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EX PARTE OR LATE FILED

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ORIGINAL

June 9, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Hand Delivery

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: EX PARTE -- CC Docket No. 00-65; Application of SBC Communications Inc. Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide InterLATA Services in Texas

Dear Ms. Salas:

This letter is written on behalf of WorldCom, Inc. to update the Commission on the status of WorldCom's launch of UNE-Platform ("UNE-P") service in Texas, and to respond to a number of incorrect assertions made by Southwestern Bell ("SWBT") in its Supplemental Reply Brief filed on May 19, 2000. WorldCom launched UNE-P service in Texas in April 2000 and is gradually increasing order volumes. In the first two months of its launch, WorldCom has gained approximately 10,000 residential customers in Texas. If SWBT's Operations Support Systems ("OSS") prove capable of handling increased volumes, WorldCom expects to place between 3,000 and 5,000 UNE-P orders per day at commercial volumes.

Based on our continuing efforts and those of the Texas Public Utilities Commission ("PUC"), SWBT has made progress over the past year in correcting a number of flaws in its OSS. Nevertheless, important defects remain that stand in the way of a fully and irreversibly open market for a CLEC offering UNE-P state-wide, such as WorldCom. In its initial and reply comments, WorldCom identified in detail these remaining defects, as well as their competitive impact. In this letter, we respond only to some of the erroneous assertions in SWBT's reply filing relating to UNE-P issues. For each of these assertions, we briefly summarize SWBT's argument in its reply brief, followed by WorldCom's response.

1. **SWBT Statement:** Some CLECs have successfully integrated pre-order and order interfaces. SWBT Supp. Rep. Br. at 38.

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WorldCom Response: As WorldCom has repeatedly explained, SWBT provides no data showing that CLECs that have attempted to integrate pre-order and order interfaces have avoided rejects caused by parsing errors, business rule conflicts and database mismatches while submitting a broad range of orders and maintaining reasonable pre-order response times. Moreover, since SWBT does not seriously dispute that it has failed to provide sufficient documented parsing rules, SWBT apparently believes that it has met its obligations if CLECs can construct interfaces through trial and error methods and phone calls to SWBT. The question is not whether any interface can be built, but whether an effective, efficient interface with minimal rejects and no manual intervention can be built. There is no evidence that this is possible, even though this capability should have been tested under prior FCC precedent.

2. **SWBT Statement:** “The very fact that SWBT provides parsed address information in EDI’s and CORBA’s Address Validation function demonstrates that DataGate’s Address Validation function is capable of being parsed.” Ham Supp. Rep. Aff. ¶ 20. See also SWBT Supp. Rep. Br. at 41.

WorldCom Response: The fact that SWBT, which understands its own data and parsing conventions, can parse addresses and return them through the address validation function, does not show that CLECs can parse addresses successfully using SWBT’s deficient documentation. SWBT’s ability to parse addresses to return through the address validation function demonstrates that SWBT could easily return parsed addresses not just for address validation but also for customer service records (“CSRs”). SWBT acknowledges that the business rules necessary for parsing are the same for address validation and CSRs. Ham Supp. Rep. Aff. ¶ 21.

3. **SWBT Statement:** After May 27, “there will be no situation . . . for which a CLEC will be required to obtain a customer’s address from the CSR.” Ham Supp. Rep. Aff. ¶ 24.¹

WorldCom Response: SWBT still requires addresses on new connects, including migration orders that have a new component. SWBT does not deny this. Thus, on any migration order in which a customer requests a second line, an address will be required. In addition, addresses will still be required on orders from existing CLEC customers for a second line. In both instances, CLECs should be able to pull the address from the CSR.

Moreover, SWBT’s filing discusses only a customer’s service address, not the customer’s directory address and directory name. When a customer wishes to change a directory

¹It is welcome news from SWBT’s filing that SWBT will not require service addresses on feature changes or trouble tickets. However, when WorldCom business representatives previously asked their SWBT counterparts whether the May 27 change would affect address requirements on orders beyond migrations, SWBT said it would not. SWBT should have explained to WorldCom that it would not require addresses on feature changes or trouble tickets, indeed, that it did not do so already.

listing, the CLEC must submit the directory name and address. Currently, the information needed to do this is not provided in parsed format as it should be.

Finally, CLECs need parsed address information in order to put that information in their back-end systems. SWBT states that some CLECs may store information in concatenated format. Ham Supp. Rep. Aff. ¶ 83. But given SWBT's long-standing requirement that CLECs submit orders in parsed format, CLECs had to design back-end systems to keep orders in parsed format and still need that capability for orders for additional lines. Now that they have done so, SWBT should provide the information in parsed format, and not force CLECs to type the information into their back-end systems.

4. **SWBT Statement:** Given the “unanimity” about the beneficial impact that SWBT’s service address change will have on reject rates, “the Commission can comfortably take account of this change in its assessment of the Application.” SWBT Supp. Rep. Br. at 46.

WorldCom Response: This is wrong as a matter of fact, and would seriously undermine the complete when filed rule. While WorldCom is hopeful that SWBT’s service address change will help reduce reject rates, WorldCom has been careful to emphasize that it will take some time to determine whether the change has achieved its goal and whether it has had any negative consequences. McMillon, Sivori & Lichtenberg Supp. Rep. Decl. ¶ 40. In particular, negative consequences may result because SWBT intends to manually correct orders when database mismatches occur, thus potentially delaying provisioning of orders and also leading to more severe problems if the manual process fails to correct the mismatch. In addition, because SWBT’s manual process will not correct the faulty address until after the point at which the CLEC has typed that address into its own systems, future CLEC orders based on that address, such as orders for second lines, will be rejected. McMillon, Sivori & Lichtenberg Supp. Rep. Decl. ¶¶ 46-47. Importantly, WorldCom is still receiving rejects from SWBT’s back-end systems (SORD rejects), which suggests that the May 27 “fix” has not provided a complete solution.

