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

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

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OFFICE OF THE SECRETARY

REPLY COMMENTS OF WORLDCOM, INC., ON THE  
APPLICATION BY SBC FOR AUTHORIZATION TO PROVIDE  
IN-REGION, INTERLATA SERVICES IN TEXAS

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**TABLE OF DECLARATIONS**

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**TABLE OF CITATION FORMS**

<b>FCC Orders</b>	
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<u>NY Order</u>	<u>In re Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Services in the State of New York</u> , CC Docket No. 99-295, Memorandum Opinion and Order, 15 F.C.C.R. 3953 (1999)
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McMillon & Sivori Decl.	Joint Declaration of Terri McMillon & John Sivori on Behalf of MCI WorldCom (Jan. 31, 2000) (MCI WorldCom Jan. 31 Comments, Tab A)
McMillon, Sivori & Lichtenberg Reply Decl.	Joint Reply Declaration of Terri McMillon, John Sivori and Sherry Lichtenberg on Behalf of MCI WorldCom (Feb. 22, 2000) (MCI WorldCom Feb. 22 Reply Comments, Tab A)

McMillon, Sivori & Lichtenberg Supp. Decl.	Joint Supplemental Declaration of Terri McMillon, John Sivori and Sherry Lichtenberg on Behalf of MCI WorldCom (April 26, 2000) (MCI WorldCom April 26, 2000 Comments, Tab A)
McMillon, Sivori & Lichtenberg Supp. Rep. Decl.	Joint Supplemental Reply Declaration of Terri McMillon, John Sivori and Sherry Lichtenberg on Behalf of MCI WorldCom (May 19, 2000) (Tab A hereto)
<b>Filings</b>	
<u>PUC Evaluation</u>	Evaluation of the Public Utility Commission of Texas, <u>In re 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</u> , CC Docket No. 00-65 (filed May 12, 2000)
<b>Other Record Materials</b>	
MCI WorldCom April 26 Comments	Comments of MCI WorldCom, Inc., on the Application by SBC for Authorization to Provide In-Region, InterLATA Services in Texas, <u>In re 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</u> , CC Docket No. 00-65 (filed April 26, 2000)
Transcript	Transcript of Proceedings, Project No. 20400 (Texas Pub. Util. Comm'n April 17, 2000) (PUC Evaluation, Tab 4)

## INTRODUCTION AND SUMMARY

WorldCom began a limited launch of UNE-Platform (“UNE-P”) service to Texas residential consumers last month. WorldCom has gained approximately 3,500 customers in this one month period – which is in the range of the number WorldCom expects to add per day when Southwestern Bell (“SWBT”) eliminates the remaining barriers to viable competition. WorldCom has not engaged in media advertising of its UNE-P service because SWBT cannot handle the demand that would result. Indeed, WorldCom’s early experience confirms that SWBT cannot even adequately process orders for 3,500 customers per month, let alone commercial volumes of 3,000 to 5,000 orders per day from WorldCom alone.

Several long-standing systemic defects in SWBT’s operations support systems (“OSS”) must be resolved before SWBT will be able to handle full commercial volumes of UNE-P orders:

First, SWBT does not provide pre-order and order interfaces that can be effectively integrated. As expected, this has caused substantial and unnecessary work for WorldCom and excessive rejection of WorldCom’s orders. While WorldCom welcomes SWBT’s promised enhancement to remove the address requirement for some types of orders, this enhancement will not eliminate the need for accurate addresses on all orders and has not, in any event, been implemented. The Commission has repeated for good reason the admonition that section 271 applications be “complete when filed”: absent that requirement, applications would be decided based on disputed and unverifiable factual assertions contained in a flurry of last-minute ex parte letters. SWBT does not today have a process for accepting UNE-P migration orders without addresses, as Bell Atlantic did before it applied for section 271 authority.

