

leased UNEs.^{23/} As SWBT well knows, virtually all of MCI WorldCom's purely local leased loops in the SWBT region are currently leased through SWBT's access tariffs as part of a service that includes multiplexing onto higher capacity transport that terminates on MCI WorldCom's SONET rings. Under SWBT's proposal, for MCI WorldCom to convert these loops to UNEs, it must disconnect them from the multiplexing and high capacity transport to which they are currently attached, needlessly interrupt the customer's service, purchase separate UNE multiplexing and UNE transport, reconnect the UNE loops to the newly leased UNE transport, and pay unnecessary disconnect and reconnect charges. At that point, MCI WorldCom would have to operate two overlapping networks – one carrying access traffic and one carrying local traffic. At the same time, when SWBT eventually gains section 271 authority, it will efficiently commingle its local and access traffic in one integrated network, will undertake no disconnect and reconnect expenses, and none of its customers will suffer pointless interruption of service. Such blatantly unreasonable and discriminatory practices are outlawed by section 251(c)(3), and are grounds to deny SWBT's application.

Finally, SWBT proposes that before CLECs be allowed to lease combined UNEs, they must "certify" that the leased UNEs will carry only certain patterns of traffic, when the "certified" facts would be so difficult to obtain that many CLECs as a practical matter will never even attempt to carry local traffic on leased UNE combinations. There is no reason to require that these facts be "certified." It ought to be no business of SWBT's what percentage of a

^{23/} Specifically, SWBT requires CLECs to "groom any Switched Access or Interconnection traffic off the Special Access circuit before converting," and therefore requires CLECs to "issue disconnect and new connect orders" to convert lines that do not need to be disturbed. Williams letter p. 2.

customer's lines MCI WorldCom has managed to wrest from its control. Even if a business customer obtains 99.9% of its local service from SWBT, if that customer purchases a single line from MCI WorldCom for local traffic, MCI WorldCom is entitled to unbundled network element pricing for that solitary circuit. The usage on the line is equally irrelevant. If the line is attached to a Class 5 local switch and is assigned a telephone number, it is a local line, even if, as it often the case, it is used as a back-up line and carries no traffic at all in the normal course. As with SWBT's other restrictions, whatever their ostensible purpose, these complex usage restrictions will have the effect of preventing MCI WorldCom and other CLECs from using combinations of UNEs to carry local traffic. For this reason as well, SWBT is not providing reasonable and nondiscriminatory access to unbundled network elements when it unilaterally imposes such restrictions.

IV. SWBT UNLAWFULLY REFUSES TO PROVIDE OPTICAL LEVEL LOOPS TO MCI WORLDCOM.

As part of the current renegotiation of MCI WorldCom's interconnection agreement with SWBT for Texas,^{24/} SWBT has refused to provide optical level loops to MCI WorldCom which are needed for a wide array of high bandwidth applications supporting voice, video and data.^{25/}

^{24/} In addition to its position concerning optical loops and EELs discussed in these Comments, SWBT has taken anticompetitive and unlawful positions with respect to a number of other issues as part of the ongoing negotiations. MCI WorldCom emphasizes the loop and EEL issues in these Comments because SWBT's position appears to be intractable; MCI WorldCom will advise the Commission if no progress is made in negotiations on other competitively significant issues.

^{25/} See SWBT's Direct Testimony of Sandra L. Lewis, Petition of SWBT for Arbitration with MCI WorldCom Pursuant to Section 252(B)(1) of the Federal Telecommunications Act of 1996, Texas PUC Docket No. 21791 (filed April 7, 2000) ("Lewis Testimony") (Tab C hereto); MCI WorldCom's Rebuttal Testimony of Michael Beach, Petition of SWBT for Arbitration with MCI WorldCom Pursuant to Section 252(B)(1) of the Federal Telecommunications Act of 1996,

SWBT seeks to justify its refusal to provide optical loops by contending that nothing in the UNE Remand Order requires it to do so, since that order refers generically to “high-capacity loops,” and not specifically to any particular kind of high-capacity loop. See UNE Remand Order ¶ 165. Apparently attempting to rely on some kind of exclusio unius reasoning, SWBT notes that in discussing unbundled local transport in the UNE Remand Order, the Commission makes explicit reference to optical fiber transport.^{26/}

SWBT’s refusal to provide optical loops when it is actively deploying such loops itself is discriminatory and anticompetitive, and its reliance on the UNE Remand Order in this regard strains credulity. The need for bandwidth is expanding exponentially, and MCI WorldCom currently has contracts in Texas that call for it to provide service that can best be provided through optical loops. The FCC squarely found that CLECs are impaired without access to the ILECs’ high-capacity loops, and there is no dispute that optical loops are a kind of high-capacity loop, indeed they are the paradigmatic high-capacity loop.