5. **SWBT Statement:** Providing addresses in concatenated format achieves parity because that is the way the information is stored in SWBT’s back-end systems. Ham Supp. Rep. Aff. ¶ 22.

WorldCom Response: This is not an apples-to-apples comparison. SWBT’s retail systems accept SWBT orders in concatenated format. Parity requires SWBT to provide CLECs information in the same format in which it accepts CLEC orders. Because SWBT accepts CLEC orders only in parsed format – and because that is how CLECs must store the information – SWBT must provide the information in parsed format.

6. **SWBT Statement:** On June 2, a new section will be added to its web site providing “[b]usiness rules for parsing the address response.” Ham Supp. Rep. Aff. ¶ 31.

WorldCom Response: This demonstrates the fallacy of SWBT’s repeated representation that complete parsing rules were available before June 2. WorldCom has specifically identified parsing rules that are missing, and SWBT never points to any place in its documentation where such rules were provided. WorldCom is continuing to review the

June 2 documentation, but it is already clear that the new changes do not come close to providing the needed rules, given the widespread problems. Moreover, SWBT's claim merely continues its effort to rely on prospective or untested changes to justify section 271 approval.

7. **SWBT Statement:** The OSS record before the Texas PUC does not show that any CLEC considered integration necessary prior to issuance of the Bell Atlantic-New York order.

WorldCom Response: This is not true. There was discussion of the importance of integration in section 271 filings before the PUC over the past two years.

8. **SWBT Statement:** WorldCom did not contest SWBT's statement that WorldCom is working with a vendor to provide the integration of WorldCom's side of SWBT's pre-ordering and ordering interfaces. Ham Supp. Rep. Aff. ¶ 57.

WorldCom Response: WorldCom does not know where SWBT obtained such information, but it is incorrect. WorldCom is not working with a vendor to obtain pre-order/order integration for UNE-P, although it is seeking to take up SWBT's offer of free consultation with GEIS to aid in integration, and also plans to discuss with vendor Mantiss its claim that it has been able to integrate pre-order and order interfaces. WorldCom is highly skeptical, however, that any vendor can resolve this type of problem -- discrepancies and missing information in SWBT's documentation.

9. **SWBT Statement:** The address validation problem Sage and Navigator "continue to experience is a reference to the CRIS/PREMIS mismatch problem." Ham Supp. Rep. Aff. ¶ 45.

WorldCom Response: SWBT's contention underscores the existence of a database mismatch problem – a problem it has no plans to correct. Moreover, SWBT's response does not show the absence of a parsing problem. In addition to database mismatches, parsing problems are likely responsible for many of the address rejects experienced by Sage and Navigator. SWBT does not show that Sage and Navigator are submitting address information without rejects caused by parsing errors.

10. **SWBT Statement:** After the May 27 change, SWBT will manually correct orders with address mismatches but this will not impact provisioning or billing. SWBT also states that fall out from address mismatches will be captured in its flow-through rate. Ham Supp. Rep. Aff. ¶ 84.

WorldCom Response: All of these remain unfulfilled promises. Whether SWBT will count these orders as failed flow-through will presumably depend on whether the mismatch occurs before the orders reach SORD. Moreover, WorldCom is only now beginning to evaluate the billing that it is receiving from SWBT, and has not had enough time in the market to determine whether some customers are being double billed. We do know that many of the orders we have checked in Toolbar have not completed in the billing systems (C order not complete or incorrect).

11. **SWBT Statement:** “To the extent address mismatches between CRIS and PREMIS do occur, they affect SWBT’s retail operations equally.” SWBT Supp. Rep. Br. at 46.

WorldCom Response: This is not so. Database mismatches affect only migration orders, the primary orders placed by CLECs. They do not affect new orders, the primary retail orders placed by SWBT. On new orders, a customer does not have a CSR, so the company representative placing the order does not rely on an address from the CRIS database. There is thus no potential for a mismatch between the CRIS address and the PREMIS address.

12. **SWBT Statement:** “Based on SWBT’s initial review of the alleged [business rule] discrepancies, excluding the address information fields, most of the ‘discrepancies’ can be easily accommodated.” Ham Supp. Rep. Aff. ¶ 53.

WorldCom Response: SWBT thus admits the existence of business rule discrepancies today. If most of these discrepancies can be easily accommodated, SWBT should have already done so. As for the other discrepancies, SWBT does not say what they are or whether it will fix them.

13. **SWBT Statement:** SWBT cites the FCC’s decision to allow section 271 entry in New York notwithstanding some business rule discrepancies. Ham Supp. Rep. Aff. ¶ 54.

WorldCom Response: In New York, WorldCom had explained that it had been able to resolve business rule discrepancies with respect to CSR and address validation. New York Order ¶ 139 & n.416. No similar testimony exists here. Significantly, in New York there was evidence of commercially successful integration by major carriers providing ubiquitous UNE-P service. No similar evidence exists here.

14. **SWBT Statement:** SWBT has offered evidence that due date availability and telephone number reservation functions can be integrated. Ham Supp. Rep. Aff. ¶¶ 55-56.

WorldCom Response: The only evidence SWBT offers is the statement that the “TN selection function . . . has already been integrated by at least one vendor for a CLEC in SWBT’s region.” Ham Supp. Rep. Aff. ¶¶ 55-56. SWBT does not say who this CLEC is or show that integration has been successful. SWBT still offers no evidence of integration of the due date function by any CLEC. SWBT does claim that “Telcordia/GEIS has successfully integrated due date availability and telephone number reservation, among other pre-ordering functions, through Exchange Link.” SWBT Supp. Rep. Br. at 39. Its only citations for this proposition, however, are a Telcordia press release concerning the general capabilities of Exchange Link that says nothing about the capabilities of Exchange Link for processing orders in the SWBT region and a separate Telcordia publication that does not mention due date availability or telephone number reservation. Certainly, nothing in the Telcordia information describes success rates or response times of these pre-order functions while using its purported product.

