BEFORE THE

PUBLIC UTILITY COMMISSION OF TEXAS

AUSTIN, TEXAS

RELATING TO THE)
 IMPLEMENTATION OF SWBT'S) PUC DOCKET NO.
 INTERCONNECTION) 19000
 AGREEMENTS WITH AT&T)
 AND MCI)

TWENTY-THIRD TELEPHONE CONFERENCE
 THURSDAY, JANUARY 14, 1999

BE IT REMEMBERED THAT at 2:09 p.m., on
 Thursday, the 14th day of January 1999, the
 above-entitled matter was discussed via conference
 call before the Public Utility Commission of Texas,
 1701 North Congress Avenue, Austin, Texas, before
 HOWARD SIEGEL, ALJ; and the following proceedings
 were reported by Rachelle Latino, Certified
 Shorthand Reporter of:

Page

1 MS. MURRAY: Okay. And
 2 we're expecting Beverly Grogan to be on the
 3 line, but I don't believe she's here yet.
 4 And that's it for us.
 5 MR. SIEGEL: Okay. For
 6 AT&T.
 7 MR. WITCHER: This a Mark
 8 Witcher for AT&T. Here with me in Austin
 9 is Sharon Mullin. On the phone in Dallas
 10 would be Kathleen LaValle, Russell Morgan,
 11 Nancy Dalton, David Kettell. Is anybody
 12 else in there with y'all?
 13 MS. DALTON: No. That's it,
 14 Mark.
 15 MR. WITCHER: That would be
 16 it for AT&T.
 17 MR. SIEGEL: And MCI.
 18 MR. HERRERA: Howard, this
 19 is Freddie Herrera for MCI WorldCom. On
 20 the line in Saint Louis is Jeff Champlin
 21 and that should be it for MCI WorldCom.
 22 MR. SIEGEL: And is there
 23 anyone who didn't hear their name called?
 24 Okay. Just for the record,
 25 before we get started, we had a brief

Page 2

1 PROCEEDINGS
 2 THURSDAY, JANUARY 14, 1999
 3
 4 (2:09 p.m.)
 5 MR. SIEGEL: Let's go on the
 6 record in this telephone conference in
 7 Docket NO. 19000 related to the
 8 Implementation of the Interconnection
 9 Agreements of Southwestern Bell with AT&T
 10 and MCI, respectively.
 11 We can go ahead and get the
 12 appearances. And when you announce, if you
 13 could have other -- either yourself or have
 14 everyone that's with your company state
 15 their names for the record. And as a
 16 reminder, don't forget to fax those names
 17 to Kennedy Reporting.
 18 Let's go ahead and start with
 19 Southwestern Bell.
 20 MS. MURRAY: This is Kelly
 21 Murray on behalf of Southwestern Bell. And
 22 with me, I have Jerry Gordon. On the line
 23 are Randall Lynch, Bryan Loewen, Bob Royer,
 24 Beth Lawson. Beth, is anybody with you?
 25 MS. LAWSON: No, ma'am.

Page -

1 discussion regarding an update status
 2 report that the parties have been preparing
 3 where they're adding comments to the
 4 initial implementation schedule, and we'll
 5 be discussing that in the future call.
 6 And also, just for the record, we
 7 tentatively set the next call for January
 8 25 at 10 o'clock, the same telephone number
 9 and access code.
 10 Can we go ahead and get started
 11 on some of our billing issues?
 12 MS. MURRAY: Billing issues?
 13 I've only got --
 14 MR. WITCHER: I've only got
 15 one item and that was the folders
 16 explanation.
 17 MS. MURRAY: And we were
 18 going to put an update -- AT&T had
 19 requested a status on the SORD update issue
 20 and we were going to provide that as well.
 21 Who all is joining?
 22 MS. GROGAN: We're all
 23 trying desperately to get in. We couldn't
 24 get in over normal channels. This is
 25 Beverly Grogan.

Page 69

1 wanted to receive a list of what was on the
2 table to be moved forward into LASR. And
3 we indicated that we were not sure if a
4 list of that sort existed and that we would
5 try and see if one did, and if one did we
6 would provide that.

7 MR. SIEGEL: Well, where's
8 that process now?

9 MS. MURRAY: That's the list
10 that we're referring to, Howard, as being
11 contained in the December 24th accessible
12 letter.

13 MS. LaVALLE: But I think we
14 all have to disagree about what was said or
15 not said at a change control process
16 meeting. If you go into December 21st open
17 meeting transcript where AT&T asked for a
18 comprehensive list of edits still in SORD.
19 And Ms. Ham said that she thought we had
20 already received it, but that we would get
21 that. We have followed up through account
22 management e-mails. And Kelly, even you
23 and I talked about it the other day.

24 What we're looking for is a
25 comprehensive list of edits still in SORDs

Page 70

1 so we can see not what you've identified as
2 a candidate to move up to LASR, but what
3 edit conditions are still in SORD, and so
4 they're not even planned at this point to
5 result in mechanical reject notice coming
6 out of LASR. That was the request and
7 that's what we understood we were going to
8 receive.

