



**WORKSHOP**

**PROJECT NO. 20400**

**PUBLIC UTILITY COMMISSION**

**TUESDAY, JUNE 6, 2000**

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

SECTION 271 COMPLIANCE )  
MONITORING OF SOUTHWESTERN ) PROJECT DOCKET NO.  
BELL TELEPHONE COMPANY OF )  
TEXAS ) 20400

WORKSHOP  
TUESDAY, JUNE 6, 2000

BE IT REMEMBERED THAT at approximately 9:30  
  
a.m., on Tuesday, the 6th day of June 2000, the  
above-entitled matter came on for hearing at the  
Offices of the Public Utility Commission of  
Texas, William B. Travis Building, 1701 North  
Congress Avenue, 7th Floor, Commissioners  
Hearing Room, Austin, Texas 78701, before NARA  
SRINIVASA and JENNIFER FAGAN; and the following  
proceedings were reported by Nancy A. Salinas,  
William Beardmore and Michelle Bulkley,  
Certified Shorthand Reporters of:

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1 MS. FAGAN: That's fine.  
2 MR. COWLISHAW: Pat Cowlshaw for  
3 AT&T. I would expect to address the subject  
4 matter as well, but we have with us as subject  
5 matter experts Julie Chambers and Eva Fettig. I  
6 think Michelle Bournianoff will be here later.  
7 MS. FAGAN: Do we have any other  
8 attorneys who would like to enter an appearance?  
9 If we have -- other than Mr. Dysart and AT&T  
10 representatives, do we have any other subject  
11 matter experts?  
12 MR. DRUMMOND: For the record we  
13 also have a subject matter expert from Rhythms.  
14 MS. SOLIS: Cindy Solis from  
15 Rhythms.  
16 MS. FAGAN: You need to speak into  
17 the microphone.  
18 MS. SOLIS: My name is Cindy Solis  
19 representing Rhythms.  
20 MS. KNIGHT: I'm Patricia Knight.  
21 I am representing Time Warner Telecom.  
22 MR. SAUDER: T.J. Sauder with  
23 Birch Telecom.  
24 MS. DILLARD: Maria Dillard,  
25 Southwestern Bell.

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1 PROCEEDINGS  
2 TUESDAY, JUNE 6, 2000  
3 (9:30 a.m.)  
4 MS. FAGAN: We will go ahead and  
5 get started. Good morning. We are here to call  
6 to order the workshop in Project No. 20400,  
7 Section 271 Compliance Monitoring of  
8 Southwestern Bell Telephone Company of Texas.  
9 Today we are here to consider performance  
10 measurements relating to OSS, change management,  
11 billing, trunking and collocation.  
12 My name is Jennifer Fagan, and to my  
13 right is Nara Srinivasa. And if we can go ahead  
14 and take appearances for the parties first, and  
15 then we will go with experts who intend to  
16 testify. So can we start with Southwestern  
17 Bell?  
18 MS. MALONE: Cynthia Malone and  
19 Tom Horn, attorneys for Southwestern Bell.  
20 Randy Dysart is our subject matter expert.  
21 MR. DRUMMOND: Eric Drummond on  
22 behalf of the CLEC Coalition, and individual  
23 coalition members and other CLECs will probably  
24 announce their subject matter experts separately  
25 for the record.

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1 MR. TOWNES: Chad Townes,  
2 Southwestern Bell.  
3 MR. NOLAND: Brian Noland,  
4 Southwestern Bell.  
5 MS. SAIEVA: Gina Saieva,  
6 Southwestern Bell.  
7 MS. FAGAN: If at some point  
8 you-all could get a card or the correct spelling  
9 to the court reporter, that would be very  
10 helpful.  
11 Let's proceed to the first item. The  
12 first items listed are performance measurements  
13 relating to OSS. Previously on May 2, we  
14 considered PMS 1 through, I believe, 10 or 10.1.  
15 MR. DYSART: This is Randy Dysart,  
16 Southwestern Bell. We have our collocation  
17 person here today, and he can only be here until  
18 noon. So if we can work that in early on, we  
19 would appreciate it.  
20 MR. SRINIVASA: How about CLECs?  
21 MS. FAGAN: Does anyone have a  
22 problem with that, to start with collocation?  
23 MR. SRINIVASA: Apparently the  
24 subject matter expert for collocation for  
25 Southwestern Bell can only be here until 1:00

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1 this afternoon or so. Probably do you want to  
2 take that up first or -- let's go through some  
3 of the OSS measures and take collocation up  
4 after the first break.  
5 MR. DYSART: That's fine with us  
6 either way. I don't think collocation will take  
7 very long. I think it is only three measures,  
8 but however you-all want to handle it.  
9 MR. SRINIVASA: Do you-all have  
10 any preference? It doesn't matter? How about  
11 Time Warner?  
12 MS. KNIGHT: That's fine.  
13 MR. SRINIVASA: If it is only  
14 three measures, we will finish up collocation  
15 anyway.  
16 (Pause).  
17 MS. FAGAN: The collocation PMs  
18 are 107, 108 and 109, and I think we have a  
19 couple of new proposed measurements, maybe just  
20 one proposed measurement. Is that correct?  
21 MR. DYSART: That's correct.  
22 MR. SRINIVASA: Let's go ahead and  
23 start with PM 107. Mr. Dysart, could you  
24 explain making any changes to this measurement,  
25 or what is it that you are proposing?

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1 MR. DYSART: In one of our  
2 conference calls, one of the issues that I think  
3 we agreed upon was to add the Southwestern Bell  
4 affiliate on there. So that's one change we  
5 made.  
6 I believe that's the only change that  
7 was agreed to. A couple of issues that came up,  
8 there was a lot of discussion around when the  
9 time would end, whether it was when Southwestern  
10 Bell completed the collocation arrangement or  
11 when it was accepted by the CLEC.  
12 And I also had an action item to check  
13 on cage, common and adjacent, on-site and  
14 off-site since in the performance measurements,  
15 there was not any data for those or any section  
16 where it showed zeros. I did check on that.  
17 Currently there's no activity in those  
18 categories. That's why there is nothing there  
19 yet.  
20 We can go ahead and implement that and  
21 show zeros on it in future reports.  
22 MR. SRINIVASA: So the adjacent  
23 on-site and adjacent off-site collocation will  
24 occur if the physical collocation space within  
25 central office is exhausted. So that's why it

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1 may not have happened yet. Is that --  
2 MR. TOWNES: Right.  
3 MR. SRINIVASA: How about caged  
4 common? Apparently CLECs were required to  
5 provide some sort of forecast in order for them  
6 to size the common-caged collocation area. Has  
7 that occurred? Can Southwestern Bell respond?  
8 Have you received any type of forecast for that?  
9 MR. TOWNES: I'm not aware of any  
10 forecast, but there has been no request for  
11 common space.  
12 MR. SRINIVASA: Caged common?  
13 MR. TOWNES: Caged common,  
14 correct.  
15 MR. SRINIVASA: Is that the  
16 understanding of the CLECs, what Southwestern  
17 Bell is stating? They haven't received any  
18 request. Those who are here, apparently you  
19 haven't submitted any request.  
20 Do we still need to keep that  
21 disaggregation in the event in the future  
22 someone requests that anyway? Right? So they  
23 will go ahead and show that as zero at this  
24 point in time for data point? Okay.  
25 Apparently other than those two issues,

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1 I don't see anything else listed in here.  
2 CLECs -- if any of the other CLECs want to raise  
3 any concerns now, please do so now in this  
4 measure, PM 107.  
5 MR. COWLISHAW: I guess I don't  
6 know if there has been any progress. This is  
7 Pat Cowlshaw. In the -- I know in the hearings  
8 in Oklahoma, this measure was a particular  
9 concern of the ALJ. And he at one point  
10 admonished both the CLECs and Southwestern Bell  
11 to try and figure out a way to address this  
12 acceptance issue and exactly when you put the  
13 stop clock on there so that you don't just  
14 create an incentive for Southwestern Bell on the  
15 one hand to simply turn over an inadequate or  
16 incomplete cage and then say, "Hey, we are on  
17 time."  
18 And, on the other hand, the CLEC  
19 shouldn't be in a position to indefinitely  
20 extend the acceptance process or have an  
21 incentive to protract acceptance in order to  
22 create a missed due date.  
23 But some -- there should be some way to  
24 get into the middle of that and have a stop date  
25 that would accommodate the need for the cage to

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1 be really complete, at least some reasonable  
2 opportunity for acceptance or something like  
3 that.  
4 The other comment I was going to make  
5 was on the benchmark, which is 95 percent within  
6 the due date. The data would say that  
7 Southwestern Bell has routinely met that date,  
8 and, if anything, the benchmark may be on the  
9 low side. But in keeping with our discussion in  
10 the last workshop, it would seem appropriate  
11 to -- if that 95 percent benchmark is going to  
12 stay in place, that the z test ought to be  
13 removed.  
14 MR. SRINIVASA: Let's look at some  
15 of the historic data for PM 107.  
16 MR. DYSART: Could I make a  
17 comment about the one issue that came up in  
18 Oklahoma before we do that? I thought a little  
19 bit about this, and what would seem to me to  
20 maybe be equitable is that we would count the  
21 date that we would turn it over to the CLEC and  
22 say, "It's yours to do acceptance testing. And  
23 then if at some point in time -- and I think  
24 there needs to be a time limit on the amount of  
25 time they had to accept it.