It is not the case that the UNE Remand Order limits its discussion of loops to copper-based technologies. Indeed, in the very paragraph SWBT relies upon, the Commission includes dark fiber as a form of loop to be unbundled. ¶ 165. It would have been wildly irrational for the Commission to have unbundled “dark” fiber, but not “lit” fiber, and plainly the Commission did no such thing. SWBT’s reliance on the fact that the Commission referred explicitly to optical fiber in its discussion of transport, and generically to high-capacity loops in its discussion of loops, as suggesting that the Commission did not understand that optical loops were a kind of

Texas PUC Docket No. 21791 (filed April 14, 2000) (Tab D hereto).

^{26/} Lewis Testimony at 14.

high-capacity loop, proves only that SWBT is unwilling to comply with Commission Orders.

The Commission cannot find SWBT has satisfied its checklist obligations when it refuses to unbundle loops as required by the Act and Commission rules.

CONCLUSION

SWBT's renewed application has not yet met the market-opening standards clearly set forth in the Commission's prior orders, and should therefore be denied as premature.

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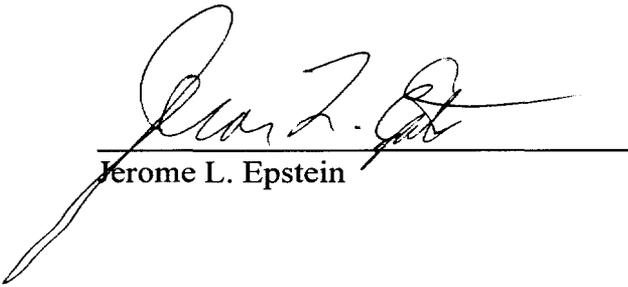
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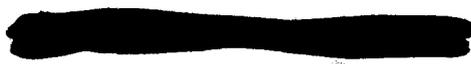
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Before the
Federal Communications Commission
Washington, D.C. 20554

APR 28 2000

In the Matter of)
)
Application by SBC Communications,)
Inc., Southwestern Bell Telephone)
Company, and Southwestern Bell)
Communications Services, Inc. d/b/a)
Southwestern Bell Long Distance)
for Provision of In-region, InterLATA)
Services in Texas)
_____)

CC Docket No. 00-65

Comments of MCI WORLDCOM, INC.

**APPENDIX
TABS A-D**

TABLE OF ATTACHMENTS

DECLARATIONS

TAB	DECLARANT	SUBJECT
TAB A	Terri McMillon, John Sivori and Sherry Lichtenberg	Operations Support Systems and Competitive Requirements

ADDITIONAL EXHIBITS

TAB	SUBJECT
B	Letter dated March 22, 2000 from Marilyn Williams, SBC, to Paula Rice, MCI WorldCom
C	SWBT's Direct Testimony of Sandra L. Lewis, <u>Petition of SWBT for Arbitration with MCI WorldCom Pursuant to Section 252(B)(1) of the Federal Telecommunications Act of 1996</u> , Texas PUC Docket No. 21791 (filed April 7, 2000)
D	MCI WorldCom's Rebuttal Testimony of Michael Beach, <u>Petition of SWBT for Arbitration with MCI WorldCom Pursuant to Section 252(B)(1) of the Federal Telecommunications Act of 1996</u> , Texas PUC Docket No. 21791 (filed April 14, 2000)