9 MS. MURRAY: There may have
10 been some misunderstanding about this,
11 because that is a huge list.

12 MS. LaVALLE: That was our
13 point. We were talking about 3500.

14 MS. MURRAY: We have got
15 900-some-odd in LASR now. We're planning
16 to move up an additional 56. These are the
17 ones that have been identified as resulting
18 in reject positions coming out. There are
19 a vast number of edits in SORD that will
20 never be moved up.

21 MS. LaVALLE: And that's
22 what we don't understand, Kelly. And we
23 have been through this so many times.

24 MR. SIEGEL: Let me ask a
25 question. For AT&T, at least my

Page 71

1 understanding is that a large number of the
2 SORD edits are form field type edits.
3 Those kinds of edits, I don't really
4 understand what AT&T can do with those.

5 MS. LaVALLE: Howard, we
6 can't tell which ones in SORD are form-type
7 edits that are incapable of being moved up
8 to LASR and would be inappropriate to move
9 up to LASR until we get the list of the
10 edits themselves. We've not even been told
11 by Southwestern Bell what the total number
12 of edits still remaining in SORD is,
13 despite the fact in the last call we had in
14 this docket, I think it may have been you,
15 Beverly, specifically committed to come
16 back in the folders filing with that
17 number. So we still don't know the total
18 number of edits in SORD so that we can have
19 any understanding of what percent the 900
20 represents of the whole. And because we
21 don't have the identity of the editing
22 SORDs yet, we can't distinguish between
23 those that simply have not been identified
24 yet as candidates to move up to LASR, but
25 could be and could cut down on some

Page 72

1 occurrence of rejects notification and
2 manual fallout of SORD, and which ones
3 should -- don't make any sense as an edit
4 for what information would be sent over in
5 LSR.

6 And I thought we were way past
7 this. The Commission understood, at least
8 the statements in the open meeting
9 transcript represent that we're getting a
10 comprehensive list of SORD edits, in fact,
11 that you thought we already had it. So
12 that remains our request.

13 MS. MURRAY: There may have
14 been a misunderstanding about what you were
15 requesting, but it is really inappropriate
16 I think to request a complete list of 4,000
17 edits, the vast majority of which will
18 never have anything to do with CLEC
19 ordering, and when the issue is whether or
20 not the orders are being processed and the
21 performance measures are being met.

22 I mean, we have an obligation to
23 develop our system in a way that the orders
24 get processed in compliance with our
25 commitment to process. How we do that and

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ATTACHMENT 19

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ATTACHMENT 18

**CONFIDENTIAL – NOT FOR
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 15 Provide In-Region InterLATA)
 16 Services Originating in Missouri)
 17 Pursuant to Section 271 of the)
 18 Telecommunications Act of 1996.)

16 NANCY M. DIPPELL, Presiding,
 17 SENIOR REGULATORY LAW JUDGE.
 18 SHEILA LUMPE, Chair,
 19 HAROLD CRUMPTON,
 20 CONNIE MURRAY,
 21 ROBERT G. SCHEMENAUER,
 22 M. DIANNE DRAINER, Vice-Chair
 23 COMMISSIONERS.

23 REPORTED BY:
 24 KELLENE K. FEDDERSEN, CSR, RPR
 25 PATRICIA A. DURBIN, CM, CSR, CCR, RPR
 ASSOCIATED COURT REPORTERS, INC.
 1199
 ASSOCIATED COURT REPORTERS, INC.
 (573)636-7551 JEFFERSON CITY, MO 65109
 TOLL FREE - 1-888-636-7551

1 APPEARANCES:
 2 PAUL G. LANE, General Attorney-Missouri
 3 KATHERINE C. SWALLER, Attorney at Law
 4 LEO J. BUB, Senior Counsel
 One Bell Center, Room 3520
 St. Louis, Missouri 63101
 5 FOR: Southwestern Bell Telephone Company.
 6 W.R. ENGLAND, III, Attorney at Law
 SONDR A. MORGAN, Attorney at Law

7 Brydon, Swearingen & England, P.C.
 P.O. Box 456
 8 312 East Capitol Avenue
 Jefferson City, Missouri 65102-0456
 9
 10 FOR: Alltel Missouri, Inc.
 BPS Telephone Company.
 11 Cass County Telephone Company.
 Citizens Telephone Company of
 12 Higginsville, Missouri, Inc.
 Craw-Kan Telephone Cooperative, Inc.
 13 Ellington Telephone Company.
 Farber Telephone Company.
 14 Fidelity Telephone Company.
 Goodman Telephone Company, Inc.
 15 Granby Telephone Company.
 Grand River Mutual Telephone
 Corporation.
 16 Green Hills Telephone Corp.
 Holway Telephone Company.
 17 Iamo Telephone Company.
 Kingdom Telephone Company.
 18 KLM Telephone Company.
 Lathrop Telephone Company.
 19 Le-Ru Telephone Company.
 Mark Twain Rural Telephone Company.
 20 McDonald County Telephone Company.
 Miller Telephone Company.
 21 New Florence Telephone Company.
 New London Telephone Company.
 22 Orchard Farm Telephone Company.
 Oregon Farmers Mutual Telephone Co.
 23 Ozark Telephone Company.
 Rock Port Telephone Company.
 24 Seneca Telephone Company.
 Steelville Telephone Exchange, Inc.
 25 Stoutland Telephone Company.
 1200