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1 But, say, five days later they say,  
2 "There is a problem." Then we go back and start  
3 the clock again from the date that we actually  
4 turned it over and then continue until we  
5 complete it. And that way if it is acceptable,  
6 then it was available to them on the date that  
7 we turned it over. If it's not, then the clock  
8 will kind of start ticking again.  
9 MS. KNIGHT: I think we may need  
10 to better -- Patricia Knight from Time Warner  
11 Telecom. I think we may need to better define  
12 the reason why it wasn't accepted. If for some  
13 reason it does not comply with the original  
14 engineering drawings that the CLEC signed off  
15 on, then the clock should not stop. It should  
16 continue.  
17 But if there is some other disagreement  
18 that is not tangible and documented, then maybe  
19 your suggestion is viable.  
20 MR. SRINIVASA: Well, let me ask  
21 you this: When you say it is complete when you  
22 send them a notice, do they send someone to go  
23 there and inspect and create a punch list item?  
24 If it is not complete in accordance with the  
25 drawings if there are things that are not

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1 completed and if they pointed out and provided  
2 you a punch list, does that happen in any of the  
3 collocation requests?  
4 MR. TOWNES: There is a joint  
5 turnover process where CLECs are given access to  
6 the space and have the ability to come in and  
7 inspect it.  
8 MR. SRINIVASA: And then they give  
9 you a punch list if they think that --  
10 MR. TOWNES: If they think that  
11 something is not complete, then certainly we  
12 would go back and complete those items.  
13 MR. SRINIVASA: So after you  
14 provide them a notice or notify them that the  
15 construction is complete, how long does it take  
16 normally for the CLECs to respond or at least to  
17 come over there and inspect the cage?  
18 MR. TOWNES: It varies by CLECs.  
19 Sometimes it is done immediately. Sometimes  
20 it's a matter of weeks. Sometimes they have  
21 multiple jobs completing and they don't have  
22 enough personnel to do them immediately. So it  
23 completely varies.  
24 MR. SRINIVASA: That being the  
25 case that if there are multiple physical

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1 collocation cages constructed and if the CLEC is  
2 unable to dispatch to all locations, you know,  
3 for their staff for inspecting and creating a  
4 punch list item -- or punch list, then wouldn't  
5 that be unfair for them to keep the clock open?  
6 MS. KNIGHT: Well, maybe if some  
7 time intervals are placed on it, so many days  
8 after the cage is ready, we'd have an  
9 agreed-upon interval, that the CLEC, you know,  
10 has to examine the space and accept it. If then  
11 they don't do it within that time frame, then  
12 the clock stops. Then they're good.  
13 Southwestern is good.  
14 MR. SRINIVASA: Do you understand  
15 that?  
16 MR. TOWNES: I want to make sure.  
17 Is everybody understanding the proposal that  
18 Randy made? We would stop the clock when we  
19 turn it over and then restart the clock if there  
20 was a problem with it.  
21 MS. KNIGHT: Okay. In restarting  
22 the clock, I guess I need to better understand  
23 that. Are you saying, okay. You have 60 days  
24 to do that. And you get it done by the 60th  
25 day. The CLEC looks at it, and it is not

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1 acceptable.  
2 And I think the issue is why isn't it  
3 acceptable? Does it not comply with the  
4 drawings? If it doesn't comply with the  
5 drawings, the clock should not stop. If it  
6 complies with the drawings and something  
7 additional needs to be done, then I see you  
8 start over with a new time frame.  
9 MR. SRINIVASA: I thought that's  
10 what you -- if there are disputes as to whether  
11 or not the construction is complete, then after  
12 you do your inspection, create a punch list item  
13 saying the drawing said the cage gate or door  
14 should have been here, and you put it here.  
15 MS. KNIGHT: Right.  
16 MR. SRINIVASA: Or the power  
17 outlet should have been this much, and you  
18 didn't provide as many. All this list, when you  
19 create that, they are going to open the time  
20 clock from the day you submit that. But how  
21 long does it take for you to do it? For  
22 example, 60 days is there to complete the  
23 construction of the cage. Do you normally send  
24 your inspector on the 60th day, or do you send  
25 them on some other days? Does it take a month

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1 or five days? I don't know.  
2 MS. KNIGHT: I'm sure this varies  
3 by CLEC, but we are usually very anxious to get  
4 into the collocation space. So I would say we  
5 are there very quickly, within a matter of days.  
6 MR. SRINIVASA: So if you are  
7 there within a matter of days and you create a  
8 punch list item, do they rebut that, saying that  
9 whatever you are stating is incorrect? Do you  
10 give them an opportunity to rebut?  
11 MS. KNIGHT: It goes back and  
12 forth, yeah, it does.  
13 MR. SRINIVASA: What happens to  
14 the clock at that time when you are in that  
15 disputing state? Say, for example, the 61st you  
16 would dispatch somebody and create a list. Do  
17 you respond back to them the next day, whether  
18 you agree with their --  
19 MR. TOWNES: It is usually a joint  
20 meeting when it is turned over, and the parties  
21 are working that jointly -- together.  
22 MR. SRINIVASA: What time frame is  
23 involved in that? I'm trying to get an idea for  
24 the time.  
25 MR. TOWNES: It completely varies

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1 by arrangement. It depends how big, how small,  
2 what the problem is. Like she says, if it's a  
3 major difference in the drawing, it's pretty  
4 obvious. It could be very small things.  
5 MR. SRINIVASA: So however -- if  
6 after having the joint meeting, it is determined  
7 that indeed Southwestern Bell is at fault, then  
8 you are going to add all those days, you know,  
9 that was spent on meeting as lost days or  
10 something that you didn't meet?  
11 MR. TOWNES: Well, I think it  
12 would be our position that we would want the  
13 clock to start over once we have identified that  
14 there's a problem, and I think their position is  
15 that the clock should continue to run through  
16 that time.  
17 MR. SRINIVASA: If the joint  
18 meeting takes, say, for example ten days to  
19 resolve the dispute, then at the tenth day you  
20 start the clock even though it was Southwestern  
21 Bell's fault, the completion was delayed by ten  
22 days. Do you count that as delayed days?  
23 MR. DYSART: Well, I think our  
24 position was that -- my proposal was that we  
25 would not.

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1 MR. SIEGEL: If I heard the  
2 initial proposal by Southwestern Bell correctly,  
3 there may not be as much difference as you  
4 think. When Southwestern Bell says they were  
5 going to restart the clock, I thought they said  
6 they would restart it at time of turnover. Or  
7 are you saying you are going to restart it after  
8 the five days? So there's a five-day hold?  
9 MR. DYSART: After the five days  
10 was what I originally intended.  
11 MR. SIEGEL: Maybe a way to bridge  
12 the gap is you restart it at time of turnover,  
13 but if a CLEC took more than five days, then the  
14 part in addition to five days you don't count.  
15 So if the CLEC took ten days to come out and  
16 inspect, you only add that five days of that  
17 window of ten to the delayed days measure but  
18 not the part after five.  
19 So it is not a hard and fast  
20 requirement to five, but it is five if you want  
21 all of the time to count towards the PM.  
22 MR. SRINIVASA: What about, say,  
23 for example, five days later, a CLEC comes in  
24 and creates a punch list item saying that you  
25 didn't finish in accordance with the drawing,

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1 the agreed-to drawings.  
2 Now, Southwestern Bell takes issue on  
3 that, and then you meet. It takes ten days for  
4 you to resolve the dispute.  
5 MR. SIEGEL: I think it probably  
6 depends on how the dispute is resolved. If a  
7 third-party engineer or the Commission finds  
8 that it was clear that the work wasn't done  
9 correctly and that Southwestern Bell should have  
10 known and shouldn't have disputed it, then I  
11 think you would count all that time.  
12 If the decision maker comes back and  
13 says, "This was truly unclear and a judgment  
14 call," and your judgment is in favor of the CLEC  
15 but you take the position that it was not an  
16 obvious situation, then I think maybe you don't  
17 count those delayed days.  
18 At least in IP's experience so far --  
19 and I'm not privy to all of the situations where  
20 our collocation sites weren't perfectly -- did  
21 not meet the specifications. My understanding  
22 is we haven't really had disputes. Where we  
23 have disputed the site, Southwestern Bell has  
24 agreed to do additional work. I can't say that  
25 100 percent but at least all of the ones that I

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1 am aware of that's the case and those disputes  
2 haven't really taken place.  
3 MR. SRINIVASA: Now, the problem  
4 is if it takes ten days -- say, the month of  
5 June, the end of June it was supposed to be  
6 complete, when does it get reported, in the  
7 month of June or July as delay days? How do you  
8 report that, what time period? What month would  
9 you report that?  
10 MR. DYSART: We would report  
11 whenever it was completed, whenever we showed  
12 that the project completed. So if it stretched  
13 between June and July, and whatever date we put  
14 on the final completion is the date -- the month  
15 that we would report it in.  
16 MR. SRINIVASA: Again, in the  
17 event that there are some disputes instead of  
18 having certain uncertainties -- well, actually,  
19 having too many days to resolve any kind of  
20 dispute on whether or not a project is complete,  
21 can we put a time limit on that? If it takes  
22 more than three days on Southwestern Bell's  
23 part, you are going to count that as delay days  
24 or two days or three days.  
25 Say, if they provide you a punch list

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1 item, then you take more than two, three days to  
2 resolve that, anything in excess of three days  
3 in resolving that is going to be counted as  
4 delay days.  
5 MR. TOWNES: That's fine.  
6 MR. DYSART: I think we could  
7 accept that.  
8 MS. KNIGHT: Okay. So after you  
9 are notified by the CLEC and you have the joint  
10 meeting, the discrepancies are identified and  
11 documented, Southwestern has three days to  
12 complete the changes? Or to respond when they  
13 will have them to provide another completion  
14 date?  
15 MR. SRINIVASA: (Nods head.)  
16 MS. KNIGHT: All right. And then  
17 if they don't provide that date within three  
18 business days, then the clock starts, and dates  
19 are being missed?  
20 MR. TOWNES: I'm not sure I  
21 understand the proposal.  
22 MS. KNIGHT: I was just expanding  
23 my understanding of what was said.  
24 MR. SRINIVASA: The 60th day you  
25 notified them that the work is complete, and I