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CC Docket No. 00-65

**JOINT SUPPLEMENTAL DECLARATION OF TERRI MCMILLON, JOHN SIVORI,
AND SHERRY LICHTENBERG ON BEHALF OF MCI WORLDCOM**

TABLE OF CONTENTS

	<u>Page</u>
I. SWBT'S PRE-ORDERING AND ORDERING INTERFACES ARE NOT INTEGRATABLE	4
A. SWBT Has Not Even Attempted to Show Its Interfaces Are Integratable With Respect to Functions Other than CSRs and Address Validation	5
B. SWBT's Failure to Provide Fully Parsed CSRs Precludes Effective Integration.	6
C. Database Mismatches Also Preclude Effective Integration of Pre-ordering and Ordering	19
D. The Information SWBT Returns at the Pre-Ordering Stage Does Not Match The Information SWBT Requires at the Ordering Stage	22
II. SWBT'S THREE SERVICE ORDER PROCESS UNNECESSARILY RISKS LOSS OF DIAL TONE AND DOUBLE BILLING	25
III. SWBT'S LIDB PROCESS REMAINS DEFECTIVE	27
IV. SWBT CONTINUES TO HAVE A DEFECTIVE PROCESS FOR RELATING ORDERS	33
V. SWBT'S HOURS OF OPERATION ARE TOO LIMITED	34
VI. SWBT REJECTS TOO MANY ORDERS, MANUALLY PROCESSES TOO MANY REJECTS, AND RETURNS THOSE REJECTS BELATEDLY	34
VII. SWBT MANUALLY PROCESSES TOO MANY ORDERS	36
VIII. MCI WORLDCOM'S EARLY EXPERIENCE FROM ITS LAUNCH SUGGESTS THAT SWBT'S OSS IS NOT OPERATIONALLY READY	39
CONCLUSION	42

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JOINT SUPPLEMENTAL DECLARATION OF TERRI MCMILLON,
JOHN SIVORI, AND SHERRY LICHTENBERG ON BEHALF OF MCI WORLDCOM

1. Our names are Sherry Lichtenberg, Terri McMillon, and John Sivori. We are the same Terri McMillon, John Sivori and Sherry Lichtenberg who filed declarations in response to SWBT's January 10, 2000 application for section 271 entry in Texas and who also filed reply declarations in that proceeding. Our responsibilities, including those relating to MCI WorldCom's launch of UNE-Platform ("UNE-P") in Texas, are described in our prior declarations.
2. We will not repeat the observations we made in our prior declarations. Instead, we will address new developments, as well as new evidence submitted by SWBT in its April 5 section 271 application.
3. Since the time of our prior declarations, MCI WorldCom has engaged in a limited launch of local telephone service to residential customers in Texas using UNE-P. MCI WorldCom did so based on plans that have been in place for well over six months. MCI WorldCom decided to attempt to enter the Texas market using UNE-P because the Texas PUC made that entry vehicle available and has generally been committed to forcing

SWBT to remove barriers to local entry. The scope and viability of our entry has always been contingent on SWBT correcting several remaining flaws in its OSS and proving that it can handle commercial volumes of orders.

4. MCI WorldCom submitted a few trial orders in early April and then launched service on April 15. MCI WorldCom transmitted 1099 orders the week of April 17 and plans to gradually increase order volumes. We cannot, however, ramp up to full commercial volumes of orders as long as present systemic defects in SWBT's OSS are not corrected.
5. The current systemic defects in SWBT's OSS include almost all of those discussed in our prior declarations. With the exception of SWBT's inability to accept trouble tickets electronically before orders have posted to billing, SWBT has not eliminated any of the defects we previously discussed: (1) failure to provide an integratable pre-ordering and ordering interface; (2) creation of three service orders from every Local Service Request (LSR) for UNE-P without a means to ensure the orders remain associated; (3) reliance on defective processes for updating its Line Information Database (LIDB); (4) reliance on too much manual processing; (5) failure to provide an adequate process for relating multiple orders for a single customer; and (6) failure to eliminate excessive system down time. None of these defects existed in New York at the time of Bell Atlantic's section 271 filing, with the possible exception of too much manual processing.
6. Elimination of these defects is vital to the success of MCI WorldCom's launch. Indeed, preparation for MCI WorldCom's launch of residential service in Texas has only deepened our concern as to the likely impact of these defects. In particular, we have become aware of additional difficulties with respect to integration of pre-ordering and

ordering interfaces. Moreover, early data from MCI WorldCom's launch, although preliminary, confirms the existence of substantial operational problems with SWBT's OSS.

7. In determining the extent to which MCI WorldCom will be able to transmit full commercial volumes of orders (and remain in the market at all), MCI WorldCom will evaluate the degree to which it continues to have operational problems due to SWBT's OSS deficiencies, as well as the likelihood of future problems with increased volumes. In particular, MCI WorldCom will evaluate the degree to which it is forced to rely unnecessarily on manual processes on our side of the interfaces (based on SWBT's failure to offer integratable pre-ordering and ordering interfaces, defective SWBT processes for updating LIDB and the high rate of rejects) – which significantly increase MCI WorldCom's costs and lead to delay and errors that could prevent operation at commercial volumes. McMillon, Sivori & Lichtenberg Reply Decl. ¶¶ 7-12. MCI WorldCom will also evaluate the extent to which SWBT continues to rely on extensive manual processing on its side of the interfaces – for example, in processing LIDB updates, rejects, and orders – which leads to delay and errors that will likely increase with greater volumes. MCI WorldCom will also look to see whether SWBT has implemented any fix to ensure there are not continued problems from its process of creating three service orders out of every LSR. The scope and viability of MCI WorldCom's entry will also depend on the extent of any additional service problems, such as delayed pre-order responses from SWBT. Finally, the viability of MCI WorldCom's entry will depend on SWBT not increasing the existing costs for unbundled elements.