Second, SWBT's claimed fix for automatically updating the Line Information Database ("LIDB") (used for branding, collect calls and PIC information) is not working. SWBT is consistently inserting the wrong Primary Interexchange Carrier ("PIC") information for WorldCom's customers in SWBT's database, and WorldCom has been forced to devote considerable resources to reviewing the constant errors and ensuring that SWBT corrects them. Moreover, SWBT admits that the cause of the incorrect LIDB records has been SWBT's manual errors, even though order volumes have been exceedingly low. SWBT has recently attempted to downplay the importance of LIDB, but its technical documentation and instructions to WorldCom have repeatedly stressed the importance of accurate LIDB records.

Third, SWBT continues to have problems processing orders because of its inherently flawed process of dividing each order into three sub-orders. SWBT has conceded that the cause of the LIDB errors relates to delayed processing of one of the three sub-orders. That SWBT cannot coordinate these sub-orders when it is processing only a few thousand of WorldCom's UNE-P orders per month does not bode well for sustainable competition at commercial volumes.

Fourth, WorldCom has confirmed from its limited launch that SWBT is manually handling far too many orders (and thus that its reported "flow-through" rates are erroneous or highly misleading). More than 40% of SWBT's LIDB updates were erroneous due to SWBT's manual handling – meaning SWBT manually handled a minimum of 40% of WorldCom's UNE-P orders. All of these simple migration orders should have flowed through SWBT's systems without any manual handling – at least according to SWBT's prior representations. This excessive level of manual handling, along with ever-changing explanations as to how SWBT supposedly coordinates the sub-orders, make it impossible for WorldCom to have the confidence needed to ramp up to commercial volumes of orders.

Fifth, SWBT is sending WorldCom too many “jeopardies” on WorldCom’s orders, and in some cases improperly doing so after the due date for the orders had already passed. Moreover, the stated reasons for many of the jeopardies – such as “missed appointment” or “no access to end user” – make no sense for orders that are supposed to be simple migrations of existing service.

Finally, WorldCom has recently discovered that the one apparent SWBT improvement noted in WorldCom’s initial comments – SWBT’s ability to accept electronic trouble tickets even if an order has not yet posted to billing – does not apply to the electronic bonding interface WorldCom uses. This means that WorldCom cannot submit electronic trouble tickets using electronic bonding, or check the status of a customer trouble, in the critical period immediately after installation.

WorldCom has emphasized these defects for months, and SWBT could certainly have corrected all of them by now if it were committed to fully opening its market to UNE-based competition. These remaining OSS barriers – along with the pricing and UNE-loop issues raised in WorldCom’s initial comments – are the difference between limited competition for a handful of customers and robust, sustainable competition for residential consumers in Texas based on unbundled elements.

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**REPLY COMMENTS OF WORLDCOM, INC.,<sup>1/</sup> ON THE  
APPLICATION BY SBC FOR AUTHORIZATION TO PROVIDE  
IN-REGION, INTERLATA SERVICES IN TEXAS**

Southwestern Bell's ("SWBT's") renewed application for section 271 authority remains premature. WorldCom's limited launch of residential service in Texas over the past month, using UNE-Platform ("UNE-P") has confirmed that the systemic defects in SWBT's operations support systems ("OSS") pose a substantial barrier to sustainable competition in Texas. Since it launched service on April 15, WorldCom has had approximately 3,500 orders completed (compared to a full commercial-scale launch of 3,000 to 5,000 orders per day), yet SWBT is not handling even these low volumes adequately.

Among other problems, SWBT's failure to provide pre-order and order interfaces that can be effectively integrated is causing a high number of rejects as well as substantial manual work for WorldCom representatives who must re-type pre-order information onto every order. Similarly, SWBT's defective and excessively manual process for updating its Line Information

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<sup>1/</sup> Effective May 1, 2000, MCI WorldCom, Inc. changed its corporate name to WorldCom, Inc.

Database (“LIDB”) is causing a staggering number of errors and delays in updating LIDB. This has forced WorldCom to expend significant resources overseeing the LIDB updates – increasing WorldCom’s costs and thus impairing its ability to compete effectively against SWBT. In addition, SWBT’s return of a high number of jeopardies, late return of these jeopardies, and questionable justification for these jeopardies is delaying service to customers and may also be posing a risk of degraded service for these customers. Finally, SWBT’s inability to accept trouble tickets until well after SWBT has completed an order, a problem that WorldCom believed SWBT had fixed, has not been fixed in SWBT’s electronic bonding interface. This limitation makes it difficult for WorldCom to submit trouble tickets. These and other OSS problems discussed below will only become more severe as order volumes increase.