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1 think this should hold good for both, you know.  
2 Within three days you are supposed to respond  
3 and let them know that you accept them or you  
4 are supposed to dispatch a technician to go out  
5 there or your inspector to go out there and  
6 create a punch list item saying that, "Well,  
7 these things are not finished." Within three  
8 days you provide them a list.  
9 Subsequent to that, they get three days  
10 to dispute it or accept it. Now, if you dispute  
11 it, we may have to put a time limit there, too.  
12 How long are you going to dispute it? We don't  
13 want that to be going on forever. You have to  
14 resolve that in three days also, whatever the  
15 disputes are.  
16 MR. DYSART: Oh, absolutely.  
17 MR. SRINIVASA: And if it takes  
18 longer, you are going to count that as delayed  
19 days. Maybe that's what needs to be -- you may  
20 have to clarify that in your business rules.  
21 MR. DYSART: We could accept that.  
22 We'll clarify that, and I assume you will get a  
23 chance to --  
24 MS. KNIGHT: I would like to talk  
25 to my operations people to clarify if a

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1 three-day turnaround, which should be, is  
2 acceptable and if that's reasonable.  
3 MR. SRINIVASA: Can you work off  
4 line on that?  
5 MS. KNIGHT: Yeah.  
6 MS. KLAMERT: Abigail Klamert for  
7 Birch Telecom. I just want to go back and  
8 clarify what I think is a basic disagreement  
9 that we have in the proposal that you said  
10 today. It should -- the clock should start when  
11 you turn it over to us to be inspected. We  
12 believe that it should stop when we positively  
13 accept it.  
14 If it is ready on day 60 per the  
15 agreement and they say, "Okay. It is ready. It  
16 is day 59 or 60," that doesn't stop the clock.  
17 And if we go in within the three-day interval  
18 and do the inspection and create a punch list,  
19 that punch list merely reflects that on day 60,  
20 it wasn't done according to specs. And those  
21 specs were turned in on day one. That's what  
22 started the clock.  
23 So I really don't see the need to  
24 extend the approval on the period for accepting  
25 it or to have that interval count. I mean, it

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1 shouldn't count. If it is not done right,  
2 that's what generates a punch list.  
3 MR. SRINIVASA: Not done right  
4 would be your position, but they can dispute  
5 that.  
6 MS. KLAMERT: That's distinct from  
7 a dispute. I think there are two steps here.  
8 One is create a punch list, and they say, "Okay.  
9 We didn't put in the right XYZ according to the  
10 specs that we all agreed on on day one. That  
11 would not be a dispute. That's merely something  
12 that isn't finished to spec.  
13 That should not drive out that time  
14 period.  
15 MR. SRINIVASA: Well, there are  
16 several interpretations as to what you agree to,  
17 what's in the specifications and where it was  
18 supposed to be in the drawing. Should you  
19 change orders subsequently --  
20 MS. KLAMERT: But change orders  
21 need to be in by day one. That's when the clock  
22 starts. If you have a change order, then they  
23 should get additional time, absolutely. And I  
24 think what Mr. Siegel was saying is that it is  
25 very uncommon for disputes to arise over such

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1 basic issues, what the specifications are.  
2 MR. DYSART: I think we have  
3 another proposal that hopefully will get us  
4 along here. What we will agree to do is if --  
5 we will stop it on the date that we complete it.  
6 We will give you three days to turn it over, to  
7 inspect it. If within that three-day period,  
8 you find that we have not done the work  
9 according to spec, we will go back and count  
10 that time, that three-day interval in there.  
11 MR. TOWNES: Start the clock back  
12 on the completion date.  
13 MR. DYSART: -- on the completion  
14 date. So all that time will be in there that  
15 you just talked about. Now, if you take four  
16 days to do that, we will only count the three  
17 days. We will start taking off days.  
18 MS. KLAMERT: Sounds reasonable.  
19 MS. KNIGHT: I think we all agree  
20 that this three days is hypothetical until we  
21 get more operational input.  
22 MR. DYSART: That's our proposal,  
23 and you will get back with us to see if that  
24 proposal is hypothetical or if, in fact, you  
25 could.

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1 MS. KNIGHT: Okay. I don't  
2 want -- I don't want to make all the operational  
3 decisions without the intelligence to do that.  
4 MR. SRINIVASA: Go ahead,  
5 Mr. Siegel.  
6 MR. SIEGEL: Just one  
7 clarification. We get into business and  
8 calendar days. If the site is turned over on  
9 Friday, do we have until Wednesday?  
10 MR. TOWNES: It needs to be  
11 business days.  
12 MR. SRINIVASA: Three business  
13 days. Ms. Bourianoff?  
14 MS. BOURIANOFF: Michelle  
15 Bourianoff for AT&T. Perhaps someone -- I  
16 assume you are the coordination -- perhaps you  
17 are more familiar with the collocation tariff.  
18 I thought there was an interval in the  
19 physical collocation tariffs in Texas by which a  
20 CLEC had so many days to accept a cage after it  
21 had been turned over.  
22 MR. TOWNES: There are intervals  
23 in the tariff for that, but I guess from our  
24 position, from a performance measure standpoint,  
25 you are in a sense shortening the intervals if

1 we have long delays in the CLECs accepting the  
2 jobs. We want to turn them over. We want to  
3 make sure we've done the work appropriately.  
4 But just because the tariff allows a  
5 20- or a 30- or a 60-day interval for turnover,  
6 we shouldn't allow that clock to continue to run  
7 through that time while we are waiting for the  
8 CLECs to come and inspect the work.

9 MS. BOURIANOFF: Isn't it like a  
10 five- or ten-day interval?

11 MR. TOWNES: I don't know the  
12 exact interval.

13 MS. BOURIANOFF: It just seems  
14 awfully confusing to me to have the tariffs to  
15 provide for one process for CLECs to accept a  
16 cage after it's been turned over and have a  
17 different process established in the performance  
18 measures.

19 MR. DYSART: The only problem that  
20 I have, though, this discussion we're having  
21 really doesn't affect PM 107. It is more on the  
22 average delay days discussion. So if you take  
23 -- you know, the requirement right now is 10  
24 percent of the intervals.

25 So if you have a job that is a 55-day

1 probably -- I'd have to go back and look at the  
2 collocation tariff. I'm not sure. If it is  
3 five to ten days, you know, after they notify,  
4 you have -- if a CLEC has five to ten days to  
5 accept it, probably the clock should stop the  
6 day they notify you.

7 Then okay, five to ten days instead of  
8 three days maybe. If it is not complete on the  
9 fifth day or the seventh day, you are going to  
10 add seven days to that. Again, three days was a  
11 hypothetical. We were bringing it up. Again,  
12 if it is already there in the tariff, maybe we  
13 need to look into the tariff and see what the  
14 time frames are.

15 MR. DYSART: I think we do. But I  
16 still have that same concern regarding PM -- one  
17 of the next PMs that we are going to be talking  
18 about, 108. That's my concern. If we do find a  
19 lot of these, then I inherently have lost a lot  
20 of time.

21 MS. BOURIANOFF: Maybe we can  
22 check the tariff to see what the intervals are,  
23 and, you know, maybe if it is five days, it is  
24 not an issue. If it is longer, I understand  
25 Randy's concern.

1 interval and you take -- it is five days. That  
2 means we really have to play around for five and  
3 a half days for an average. And if you take  
4 tariff intervals ten days, I automatically miss  
5 that day because you took the entire time to do  
6 the inspection. So that's my only dilemma with  
7 that.

8 MR. SRINIVASA: Even 107 says you  
9 are measuring collocation missed due dates.

10 MR. DYSART: Right.

11 MR. SRINIVASA: If you stated that  
12 you completed it on a certain date and it was  
13 not complete -- if you find out that after a  
14 CLEC gives their comments, then indeed you  
15 missed it.

16 MR. DYSART: Well, there's  
17 agreement that we would go back and say we  
18 missed it. It is just the length of time. Is  
19 it a three days, five days, ten days type of  
20 thing that you have to do the inspection. I  
21 mean, that's where you get into the delay day  
22 issue. That could be overly distorted depending  
23 upon how long it took an individual CLEC to  
24 check and verify whether that was done or not.

25 MR. SRINIVASA: The acceptance is

1 MR. DYSART: I think conceptually  
2 we agree on the process. It's just a time  
3 interval. Right? So I think that is a lot of  
4 progress.

5 MS. KNIGHT: One other point: You  
6 know, once we come to agreement that some  
7 changes or whatever need to be made, how do we  
8 set some types of parameters to complete those  
9 changes? I know that is dynamic based upon the  
10 extent of the changes.

11 How do we deal with that?

12 MR. DYSART: From my perspective,  
13 it's measurement dependent. Like if it's a  
14 simple change like you are talking about maybe  
15 in this one, it wouldn't take nearly as long as  
16 if I have to do some reprogramming on an OSS  
17 measurement to capture additional data. So it  
18 is dependent upon the measurement.

19 MR. TOWNES: If you are talking  
20 about fixing --

21 MS. KNIGHT: I am talking about  
22 physical work in that cage.

23 MR. DYSART: Oh, I'm sorry.

24 MS. KNIGHT: Sorry.

25 MR. TOWNES: It is a case-by-case

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1 basis with the operational folks in that  
2 particular office. It really depends on what is  
3 needing to be done.  
4 MS. KNIGHT: See, that's difficult  
5 to accept, but I know it is difficult to define  
6 because they are all different.  
7 MR. TOWNES: But on 108 if we are  
8 counting those days, Performance Measure 108 is  
9 going to capture the number of days it takes to  
10 correct things. And that inherently will  
11 capture that one because for every day we miss,  
12 the clock continues to run until we correct that  
13 problem.  
14 Performance Measure 108 is going to be  
15 capturing those days.  
16 MS. KNIGHT: Maybe we can absent  
17 this for a bit, but that is still a concern.  
18 MR. SRINIVASA: I'm trying to  
19 understand. Say, for example, you increase the  
20 scope of the work?  
21 MS. KNIGHT: No. This is only on  
22 the discrepancies. It is not what I ordered.  
23 We identify what that is. We both  
24 agree this is not what I ordered, and  
25 Southwestern is going to make those changes.