8. MCI WorldCom believes that all of these problems can be corrected quickly and hopes they are corrected so that it can ramp up to full commercial volumes. A full-scale entry in the Texas residential market is an important part of MCI WorldCom's business plans. Whether MCI WorldCom is able to do so, however, depends on the extent to which SWBT makes further progress. SWBT's OSS is not yet operationally ready to accept commercial volumes of UNE-P orders.

I. SWBT'S PRE-ORDERING AND ORDERING INTERFACES ARE NOT INTEGRATABLE.

9. We have previously explained that SWBT's pre-ordering interfaces are inadequate largely because they cannot be effectively integrated with an EDI ordering interface. That remains true.

10. SWBT presents no evidence of integratability of its interfaces with respect to pre-order functions other than CSRs and address validation. And with respect to CSRs, which SWBT does attempt to show are integratable, careful review of SWBT's documentation shows that they are not integratable. This is so because SWBT does not provide fully parsed CSRs, its business rules for ordering are different than its rules for pre-ordering, and its address databases contain mismatches. The report of SWBT's consultant Telcordia does not show to the contrary.

11. In order to provide integratable pre-ordering and ordering interfaces, SWBT must: (1) provide fully parsed CSRs (or, although a far inferior solution, provide documentation containing complete and accurate parsing conventions); (2) eliminate mismatches in its address databases, and (3) eliminate conflicts in its business rules between pre-ordering

and ordering. In addition to eliminating these known barriers to integration, SWBT should provide evidence that its interfaces are integratable and that an integrated interface can perform at parity with commercial volumes of orders.

A. SWBT Has Not Even Attempted to Show Its Interfaces Are Integratable With Respect to Functions Other than CSRs and Address Validation.

12. First, SWBT has presented no evidence that any of its pre-ordering interfaces are integratable with respect to any functions other than CSRs and address validation. SWBT does not, for example, present an evaluation from an objective third party or commercial evidence that its telephone number reservation function and due date calendar can be integrated with ordering. The letters SWBT presents from Sage and Navigator (Ham Supp. Aff. att. A & B) only discuss integration of CSR functionality. The Telcordia report on integration, which was released on April 24 and which we did not receive until April 25,^{1/} also does not seem to claim that Telcordia evaluated integration of telephone number reservation and due date functionality. It certainly does not state that Telcordia obtained that information from SWBT and successfully populated it on any orders that it transmitted to SWBT. Integration of the telephone number reservation and due date calendar functions are important, because such integration would allow CLECs to operate more efficiently and reduce rejects that result from mistyping the due date or telephone number.
13. The fact that SWBT generally complies with industry standards does not show that these functions are integratable. Industry standards are vital starting points but they do not

^{1/} As a result of our late receipt of the Telcordia analysis, we are continuing to examine it in more detail.

resolve many issues vital to integration. Even pre-ordering interfaces that comply with industry standards may return data that cannot be used at the ordering stage. As explained in more detail below, this is so if, for example, the business rules differ for pre-ordering and ordering, the information returned is not fully parsed, or back-end database issues preclude information obtained at the pre-ordering stage from being used at the ordering stage. As a result, the Commission has rightly emphasized the importance of proof of operational readiness. NY Order ¶¶ 87, 133-34, 138. SWBT has not provided such proof.

B. SWBT's Failure to Provide Fully Parsed CSRs Precludes Effective Integration.

1. SWBT Does Not Provide Fully Parsed CSRs.

14. We have previously discussed SWBT's failure to provide fully parsed CSRs. SWBT continues to return much of the information on its CSRs in concatenated, rather than fielded format. In other words, SWBT does not separate the information into the various fields that a CLEC must populate in filling out an order, thus forcing CLECs to manually separate the information and re-type it.
15. In our prior declarations, we discussed SWBT's return of service address information in a concatenated rather than fielded format. In particular, in placing an order, CLECs must populate the following individual address fields which are returned in a single concatenated field at the pre-order stage: (1) Service Address House Number (SANO); (2) Service Address House Number Suffix (SASF); (3) Service Address Street Directional (SASD); (4) Service Address Street Name (SASN); (5) Service Address

Thoroughfare (SATH); (6) Service Address Street Suffix (SASS), and (7) City (CITY).