ASSOCIATED COURT REPORTERS, INC.
 (573)636-7551 JEFFERSON CITY, MO 65109
 TOLL FREE - 1-888-636-7551

1 MATTHEW D. TURNER, Attorney at Law
 2 Andereck, Evans, Milne, Peace & Baumhoer
 P.O. Box 1438
 3 305 East McCarty Street
 Jefferson City, Missouri 65102
 4

5 FOR: Mid-Missouri Group.
 6 JAMES FISCHER, Attorney at Law
 101 West McCarty, Suite 215
 Jefferson City, Missouri 65101
 7
 8 FOR: Associated Industries of Missouri.

9 PAUL S. DeFORD, Attorney at Law
 Lathrop & Gage
 2345 Grand Boulevard
 10 Kansas City, Missouri 64108

11 FOR: AT&T Communications of the S.W., Inc.
 ACI Corp.

12 MICHELLE SLOANE BOURIANOFF, Attorney at Law
 13 919 Congress, Suite 900
 Austin, Texas 78701

14 FOR: AT&T Communications of the S.W., Inc.
 15 KATHLEEN M. LaVALLE, Attorney at Law

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1 created by a service representative; do you agree?
 2 A. I'm not sure I agree with that.
 3 Q. Okay. Do you think there would -- is any
 4 preference from the standpoint of you the CLEC in
 5 having entirely electronic communication of a reject
 6 notification over having the return of a reject
 7 notification that a service representative manually
 8 types in?
 9 A. Well, ultimately that would probably be
 10 the -- what I would want as the CLEC, but I also as
 11 the CLEC I think realize that systems in
 12 telecommunications are an evolving process. And it is
 13 a huge effort, not only on the CLEC's part but I think
 14 on an ILEC's part, to make these as user-friendly and
 15 as easy to handle as we can. And I think that, as a
 16 CLEC, I think that's what I would perceive has been
 17 done.
 18 But it is an evolving process, one that will
 19 be worked on jointly for years to come, just as we
 20 have with the ILECs.
 21 Q. Let's switch over --
 22 A. IXCs. Excuse me.
 23 Q. I'm sorry. Let's switch over to the EASE
 24 system for a second.
 25 A. Okay.

1,230

1 Q. And so what happens is -- I don't want to
 2 use the word dummy-proof, but EASE will not let me go
 3 from screen to screen if I've goofed up on the
 4 preceding screen?
 5 A. That's correct. But I as the CLEC can have
 6 that same capability in my application-to-application
 7 interface.
 8 Q. Right. And that's in this resale, in the
 9 sending of resale orders, correct?
 10 A. For EASE?
 11 Q. Yes.
 12 A. Yes. But I as a CLEC would want that same
 13 capability in my application-to-application interface
 14 which I would build myself, just as Southwestern Bell
 15 retail has built that for their service reps.
 16 Q. Well, let's talk about what happens -- and I
 17 think we probably would agree that it doesn't happen
 18 very often, but in the -- if we're a CLEC using EASE
 19 for resale, using the proprietary system Southwestern
 20 Bell has, and for Southwestern Bell retail using EASE,
 21 if the order somehow is allowed to be transmitted so
 22 it looks to the service rep like there's no errors
 23 because I've made it screen to screen and it hasn't
 24 flashed back at me or stopped me from going forward,
 25 so I get to the end of it and I hit something called

1,229

1 Q. And the EASE system is available to CLECs
 2 for resale orders, and it's available to Southwestern
 3 Bell's retail operation, correct?
 4 A. Yes, it is.
 5 Q. And let's talk about how it works where you
 6 would get edit -- or reject notifications in
 7 Southwestern Bell's retail environment. And am I
 8 correct, we're now out of the situation where we're
 9 talking about machine talking to machine?
 10 Instead, if a CLEC's using EASE, for
 11 example, they've got a -- I'm going get all the terms
 12 wrong, but they've got some kind of a GUI interface.
 13 So they've got a graphic depiction of the screens for
 14 EASE on their terminal, and they will key in
 15 information to complete spaces on that form?
 16 A. Well, their EASE screens look just like our
 17 EASE screens, and it's a terminal emulation, yes, with
 18 a screen that they fill in the blanks.
 19 Q. Okay. So it looks like an electronically
 20 generated form basically that you're filling out,
 21 correct?
 22 A. Right.
 23 Q. And what EASE will do, it has what they call
 24 on-screen edits; is that correct?
 25 A. Yes, ma'am.