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1 MR. SRINIVASA: How long is it  
2 going to take to make those changes?  
3 MS. KNIGHT: Right, correct.  
4 MR. SRINIVASA: What time  
5 parameters apply?  
6 MR. DYSART: Again, that is  
7 captured in average delay days because with what  
8 we have agreed to right here, that wouldn't be  
9 completed. So it would be a missed due date.  
10 So every day that it's ticking away, it is going  
11 to show up in 108 as a delay day because really  
12 it's not a new job. It's the same existing job,  
13 but just a delay in that job. So that's where  
14 it would show up.  
15 MR. SRINIVASA: Sixty days is what  
16 they agree to start with. And if they didn't  
17 complete it and then you notify of the  
18 discrepancies and it takes them 20 days to  
19 complete that, that means their delay date was  
20 20 days. In 60 days they should have completed  
21 all of those. They pay damages for every day  
22 that they missed. They delayed it.  
23 MS. KNIGHT: Sounds reasonable.  
24 MR. DYSART: I believe that was  
25 all, the only issues on 107.

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1 MR. SRINIVASA: I believe there  
2 was one more. The benchmark should be applied,  
3 the critical z factor that goes with this, given  
4 that historic data shows that you have no  
5 problem meeting that. I think we do have -- let  
6 me see -- caged initial, 0 percent missed.  
7 So leave it at 95 percent, do not apply  
8 critical z factor. Is that your proposal,  
9 Mr. Dysart? I think we were discussing --  
10 MR. DYSART: If you can give me  
11 some time to look at the data -- I don't have  
12 it. I know you were looking through it there.  
13 I don't have it in front of me, but if the data  
14 indicates that, then I probably wouldn't have a  
15 problem.  
16 MR. SRINIVASA: Okay. That's  
17 fine. Move on to 107.1. Apparently this is a  
18 new PM proposed by Covad and Rhythms. Can you  
19 explain what the proposal is? Who is here for  
20 Rhythms? Are you here for Rhythms?  
21 MS. SOLIS: Yes, I am. I believe  
22 this addresses the receipt by Southwestern Bell  
23 of the collocation application, and there is a  
24 time interval in which they need to respond to  
25 the CLEC that gives us a due date. And I

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1 believe this is what that addresses, the  
2 response to the CLEC and when that is made.  
3 MR. TOWNES: Southwestern Bell's  
4 position is it is not necessary because  
5 Performance Measure 109 is the quote interval,  
6 and the quote is going to include space is  
7 available or not. And in offices where there is  
8 known no space available, they would be posted  
9 on the Web site. So the CLECs would be able to  
10 check that before they place an application.  
11 So the tariff requires us to within ten  
12 days give a quote, and we are going to meet  
13 that. And that will tell them if there is space  
14 or not.  
15 MR. SRINIVASA: Apparently  
16 Southwestern Bell should notify the CLEC within  
17 ten business days of space availability. I  
18 believe the tariff has some guidelines on that,  
19 from the day of the request depending on the  
20 number of requests within how many days you are  
21 supposed to respond?  
22 MR. TOWNES: Correct. That's for  
23 a quote, and the quote will also include whether  
24 space exists or not.  
25 MR. SRINIVASA: Right. So are you

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1 familiar with the tariff?  
2 MS. SOLIS: Yes.  
3 MS. FAGAN: So would this --  
4 MR. SRINIVASA: Please identify  
5 yourself.  
6 MS. FETTIG: I'm sorry, Eva Fettig  
7 for AT&T. I'm -- just a clarifying question:  
8 Is your intent for this additional measure to  
9 capture where collocation applications are  
10 either denied or there is no space in that cage  
11 or in the central office where you are looking  
12 to place a cage?  
13 MS. SOLIS: I believe it would be  
14 for both responses whether there was space  
15 available or not.  
16 MS. FETTIG: I guess I agree with  
17 Southwestern Bell that in 109, you are going to  
18 capture where there is space because they are  
19 giving you a quote for an affirmative response  
20 saying, "Yes, we do have space, and here is the  
21 price for it."  
22 I guess -- but from my perspective on  
23 109, you don't capture those instances where  
24 there is a denial of application.  
25 MR. SRINIVASA: So if a CLEC makes

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1 a request for physical collocation space, to the  
2 extent space is available, they'll respond  
3 within so many days. And if they come back and  
4 say there is no space available --  
5 MR. TOWNES: If the concern there  
6 is that, on 109, we could include that, I think  
7 we do include that the "no" responses would be a  
8 response to the quote. So we would capture the  
9 data on both yeses and nos as far as -- we still  
10 have to respond within ten days.  
11 MR. COWLISHAW: Maybe some  
12 business rule language is in order. What you  
13 say is you respond back to the application  
14 request for the quote. To me a quote sounds  
15 like space is available and I'm getting a price.  
16 And if what you are really capturing here is the  
17 clock stops when SWBT delivers its response  
18 whether a quote or a notification of no space  
19 available --  
20 MR. TOWNES: We would add the  
21 words "with a quote or no space available  
22 response," or something to that effect.  
23 MR. DYSART: We will also validate  
24 whether we are, in fact, doing that. If we're  
25 not, we will incorporate that.

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1 MR. SRINIVASA: That being the  
2 case, then where is PM 107.1 if No. 109, the  
3 business rule, is modified to include clock  
4 stops when Southwestern Bell responds back to  
5 the application request with a code or  
6 notification of space unavailability?  
7 MS. FETTIG: Does that capture --  
8 does that capture Rhythms' and Covad's concern?  
9 MS. SOLIS: I believe it captures  
10 Rhythms, yes.  
11 MR. SRINIVASA: So we wouldn't  
12 need 107.1 if we make the change to 109.  
13 However, you are still proposing Tier 1 and Tier  
14 2 as high; whereas, for the 109, it is not a  
15 Tier 2 measure. It's only with a Tier 1 with a  
16 low amount.  
17 MR. SIEGEL: And there's also a  
18 proposal at 107.1 that we want 109 that has the  
19 reporting for the DSL affiliate.  
20 MR. TOWNES: That's in 109 as  
21 well, and we would agree to that.  
22 MR. SRINIVASA: You have to add  
23 that in?  
24 MR. DYSART: We will.  
25 MR. TOWNES: That's in a proposal

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1 in 109 that we would agree to.  
2 MR. SRINIVASA: So can we do away  
3 with 107.1 and work on 109 to address the  
4 concerns created in 107.1?  
5 MR. DRUMMOND: This is Eric  
6 Drummond on behalf of the CLEC Coalition. Is it  
7 possible for us to have some sort of a  
8 discussion about this specific submeasure during  
9 a break and then come back after the break and  
10 clarify exactly what position the companies are  
11 taking?  
12 MR. SRINIVASA: Okay. Work off  
13 line and then come back?  
14 MR. DRUMMOND: Yes, thank you.  
15 MR. SIEGEL: Just before we move  
16 off, just sort of pointing out the differences  
17 in the proposal, one last thing that is  
18 different is the proposal for benchmark. I  
19 believe the benchmark in 107.1 is 95 percent,  
20 and the benchmark in 109 I believe is 90  
21 percent.  
22 MR. SRINIVASA: Right. We will go  
23 on to 108. Can we talk about that briefly,  
24 average delay days for Southwestern Bell, missed  
25 due dates. And you are going to give us the

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1 language in the business rule for PM 107. Still  
2 the reference in here would be "For business  
3 rule, see Measurement 107."  
4 MR. DYSART: Correct, and we will  
5 also add SWBT affiliate there.  
6 (Pause)  
7 MR. SRINIVASA: Okay. Any other  
8 proposals by CLECs on this, on the benchmark?  
9 Ten percent tariff intervals, that's what the  
10 benchmark states. Let's look at some of the  
11 historic data. There's 108, same thing on the  
12 critical z whether it should be in here.  
13 Historic data shows compliance. Maybe we should  
14 do away with it.  
15 MR. DYSART: One point on that  
16 would be, though, depending on the outcome of  
17 the discussion on the other, then I couldn't  
18 necessarily agree to getting rid of the critical  
19 z if we are going to have a lot of time there.  
20 If it is three days, five days, makes a  
21 difference in my mind whether I can agree to get  
22 rid of the critical z because this is something  
23 new that would actually be implemented.  
24 MR. SRINIVASA: Any comments from  
25 CLECs on that? Mr. Dysart stated that the time

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1 period still -- they are negotiating with CLECs  
2 on that, whether it should be five days or three  
3 days or seven days. That benchmark being new,  
4 that critical z alone should still apply until  
5 we get some historic data.  
6 MR. COWLISHAW: I think the  
7 performance would actually -- we're just doing  
8 away with it anyway, but let's get the data on  
9 the tariff.  
10 MR. SRINIVASA: Okay. We will do  
11 that. 109, percent of request process within  
12 the tariff time lines. And I believe that you  
13 agreed on modifying the business rules to  
14 include notification of no space?  
15 MR. DYSART: Correct.  
16 MR. SRINIVASA: How about  
17 reporting structure? You are going to add the  
18 Southwestern Bell affiliate to that?  
19 MR. DYSART: That's correct.  
20 MR. SRINIVASA: I wanted to see  
21 some of the historic data in 109 that you  
22 reported.  
23 MR. SAUDER: This is T.J. Sauder  
24 with Birch. Randy, when do you report on 109?  
25 When the request is given back to the CLEC or

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1 after the actual cage is --  
2 MR. DYSART: It will be when the  
3 request is given.  
4 MR. SAUDER: Is that the way it is  
5 reported now?  
6 MR. DYSART: Yeah, I believe so,  
7 correct.  
8 MR. SRINIVASA: Apparently  
9 cageless augments, this April data shows that  
10 there were only two requests, but you missed one  
11 of them. Other than that, it is consistently --  
12 well, you're at 95 percent and above that level.  
13 So that's just an aberration. April is only  
14 two. So can we do away with the critical z  
15 alone on some of this?  
16 MR. DYSART: I would just like to  
17 look at the data. But depending on that, I  
18 think we probably could.  
19 MR. SRINIVASA: Okay. Any  
20 comments?  
21 MS. BOURIANOFF: Can I ask a  
22 separate question and go back to 107 for a  
23 minute? I'm sorry. Michelle Bourianoff for  
24 AT&T.  
25 The way the business rule is written

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1 currently -- and I know we are having discussion  
2 about changing it -- it says the clock stops  
3 when the collocation arrangement is complete and  
4 ready for CLEC occupancy. And looking at the  
5 tariff -- I'm not sure I have the latest  
6 version. But looking at a version of the  
7 tariff, the occupancy provisions talk about  
8 Southwestern Bell having to notify the CLEC  
9 within five days after. So that completes the  
10 preparation of the cage space, for example.  
11 So does the business -- the way the  
12 business rule and the performance measure have  
13 been implemented to date, does the clock stop  
14 when it is complete? Or does the clock stop  
15 when Southwestern Bell notifies the CLECs,  
16 because under the tariff there is a five-day  
17 period that Southwestern Bell has to notify the  
18 CLEC.  
19 MR. DYSART: I don't know the  
20 answer. I would have to check.  
21 MR. SRINIVASA: Okay.  
22 MS. BOURIANOFF: Because I think  
23 the answer to that might also affect our  
24 discussions on how we want this three-day,  
25 five-day period to work.