15. **SWBT Statement:** The reject rate is declining. Ham Supp. Rep. Aff. ¶ 58.

WorldCom Response: SWBT appears to acknowledge that the relevant reject rate is for EDI and LEX together. Ham Supp. Rep. Aff. ¶ 71. This reject rate continues to hover around 30% in April as it did in February and March. Ham Supp. Rep. Aff. ¶ 59. WorldCom continues to experience a reject rate far higher than this – close to 50% in April. Moreover, WorldCom is receiving a high number of jeopardies, many of which are for reasons that would ordinarily cause rejects, showing that the “true” reject rate is even higher. As of May 30, WorldCom has received jeopardies on 7.6% of the orders on which it has received a FOC.² Even using SWBT’s own figures, the overall jeopardy rate was 3.4% in April and 3.3% in March. SWBT acknowledges that the reject rate would have been 1.4% higher in February and 1.3% higher in March if post-FOC jeopardies were included. Noland/Dysart Supp. Rep. Aff. att. N, p.5.

More fundamentally, as WorldCom explained in its reply filing, SWBT’s high rate of jeopardies is a significant problem in and of itself because SWBT frequently returns jeopardies for inexplicable reasons and often does so after the due date. In addition, the fact that CLECs are receiving a high number of jeopardies for reasons that would ordinarily lead to a reject, such as address and TN “do not match,” explains why more edits must be moved up front. SWBT should be rejecting orders for such reasons before transmitting a FOC, not providing jeopardies after a FOC.

SWBT states that CLECs should have proposed in change management moving more rejects up front, but CLECs did propose this. The December change management minutes reflect that SWBT promised to “continue to assess the manual reject reasons to determine if further up-front edits can be implemented in the future.” McMillon, Sivori & Lichtenberg Supp. Rep. Decl. att. 10, p. 14. SWBT does not appear to have done so, however.

16. **SWBT Statement:** “Given the work involved in preparing a manual rejection notice, requiring virtually every notice to be sent within five hours is simply unrealistic.” SWBT Supp. Rep. Br. at 56.

WorldCom Response: This is why SWBT should be processing rejects electronically. The benchmark for return of electronic rejects is one hour, rather than the five hours for manually processed rejects, a significant improvement for CLECs and their customers even if SWBT could meet the five hour benchmark.

17. **SWBT Statement:** WorldCom’s complaint regarding inaccurate Line Information Database (“LIDB”) updates refers to a few isolated incidents that have now been fixed. SWBT Supp. Rep. Br. at 71-72.

WorldCom Response: This is simply not so. WorldCom has now checked 10 batches of 60 LIDB orders each and has experienced significant problems with each batch. For

²Orders on which WorldCom has not yet received a FOC are excluded, because SWBT should not be sending jeopardies on such orders. Even including these orders, however, WorldCom has received jeopardies on 5.8% of its orders.

example, the last 3 batches of 60 orders checked by WorldCom all contain numerous errors. WorldCom checked 60 orders on May 23 and found 13 orders that had incorrect intraLATA and/or long distance PICs in LIDB. (On last check on May 26, 10 of these orders still had errors). WorldCom checked another 60 orders on May 26 and found 13 orders that had incorrect intraLATA and/or long distance PICs. (On last check on May 31, 7 of these orders still had errors). Finally, on June 5, WorldCom checked another 60 orders and found 8 orders that had incorrect intraLATA and/or long distance PICs. Although the number of errors in this final sample is somewhat lower than in the prior batches, there is no evidence of a consistent decline. Previous results show that the number of errors varies significantly from batch to batch.

Moreover, while SWBT has now explained that the LIDB problems are caused by delays and errors in SWBT's typing of the "N" order, and thus would supposedly have a limited impact, WorldCom recently went through the time consuming exercise of researching C and D orders, as well as N orders, in SWBT's Toolbar application to determine whether problems were in fact limited to the N orders. WorldCom did so for each order that SWBT had updated incorrectly in LIDB on the most recent two batches of 60 orders it checked in LIDB. The results are disturbing. They show that on some LSRs, SWBT creates multiple C, D, and N orders; on some LSRs, the C order appears to be missing altogether, and on some LSRs, the D order, as well as the N order, has not posted. All of these discrepancies have occurred for LSRs on which WorldCom received a completion notice more than 48 hours before checking their status in Toolbar. We have set forth in Attachment A to this letter the e-mails that WorldCom sent to SWBT containing the discrepancies and asking for an explanation, as well as the spreadsheets detailing the problems we have described.

SWBT's ostensible fix is simply not working, demonstrating ongoing problems with its manual processing and three service order process that are at the core of SWBT's explanation for the LIDB problems.

18. **SWBT Statement:** "The 19 orders MCI WorldCom specified in its letter of April 24 to the TPUC have been processed and MCI WorldCom has not identified any additional orders with similar problems." Noland Supp. Rep. Aff. ¶ 89.

WorldCom Response: This statement contains several factual errors. First, WorldCom identified 28 problems on the original batch of 60 LIDB orders that it checked, not 19. Nineteen of these orders had incorrect intraLATA and/or long distance PICs and another 9 orders had indicators such as "ownership conflict" that precluded WorldCom from even accessing the LIDB information. McMillon, Sivori & Lichtenberg Supp. Decl. ¶¶ 66-67. Second, the original problems had not all been processed at the time of SWBT's reply comments; at that point, 5 of the original 60 orders remained incorrect. McMillon, Sivori & Lichtenberg Supp. Rep. Decl. ¶¶ 26-27. Even more troublesome, after communicating the problems with the initial batch of orders that WorldCom checked in LIDB, WorldCom did identify to SWBT additional orders with similar problems well before its May 19 reply filing. On Monday, May 1, WorldCom provided to SWBT in two separate e-mails a PON by PON list of 19 additional orders that SWBT had failed to update correctly. The first set of e-mails set forth in Attachment B to this letter includes these and related e-mails.