In addition, for multi-tenant buildings or industrial complexes, CLECs must populate the following location-information fields which SWBT returns in one concatenated field at the pre-ordering stage: (1) Floor (FLOOR); (2) Room (ROOM); and (3) Building (BLDG). Finally, at least according to SWBT's business rule documentation, SWBT does not return any information in the State (STATE) field at the pre-order stage. This information must be included on every order and is important to CLECs like MCI WorldCom which use regional or national service centers.

16. In addition to returning service address information in concatenated format, SWBT also provides most of the information associated with directory listings in a concatenated format. SWBT provides the customer's listed name in a single concatenated field that includes the data needed to populate each of twelve individual fields on a directory listing order: (1) Style Code (STYC); (2) Degree of Indent (DOI); (3) Listed Name Last (LNLN); (4) Listed Name First (LNFN); (5) Do Not Abbreviate (DNA); (6) Designation (DES); (7) Title of Lineage (TL); (8) Title of Address 1 (TITLE1); (9) Title of Address 2 (TITLE2); (10) Nickname (NICK); (11) Dual Name Listing (DLNM), and (12) Business/Residence Placement Override (BRO). SWBT also provides the customer's directory listing address in a single concatenated field containing information needed to populate each of eleven individual fields on a directory listing order: (1) Listed Address House Number (LANO); (2) Listed Address House Number Suffix (LASF); (3) Listed Address Street Directional (LASD); (4) Listed Address Street Name (LASN); (5) Listed Address Thoroughfare (LATH); (6) Listed Address Street Suffix (LASS); (7) Listed

Address Location (LALO); (8) Listed Address Locality; (9) Listed Address State (LAST); (10) Listed Address Zip Code (LAZC), and (11) Indent Text (ITEXT). Similarly, SWBT provides all eleven fields which make up a customer's delivery address in concatenated format. The delivery address is used as a basis for delivering a customer's phone books.

17. SWBT's return of concatenated service address information, information presently required on every order, forces CLEC representatives to visually determine which information belongs in each field (visually parse the information), something a person can do by eye more easily – albeit imperfectly – than rules can be written telling a computer how to parse the information. The representatives must then re-type the service address information onto each order. This wastes an enormous amount of time and money and results in a high number of rejects both as a result of typing errors and “parsing” errors. MCI WorldCom is presently experiencing the impact of this defect. It is “visually parsing” and then re-typing service addresses onto every order and is experiencing a very large number of address rejects as a result. We quantify below the number of rejects MCI WorldCom is experiencing.
18. In addition to being forced to re-type service addresses, CLECs are forced to “visually parse” and then re-type directory information. SWBT's return of concatenated directory information forces CLECs to re-type a customer's directory name and address on orders to change a customer's directory listing (as well as directory delivery information where that differs from the customer's service address). In order to change a customer's directory listing (for example, when a customer wishes to add a spouse to the listing), the CLEC must transmit both the customer's existing listing and the customer's new listing.

If SWBT returned fielded directory information, the CLEC could populate the customer's old listing from the CSR (obtained by using a combined CSR/directory listing inquiry) directly onto an order and use that as a basis for creating the new listing. Without fielded directory information, however, the CLEC must re-type the existing directory information. Once again, this re-typing wastes resources and will lead to rejects. It also may lead to a customer receiving an inaccurate directory listing.

2. SWBT, not CLECs, Should Parse CSRs and CLECs Cannot Do So Effectively Themselves.

19. SWBT contends that CLECs can parse the concatenated information on the CSR based on documentation it has provided. This is not so as discussed below. Moreover, we firmly believe that SWBT, which knows its data and parsing conventions best, should parse the data provided on the CSR. It is unreasonable for SWBT to force each individual CLEC to attempt to separately develop parsing routines when SWBT could develop such a routine once. This is a clear barrier to CLEC entry and would also lead to state specific CLEC development efforts. Moreover, it is discriminatory to force CLECs to develop parsing routines given that SWBT does not have to parse data on its retail orders since its retail systems accept data in concatenated format. MCI WorldCom has been asking for parsed CSRs since 1998.
20. Nonetheless, MCI WorldCom would be interested in developing a parsing routine if it were possible to do so successfully. But SWBT has not provided documentation sufficient to enable MCI WorldCom to do so. SWBT's business rule documentation does

not contain any parsing conventions, nor does it reference any other documentation containing such rules.