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1 MR. SRINIVASA: You have to take  
2 that into consideration also.  
3 MR. DYSART: Correct.  
4 MR. SIEGEL: Just -- for IP  
5 Communications, Howard Siegel. If it is not  
6 being based on when the CLEC is notified, I  
7 think we would want it changed to be when the  
8 CLEC is notified. That's the same way that LSRs  
9 are done. You base things on when the service  
10 order completion is provided to the CLEC, not  
11 when the work was actually done, and you base  
12 things on when the FOC is returned from the  
13 CLEC.  
14 And I think when the notification goes  
15 to the CLEC would have to be the triggering  
16 point.  
17 MR. SRINIVASA: How do you notify  
18 them? Do you fax them, or do you send some sort  
19 of an e-mail? Do you have a time stamp on that?  
20 MR. TOWNES: To be honest, I don't  
21 know exactly how the information is sent. I  
22 believe it is sent via some written  
23 communication, but I don't know the answer to  
24 that specifically.  
25 MR. SRINIVASA: Can you find that

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1 out also?  
2 MR. DYSART: Yeah, we will check  
3 on that.  
4 MR. SRINIVASA: Okay. I believe  
5 that concludes all of the collocation PM  
6 discussions. Now we can get on to --  
7 MR. SIEGEL: Is that because we  
8 are deferring until after the break the  
9 additional issues relating to 109?  
10 MR. SRINIVASA: Right, 107 and  
11 109.  
12 MR. DYSART: Are there additional  
13 issues on 109?  
14 MR. SIEGEL: Well, just the  
15 differences between 107.1 and 109.  
16 MR. TOWNES: I thought we had  
17 already talked about them.  
18 MR. SRINIVASA: There is a  
19 difference in benchmark in what Rhythms and  
20 Covad have proposed for 107.1 to what is there  
21 in 109. And then also benchmarks are different.  
22 Right? The penalty levels are different.  
23 Given the historic data, do you want to  
24 modify 109's benchmark level?  
25 MR. DYSART: No.

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1 MR. COWLISHAW: I thought we were  
2 doing away with --  
3 MR. DYSART: Other than doing away  
4 with the z value. Also -- I mean, you'll know  
5 our position, and you can address it after the  
6 break. The measurement type, it was  
7 intentionally created a measurement type low  
8 because 107 is when the due date is met for  
9 actually getting the collocation space in.  
10 That's the critical time frame.  
11 This response, I guess, was deemed not  
12 as critical, and I think it should reflect a  
13 different measurement type than does the missed  
14 due date for collocation.  
15 MR. SRINIVASA: Response?  
16 MS. SOLIS: I think that the  
17 definition of critical may be different for  
18 Southwestern Bell than it is for the CLECs in  
19 getting back the response from Southwestern Bell  
20 as to whether there is space available or not.  
21 MR. DRUMMOND: I think that may be  
22 true, and really I think now that we have had  
23 enough time in terms of historical data to look  
24 at the issue, it might be worthwhile to discuss  
25 that off line both with respect to the specific

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1 issues we need to -- that we have here with this  
2 PM and the fact with the context we have some  
3 history here, whether or not it is important to  
4 make some changes to the type of measurements.  
5 But that is something we can address  
6 off line and come back to you with.  
7 MR. SRINIVASA: That's fine.  
8 MR. DYSART: That's fine.  
9 MR. SRINIVASA: I will take up PMS  
10 related to operational support systems, OSS.  
11 MS. BOURIANOFF: Before we do  
12 that, Nara, I keep raising this issue about  
13 possibly developing a measure to track  
14 maintenance of virtually collocated equipment.  
15 And I think Randy has indicated twice he would  
16 check on how that is done and whether it would  
17 be feasible to measure that under the virtual  
18 collocation tariff, which indicates that  
19 Southwestern Bell will in most instances be  
20 maintaining the equipment.  
21 So a CLEC has to request that  
22 maintenance. I think we need some sort of  
23 measure that will track average time or how long  
24 that maintenance takes.  
25 MR. SRINIVASA: Well, trouble

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1 reports as it relates to virtual collocation?  
2 MS. BOURIANOFF: It could be a  
3 trouble report or mean time to restore kind of  
4 measure.  
5 MR. DYSART: What I have been able  
6 to find out so far is that it appears that the  
7 collocation arrangement is assigned a  
8 pseudocircuit ID, and that actually the trouble  
9 is taken at the LOC today. And we are still  
10 investigating. I don't know how many of these  
11 we have had.  
12 But it appears that it has probably  
13 already being captured in that mean time to  
14 restore measurement for other things. So we  
15 really need to determine whether it is being  
16 captured, and then is it -- does it need to be  
17 captured separately? I don't really have an  
18 answer to either of those questions for sure  
19 yet.  
20 MS. BOURIANOFF: So it might be  
21 being captured in --  
22 MR. DYSART: I'm not sure.  
23 MS. BOURIANOFF: Sixty-seven or  
24 whatever?  
25 MR. COWLISHAW: In the UNE

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1 measures, UNE maintenance?  
2 (Simultaneous discussion).  
3 MR. DYSART: That's what I need to  
4 try to identify, a few of those and find out if  
5 it is actually being captured in there or not.  
6 MS. FETTIG: So we need an  
7 additional level of disaggregation for those?  
8 Is that what you are saying?  
9 MR. DYSART: Well, I don't know  
10 exactly how to handle that yet. It is a little  
11 bit different.  
12 MS. BOURIANOFF: AT&T is not  
13 interested in having those being counted twice.  
14 MR. DYSART: Right. I understand.  
15 MS. BOURIANOFF: We just want to  
16 make sure they are captured somewhere and that  
17 they're captured somewhere where we can see them  
18 broken out and track that information.  
19 MR. DYSART: Right. And I'm still  
20 trying to find -- it's kind of hard to  
21 investigate when you are looking for something  
22 that you don't know it has even happened yet.  
23 We are trying to dig in there and find somebody  
24 that can point us to something.  
25 If anybody knows of something they

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1 reported on, that would be a great help to try  
2 to trace this backwards.  
3 MR. TOWNES: Part of the problem  
4 is there are very few virtual collocators in the  
5 state of Texas. So if you don't have very many  
6 occurrences of it, how do you -- how many  
7 maintenance occurrences you have. Trying to  
8 find that is like a needle in a haystack.  
9 MS. BOURIANOFF: ASI is virtually  
10 collocated all over the place is what we hear.  
11 That's part of our concern. That has been  
12 thrown out to CLECs as an option to get to  
13 parity with ASI in the line sharing arena.  
14 So I think -- I understand there might  
15 not be a lot of it now, but I think this is  
16 something that we might see more and more of as  
17 we go forward.  
18 MR. SRINIVASA: So has AT&T  
19 virtually collocated any of the equipment?  
20 MS. FETTIG: I can check.  
21 MR. SRINIVASA: How about Time  
22 Warner? Have you virtually collocated  
23 equipment?  
24 MS. KNIGHT: No. We have virtual  
25 collocation spaces, but we have no equipment

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1 that we share.  
2 MR. SRINIVASA: In which they do  
3 the maintenance.  
4 MS. KNIGHT: Yes.  
5 MR. SRINIVASA: When you virtually  
6 collocate, Southwestern Bell does the  
7 maintenance.  
8 MS. KNIGHT: Correct.  
9 MR. SRINIVASA: Do you have any  
10 arrangement like that? That's what I was trying  
11 to find out.  
12 MS. KNIGHT: Yes, we do. And I  
13 would have to talk to my local people to see how  
14 that process works and if they have had any  
15 problems.  
16 MR. SRINIVASA: Can you also check  
17 with your operational people to see if they  
18 generated any type of maintenance request or  
19 trouble reports on those and how long did it  
20 take for them to respond? And let your  
21 operational people let us know.  
22 MS. KNIGHT: Yes, I can.  
23 MR. SIEGEL: It is kind of hard to  
24 know if it's related to collocation or not, but  
25 there are two related issues with ILEC-owned

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1 splitters that are being addressed in the line  
2 sharing docket. One would be timeliness of  
3 adding new splitters, and one would be the  
4 repair intervals.  
5 As we discussed with the folks that  
6 weren't at the DSL meeting on the 1st, what we  
7 did on some DSL measures that had that pending  
8 project involved or Project Pronto involved is  
9 we basically agreed to set up a process ahead of  
10 the next six-month review to take the mandates  
11 in those proceedings and put them in.  
12 I guess what I would propose is at  
13 least for adding new ILEC-owned splitters when  
14 they run capacity and in the meantime to repair  
15 ILEC-owned splitters, we take those and put it  
16 in that same process. Where -- once we have  
17 intervals a quarter, we can then probably  
18 jointly, with agreement, develop the measure.  
19 MR. SRINIVASA: Well, there is --  
20 isn't there a PM which captures the installation  
21 interval for line sharing requests?  
22 MR. SIEGEL: There will be one  
23 for -- on an LSR/LSR basis. I think what we  
24 were looking at was if Southwestern Bell's  
25 ILEC-owned splitters are all used, what I would