In these reply comments, WorldCom discusses only those issues on which there is new information to report. WorldCom has not addressed issues such as SWBT’s glue charges, SWBT’s refusal to provide optical loops, or SWBT’s unreasonable and discriminatory conditions on providing loop-transport combinations – issues that have not changed since the filing of our initial comments.

**I. SWBT’S FAILURE TO PROVIDE A PRE-ORDER INTERFACE THAT CAN BE EFFECTIVELY INTEGRATED WITH AN EDI ORDERING INTERFACE POSES SIGNIFICANT PROBLEMS FOR WORLDCOM**

SWBT has made no progress in providing integratable pre-order and order interfaces since WorldCom filed its initial comments in April or, indeed, since SWBT filed its first section 271 application for Texas in January. SWBT has not begun providing fully parsed Customer Service Records (“CSRs”) or adequate documentation necessary for CLECs to parse the CSRs

themselves. It has not eliminated the conflicts in its business rules between pre-order and order, and it has not eliminated the conflicts in its address databases.

WorldCom is experiencing severe problems as a result of these failures. WorldCom has been forced to re-type pre-order information onto every order. As a result of typing errors, business rule conflicts, and database mismatches, WorldCom is experiencing a reject rate of 46%, of which 7 out of 10 are related to address errors. The reject rate is even higher – 66% – on the first version of the orders WorldCom has submitted. The manual effort required to re-type pre-order information onto each order and the time consuming process of correcting so many rejects vastly increases WorldCom’s costs and also delays provisioning of service to customers. McMillon, Sivori & Lichtenberg Supp. Rep. Decl. ¶ 6.

The Texas PUC incorrectly concludes in its evaluation that CLECs can avoid these problems. The PUC relies on Telcordia’s report on integration, letters from Sage and Navigator, and testimony from a half-day workshop the PUC conducted on integration.<sup>2/</sup> PUC Evaluation at 2-3, 6-8. As WorldCom previously explained, however, neither the Telcordia report nor the letters from Sage and Navigator demonstrate that effective integration is possible, and WorldCom will not repeat that explanation here. MCI WorldCom April 26 Comments at 7-8, 10-13. As for the April 17 workshop, the only testimony from CLECs at that workshop demonstrates that effective integration is not possible.

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<sup>2/</sup> As explained in WorldCom’s initial Comments, there is no evidence that any CLEC has even attempted to integrate pre-order and order with respect to functions other than the CSR, such as telephone number reservation and address validation. There is also no other evidence in the record that these functions are integratable. For that reason alone, SWBT’s application must be rejected.

The PUC notes that at the workshop WorldCom “stated that it has integrated several fields, one such being account telephone number.” PUC Evaluation at 6. Yet while WorldCom stated that the account telephone number and several other fields could be integrated, it also explained that, as a result of the three key barriers to integration discussed above, most fields cannot be integrated. Transcript at 27-29; 84-86. For example, more than 80% of the fields on the end user ordering form that should be integratable are not. McMillon, Sivori & Lichtenberg Supp. Rep. Decl. ¶ 9. WorldCom explained to the PUC that as a result of such problems it was re-typing pre-order information onto every order – extra work WorldCom certainly would not undertake if it were avoidable. Transcript at 27.

AT&T is the only CLEC other than WorldCom that the PUC cites as testifying at the workshop that integration of some pre-order information is possible.<sup>3/</sup> PUC Evaluation at 6-7. Yet the core of AT&T’s testimony was that it has not been able to successfully parse the concatenated information that SWBT returns at the pre-order stage despite attempting to do so for over 18 months. Transcript at 18-19, 24-25. That is exactly what AT&T has explained to this Commission. Chambers & DeYoung Supp. Decl. ¶¶ 48, 55, 62-65.