21. SWBT did provide some parsing rules in the February 18 ex parte letter it submitted to the Commission (Ham Supp. Aff. att. F), but this is not an adequate or appropriate way in which to provide such information to CLECs. Moreover, that information is not anywhere close to complete. For example, it contains no explanation of how CLECs should determine what information to place in the Street Name Field as opposed to the Thoroughfare field when transmitting either a Street Address or a Listed Address. Thus, if a customer has the address 118 Camino Royal Trail (or the even more complicated address 106 S Parklands Drive Trail), the CLEC has no way of determining whether “Trail” should be placed in the street name or thoroughfare field, two separate fields on the End User Form required for migrating a customer’s service and also on the Directory Listing Form required for changing a customer’s directory listing. Indeed, the ex parte letter does not contain rules adequate to parse the majority of the fields in a Service Address or a Listed Address. SWBT’s ex parte letter also does not contain any rules for parsing the fields Floor, Room and Building, location fields which are required fields for more complex addresses. In addition, SWBT’s ex parte letter contains no information as to how to parse the twelve fields which make up a customer’s directory name information -- information required to change a customer’s directory listing.

22. SWBT also refers to parsing information ostensibly contained in its Universal Service Order Practice (USOP) Manual. Ham Supp. Aff. ¶ 18. However, MCI WorldCom was unable to access the relevant information in that manual for weeks (no information was

returned when a proper Field Identified (FID) was entered), despite repeated attempts.

The manual is not even referenced in SWBT's business rule documentation. As a result, MCI WorldCom transmitted a request to SWBT on April 14 asking for a hard copy of the USOP manual as soon as possible. To date, SWBT's response has been that it is unable to find a copy of the manual. This exemplifies the low level of support that SWBT is generally providing to CLECs.

23. In any event, just this week MCI WorldCom was finally able to access the relevant information in the USOP manual on the web. While MCI WorldCom has not yet completed a thorough analysis, it is apparent just from examining the Street Address FID that the manual does not contain complete parsing rules. Like the ex parte letter, for example, it contains no rules describing how to separate street name and thoroughfare (indeed, it does not even discuss thoroughfare) or what separates the house number from the house number suffix. It also does not explain what should act as a place holder if data elements, such as street number, or house number suffix are absent. In writing a parsing routine, a programmer must be able to tell the computer that the first element will always be street number, or write a definitive statement stating how the computer will know that a street number is absent (such as by including a placeholder). Thus, in the example provided in the USOP of 440 S Main St, St Louis, MO, there is no house number suffix present, yet no way for a computer to determine that the suffix field should be left blank.
24. The USOP manual also contains information different than that provided in the ex parte letter. For example, the USOP states that the street name may contain the Directional Prefix to House Number (DFX), House Number Prefix (HFX), Street Name Prefix

(PFX), and Suffix Street Name (SFX), but the ex parte letter does not state that the DFX and HFX may be part of the street name component. Moreover, neither the letter nor the USOP manual states how these different parts of the street name component can be parsed – it does not say in what order they appear or what separates them. Thus, the street name S Main St contains information used to populate three separate ordering fields; yet there is no information as to how to determine what goes into each field.

25. Telcordia's April 24 report on integration does not show that integration is possible. Telcordia acknowledges that SWBT returns concatenated service address information and that SWBT's documentation does not contain adequate parsing rules. Telcordia states, however, that it was able to obtain information from discussions with SWBT that enabled it to parse service addresses. But Telcordia does not provide the actual parsing rules, making it impossible to fully evaluate its claim. If SWBT really has adequate parsing rules, it must document those rules and provide them to all CLECs. It is not at all reasonable to expect CLECs to attempt to build an interface based on verbal communication. Different SWBT representatives may provide different rules, and the supposed "rules" may change from day to day. SWBT has now been claiming for months that CLECs can parse CSRs themselves; there is simply no excuse for it to attempt to defend this proposition while failing to provide the documentation enabling CLECs to do so.
26. Moreover, although Telcordia states that it was able to obtain parsing rules for the service address segments, it does not make the same claim with respect to the location fields such as building, floor and room, or with respect to directory name information. And even as