1 And I don't know anything about any of that  
2 right at the moment. So it is way -- way in  
3 advance of me -- of my knowledge level at this  
4 time.  
5 I mean, I think we can talk about  
6 anything later on once things -- circumstances  
7 arise, the splitters. The thing that comes into  
8 my mind with my limited knowledge is that, well,  
9 a CLEC can have a splitter, too. I don't know  
10 all the details. And until I do, I'm not  
11 comfortable even commenting on much more than --  
12 MR. SRINIVASA: There is an  
13 arbitration on line sharing issues. Are there  
14 PMS proposed as part of that?  
15 MR. SIEGEL: Not in the interim  
16 hearing. That was something that I think the  
17 CLECs felt wasn't appropriate for them to push  
18 in the interim hearing. I would expect that  
19 CLECs would propose PMS in the permanent hearing  
20 unless they were directed to only seek  
21 requirements and leave the PMS for this PM  
22 group.  
23 I think the CLECs would be more than  
24 willing to propose them in that arbitration. I  
25 just don't know if that's how the Commission

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1 assume we would get back if a CLEC is actually  
2 in jeopardy for no facilities if we put in a new  
3 order or possibly even a reject. I'm not sure.  
4 I don't know even know if that M&P has  
5 been developed yet for Southwestern Bell. So  
6 what we would be looking for in line sharing is  
7 a process to make sure we don't get behind the  
8 curve, either a capacity management program,  
9 which I think would be preferred where  
10 Southwestern Bell proactively adds more as they  
11 reach a capacity level. But it may be based on  
12 a CLEC request where a CLEC says, "We give you a  
13 forecast, and we said we were going to need X  
14 amount, and you didn't put them in." I'm not  
15 sure exactly -- I understand for Southwestern  
16 Bell it is kind of difficult to discuss a PM  
17 today because we don't know what requirements  
18 are going to be in place.  
19 But I think what we probably need is a  
20 place holder for that process. Once we know  
21 what requirements are in existence, we could  
22 have that expedited process include whatever PMS  
23 are necessary relative to notice of equipment.  
24 MR. DYSART: Quite frankly, I  
25 don't know what that has to do with collocation.

1 wants to address those issues.  
2 MR. SRINIVASA: Some of the terms  
3 and conditions are not clear yet until the  
4 arbitration award comes out. Without knowing  
5 that, establishing a PM would be kind of hard.  
6 MR. SIEGEL: Yes.  
7 MR. SRINIVASA: So let's see how  
8 that goes, and then we will take that up. And I  
9 don't know if we need to wait. If an  
10 arbitration award comes up, you know, sooner  
11 than the next six-months' review, we may have to  
12 consider this in the next three months or so.  
13 This may be one of those -- like we had some  
14 measures that we didn't want to wait until six  
15 months.  
16 MR. DYSART: This is Southwestern  
17 Bell, Randy Dysart. We understand that. But  
18 right now what Mr. Siegel was saying was going  
19 way over my head.  
20 MR. SRINIVASA: All right. Are  
21 there any other collocation related issues?  
22 The off line discussions on 107 and  
23 109, when is that going to take place?  
24 MR. DRUMMOND: I assume that as  
25 soon as we have a break, we will probably try to

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1 make some phone calls and get together with some  
2 of the other data LECs and SBC to close the loop  
3 on that.

4 MR. SRINIVASA: Shall we go ahead  
5 and take a 15-minute break now and come back on  
6 OSS measures?

7 MS. FAGAN: We'll come back at  
8 10:45.

9 (Recess: 10:30 a.m. to 11:00 a.m.)

10 MS. FAGAN: Let's go back on the  
11 record. I believe when we broke, the parties  
12 were going to discuss some of the issues that  
13 were raised relating to the collocation  
14 measurements. Would -- Southwestern Bell, would  
15 you like to report on the discussions?

16 MR. TOWNES: Well, I think we have  
17 reached agreement on 107 as far as in principle  
18 on this stopping of the clock on the  
19 notification. It will be done in writing, which  
20 may not always be the case today, but we will  
21 implement that as a practice.

22 The only dispute is whether the parties  
23 have three versus five days to get back together  
24 to actually do the acceptance, and so the clock  
25 would stop on notification date in writing to

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1 the CLECs. There would be either a three- or  
2 five-day window for the parties to get together  
3 for acceptance.

4 If it's determined that there was a  
5 problem that Southwestern Bell did not correct,  
6 the clock would restart back on the original  
7 completion date. If there was no problem, then  
8 the completion would be done on that date.

9 If it took more than three or five days  
10 for the parties to get together, we would start  
11 it back on the original completion date, but  
12 discount out the number of days after either the  
13 three or five that it took the parties to get  
14 together.

15 Does that capture it?

16 MS. KNIGHT: Yes. In addition, it  
17 would -- the discrepancies would be "This is not  
18 what I ordered." If there is a disputed design,  
19 then that's not included in this measure. It is  
20 fairly cut and dry.

21 MR. SRINIVASA: Okay. The tariff,  
22 did anyone check the tariff to see if there is a  
23 guideline there for acceptance?

24 MR. TOWNES: The tariff has some  
25 language as far as occupancy, that the CLECs

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1 have a certain number of days to occupy the  
2 space, but not to accept it.

3 MS. BOURLIANOFF: That's correct.

4 I checked also.

5 MR. SRINIVASA: So given that, the  
6 only issue is should that be three days or five  
7 days?

8 MR. TOWNES: SWBT is proposing  
9 three. The CLECs are proposing five. We're  
10 going to get back together and come to terms on  
11 that.

12 MS. KNIGHT: I think some of us  
13 have to place calls to our regional operations  
14 people to see what is viable and what makes  
15 sense.

16 MR. SRINIVASA: Get back to us.  
17 If not, staff will make a cut.

18 MS. KNIGHT: Okay.

19 MR. COWLISHAW: Was Southwestern  
20 Bell able to confirm how existing 107 is being  
21 implemented? Is the completion date that is  
22 being implemented the date the work is complete  
23 or the date that notification is, in fact,  
24 delivered to the CLEC?

25 MR. TOWNES: I don't think we

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1 specifically answered that question, but in  
2 practice we are notifying the CLECs on the  
3 completion date or in some instances prior to,  
4 letting them know the completion date will be a  
5 day or two away. We're as eager to get them  
6 turned over as the CLEC is to receive them.

7 So it is to our advantage to get the  
8 process done much quicker. So we are proactive  
9 to getting them done as fast as we can.

10 MR. SRINIVASA: Now, actually the  
11 stop time for that, you know, should be the day  
12 you send the notification.

13 MR. TOWNES: Absolutely. We're  
14 agreeable to that. As far as the way it's been  
15 done in the past --

16 MR. COWLISHAW: It should be the  
17 day they send the notification unless, as was  
18 suggested, sometimes they provide you advanced  
19 notification of the completion date.

20 MR. TOWNES: Then it would be the  
21 date that we say it is going to be complete, not  
22 the day we send the letter.

23 MR. SRINIVASA: Okay.

24 MS. FAGAN: If there is nothing  
25 further on collocation, we will move on to the

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1 PMS relating to operation support systems.  
2 MR. SRINIVASA: Before we do that,  
3 107.1 and 109, there was an issue. I think that  
4 109 business rule was modified to capture the  
5 space and availability issue. Space and  
6 availability is also going to part of when they  
7 provide you a quote, they tell you whether the  
8 space is available or not.  
9 But now the issue as to should the  
10 benchmark be different or should the penalty and  
11 damage levels be different than 107.1, have you  
12 had a chance to talk to them about it?  
13 MR. DRUMMOND: Well, we think what  
14 we would like to propose -- we didn't get a  
15 chance to actually talk to the SBC people.  
16 Rhythms did get a chance to talk to some people  
17 at the home office. We can either talk off  
18 line, get a chance to actually talk off line to  
19 SBC, or we can go ahead and propose what we  
20 think would be a reasonable modification to 109  
21 that would capture the information that would be  
22 used.  
23 MR. SRINIVASA: Do you have a  
24 proposal for 109?  
25 MR. DRUMMOND: We do. I can just

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1 let our subject matter expert address those  
2 issues.  
3 MS. SOLIS: I think 109 --  
4 MR. SRINIVASA: Would you state  
5 your name for the record one more time?  
6 MS. SOLIS: Cindy Solis for  
7 Rhythms. I think 109 looks acceptable with a  
8 couple of exceptions. First of all, the one  
9 thing in 107.1 that is not in 109, the business  
10 rule just simply states that Southwestern Bell  
11 should notify the CLEC within ten days of space  
12 availability. And that is per the tariff.  
13 If we could add that into the business  
14 rules, though, so it states clearly --  
15 MR. TOWNES: Would you want the  
16 business rule to read that "We will respond back  
17 within the guidelines of the tariff at the  
18 application with a quote including space  
19 availability or the lack thereof?" Would that  
20 capture it?  
21 MS. SOLIS: That would suffice.  
22 That says the same thing.  
23 MR. SRINIVASA: Okay.  
24 MS. SOLIS: The other issue that  
25 we still had was the measurement type. It is

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1 Rhythms' position that there needs to be a  
2 higher -- Tier 1 and the Tier 2 need to remain  
3 high in 109 simply because collocation is  
4 essential to CLECs entering the marketplace.  
5 And what's proposed in 109 shows no  
6 Tier 2 -- shows Tier 2 as being none as for the  
7 measurement type, and that doesn't hold SBC  
8 responsible really.  
9 MR. SRINIVASA: You are aware for  
10 the criteria for classifying a measure as both  
11 Tier 1 and Tier 2? It has to be competition  
12 affecting and customer affecting.  
13 MS. SOLIS: Right. It would be  
14 competition affecting if collocation wasn't  
15 turned over in a timely manner, I believe,  
16 because that's what puts us into the  
17 marketplace.  
18 MR. SRINIVASA: This is a request  
19 for whether the space is available or not.  
20 That's what this one is, PM 109. The  
21 performance is capturing did they respond to you  
22 within the tariff time line as to the space  
23 availability and also price quote.  
24 How is it customer affected?  
25 Apparently the Commission decided in an earlier