Moreover, WorldCom has provided to the Commission substantial detail as to the parsing rules that SWBT has failed to provide, as well as the conflicts in business rules between pre-order and order. McMillon, Sivori & Lichtenberg Supp. Decl. ¶¶ 15-18, 21-23, 50-53. If the necessary parsing rules did exist, SWBT should have been able to point to them in its documentation. It has not done so. Similarly, if the business rules were not in conflict, SWBT

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<sup>3/</sup> Neither Sage nor Navigator testified at the April 17 workshop before the PUC.

should have been able to so explain. SWBT has not done so here and did not do so at the PUC workshop (and it surely should not have saved such critical information for its reply brief in this second application).

Indeed, in its report on integration, Telcordia acknowledged that SWBT's documentation fails to provide sufficient information for CLECs to parse key pre-order information themselves. The PUC does not conclude to the contrary. That should be the end of the matter. As WorldCom previously explained, even if it were not SWBT's responsibility under the Act to provide pre-order information to CLECs in parsed format – and it is – it is certainly SWBT's responsibility to provide adequate documentation to enable CLECs to parse that information themselves. CLECs cannot be expected to construct their interfaces based on trial and error and oral "specifications." MCI WorldCom April 26 Comments at 10.

The PUC also relies in part on SWBT's promised May 27 "fix" with respect to service addresses. PUC Evaluation at 10. However, as previously explained, this promised functionality, although desirable, will not alleviate many of the key problems associated with SWBT's failure to provide integratable interfaces. McMillon, Sivori & Lichtenberg Supp. Decl. ¶¶ 34-40. Even after implementation of this enhancement, CLECs will have to re-type pre-order service address information into their systems to transmit on subsequent orders, such as orders for feature changes, disconnects, and trouble tickets. CLECs will also need to re-type directory name and listing information to use on orders for directory changes, which will be unaffected by the May 27 change. Moreover, the functionality has not yet been implemented. If the Commission's repeated emphasis on the "complete when filed" rule is to mean anything, SWBT

cannot rely on a planned change that will not be implemented until late in the review process – after reply comments are due. One cannot rationally assess the success of a significant systems change (particularly with modest order volumes) through a few weeks of data reported and analyzed in competing ex parte letters. SWBT could easily have filed its application after it implemented this functionality and proved that it worked, but chose not to in the face of unambiguous Commission precedent barring reliance on post-application facts.

The Commission's decision here will be vital not only for this application, but also for future section 271 proceedings. The Commission has long emphasized the importance of pre-order and order integration and has indicated that parsed address information is needed to allow such integration to occur. NY Order ¶¶ 83-84, 137, 151-52; LA II Order ¶¶ 94-100; SC Order ¶¶ 112, 156-59. The Commission should establish a bright line rule consistent with the Bell Operating Companies' ("BOC") obligation to provide reasonable and nondiscriminatory access to unbundled elements: BOCs must provide parsed pre-order information that can be populated directly into orders without conflicts in business rules. This should not be difficult for a BOC to do. It is certainly far easier for the BOC to do than to impose the unreasonable requirement that each CLEC attempt to develop a parsing routine (especially with undocumented parsing rules) and attempt to compensate for disparate business rules. Establishing a bright line rule will prevent the inevitable series of battles between BOCs and CLECs as to whether the BOCs have done enough to make their interfaces integratable. More important, it will ensure that CLECs actually can effectively integrate their interfaces, rather than being forced to use trial and error methods to arrive at makeshift, partially integrated interfaces.

**II. SWBT CONTINUES TO MAKE A SUBSTANTIAL NUMBER OF ERRORS IN UPDATING LIDB**

WorldCom's initial comments discussed SWBT's widespread failure to update LIDB on time or accurately, including incorrectly updating records of customers' long distance and/or intraLATA PICs. Despite a May 3 promise from SWBT to minimize future problems (McMillon, Sivori & Lichtenberg Supp. Rep. Decl. att. 2), the situation has not improved.