WorldCom also called SWBT on May 10 to report on an additional 51 orders that had not been updated properly in LIDB. SWBT refused to open a trouble ticket for these orders. A description of WorldCom's attempt to open a trouble ticket is described in the McMillon, Sivori & Lichtenberg Supp. Decl. ¶ 33. A contemporaneous description is set forth in e-mails from Kyle Johnson that are set forth in the second set of e-mails in Attachment B to this letter. Moreover, on May 18, WorldCom faxed to SWBT information on an additional 16 orders that SWBT had failed to update properly in LIDB. In short, prior to filing its reply comments, SWBT was well aware of many additional LIDB problems with WorldCom's orders, as WorldCom has documented.

In addition, subsequent to SWBT's reply filing, WorldCom has continued to find numerous errors in LIDB updates and has continued to provide this information to SWBT. (See, e.g., Attachment A hereto.)

19. **SWBT Statement:** WorldCom's complaint regarding inaccurate branding as a result of failed LIDB updates involves four isolated customers. SWBT Supp. Rep. Br. at 70.

WorldCom Response: As WorldCom has explained, it is extremely difficult to check the accuracy of a customer's branding. Doing so requires contacting customers (who generally do not want to be bothered) and persuading them to call directory assistance and the operator. Both times WorldCom has managed to persuade customers to do this -- with test customers in January and with a small number of real customers in April -- branding was incorrect for a high percentage of customers. Although the sample size is small, there is every reason to expect that the high percentage of branding problems on these orders is a relatively accurate reflection of the percentage of branding problems generally. Because LIDB updates are what trigger branding, it appears that SWBT's inability to update LIDB correctly is also leading to incorrect branding on a high number of orders.

20. **SWBT Statement:** SWBT's existing interfaces are adequate for transmission of LIDB updates on subsequent orders, and Interactive Interface, used by WorldCom, provides status information. SWBT also contends that WorldCom and other CLECs agreed that the new process for LIDB updates would not be implemented until December 2000. SWBT Supp. Rep. Br. at 73.

WorldCom Response: The Interactive Interface used by WorldCom is severely deficient. It requires dual data entry and use of a separate process from the process CLECs have established to transmit all other ordering information to SWBT. It also fails to return status information to CLECs, allowing CLECs only the inferior alternative of affirmatively checking status information order by order. Contrary to SWBT's claim, WorldCom has repeatedly urged that the date for implementation of LIDB Phase II, in which CLECs will be able to submit LIDB updates using LSRs, be moved up, as the change management minutes show. McMillon, Sivori & Lichtenberg Supp. Rep. Decl. att. 10, pp. 2-3 (December minutes stating that CLECs expressed concern regarding the scheduling of LIDB Phase II for December of 2000. CLECs questioned the point of prioritizing it as high, only to see it scheduled for December.); att. 9, p.2 (February minutes showing that SWBT confirmed that LIDB II could not be moved up).

21. **SWBT Statement:** The three service order process is not causing significant operational problems. SWBT Supp. Rep. Br. at 54.

WorldCom Response: As previously noted, SWBT acknowledges that AT&T lost dial tone on 0.7% of its orders in December 1999 and 0.8% of its orders in January 2000. In addition, the process appears to have caused some WorldCom customers to lose dial tone, the process has contributed to substantial problems in ensuring accurate updates of LIDB, and the process appears to be leading to a significant number of other errors (multiple C, D, and N orders, delays in posting of the D order, missing C orders), all of which are troubling.

22. **SWBT Statement:** The loss of dial tone caused by the three service order process is not significantly greater than the outages experienced by SWBT's retail customers. SWBT Supp. Rep. Br. at 55.

WorldCom Response: SWBT offers no evidence of this and fails to describe any process used for retail customers that is analogous to the three service order process used for CLEC customers. Moreover, that there is no similar loss of dial tone for UNE-P orders in New York suggests that SWBT's process is unreasonable.

23. **SWBT Statement:** SWBT acknowledges that CLECs will not be able to submit trouble tickets via the electronic bonding interface until an order has posted to billing. Ham Supp. Rep. Aff. ¶ 82.

WorldCom Response: This problem forces WorldCom to re-train its representatives to determine why they have been denied access to the electronic bonding interface and to determine that they need to use SWBT's Toolbar application in such instances. Use of this dual process is inefficient and significantly diminishes the advantages of WorldCom's investment to develop an electronic bonding interface.

24. **SWBT Statement:** WorldCom's market launch in Texas, as in New York, was timed to coincide with receipt of interLATA relief by the BOC, but WorldCom miscalculated and now "finds itself in the awkward position of providing mass-market service, yet having no significant operational problems to report." SWBT Supp. Rep. Br. at 6-7.

WorldCom Response: This account is wrong in several respects. WorldCom did not plan its market entry either in New York or Texas based on expectations of interLATA relief for the BOC. In New York, WorldCom provided mass-market UNE-based service for more than nine months prior to Bell Atlantic's section 271 application. In Texas, WorldCom planned its market launch well over half a year prior to launch (months prior to SWBT's section 271 application) – as it had to do to conduct the necessary systems development. WorldCom would very much like to be in the "awkward position" of providing mass-market service with no significant operational problems, but this has not been WorldCom's experience. WorldCom has experienced a high number of rejects as a result of SWBT's failure to provide integratable pre-order and order interfaces, too many jeopardy notifications for unacceptable reasons, an inordinate number of errors when SWBT updates

its LIDB, and significantly increased costs as a result of the need for manual data entry, correction of rejects, and oversight of SWBT's defective processes. In addition, some customers have lost dial tone or been unable to make local and long distance calls as a result of errors in SWBT's switch translations, have experienced branding problems, or have suffered a range of other delays and inconveniences caused by SWBT's inadequate systems, as described in WorldCom's filings.