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1 version that Tier 1 should apply and Tier 2  
2 should not. And what has changed since then to  
3 classify this as Tier 2?  
4 MR. DRUMMOND: I think the idea  
5 behind the original proposal -- Eric Drummond.  
6 The idea behind the proposal in 107.1 was to  
7 assure that with some history behind the  
8 companies, everyone understands how critical  
9 this particular PM -- these kinds of PMS would  
10 be to these companies.  
11 If the case had been made of this, the  
12 Tier 2 is cut, that we can't make a customer  
13 affecting case, then I think at least the Tier 1  
14 should be high because this is a critical  
15 measure. And with some history behind it, we  
16 realize now just how critical it is.  
17 MR. SRINIVASA: Would Southwestern  
18 Bell respond to that?  
19 MR. TOWNES: We would disagree  
20 that it needs to be high for two reasons: One,  
21 our benchmark is ten days. Ten days isn't an  
22 exorbitant amount of time, and, two, we publish  
23 a list of our closed offices -- of known closed  
24 offices on a Web site that is available to any  
25 CLEC to look at at anytime. And as an office

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1 closes, we update that and provide floor plans  
2 to the Commission to inspect those closed  
3 offices.

4 So unless this request is one that puts  
5 us into a closed status or one has just come in  
6 within the past few days -- past ten days, then  
7 the closed office status should be made  
8 available on a Web site. So it should be there  
9 ahead of time.

10 MR. SRINIVASA: Well, you stated  
11 something about floor plans are provided for  
12 Commission inspection. Are you aware that there  
13 is a third-party engineer --

14 MR. TOWNES: Absolutely.

15 MR. SRINIVASA: -- process for  
16 that?

17 MR. TOWNES: Yeah.

18 MR. SRINIVASA: Only if in the  
19 third-party engineer process there is a dispute,  
20 then the Commission --

21 MR. TOWNES: Then they are --  
22 correct. I understand. But we do publish a  
23 list of closed offices on the Web site. So  
24 known offices are there. It would only be  
25 recently closed offices that would not be on the

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1 Web site, and that would be for a short period  
2 of time.

3 MR. SRINIVASA: Okay. I think we  
4 have the parties' positions. We will have to  
5 make a cut on that.

6 How about on the benchmark issue?

7 MR. DRUMMOND: We -- Rhythms had  
8 no issue with the benchmark as it stands for PM  
9 109.

10 MR. KITE: I'm Jim Kite with  
11 Sprint Corporation. And because we are an ILEC  
12 in Nevada, I do know that we share a benchmark  
13 of 100 percent, in fact, with Nevada Bell and  
14 also that same benchmark in California for a  
15 similar measure, California Measure No. 40.

16 And I know that 100 is not what we are  
17 talking about. We are talking about raising  
18 from 90 to 95. Most measures seem to fall in  
19 the 95 percent range. I wanted to bring that to  
20 your attention. That is for a similar measure  
21 what is used in another SBC jurisdiction.

22 MR. SRINIVASA: Mr. Dysart, do you  
23 want to respond to that? Is that true that Pac  
24 Bell territories are --

25 MR. DYSART: I really don't know.

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1 I'm obviously not going to -- I don't have any  
2 reason to believe he would be telling me  
3 something that is not correct.

4 The only comment I would have is they  
5 had separate proceedings in California and  
6 Nevada, which are completely different than what  
7 was done here. I can't speak to what happened  
8 in California. I wasn't involved in that  
9 process. This is Texas, and we are trying to  
10 take these as a group of measurements.

11 A whole different situation existed out  
12 there, and I can't address any of those issues.  
13 So I really don't think what's done in  
14 California or Nevada is really applicable here  
15 in Texas.

16 MR. SRINIVASA: Well, the historic  
17 data, have you had a chance to look at that or  
18 do you have a copy of that?

19 MR. DYSART: Not in detail. We  
20 haven't had a problem meeting 90 percent on this  
21 measure.

22 MR. SRINIVASA: Well, for the  
23 caged initial, for 109 with the data that I  
24 have -- this is statewide aggregate data that  
25 you filed as part of your ex parte filing -- it

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1 indicates that in November of '99, you were at  
2 85.7 percent. And in August of '99, you were at  
3 92.5 percent, and the overall average for the 12  
4 months, you were at 97.9 percent for the caging  
5 issue.

6 And looks like you are above 95  
7 consistently for cage initial, caged augments,  
8 cageless augments.

9 MR. DYSART: That's correct.

10 Obviously that's the data we reported. I still  
11 don't necessarily understand the need to raise  
12 the benchmark at this time. I mean, we would  
13 still go with the 90 percent. I understand the  
14 other proposal is 95.

15 So I guess the bottom line is we will  
16 leave it to you-all to make a cut on that one.

17 MR. SRINIVASA: Okay. The  
18 allowance for the critical z?

19 MR. DYSART: Well, given those  
20 numbers, I believe we can get rid of the  
21 allowance for critical z at 90 percent. Now, if  
22 you change the benchmark to 95, I don't know  
23 that I would be that interested in doing that at  
24 this point.

25 MR. SRINIVASA: How about for the

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1 107? The current benchmark is 95 percent within  
2 due date.  
3 MR. DYSART: As far as the  
4 critical z?  
5 MR. SRINIVASA: Yeah.  
6 MR. DYSART: I haven't looked at  
7 the data on 107. If you give it -- after lunch,  
8 I can let you know if I just look at it over  
9 lunch.  
10 MR. SRINIVASA: Okay. I believe  
11 that concludes our discussion of PMS related to  
12 collocation.  
13 We will get on to OSS related measures.  
14 MS. FAGAN: At the May 2 PM  
15 workshop, we started our review of the OSS PMS,  
16 and then following that workshop is when I  
17 believe the CLECs and Southwestern Bell had  
18 informal work sessions to narrow down the issues  
19 and identify which PMS had been agreed to.  
20 I think -- my question is I think there  
21 were several PMS that were agreed to on May 2  
22 that now have come back in the latest draft as  
23 not agreed to. And so if someone could clarify,  
24 maybe I misunderstood what happened May 2, or  
25 were additional issues brought up on those?

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1 MR. DYSART: I really don't -- I'm  
2 not sure specifically which ones you are talking  
3 about. If you would like, we could go  
4 through -- I would recommend starting at one. I  
5 think it would go much quicker than collocation.  
6 We have discussed it. I'd just point out where  
7 we disagree if that is okay.  
8 MS. FAGAN: That's fine.  
9 MR. SRINIVASA: We will start with  
10 PM 1.  
11 MR. DYSART: PM 1, I think we have  
12 had -- the only issue that I am aware of is the,  
13 I guess, concern -- I think this is from AT&T  
14 and maybe others -- regarding the comparison for  
15 Southwestern Bell perspective for the different  
16 preordering transaction types. And we have had  
17 this disagreement for pretty much ever, I guess.  
18 And so I don't know if this is something that  
19 makes this one not agreed to or is just a  
20 concern that we wanted to go ahead and  
21 incorporate.  
22 And I would ask Mr. Cowlshaw if that  
23 is correct.  
24 MR. COWLISHAW: I think you have  
25 captured certainly what we started out as

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1 proposing, not as a substitute for PM 1 but as  
2 some diagnostic work that could be done during a  
3 six-month interval. I think I understand there  
4 are -- I don't know whether it was April 17 or  
5 May 2 that we had this discussion. But about  
6 Southwestern Bell looking at some measurement  
7 of -- some way of measuring the queuing time or  
8 the OSS transaction time. I don't know if part  
9 of it is queuing and part of it is EDI/CORBA  
10 that is outside of where you take the time  
11 stamps today.  
12 I thought Angie had said that they were  
13 going to look at whether -- at least on a  
14 perhaps diagnostic basis or a study basis,  
15 even -- some amount of information could be  
16 developed about what is that transaction time  
17 really taking.  
18 MR. DYSART: I do have a note from  
19 Angie on that. I wish she could have been here  
20 today, but she had another commitment. She did  
21 propose on PM 1 that we would look at, on a  
22 diagnostic basis, two new levels of  
23 disaggregation: Protocol translation time for  
24 EDI and protocol translation time for CORBA.  
25 She said we can measure this at an aggregate

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1 CLEC and transaction level. Basically we can't  
2 disaggregate these items because we don't know  
3 what they are.  
4 MR. SRINIVASA: So on a diagnostic  
5 basis, you are going to collect this data and  
6 report --  
7 MR. DYSART: Correct.  
8 MR. SRINIVASA: -- the protocol?  
9 MR. DYSART: That was what I just  
10 got this morning, that we had agreed to that.  
11 MR. SRINIVASA: That was during  
12 the last work session this was brought up.  
13 MR. DYSART: Right. We'll report  
14 it -- it would be reported in seconds. It would  
15 be on the input side, and she is still working  
16 on the write-up and a full explanation of that.  
17 But I think in principle we agree to do  
18 that for those two things, if that will address  
19 you-all's concerns.  
20 MS. CHAMBERS: Julie Chambers with  
21 AT&T. Randy, I think subject to seeing the  
22 write-up, at least that's a -- we are moving in  
23 the right direction to gather data and see what  
24 the effects are on this measure.  
25 MS. FAGAN: Other than those

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1 additional levels of, I guess disaggregation,  
2 was the remainder of PM 1 as in the recent draft  
3 agreed to?

4 MR. DYSART: To the best of my  
5 knowledge it was.

6 MS. BOURLIANOFF: I just have a  
7 question. Why is the last sentence in gray of  
8 the business rule?

9 MR. DYSART: I really don't know.  
10 It shouldn't be in gray. I don't think there  
11 was any significant -- I think it was a change  
12 maybe. It was just highlighted.