WorldCom's initial discussion was based on a sample of WorldCom's first 60 completed orders. WorldCom has now reviewed 6 batches of 60 orders and each batch has had significant problems. Overall, on the 360 orders WorldCom checked, each of which was checked more than 48 hours after receiving a completion notice, SWBT had either erroneously updated, or not yet updated, more than 43% of the orders. For example, in one set of 60 orders, 51 had not been updated correctly when WorldCom first checked. In this batch, 42 had an incorrect long distance and/or intraLATA PIC. Another 9 orders apparently had not yet been updated at all, as WorldCom could not access these orders. McMillon, Sivori & Lichtenberg Supp. Rep. Decl. ¶¶ 26-27.

In communications with WorldCom and in filings at the Texas PUC, SWBT has not denied the existence of these errors. SWBT has attributed them to manual processes – “delay[s] in typing the Toll File Guide orders which is what generates LIDB . . . . [T]he ‘N’ order that updates LIDB was delayed being typed” (*id.* att. 2). SWBT has also stated that errors and delays result from a different manual problem – “work of service representatives in SWBT's LSC that created incomplete Toll File Guide orders” (*id.* att. 11 at 20). In other words, delays and errors that result from manual processing are responsible for the errors in the LIDB updates. SWBT's

proposed solution – devoting more employees to typing LIDB updates (McMillon, Sivori & Lichtenberg Supp. Rep. Decl. att. 2) – will not fix the problem. More than a week after SWBT promised to increase staffing, LIDB problems had not diminished, despite the fact that WorldCom has submitted only a very small volume of orders. Id. ¶¶ 26-28.

Although SWBT has not denied the existence of problems with LIDB updates, it recently stated in a regulatory filing that the erroneous PIC information in LIDB has no present impact of any kind. Id. att.11 at 20. This assertion in SWBT’s regulatory filing flatly contradicts SWBT’s consistent statements to WorldCom and other CLECs in Accessible Letters and other formal instructions to CLECs. For well over a year, WorldCom has challenged SWBT’s insistence that CLECs update LIDB records, and asked whether completion of the LIDB records was optional or mandatory. For example, when WorldCom asked in November 1999 whether it is optional for CLECs to update PIC information in LIDB, SWBT responded that “PIC changes are required updates in order to maintain the integrity of the LIDB database.” (Id. att. 4) (emphasis added). SWBT later confirmed this and emphasized to the CLEC community in an Accessible Letter that “the accuracy of the PIC has potential financial impact on the Interexchange Carrier providing the service” (id. att. 5 at 50); SWBT added in a different Accessible Letter that the PIC information in LIDB is used for “secondary IXC selection on 0- calls.” (Id. att. 6 at 4). All of this strongly suggests that the PIC information in LIDB is not extraneous; if it served no purpose, completion of the field would not be mandatory.

Indeed, WorldCom and other CLECs have complained for the past year about the inefficient processes SWBT provides for updating LIDB, resulting in the Texas PUC order

requiring SWBT to update LIDB records through the LSR. Not once throughout this process did SWBT suggest to CLECs or the PUC that an automated process is unnecessary because the PIC information in LIDB is unnecessary or not presently used. Indeed, because SWBT does not plan to implement a process for LIDB updates after initial orders at least until December 2000, WorldCom has expended considerable effort and resources to be able to update these records, relying on SWBT's prior, repeated emphasis on the importance of accurate LIDB updates. Id. ¶ 35.

It is also curious that SWBT now claims that the PIC information in LIDB does not determine the routing of a customer's intraLATA and long distance calls, given that when CLECs need to change a customer's PIC, SWBT requires CLECs to submit a request for SWBT to update LIDB. At a minimum, then, it seems likely that defects in the process for updating LIDB could also cause errors in the PIC information that is used for routing. Id. ¶ 38. Finally, it is important to note that although SWBT has attempted to minimize the impact of the PIC errors in LIDB, it has not denied that accurate and efficient LIDB updates are essential to ensure proper branding on customers' directory assistance and operator calls. Id. ¶ 39; McMillon, Sivori & Lichtenberg Supp. Decl. ¶ 72.