* * * * *

In accordance with section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, an original and one copy of this letter are being filed with your office.

Sincerely,



Keith L. Seat

cc: Kathryn Brown, Dorothy Attwood, Jordan Goldstein, Helgi Walker, Kyle Dixon, Sarah Whitesell, Larry Strickling, Robert Atkinson, Michelle Carey, Jake Jennings, Margaret Egler, Audrey Wright, William Dever



**ATTACHMENT A – LIDB CORRESPONDENCE
BETWEEN WORLDCOM AND SWBT**

Copy of E-mail to SWBT re: N/C/D issues on Batch 9 orders with LIDB errors

Subject: Batch 9 Incorrect PICs
 Author: <kyle.johnson@wcom.com>
 Date: 5/30/00 5:03 PM

Miss Robinson,

As we discussed earlier today, I am attaching the Batch 9 spreadsheet with the 13 orders that have the incorrect LD and/or Intralata PIC's. I have also included a column that describes the status of the various D, C, and N orders that are placed to migrate a customer over to WorldCom.

As you can see from the remarks in the Toolbar column, some of the records have multiple orders (as many as 6). Perhaps you could shed some light on how these multiple orders might relate to why the PIC's are incorrect in the LIDB Database. There are also many scenarios where none, or at least 1 or 2, of the orders has not yet Posted. I believe that this may be a direct correlation to the LIDB Database not being updated in a timely (within 48 hours) fashion. It would be greatly appreciated if you could explain these issues, as it would bring us much closer to getting a full understanding of South Western Bell's ordering procedures and processes.

Kyle Johnson
 (V) 235-2757

Spreadsheet with N/C/D issues on Batch 9 orders with LIDB errors

| PON | TN | (SOC) Complete | LD/Intra PIC Ordered | LD/Intra PIC in LIDB | Date Checked in LIDB | Information from SWBT Toolbar |
|----------------------|----------------|-----------------------|-----------------------------|-----------------------------|-----------------------------|---|
| S000786107SWTX PR | 71368816 63 | 5/23/00 | 0222-0222 | 0222-0859 | 5/30/00 | Order Status gave message of "No entries found for TN". When searched under Pending Orders, only the D and N orders were found, no C. The N order status was Error. |
| S000763420SWTX PR | 97222450 12 | 5/23/00 | 0222-0222 | 0222-9100 | 5/30/00 | Order Status gave message of "No entries found for TN". When searched under Pending Orders, only the D and N orders were found, no C. The N order status was Error. |

| | | | | | | |
|----------------------|----------------|----------------|-----------|-----------|---------|---|
| S000778847SWTX PR | 51234609 17 | 5/23/00 | 0222-0222 | 0222-9100 | 5/30/00 | Order Status gave message of "No entries found for TN". When searched under Pending Orders, only the D and N orders were found, no C. The N order status was Error. |
| S000736100SWTX PR | 21482662 89 | 5/23/00 | 0222-0222 | 0222-9100 | 5/30/00 | This account shows posted but has 2 N orders with 2 different PON #'s. One N order is posted and the other is pending and in Error status. No C order was listed. |
| S000804525SWTX PR | 21030802 29 | 5/23/00 | 0333-0333 | 0222-0222 | 5/30/00 | This account shows pending and has 2 D orders and 2 C orders. The N order is in Error status. |
| S000727128SWTX PR | 21469250 25 | 5/23/00 | 0222-0222 | 0288-9100 | 5/30/00 | This account has 2 C orders and 1 D order posted and 2 N orders and 1 D order pending. |
| S000774405SWTX PR | 97261322 69 | 5/23/00 | 0222-0222 | 0288-9100 | 5/30/00 | Only the D order has posted. No C or N order status shown. |
| S000817212SWTX PR | 25475261 18 | 5/23/00 | 0222-0222 | 0444-9100 | 5/30/00 | This account has the N order pending and in error status. The D order has posted |
| S000774502SWTX PR | 90373983 47 | 5/23/00 | 0222-0222 | 0000-0000 | 5/30/00 | This account has 4 C orders posted, 1 D order pending and in error status and 1 N order pending and in error status. |
| S000806735SWTX PR | 90346516 62 | 5/23/00 | 0222-0222 | 0000-0000 | 5/30/00 | This account has 3 D orders, 2 N orders, and 1 C order. All orders are pending and in error status. |
| S000817419SWTX PR | 21069641 35 | 5/23/00 | 0222-0222 | 0000-0000 | 5/30/00 | This account shows the D and N orders pending and in error status. No C order is shown. |
| S000768548SWTX PR | 51238397 96 | 5/23/00 | 0222-0222 | 0000-9100 | 5/30/00 | This account has 2 D orders; 1 is posted and the other is pending. The N order is pending and in error status. No C order is shown. |
| S000782103SWTX PR | 71369554 28 | 5/23/00 | 0222-0222 | 0000-9100 | 5/30/00 | This account shows 2 N orders; 1 posted and 1 pending with an error status. The D order is posted and no C order is shown. |

E-mail of June 6 on Batch 10 LIDB errors

Miss Robinson,

I am again sending another batch of orders that have the incorrect LD and / or Intralata PIC assigned in the LIDB Database. I am attaching a spreadsheet with the Batch 10 orders that need to be corrected. I have also included a column that shows the status of the D and N orders from the SWBT Toolbar. It seems as though, the fact that the N order has not posted, is causing a delay in the LIDB update. I would appreciate it if you could explain the relationship between the two processes to me in writing so that I may, in turn, relay your response to my team.

In another matter, I would also like to know what happened to the Batches 7, 8, and 9 spreadsheets that I previously e-mailed to you. I have checked them in LIDB today and errors still remain on each of the batches. You had mentioned during our previous conversation on 5/26 that another individual was going to be working these issues and that you would provide me with that persons name for future reference. I have yet to receive that information from you as well. An understanding of the relationship between the order posting process and the LIDB updates is very important to WorldCom. And, your timely response to the issues mentioned above would be very helpful to us.