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1 transmit?
 2 A. Yes, ma'am.
 3 Q. Okay. I hit transmit, and it turns out that
 4 when it gets down, because it ultimately ends up in
 5 SORD, right?
 6 A. Everything ends up in SORD.
 7 Q. All roads lead to SORD?
 8 A. Right.
 9 Q. And when it ends up in SORD, there are some
 10 limited occasions when the order may still fall out;
 11 is that correct?
 12 A. For Southwestern Bell retail, yes, ma'am.
 13 That's the same for the wholesale.
 14 Q. And it's a very small percentage for both of
 15 those environments, correct?
 16 A. We would hope it would be very small, yes,
 17 ma'am.
 18 Q. Okay. Now, if I can ask you to look at, I
 19 believe it's Data Request 35, and this is unfair, but
 20 if you could also look at page 34 of your testimony.
 21 Would you agree that Southwestern Bell has
 22 made available through EASE a feature that provides
 23 immediate notification to EASE when a service order
 24 errors in SORD?
 25 A. Yes, ma'am.

** NOTES **

** NOTES **

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

ATTACHMENT 20

GB

OPEN MEETING

DOCKET NO. 16251

COMPRESSED TRANSCRIPT

APRIL 7, 1998

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(512) 474-2233

we keep the original one, and we pull five more from which to select. So the minimum number of TNs that they could select from would be six within Consumer EASE. If for some reason they want a vanity telephone number or something that does not come up on the list, then they would contact the Local Service Center, and they would assist them in seeing if that particular telephone number was available for assignment, and then they could manually assign.

We only allow one exchange in Consumer EASE because we keep all of these telephone numbers within the negotiation until the service rep actually gets to the end of the negotiation and issues the order. At that point, then we send the unused telephone numbers back to our back-end system for assignment on other service orders. If we allowed multiple and let them keep the telephone numbers, we would deplete the list pretty quickly.

This is our carrier selection screen, and this is where the customer can choose who they would like to have as their

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transaction to see if there were any spare facilities in the serving terminal. We found that there was one spare facility available. So we will have to dispatch on this particular service order to provide customer service. Based upon that, we do have to go by the first available due date. Had this been, "Dispatch: No," we really could have made this order due today if it's prior to three o'clock. We don't have to wait until the first available due date.

The only other thing required on this particular order is a "can be reached" number in case we have some type of a question in establishing the service. Once I hit enter, the system puts this particular order through edits, and I wanted to do this just to show you that we do have over a thousand edits built into the system so that we attempt to catch everything up front before it hits our back-end system, and this is telling us we have three errors that we need a call return USOC or an RCU FID. We need one on Item Redial or an RCU FID, in that we have

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interLATA long distance carrier. We do show the carriers on the bottom of the screen, which will page. These are rotated on a nightly basis so that the same carrier is not listed first all the time. And they can either -- if they know the carrier code, they can key it in, or if the customer says they do not want a carrier or they haven't really decided who they want as their carrier, they can select that.

This is our due date board that we pull back from our back-end system, and, again, this is the same due date availability that our retail representatives pull back. We show them the next 28 calendar days on the right side of the screen. We populate the first available date in the due date field.

However, we did check for facility information also while we were doing this negotiation. So we found that there were zero connected facilities, and that means that there's no connected facilities from the customer PREMIS all the way through to the central office. So we did a second

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to have either Call Trace or an RCU FID. The RCU FID basically restricts the customer from using the usage-sensitive features, or they may choose to select one of the features themselves.

The reason we have this as an edit as opposed to the system automatically selecting these is it's something that needs to be discussed with the customer. If you arbitrarily do it, many times representatives fail to negotiate that with the customer. So we put it in as an edit as opposed to populating it for them.

Again, you have to have some training on products and services in order to know how to go back and fix it. We try to make the description of the errors, I guess, as understandable for a representative as we possibly can, but they do have to have some type of training in order to know what to do. Again, if they would want to restrict them, they'd just go to another screen, and they'd put that RCU FID and the data behind it.

You put the order back through

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MS. LOWRANCE: Well, because it could be that you have orders that are here, and they are processing the orders that came in that morning. Okay? So they're working on the orders, for instance, that got faxed over that morning, and we have some CLECs that send them to us in bulk. We have some that send them to us on courier, and so they'd be working on the orders from that morning, for instance. So the faxes that came in that afternoon -- we would process those after the ones that came in this morning. Okay? And once the distribution went out, then the individual service rep would then look to see what is the due date that is being requested on those orders.

CHAIRMAN WOOD: If you get a big load, I mean, how do you know when to hire more people to sit out there and work? I mean, if somebody puts some -- what check is there from the competitor community -- what check is there that you've got enough staff to do the job?

MS. LOWRANCE: I have got --
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Right now I have significantly ramped up from 1996 to 1998 to handle the volumes, and we are constantly monitoring the use of mechanized systems in terms of which CLEC is on a mechanized system and what errors we're seeing across those so we can go back and do process improvements, as well as adjust the product mix in terms of are we seeing predominantly res, or are we seeing predominantly business or complex business in that case or UNE or interconnection.