In addition to the potential impacts of SWBT's defective LIDB process on CLEC customers, SWBT's process forces CLECs to expend inordinate resources to use and monitor the LIDB records.<sup>4/</sup> WorldCom has devoted substantial resources to ensure that the LIDB process works correctly. As noted above, WorldCom has developed an internal process that will enable

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<sup>4/</sup> Of course, if SWBT were to state that CLECs do not need to ensure that the information in LIDB is accurate, CLECs could avoid this cost.

it to submit subsequent LIDB updates through SWBT's graphical user interface until SWBT implements an LSR process for such updates. McMillon, Sivori & Lichtenberg Supp. Rep. Decl. ¶ 36. Moreover, WorldCom has already deployed three employees just to oversee these subsequent LIDB updates. McMillon, Sivori & Lichtenberg Supp. Decl. ¶ 75. In addition, WorldCom is spending a substantial amount of time tracking the LIDB errors that SWBT is making on initial WorldCom orders. Checking each batch of 60 orders takes an employee several hours, and WorldCom has had to check each batch on multiple occasions in order to determine whether the errors have been corrected. WorldCom has also had to spend significant time attempting to persuade SWBT to correct these errors, because SWBT refused to open trouble tickets for these LIDB problems. Even with all of this effort, WorldCom is only able to monitor a portion of the relatively small volume of orders that it is currently submitting. Monitoring costs obviously will increase significantly as volumes increase if SWBT does not resolve this problem. McMillon, Sivori & Lichtenberg Supp. Rep. Decl. ¶ 34.

SWBT should either inform CLECs that they no longer need to concern themselves with updating LIDB or should acknowledge that the defects in its process for updating LIDB have real consequences. SWBT should not be able to force CLECs to spend significant resources updating LIDB while simultaneously claiming that it is irrelevant that SWBT is then delaying or erroneously processing those updates.

### **III. SWBT'S PROCESS OF CREATING THREE SUB-ORDERS FROM EVERY LSR CONTINUES TO IMPAIR ORDER PROCESSING**

SWBT's process of dividing every Local Service Request ("LSR") for UNE-P into three sub-orders and failing to ensure that these sub-orders remain associated already appears to be

causing problems for WorldCom even at the early stages of its launch. As discussed above, SWBT has attributed the errors and delays in processing LIDB updates to failure of the “N” sub-order to post on time as a result of manual processing of that sub-order. In other words, one of the three sub-orders SWBT has created is posting significantly after the other two sub-orders, thus leading to errors in SWBT’s databases. In addition, between May 1 and May 15, WorldCom opened trouble tickets for six customers who lost dial tone as a result of SWBT errors, most likely as a result of the three service order process. It is again worth noting that no similar loss of dial tone has occurred in New York. McMillon, Sivori & Lichtenberg Supp. Rep. Decl. ¶ 50.

SWBT’s inability to coordinate the three sub-orders will inevitably contribute to additional problems as order volumes increase and manual processes are overwhelmed. SWBT has not even been able to manually coordinate the “N” order by “staffing up” to handle a mere 1,000-2,000 orders per week for WorldCom – a fraction of the volume SWBT will need to handle if and when WorldCom is able to fully ramp up to 3,000-5,000 orders per day. SWBT’s ability to coordinate the three service orders, especially given its manual processing of these three sub-orders (discussed below), can only worsen as volumes increase.

**IV. SWBT IS MANUALLY PROCESSING A FAR HIGHER NUMBER OF ORDERS THAN IS APPARENT FROM ITS PERFORMANCE DATA**

SWBT’s explanation of the errors in its LIDB process confirms what WorldCom has long feared – SWBT’s reported data on flow-through does not come anywhere close to capturing the number of orders that fall out of its systems for manual intervention. In part, this is because SWBT’s data does not capture orders that fall out after reaching its SORD database, the point at

which it appears many orders are falling out.

As explained above, more than 43% of the orders that WorldCom has checked in LIDB either have errors or are inaccessible to WorldCom, and SWBT has attributed these problems to delays and mistakes in its manual processes. This suggests that at least 43% of WorldCom's orders are being processed manually. In reality, the number is probably far higher because not every order that SWBT manually processes is processed incorrectly or in a delayed fashion.