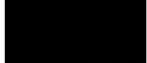
If you are not the person to which these concerns should be addressed, I would appreciate it if you could pass this on to the person that is best qualified to give me a response as soon as possible.

Kyle Johnson
(V) 235-2757

Spreadsheet with N/C/D issues on Batch 10 orders with LIDB errors

| PON | TN | (SOC) Complete | LD/Intra PIC Ordered | LD/Intra PIC in LIDB | Date Checked in LIDB | Information from SWBT Toolbar (6/6) |
|------------------|------------|---------------------------|-------------------------------------|-------------------------------------|-------------------------------------|---|
| S000722815SWTXPR | 9724841260 | 5/31/00 | 0222-0222 | 0222-9100 | 6/5/00 | This account shows 2 D orders, 1 pending and 1 posted. The N order is also pending and with an error. |
| S000755527SWTXPR | 2548573059 | 5/31/00 | 0222-0222 | 0222-9100 | 6/5/00 | This account shows 2 D orders, 1 pending and 1 posted. The N order is also pending. |
| S000756337SWTXPR | 2818202130 | 5/31/00 | 0222-0222 | 0222-9100 | 6/5/00 | There are 3 C orders, 1 N order, and 1 D order on this account. All are pending except for 1 C order which is posted. |

| | | | | | | |
|------------------|------------|----------------|-----------|-----------|--------|---|
| S000759305SWTXPR | 8064631196 | 5/31/00 | 0222-0222 | 0222-9100 | 6/5/00 | This account has 2 posted D orders and 1 pending N order that is in error status. |
| S000759775SWTXPR | 8063512514 | 5/31/00 | 0222-0222 | 0222-9100 | 6/5/00 | This account has 1 D order posted and 1 N order pending and in error status. |
| S000759804SWTXPR | 8063830243 | 5/31/00 | 0222-0222 | 0222-9100 | 6/5/00 | This account has 1 D order posted and 1 N order pending and in error status. |
| S000752438SWTXPR | 2548221893 | 5/31/00 | 0222-0222 | 0288-9100 | 6/5/00 | This account only shows a posting of 1 D order. No other orders were listed. |
| S000756341SWTXPR | 2548482122 | 5/31/00 | 0222-0222 | 0070-9100 | 6/5/00 | This account has 1 D order posted and 1 N order pending and in error status. |



2



**ATTACHMENT B – ADDITIONAL LIDB CORRESPONDENCE
AND COMMUNICATIONS BETWEEN WORLDCOM AND SWBT**

May 1 Communication With SWBT Re: 19 orders

Date: Mon, 01 May 2000 22:42 -0500 (CDT)
From: "WILLIAMS, MARILYNN Y (SBC-MSI)" <mw195a@txmail.sbc.com>
To: Carl Benson <Carl.Benson@wcom.com>
CC: "Leslee W. Engleman" <Leslee.W.Engleman@wcom.com>,
Roseann Kendall <Roseann.Kendall@wcom.com>,
"Michael A. Beach" <Michael.A.Beach@wcom.com>,
Carl Benson <Carl.Benson@wcom.com>
Subject: RE: Additional Examples of LIDB Update Problems

Carl

Thanks. Chuck is working on setting up a meeting with Leslee to discuss the questions from April 26th. I will also check on the additional questions so we can discuss all your LIDB concerns at the same time.

The 38 orders I will confirm tomorrow the status of them with Chuck and the LSC.

Marilynn Y. Williams
Director-Local Compliance
MCIW Account Team
214-464-1750 - office
mw195a@txmail.sbc.com

Date: Mon, 01 May 2000 16:18 -0500 (CDT)
From: Carl Benson <Carl.Benson@mci.com>
Organization: MCI
To: Marilyn Williams <mw195a@txmail.sbc.com>
CC: Leslee W. Engleman <Leslee.W.Engleman@wcom.com>,
Roseann Kendall <Roseann.Kendall@wcom.com>,
Michael A. Beach <Michael.A.Beach@WCOM.COM>,
Carl Benson <Carl.Benson@WCOM.COM>
Subject: Additional Examples of LIDB Update Problems

Marilynn,

Leslee has sent an additional sample of LIDB update errors to Chuck below, and asks for responses to the same questions asked April 26 on the first list.

I assume the 38 orders sent with LIDB errors have been or will be corrected? Can you confirm?

Also, what do you propose for the total universe of completed orders, (1,148 a/o 4-28), and how will you insure ALL orders have been and are being correctly input into LIDB from information on our LSRs? An audit is not pleasant to consider, but may be necessary if we are to become comfortable with the implementation of our migration orders, and the associated LIDB parameters, including inter and intra LATA PICs.

I appreciate your attention to these questions and look forward to discussion of your findings.