So it's a constant monitoring within my Center. It's a management process that we go through all the time to ensure that I have the reps trained to handle the right products that the CLECs will be sending us across the board.

MS. HAM: In addition to that, if we could get meaningful forecasts from the CLECs that indicate what their -- what they're going to be doing, it would certainly help this process that Nancy just went through and get to your question.

CHAIRMAN WOOD: In your training for your people here, I mean, how
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How long do you need to ramp up an employee to where he or she can do an effective job in servicing the wholesale customers that you've got?

MS. LOWRANCE: We've got resale customers that are handling residence for a specific group of service representatives. Okay? We could -- we strain them seven to eight weeks, but I will go to Liz's point of it certainly would be beneficial for me from an ongoing standpoint to have some forecasts.

CHAIRMAN WOOD: Sure.

MS. HERMANN: Let me say something. On some of these errors that she's talking about getting the status on the errors, I think some of those she's referring to is when we're trying to post them to our back-end CRIS billing system. It's not necessarily front-end errors that they would be sending back to a CLEC to say, "I need help," and those types of things -- we typically do not go back to the CLEC to get their help to fix it. It's something that our CRIS system needs on
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that service order in order for it to post. So we are manipulating those orders and working with our back-end systems people to figure out what we need to have on that service order in order for it to flow through to our billing system and post.

So those types of things -- I don't think we typically go back to the actual CLEC and say, you know, "We've got an error on this particular thing," because the service is already completed, and the order is completed, and the customer is provisioned, and we just can't get it to post to our billing system, and when you have complex service orders like that, we experience the same thing in our own retail side in trying to manipulate the service orders and getting them to post as far as what our CRIS system needs. So -- and I think she's seeing some of that probably on the order status when she's going in and looking at the order status and seeing that E on there, which means it's in a CRIS error status.

MS. BALDWIN: Yes.
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**DECLARATION OF
NANCY DALTON and SARAH DEYOUNG
ON
BEHALF OF AT&T CORP.**

ATTACHMENT 21

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PUC PROJECT NO. 16251

INVESTIGATION OF SOUTHWESTERN *
BELL TELEPHONE COMPANY'S ENTRY * PUBLIC UTILITY
INTO THE TEXAS INTERLATA * COMMISSION OF
TELECOMMUNICATIONS MARKET * TEXAS

RE: Hearing for Southwestern
Bell

TAKEN AT: Southwestern Bell Local
Service Center -
5501 Alliance Gateway
Freeway
Fort Worth, Texas 76178

TAKEN ON: April 3, 1998

TIME: 9:00 a.m. - 1:30 p.m.

REPORTED BY: Kendra Rowland, CSR

1 APPEARANCES:

2 - HEARING PANEL -

3
4
5 JOHN SMITH

6 JUDY HERMANN

7 KEVIN TALBOT

8 GERRIE GRUBB

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1 dispatch the technician, which is the same with our
2 own retail rep. That's how they do it.

3 But if it shows dispatch no and if it's
4 prior to three o'clock, they really can make that
5 order due today or tomorrow depending. It varies
6 from place to place. Some of our offices make it
7 due the next day. Some of them make it due today.
8 Some of them make it due in two days, depending
9 upon what the customer wants and what information
10 is displayed here.

11 We do have edits in place to say populate
12 the can-be-reached number in case we needed to have
13 a contact. And once I hit enter, what we're going
14 to do then is basically put the order through edits
15 to see if there's any type of an edit on the
16 system. If there were, we would make them fix it
17 before they released the order to our downstream
18 system.

19 Since I didn't have any, this is our
20 final negotiation screen, negotiation summary. And
21 this is where they really would recap with the
22 customer. It shows you the order number. This is
23 the person that actually did the order. This is
24 our billing date. This is the telephone number
25 that's assigned. And you can go through and recap

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

ATTACHMENT 22

STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

TRANSCRIPT OF PROCEEDINGS

Hearing

March 5, 1999
Jefferson City, Missouri
Volume 8

In the Matter of the Application of)
Southwestern Bell Telephone Company)
to Provide Notice of Intent to File) Case No. TO-99-227
an Application for Authorization to)
Provide In-Region InterLATA)
Services Originating in Missouri)
Pursuant to Section 271 of the)
Telecommunications Act of 1996.)

NANCY M. DIPPELL, Presiding,
SENIOR REGULATORY LAW JUDGE.

SHEILA LUMPE, Chair,
HAROLD CRUMPTON,
CONNIE MURRAY,
ROBERT G. SCHEMENAUER,
M. DIANNE DRAINER, Vice-Chair
COMMISSIONERS.

REPORTED BY:

KELLENE K. FEDDERSEN, CSR, RPR
PATRICIA A. DURBIN, CM, CSR, CCR, RPR
ASSOCIATED COURT REPORTERS, INC.
1199

ASSOCIATED COURT REPORTERS, INC.
(573)636-7551 JEFFERSON CITY, MO 65109
TOLL FREE - 1-888-636-7551

1 APPEARANCES:

2 PAUL G. LANE, General Attorney-Missouri
3 KATHERINE C. SWALLER, Attorney at Law
4 LEO J. BUB, Senior Counsel
One Bell Center, Room 3520
St. Louis, Missouri 63101

FOR: Southwestern Bell Telephone Company.