It is also apparent that the more than 43% rate of manual processing of the "N" sub-order (used to trigger LIDB updates) applies equally to the "C" and "D" sub-orders. This is so because SWBT has stated that it manually processes each of the sub-orders when it manually processes one of them, and has stated that it does so when the LSR transmitted by the CLEC "does not mog." McMillon, Sivori & Lichtenberg Rep. Decl. ¶ 47 & att. 2. Yet all of the orders that WorldCom is transmitting are basic UNE-P orders that are supposed to be "MOGable" – that is, are capable of flowing through SWBT's systems without manual intervention, according to the information provided by SWBT. Id. ¶ 47. The fact that WorldCom is experiencing so many errors and delays attributable to manual processing shows that SWBT has vastly exaggerated the flow-through capabilities of its systems. Indeed, the number of orders falling out of SWBT's systems for manual processing appears far higher than existed in New York at the time of Bell Atlantic's application.

This high level of manual processing is already causing delays and errors in updating LIDB. It is also causing delays in processing of rejects. In the future, as order volumes increase, this level of manual processing will almost certainly cause a wide variety of additional problems.

This is especially so because manual errors in processing any of the three sub-orders can lead to disassociated orders.

**V. SWBT IS RETURNING TOO MANY JEOPARDIES, FOR IMPROPER REASONS, AND IS DOING SO LATE**

SWBT has been sending too many jeopardy notifications to WorldCom, including for orders that should not receive jeopardies at all. Many of these jeopardies are being sent far too late, and the reasons for some of the jeopardies suggest that SWBT may be unnecessarily changing facilities on simple migration orders.

SWBT had transmitted 172 jeopardies on WorldCom UNE-P orders as of May 17. One hundred thirty eight of these orders were simple migration orders. The reasons SWBT provided for transmitting these jeopardies were: “field visit determined address invalid,” “missed appointment,” “no access to end user prem,” “frame due time cannot be met,” “notification of new due date,” “invalid feature,” verify address or provide nearby TN,” and “EU name and TN do not match.” Id. ¶¶ 57-60.

WorldCom does not understand why SWBT provided jeopardy notices at all on basic UNE-P migration orders. Certainly, it should not have provided jeopardies for “field visit determined address invalid,” “missed appointment,” “no access to end user,” or “frame due time cannot be met.” There is no need for field visits, appointments or access to the end user unless SWBT is changing or adding facilities – which it should not be doing on UNE-P migration orders. Id. ¶ 60. Changing facilities would substantially increase the risk of lost dial tone and can also cause diminished quality of service. Id. ¶ 64.

SWBT also should not be providing jeopardies for invalid features or addresses. If an order has an invalid feature or address, it should be rejected prior to transmission of the FOC. Id. ¶ 59. Transmitting a FOC signals the CLEC that the order has been accepted and will be completed on the due date.

Subsequent transmission of a jeopardy significantly delays provisioning of service to the customer. This is especially so when the BOC transmits the jeopardy after the due date. SWBT has transmitted 38% of the jeopardies after the due date, often well after the due date. Id. ¶ 62. When the jeopardies come after the due date, CLECs obviously cannot even warn their customers of the delay.

It is clear from the filing of AT&T that WorldCom is not the only CLEC that is experiencing this problem. Chambers & DeYoung Supp. Decl. ¶¶ 111-113. However, SWBT does not report the number or timeliness of jeopardies in its performance data. Continuation of SWBT's current poor jeopardy performance will pose yet another significant obstacle to expansion of service to commercial volumes.

**VI. SWBT WILL NOT ACCEPT TROUBLE TICKETS THROUGH ITS ELECTRONIC BONDING INTERFACE UNTIL THE CUSTOMER'S ORDER HAS POSTED TO BILLING**

In response to SWBT's first section 271 application for Texas, WorldCom extensively discussed SWBT's inability to open electronic trouble tickets until orders had posted to billing – often well over 48 hours after SWBT had transmitted a completion notice. McMillon & Sivori Decl. ¶¶ 192-200. Until recently, WorldCom believed that SWBT had fixed this problem and thus indicated to the Commission it was the one systemic problem that SWBT appeared to have

resolved. Unfortunately, however, WorldCom recently learned that SWBT had implemented the fix only for its “toolbar” application and not for its electronic bonding (“EB”) interface – the interface that WorldCom uses to submit troubles. McMillon, Sivori & Lichtenberg Supp. Rep. Decl. ¶ 55.