cb

ADDITIONAL LIDB ERRORS FROM SECOND SAMPLE OF 60 CMLPTD ORDERS

| PON | Tel Number | SOC | RCVD | LD/Intra | LD/Intra | PIC RQSTD | PIC in LIDB | Date Checked | LIDB |
|------------------|------------|---------|---------------|------------------|----------|-----------|-------------|--------------|------|
| S000727145SWTXPR | 8172465409 | 4/26/00 | 0222-0222 | 0222-9100 | 4/28/00 | | | | |
| S000732421SWTXPR | 9726715448 | 4/26/00 | 0222-0222 | 0222-9100 | 4/28/00 | | | | |
| S000732311SWTXPR | 2106583007 | 4/26/00 | 0222-0222 | 0222-9100 | 4/28/00 | | | | |
| S000731941SWTXPR | 2819970443 | 4/26/00 | 0222-0222 | 0222-9100 | 4/28/00 | | | | |
| S000739782SWTXPR | 7137412513 | 4/25/00 | 0222-0222 | 0222-9100 | 4/28/00 | | | | |
| S000721994SWTXPR | 7134261056 | 4/26/00 | 0222-0222 | 0000-0000 | 4/28/00 | | | | |
| S000722088SWTXPR | 5128924404 | 4/26/00 | 0222-0222 | 0000-0000 | 4/28/00 | | | | |
| S000727732SWTXPR | 5124421324 | 4/26/00 | 0222-0222 | 0000-9100 | 4/28/00 | | | | |
| S000735644SWTXPR | 2815912578 | 4/26/00 | 0222-0222 | 0288-9100 | 4/28/00 | | | | |
| S000735674SWTXPR | 7134624816 | 4/26/00 | 0222-0222 | 0288-9100 | 4/28/00 | | | | |
| S000725855SWTXPR | 7139567430 | 4/26/00 | 0222-0222 | 0288-9100 | 4/28/00 | | | | |
| S000739445SWTXPR | 2814928369 | 4/25/00 | 0222-0222 | 0288-9100 | 4/28/00 | | | | |
| S000728459SWTXPR | 2814372964 | 4/25/00 | 0222-0222 | 0288-9100 | 4/28/00 | | | | |
| S000731294SWTXPR | 9722311531 | 4/26/00 | 0222-0222 | 0121-9100 | 4/28/00 | | | | |
| S000736013SWTXPR | 8066221077 | 4/26/00 | 0222-0222 | 0472-9100 | 4/28/00 | | | | |
| S000738873SWTXPR | 4098600839 | 4/26/00 | 0222-0222 | Unable to access | 4/28/00 | | | | |
| S000732183SWTXPR | 2816562830 | 4/26/00 | 0222-0222 | Unable to access | 4/28/00 | | | | |
| S000732163SWTXPR | 4098860669 | 4/26/00 | 0222-0222 | Unable to access | 4/28/00 | | | | |
| S000747266SWTXPR | 4098131089 | 4/26/00 | NO PIC LISTED | Unable to access | 4/28/00 | | | | |

Forwarded message:

Date: Mon, 01 May 2000 14:33 -0500 (CDT)
 From: Leslee W. Engleman <Leslee.W.Engleman@mci.com>
 Organization: MCI
 To: "WILLIAMS JR., CORNELIUS (SWBT)" <cw3645@txmail.sbc.com>
 CC: Roseann.Kendall <Roseann.Kendall@wcom.com>,
 Carl.Benson <Carl.Benson@wcom.com>,
 "MARILYNN Y WILLIAMS (SWBT)" <mw195a@txmail.sbc.com>,
 "MOYA, MARY E (SWBT)" <MM8783@txmail.sbc.com>
 Priority: High
 Subject: Additional Examples of LIDB Update Problems

Chuck,

Per our call with SWBT today Mary Moya mentioned that the LIDB update issue had been resolved and Doug Wallace said the below list of PONs had been corrected except for one order. Can you please send us the answers to the below questions as soon as possible? Also, we need to know when the process was corrected?

We have identified 19 new PON's that have NOT been updated in LIDB within the 24 hour timeframe mentioned by SWBT. I have attached a worksheet containing the PONs and other specific details. We would like someone to research these PONs and make sure they are updated in LIDB correctly. Please let me know if you need any additional information or have any questions.

Thank you,

Leslee Engleman
 MCI WorldCom
 972-656-1567

Forwarded message:

Date: Wed, 26 Apr 2000 16:53 -0500 (CDT)
From: Carl Benson <Carl.Benson@mci.com>
Organization: MCI
To: Marilyn Williams <mw195a@txmail.sbc.com>
CC: Leslee W. Engleman <Leslee.W.Engleman@wcom.com>,
Roseann Kendall <Roseann.Kendall@wcom.com>,
Michael A. Beach <Michael.A.Beach@WCOM.COM>,
Carl Benson <Carl.Benson@WCOM.COM>
Subject: LIDB Update Problems

Marilynn,

Listed below are orders with apparent LIDB update errors. We observe many orders with inter and/or intra LATA LD PIC errors that concern us.

I would ask your review of these orders and response to the questions below:

1. What caused the update errors below;
2. What procedures are being implemented to prevent these errors;
3. What degree of manual intervention is necessary to perform LIDB updates;
4. What level of order volume can be supported by planned staffing?;
5. What degree of audits are practiced to manage the quality of LIDB updating?;
6. Of specific concern are problems getting troubles accepted and processed by LSC/LOC. Our transmission of troubles re LIDB issues reflect

confusion and lack of understanding by LSC/LOC support groups sufficient to address our LIDB questions and problems. I would ask your support setting up a meeting/call this week to address escalation processes and procedures. In addition to escalation POCs, it appears we collectively need to document processes.

In my absence tomorrow and Friday, pls respond to and coordinate with Leslee Engleman at 972-656-1567.