6 W.R. ENGLAND, III, Attorney at Law
SONDRA B. MORGAN, Attorney at Law

7 Brydon, Swaengen & England, P.C.
8 P.O. Box 456
9 312 East Capitol Avenue
10 Jefferson City, Missouri 65102-0456

FOR: Alltel Missouri, Inc.
11 BPS Telephone Company.
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1200
ASSOCIATED COURT REPORTERS, INC.
(573)636-7551 JEFFERSON CITY, MO 65109
TOLL FREE - 1-888-636-7551

1 MATTHEW D. TURNER, Attorney at Law
2 Andereck, Evans, Milne, Peace & Baumhoer
3 P.O. Box 1438
4 305 East McCarty Street
Jefferson City, Missouri 65102

FOR: Mid-Missouri Group.

5 JAMES FISCHER, Attorney at Law
6 101 West McCarty, Suite 215
7 Jefferson City, Missouri 65101

FOR: Associated Industries of Missouri.

8 PAUL S. DeFORD, Attorney at Law
9 Lathrop & Gage
10 2345 Grand Boulevard
Kansas City, Missouri 64108

FOR: AT&T Communications of the S.W., Inc.
ACI Corp.

11 MICHELLE SLOANE BOURIANOFF, Attorney at Law
12 919 Congress, Suite 900
13 Austin, Texas 78701

FOR: AT&T Communications of the S.W., Inc.

14
15 KATHLEEN M. LaVALLE, Attorney at Law

1,316

1 A. No, sir.
 2 COMMISSIONER CRUMPTON: That takes care of
 3 of my questions.
 4 JUDGE DIPPELL: Commissioner Murray?
 5 COMMISSIONER MURRAY: Thank you.
 6 QUESTIONS BY COMMISSIONER MURRAY:
 7 Q. Good morning.
 8 A. Good morning.
 9 Q. You indicated earlier that the personalized
 10 ring was the only feature that you knew of that didn't
 11 MOG?
 12 A. Yes, ma'am.
 13 Q. Does that personalized ring MOG in the
 14 process flow used by SWBT for its retail customers?
 15 A. I think it does, yes, ma'am.
 16 Q. But it does not for the CLEC?
 17 A. Right. It's a very small -- it's not very
 18 popular with the end users. We have a little less
 19 than 1 percent even in retail. And part of the -- it
 20 eventually, I think, will, but as we designed what is
 21 MOGable and worked with the CLECs in this change
 22 control, we designed for those services that would be
 23 most used by the CLECs and as was business interested
 24 in.
 25 Q. Okay. When a CLEC is placing an order, is

1,317

1 that CLEC made aware that the due date will change or
 2 could possibly change if the CLEC doesn't submit its
 3 order quickly?
 4 A. Well, I think that's covered in the
 5 training, and it's just kind of common business sense
 6 that if, you know, if you hold something, that the
 7 cues are going to fill up. So that's covered in the
 8 CLEC training.
 9 Q. Okay. Now, as I understood the process as
 10 you went over it earlier, I think there is first a
 11 request that's made that generates a due date, and
 12 's called a pre-order; is that correct?
 13 A. Yes, ma'am. There's several things that are
 14 done, and pre-ordering is one of them.
 15 Q. And then the next request that must be made
 16 in order to maintain that customer's place in line
 17 for that due date would be? What would that be
 18 called?
 19 A. That would be to issue the local service
 20 request.
 21 Q. And that would be done by the CLEC?
 22 A. Yes, ma'am.
 23 Q. Okay. Is that the same process that takes
 24 place when a SWBT customer representative or customer
 25 contact person would initiate an order for a retail

** NOTES **

1,318

1 SWBT customer?
 2 A. When Southwestern Bell negotiates the order
 3 and we get a due date, then the service
 4 representative, as Ms. LaValle said, hits the transmit
 5 and transmits it.
 6 If the service rep for some reason holds
 7 that order and doesn't transmit it, then the same
 8 probability exists for retail that that due date cue
 9 would be filled up and we would have to give another
 10 due date to the customer.
 11 Q. Is there any difference in the way that the
 12 order would be transmitted for the Southwestern Bell
 13 customer than for the CLEC customer?
 14 A. If they're using EASE, which is the CLEC
 15 customer which is the same as the retail, it's the
 16 exact same way. But if they're using one of the here
 17 on these exhibits, it is different systems. But once
 18 it gets to SORD, then it's all the same.
 19 Q. Okay. I think I understand that.
 20 A. Okay.
 21 Q. What would be an average time period from
 22 the pre-order to the due date that is given?
 23 A. Well --
 24 Q. Or is there an average?
 25 A. When you do a pre-order transaction, then