As WorldCom began submitting trouble tickets to SWBT through the EB interface, it was unable to do so for some customers whose service had recently been installed. After querying SWBT, WorldCom learned that SWBT had indeed implemented its much heralded fix only with respect to toolbar, not EB, and also learned that no fix for the EB interface appears imminent. *Id.* ¶ 55. This is a significant problem. One of the advantages of doing business in Texas is that SWBT offers EB, an application-to-application interface that avoids the need for dual data entry, and which WorldCom expects to use on a national basis. But if WorldCom cannot submit trouble tickets for customers through EB until orders have posted to billing, it will be denied access when it first attempts to submit troubles for newly provisioned customers, it will next have to determine the source of the problem, and then will have to switch to toolbar to submit the troubles. This will force WorldCom to train its employees in a dual process, will discourage use of EB, and will delay submission of the troubles when the dual process is used. *Id.* ¶ 56.

## **VII. SWBT IS INACCURATELY PROVISIONING ORDERS**

Although WorldCom’s launch remains at an early stage, it is already experiencing several other problems due to SWBT’s OSS. Between May 1 and May 15, WorldCom has opened four trouble tickets for customers unable to make intraLATA or long distance calls, two trouble tickets for customers who could not receive any calls, seven trouble tickets for customers whose

features had been provisioned incorrectly, and one trouble ticket for a customer who received a busy signal whenever dialing the operator. WorldCom had to submit several of these tickets on multiple occasions before the issue was resolved. McMillon, Sivori & Lichtenberg Supp. Rep. Decl. ¶ 68. Even worse, three customers WorldCom signed up were erroneously migrated to AT&T rather than WorldCom for local service. Id. ¶ 67. While these problems account for a small percentage of orders, they demonstrate that automated systems which are needed to process commercial volumes of orders are not yet in place.

In addition, SWBT continues to have trouble returning firm order confirmations (“FOCs”) in a timely fashion. Preliminary data, which WorldCom is still in the process of verifying, shows that SWBT is taking more than 5 hours to return FOCs on over 15% of WorldCom’s UNE-P orders. SWBT is also missing the due date it returns on the FOC for approximately 5% of those orders and is missing the customer requested due date on approximately 8% of those orders.<sup>5/</sup> Id. ¶¶ 69-71.

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<sup>5/</sup> In WorldCom’s initial comments, we discussed 55 FOCs and 42 completion notices that were missing as of 9:00 a.m. on April 25. Subsequent reconciliation shows that 21 FOCs were missing as of April 25 and were subsequently returned late. Id. ¶¶ 73-76. That reconciliation also shows that 41 of the completion notices were missing as of April 25. SWBT subsequently returned jeopardy notifications, rather than completion notices, on 24 of these orders, all of which were returned after the due date. Id. ¶ 73. SWBT ultimately returned completion notices on 17 of these orders, all of which were returned after the due date. Id. ¶ 74. Thus, contrary to the claims of SWBT in its May 3, 2000 letter to the Texas PUC, of the 42 orders that were missing completion notices on April 25, SWBT belatedly returned either completions or jeopardies on 41 of these orders; only one of these SOCs was returned on time.

**CONCLUSION**

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

Respectfully submitted,

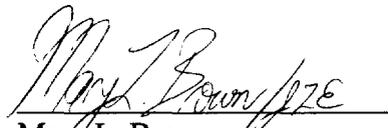
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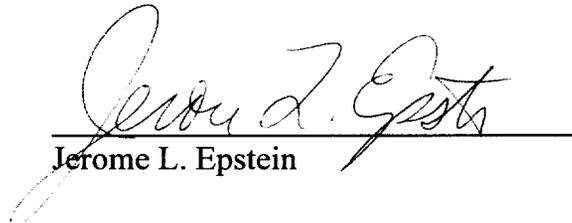
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