19 of 60 orders sampled have incorrect LD and/or Intralata PICs

| PON | TN | COMPLETED | LD/INTRA PIC REQ | LD/INTRA PIC RECVD | DATE CHK IN LIDB | DTE SWBT UPD LIBD |
|------------------|------------|-----------|---------------------|-----------------------|---------------------|----------------------|
| - | | | | | | |
| S000722378SWTXPR | 2815830125 | 4/20/00 | 0222-0222 | 0222-9100 | 4/25/00 | 4/20/00 |
| S000727290SWTXPR | 2814592298 | 4/20/00 | 0222-0222 | 0288-9100 | 4/25/00 | 4/20/00 |
| S000727710SWTXPR | 2143917509 | 4/20/00 | 0222-0222 | 0222-9100 | 4/25/00 | 4/20/00 |
| S000728133SWTXPR | 3612410012 | 4/20/00 | 0222-0222 | 0222-9100 | 4/25/00 | 4/20/00 |
| S000728316SWTXPR | 3618544378 | 4/20/00 | 0222-0222 | 0222-9100 | 4/25/00 | 4/20/00 |
| S000728410SWTXPR | 9722310362 | 4/20/00 | 0222-0222 | 0000-9100 | 4/25/00 | 4/20/00 |
| S000728418SWTXPR | 2814580304 | 4/20/00 | 0222-0222 | 0222-9100 | 4/25/00 | 4/20/00 |
| S000728193SWTXPR | 2547991046 | 4/21/00 | 0222-0222 | 0288-9100 | 4/25/00 | 4/21/00 |
| S000728414SWTXPR | 7136670264 | 4/21/00 | 0222-0222 | 0222-9100 | 4/25/00 | 4/21/00 |
| S000731904SWTXPR | 4097240107 | 4/21/00 | 0222-0222 | 0222-9100 | 4/25/00 | 4/21/00 |
| S000732149SWTXPR | 2547760039 | 4/21/00 | 0222-0222 | 0000-0000 | 4/25/00 | 4/21/00 |
| S000732264SWTXPR | 8179240276 | 4/21/00 | 0222-0222 | 0222-9100 | 4/25/00 | 4/21/00 |
| S000735375SWTXPR | 2143750760 | 4/21/00 | 0222-0222 | 0432-9100 | 4/25/00 | 4/21/00 |
| S000735852SWTXPR | 7136431406 | 4/21/00 | 0222-0222 | 0222-9100 | 4/25/00 | 4/21/00 |
| S000735879SWTXPR | 2105903804 | 4/21/00 | 0222-0222 | 0222-9100 | 4/25/00 | 4/21/00 |
| S000731510SWTXPR | 2106560448 | 4/22/00 | 0222-0222 | 0222-9100 | 4/25/00 | 4/22/00 |
| S000728208SWTXPR | 2149464588 | 4/21/00 | 0222-0222 | 0795-9100 | 4/25/00 | 4/22/00 |

S000728450SWTXPR 9727321697 4/20/00 0222-0222 0288-0288 4/25/00 4/22/00
 S000720422SWTXPR 5123381889 4/18/00 NONE-NONE 0222-0222 4/25/00 4/14/00

7. The orders below seem to indicate an ownership problem we can't understand. In addition, for three cases we cannot locate orders we expect to find in TOOLBAR/LVAS. Pls advise status of these orders.

| PON | TN | COMPLETED | LD/INTRA PIC REQ | DATE | CHK IN LIDB | RESULTS |
|------------------|------------|-----------|---------------------|---------|----------------|--------------------|
| S000722721SWTXPR | 2546664816 | 4/19/00 | 0222-0222 | 4/25/00 | | Ownership Conflict |
| S000722723SWTXPR | 8063420851 | 4/19/00 | 0222-0222 | 4/25/00 | | Ownership Conflict |
| S000722305SWTXPR | 2819203557 | 4/20/00 | 0222-0222 | 4/25/00 | | Ownership Conflict |
| S000731512SWTXPR | 4099820132 | 4/20/00 | 0222-0222 | 4/25/00 | | Ownership Conflict |
| S000731516SWTXPR | 4097240857 | 4/20/00 | 0222-0222 | 4/25/00 | | Ownership Conflict |
| S000730929SWTXPR | 2814715056 | 4/21/00 | 0222-0222 | 4/25/00 | | Ownership Conflict |
| S000722746SWTXPR | 7134360456 | 4/20/00 | 0222-0222 | 4/25/00 | | Record Not Found |
| S000731518SWTXPR | 7136230886 | 4/20/00 | 0222-0222 | 4/25/00 | | Record Not Found |
| S000722801SWTXPR | 5126713568 | 4/20/00 | 0222-NONE | 4/25/00 | | Record Not Found |

cb



TX_LIDB_Issues_2nd_
set_of.xls



RFC822.TXT

Kyle Johnson (WorldCom) internal notes re: May 10 conversations with SWBT re: 51 LIDB problems

May 11:

I have left a message for Doug Wallace (LSC Manager 1st level escalation) and am waiting for him to call me back so that I can open a trouble ticket for the incorrect LIDB data. I am attaching a copy of the spreadsheet with the updates pulled today. SWBT corrected 36 out of the 42 orders with incorrect LD and/or Intralata PICs. None of the 9 Ownership Conflict/Record Not Found orders have been corrected yet.

May 10:

I attempted to open a trouble ticket today with the LSC regarding the incorrect orders in LIDB. I first spoke with Stan who said he could not take 42 orders but could take 5. He asked if I could fax the orders to him and I asked if I could e-mail them instead. He gave me his e-mail address and after doing so put a young lady by the name of Amy on the line who was more familiar with LIDB. Amy said she needed to discuss the matter with her Account Manager and get back to me in 10 minutes.

Amy called me back within 10 minutes and said that her Account Manager said

that this matter needs to be handled by WorldCom's Carrier Management team. She said that I should refer the matter to Leslee Engleman, and that she would know the correct person at SWBT to contact to handle the matter. Amy also said that the LSC group does not open trouble tickets for these issues. As an added note, it took me from 3:58 to 4:17pm just to get a Rep. on the line at the LSC. This is the second time that I have spoken with the LSC and been denied the option of having a ticket opened for LIDB discrepancies.

From: Kyle Johnson [mailto:kyle.johnson@wcom.com]
Sent: Wednesday, May 10, 2000 10:30 AM
To: Linda Dishman (E-mail); Sherry Lichtenberg (E-mail)
Subject: Batch 5 LLIMS / LIDB Comparisons

Linda / Sherry,

Here is the Batch 5 LLIMS / LIDB Comparisons spreadsheet. Brace yourselves for the results. There are 42 out of 60 orders with the incorrect PIC and or LPIC. There are 9 out of 60 orders with Ownership Conflict or Record Not Found messages. A total of 85% of the Batch 5 orders are incorrect in LIDB. See attached spreadsheet.

Kyle Johnson
(V) 235-2757