1,319

1 when you're talking with your customer, then there is
 2 presented on the screen in front of the service
 3 representative, the CLEC, is a -- is like two weeks'
 4 worth of dates. And then the customer can -- the CLEC
 5 can offer you know, a due date or the customer can
 6 say, well, that's not good for me. I'd rather have
 7 such and such date.
 8 Q. So the customer has input into the due date?
 9 A. Yes, ma'am.
 10 Q. Okay. You said that it normally takes less
 11 than five hours to process and get the FOC. Did I
 12 hear you say that?
 13 A. We have a performance measurement that we --
 14 our requirement is to return 95 percent of the firm
 15 order confirmations within five hours. Now, that --
 16 for any mechanized service orders, and that includes
 17 all of them, even the ones that are not MOGable.
 18 And certainly if they're MOGable the FOC
 19 returns, you know, quicker than five hours, but there
 20 may be some that require the manual typing that would
 21 be at that limit.
 22 Q. Okay. If a CLEC did not receive an FOC
 23 within five hours from the time of their local service
 24 request, would that be an indication to the CLEC that
 25 the due date is likely to change?

** NOTES **

1,320

1 A. No, ma'am, I don't believe that would be an
 2 indication. I'm going to have to -- would you put a
 3 circle around that and put Kramer on it, Mrs. Kramer?
 4 She can talk more about what the process is with
 5 the -- in the local service center to notify the CLECs
 6 of that FOC.
 7 Q. All right. And I suppose she would be able
 8 to answer my follow-up questions that would concern
 9 how a CLEC might check on the status of the customer
 10 order?
 11 A. I can help you with that one, yeah. We have
 12 another application. It's called order status, and
 13 the CLEC can look on line at the status of their
 14 order, and once it's been distributed through SORD,
 15 through the engine that kind of sends it out, then
 16 they can check to see whether or not the order is
 17 pending or whether it's completed or whether it's
 18 posted. So they do have a vehicle.
 19 Now, prior to it getting to SORD, then,
 20 there's other means for them to check on the order,
 21 but that is a mechanized means that we provide. And
 22 then also when they have SORD availability, they can
 23 check in SORD also.
 24 Q. Okay. But assume that there's something
 25 that is an error within the order. It's not going to

1,322

1 A. Well, most of the time that's the case is
 2 that the due date that's assigned is expected to be
 3 met. And we do center a performance measurement on
 4 percent missed due dates, and, I mean, it's over
 5 99 percent that we meet.
 6 Q. Excuse me. But when you say meets the due
 7 date, you mean -- do you mean that it is either --
 8 service is either connected by that -- that service is
 9 connected on that date?
 10 A. Yes, ma'am.
 11 Q. You don't mean that it could also be
 12 changed, but that the CLEC would be notified prior to
 13 the due date? That's not what you mean by 99
 14 percent --
 15 A. No.
 16 Q. -- meet the due date? You mean actually
 17 connected on the due date?
 18 A. Yes, ma'am. And I think there's the other
 19 instance, and maybe I'm trying to help ask your
 20 question. I don't mean to, but --
 21 Q. Please do.
 22 A. Once the firm order confirmation is given,
 23 then how often does that due date change based on the
 24 firm order confirmation?
 25 Q. Well, you answered what I was asking.

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1 be readily apparent to them when they check the status
 2 on line; is that correct?
 3 A. Well, it would depend again on what the
 4 order is. If it's one of these fatal orders that we
 5 talked about, they would know because that information
 6 is sent back to them. But if it's a nonfatal that's
 7 being handled by the local service center, then I
 8 think Ms. Kramer can tell you kind of how that works.
 9 Q. When there is a problem that causes a change
 10 in the due date, would the CLEC customer then have to
 11 go back into sort of an end line arrangement that that
 12 customer would then be given possible due dates and
 13 the customer and the CLEC representative, I would
 14 assume, would choose another due date? Is that how
 15 that would work?
 16 A. They could do that. If there's a problem
 17 with something happened and the customer still would
 18 like to have the due date, then there's an escalation
 19 procedure that the CLEC can follow. They can call the
 20 LOC, and the LOC will work with kind of the back
 21 office people that we talked about earlier to see if
 22 that due date could be met.
 23 Q. When a -- when it's not possible to meet a
 24 due date, how frequently is that, or if ever, is it
 25 not known until the actual due date?

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1 A. Okay. Good.
 2 Q. Can the -- when a Southwestern Bell
 3 Telephone Company employee places an order for a
 4 retail customer, do they receive the same information
 5 regarding fallout as a CLEC who has placed a new
 6 customer order would receive?
 7 A. Well, again, it depends on the interface
 8 that they're using. But if they're using EASE, then
 9 there's a notification that comes back that is a SORD
 10 edit, and they would receive the notification there.
 11 If they're using one of the other, since we don't use
 12 one of the other interfaces, then it is different.
 13 Q. Okay. And the reason that someone wouldn't
 14 be using a SORD interface would be because they've
 15 chosen to do it another way, which they consider as an
 16 easier way for them to handle it?
 17 A. That could be one reason, or EASE only
 18 supports resale. So if you're a facility-based
 19 provider or using unbundled network element
 20 combinations, then you have to use either LEX or EDI.
 21 Q. To your knowledge, have any of the parties
 22 in this proceeding provided evidence of any problems
 23 that they're experiencing with the OSS that are
 24 greater than or different from the problems that SWBT
 25 encounters with its own OSS for processing its own

** NOTES **

** NOTES **

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1 inversion of a customer is more complicated than a
 2 new order?
 3 A. Well, I think it would be, especially if you
 4 have a facility, another -- when you're using other
 5 facilities besides all the facilities being provided
 6 by Southwestern, yes, ma'am.
 7 Q. And Ms. Ham, when you compare the fallout
 8 rate for Southwestern Bell providing POT service,
 9 plain old telephone service using EASE, which I think
 10 we'd agree is recorded to be very low, do you agree
 11 they're not experiencing on the retail side a fallout
 12 rate in the neighborhood of 34 to 50 percent?
 13 A. No, but neither do the CLECs for resale.
 14 Q. Right. But what about for a CLEC who is
 15 providing the same POT service using unbundled network
 16 elements, for example, the platform? You're not
 17 prepared to say that the fallout rate that would be
 18 experienced for a CLEC using EDI, for example, would
 19 be as low as the fallout rate for Southwestern Bell
 20 providing POT service over EASE?
 21 A. What I believe I said is that we don't have
 22 enough data to know right now. The data that you're
 23 referring to was based on a very early study and a
 24 very limited study.
 25 Q. And then lastly, when you talk again about

1 June 26th?
 2 A. Great. Thank you. I was reminded of that.
 3 I just simply cannot remember all the Accessible
 4 Letters. But yes, thank you, that's true. Thanks for
 5 bringing that up.
 6 Q. Yeah. Ms. LaValle wants to note that
 7 change.
 8 A. Yeah. In fact, it might help here. Thank
 9 you.
 10 Q. And lastly, were the standards for that
 11 jeopardy notification actually promulgated or released
 12 roughly a year ago?
 13 A. If that's laid out in this letter, I would
 14 say yes, but I don't know that to be true.
 15 MR. MORRIS: That's all the questions I
 16 have, your Honor.
 17 JUDGE DIPPELL: Sprint?
 18 MS. LIPMAN: No questions.
 19 JUDGE DIPPELL: Birch?
 20 MR. JOHNSON: I have no questions. Thank
 21 you.
 22 JUDGE DIPPELL: E.spire?
 23 MS. PERKINS: No questions.
 24 JUDGE DIPPELL: McLeod?
 25 MS. YOUNG: No questions.

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1 the comparison, can we agree that the SORD edit return
 2 that you've discussed in response to my questions and
 3 to one from the Commissioners, that immediate return
 4 on the EASE screen of a message that there's been a
 5 fallout in SORD, that that means that SORD errors are
 6 being communicated electronically when you're using
 7 EASE, as compared with SORD errors that are not
 8 resulting in an electronic reject notification using
 9 the EDI process?
 10 A. Yes, ma'am.
 11 MS. LaVALLE: Thank you, Ms. Ham.
 12 JUDGE DIPPELL: MCI?
 13 MR. MORRIS: Just a couple of questions.
 14 RE-CROSS-EXAMINATION BY MR. MORRIS:
 15 Q. Ms. Ham, during the discussions with the
 16 Commissioners regarding the collaborative, is it not
 17 true that in the context of the collaborative the
 18 Texas Commission has defined electronic flow-through
 19 for 271 purposes that perhaps differs from the
 20 definition that may be contained in the
 21 interconnection agreements?
 22 A. No, sir. I don't know that to be true.
 23 Q. And is it not true that Southwestern Bell's
 24 February 19, 1999 Accessible Letter states that EDI
 25 for jeopardy notification will be available on

1 JUDGE DIPPELL: State of Missouri?
 2 MR. LONG: No questions.
 3 JUDGE DIPPELL: Staff?
 4 MS. BAKER: No questions.
 5 JUDGE DIPPELL: Is there redirect?
 6 MR. DANDINO: Your Honor.
 7 JUDGE DIPPELL: I'm sorry. Office of the
 8 Public Counsel?
 9 MR. DANDINO: I do have one question.
 10 RE-CROSS-EXAMINATION BY MR. DANDINO:
 11 Q. Ms. Ham, Commissioner Crumpton asked you
 12 about the mechanized loop test, MLT?
 13 A. Yes, sir.
 14 Q. Do you provide the results of those or are
 15 they available to the CLECs?
 16 A. Yes, sir. They're available real time and
 17 presents results back on the screen to them, what the
 18 results of that test were.
 19 Q. And they can get the documentation to
 20 support that?
 21 A. Yes, sir. That's the Accessible Letter
 22 where they call us and get that information.
 23 MR. DANDINO: That's all I have, your Honor.
 24 Thank you.
 25 JUDGE DIPPELL: Redirect?

** NOTES **

** NOTES **