13 MR. SRINIVASA: It probably was in  
14 blue.

15 MS. FAGAN: It was an addition.  
16 In the last draft I have as of May 1, it looks  
17 like it was an addition. It was agreed to on  
18 5/2. So it was probably still in there as some  
19 sort of like red line.

20 MR. COWLISHAW: There was also, at  
21 either the April 17 or the May 2 session, a  
22 discussion about the time-out periods that  
23 Southwestern Bell has programmed in for these  
24 various preorder response times that represents  
25 sort of a maximum amount of time that could be

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1 returned under these.

2 And I have that that was an action  
3 item, that Southwestern Bell was to provide the  
4 time-out intervals that have been set for each  
5 of these different transaction to the CLECs. At  
6 least the folks that I have been able to check  
7 with, I don't think that's happened yet. If it  
8 was, somebody --

9 MR. DYSART: I will verify. I'm  
10 not sure if we have provided that or not.  
11 Probably -- but we will get that information.

12 MR. SRINIVASA: 1.1 is the DSL. I  
13 think we already talked about that. 1.2 is DSL.

14 MR. COWLISHAW: I'm sorry, Nara, I  
15 know it is a DSL. But there was an agreement  
16 related to impact on non-DSL raw data access in  
17 the 1.1 that was discussed on one of our calls.  
18 And I don't see it in the text here.

19 1.1, apparently there has been an  
20 agreement to provide some raw data under 1.1 on  
21 an automatic basis without the need for  
22 requesting raw data. To my knowledge, that's an  
23 accommodation that's unique to this measure and  
24 to DSL providers.

25 Because this got written into 1.1 and

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1 it talks about raw data being provided this way  
2 until it is no longer necessary, we wanted to  
3 make sure that it was identified in here that  
4 the phase-out of the raw data access that's  
5 described here only applies to this peculiar  
6 automatic provision of raw data. And I thought  
7 Southwestern Bell had agreed to make it clear  
8 that this is raw data that's going to be  
9 provided in an agreed-to format, automatically  
10 or without the need for a CLEC request.

11 So I think inserting the words,  
12 "without the need for a CLEC request" is what I  
13 have from our call.

14 MR. DYSART: We will do that.

15 MR. SRINIVASA: So Southwestern  
16 Bell will provide raw data to CLECs in an  
17 agreed-to format on a monthly basis without the  
18 need for a request from a CLEC until such time  
19 as both parties agree it is no longer necessary.

20 MR. DYSART: Right.

21 MR. SRINIVASA: Okay. 1.2, that's  
22 DSL. 1.3 is a DSL measure. 1.4 --

23 MR. DYSART: That's a DSL also.

24 MR. SRINIVASA: PM 2. I see  
25 something right up on top, agreed to. Everyone

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1 agree -- has everyone agreed to that?

2 MR. DYSART: I think this one is  
3 agreed to with -- whatever happens on 1 is  
4 agreed to on 2, I believe.

5 MR. SRINIVASA: They are related.  
6 This is a percentile for the --

7 MR. COWLISHAW: Same issues as 1.

8 MS. BOURLIANOFF: So, Randy, does  
9 that mean that you will make the same change in  
10 wording?

11 MR. COWLISHAW: Protocol --

12 MS. BOURLIANOFF: Right. Protocol  
13 transition for EDI/CORBA on a diagnostic basis  
14 on 2?

15 MR. DYSART: Pending verification  
16 we can do that, yeah, I think we will do that.

17 MR. SRINIVASA: The data is there.  
18 You have to calculate the percent. But we  
19 wouldn't know within -- what will be the X in  
20 there?

21 MR. DYSART: I think maybe what we  
22 could do for that is give an average, but I  
23 don't know that --

24 MR. SRINIVASA: How many were --

25 MR. COWLISHAW: What we did on a

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1 similar situation was -- and one is going to  
 2 give you the average and two simply report the  
 3 95th percentile, whatever it turns out to be.  
 4 And then that would allow you to look at it on a  
 5 going-forward basis.  
 6 MR. SRINIVASA: Right, both the 90  
 7 and the 95 actually --  
 8 MR. DYSART: I would agree to do  
 9 that assuming that the way she is capturing the  
 10 data, we can do that. If we can do that and get  
 11 all the transactions and it's just not an  
 12 additive thing where you take the total time and  
 13 divide it by the number of transaction -- if we  
 14 capture the individual occurrences, then I am  
 15 willing to do that. If it is feasible to do it,  
 16 we will do it.  
 17 If not, I think we can provide an  
 18 average, but I will have to verify.  
 19 MR. SRINIVASA: Okay. Number  
 20 three is eliminated. Everybody agreed to that.  
 21 Number four, OSS interface  
 22 availability.  
 23 MR. DYSART: We have a couple of  
 24 issues, I think, maybe we can get off the table  
 25 on this one that I have gotten some information

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1 on. One of the issues was that we need to look  
 2 at availability of order status, trouble with  
 3 admin and provisioning status. We can agree to  
 4 to do that.  
 5 MR. COWLISHAW: Could you say that  
 6 again? Add those as separate disaggregations?  
 7 MR. DYSART: Right. Order status,  
 8 trouble admin and provisioning status.  
 9 MS. FAGAN: What about the other  
 10 two items listed?  
 11 MR. DYSART: Notification for -- I  
 12 don't have any new information on that. I know  
 13 that we do send out a letter that changes -- if,  
 14 for example, something is different than what is  
 15 on the Web site, we would send out an accessible  
 16 letter notifying the CLECs that the maintenance  
 17 interval is different. But I'm not sure of the  
 18 time frames on that.  
 19 And the third issue there was a DSL  
 20 issue, proposed adding the SOLID GUI to the  
 21 disaggregation list. Quite frankly, I have  
 22 trouble finding anybody in our IT organization  
 23 that knows about that yet -- at least from my  
 24 contacts. So I'm not sure it is offered yet or  
 25 what it is.

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1 So I can't guarantee that we would do  
 2 that. I'm assuming if it is a GUI, we probably  
 3 would. I don't think there's a big issue with  
 4 that.  
 5 MR. SRINIVASA: Of course, you do  
 6 have GUI. There is another category, SOLID when  
 7 it is not SOLID.  
 8 MR. DYSART: SOLID GUI, I'm not  
 9 familiar with it. I know it has to do with  
 10 Project Pronto.  
 11 MR. SIEGEL: Correct. SOLID GUI  
 12 is what, if I remember correctly, the CLECs use  
 13 to put in their CLEC profile information that is  
 14 used for -- where that information is then used  
 15 when you send in your specific LSR.  
 16 And I'm happy with the "Southwestern  
 17 Bell needs to further investigate." We can deal  
 18 with that off line.  
 19 MR. DYSART: Is it available yet?  
 20 MR. SIEGEL: I do not believe it  
 21 is available yet. My guess from discussions  
 22 yesterday, it is probably in testing.  
 23 MR. DYSART: My initial take on  
 24 it, would be it seems to be reasonable. But I'd  
 25 have to verify again once it is up.

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1 MR. SRINIVASA: Up and running,  
 2 you would disaggregate and provide data on that?  
 3 MR. DYSART: That's my initial  
 4 call. I would have to verify and talk to some  
 5 people about it and see what it actually is. I  
 6 don't anticipate this being something that would  
 7 cause a lot of problems for us.  
 8 MR. SRINIVASA: On Bullet Point  
 9 No. 1, do we have CLECs' input on that?  
 10 MS. McCALL: Cindy McCall,  
 11 WorldCom. On the comment that you made, Randy,  
 12 could you repeat that again about the accessible  
 13 letter for maintenance?  
 14 MR. DYSART: Probably not exactly  
 15 like I said it before, but I will try. That  
 16 points -- what we are trying to do here is  
 17 capture a comment I believe that you-all made,  
 18 MCI made, regarding the hours of availability.  
 19 We added a sentence in here in the  
 20 middle of the business rules that says, "OSS  
 21 hours of availability as posted on the CLEC Web  
 22 site unless otherwise notified via an accessible  
 23 letter."  
 24 It is my understanding that if that  
 25 window for some reason that is on the Web site

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1 is going to change, then we will send out an  
2 accessible letter. Maybe it is a particular  
3 release they had to put in. It is going to  
4 require an increased maintenance window. We  
5 would send an accessible letter out notifying  
6 you of that, and that's what we would base it  
7 on.

8 We have to notify you that the  
9 maintenance window is changing before it would  
10 be excluded from the measurement -- or before  
11 that would change.

12 MS. McCALL: And you said that  
13 there was a maintenance window already posted on  
14 the CLEC Web site?

15 MR. DYSART: It is my  
16 understanding that for all the operational  
17 support systems, the hours of availability is on  
18 there.

19 MS. McCALL: There's hours of  
20 availability.

21 MR. DYSART: Well, that's what I  
22 meant.

23 MS. McCALL: Okay. But I don't  
24 believe there is maintenance windows posted on  
25 the CLEC Web site.

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1 MR. DYSART: Well, when I say  
2 maintenance windows, I am talking about hours of  
3 availability. If hours of availability are  
4 going to change different from what is on there,  
5 then we would notify you with an accessible  
6 letter.

7 MS. McCALL: Okay. How does that  
8 tie in to maintenance then?

9 MR. DYSART: Well, typically  
10 that's when it's not available.

11 MS. McCALL: So you will perform  
12 maintenance outside of those hours of  
13 availability?

14 MR. DYSART: Right, right.

15 MS. McCALL: Normally unless  
16 notified by an accessible letter that some  
17 extenuating circumstances occur?

18 MR. DYSART: Right.

19 MR. SRINIVASA: Scheduled  
20 maintenances are outside of those posted hours.  
21 If there is an unscheduled maintenance --

22 MR. DYSART: Well, if it is  
23 unscheduled and we haven't notified you, we eat  
24 that. That's a miss.

25 MR. SRINIVASA: That's a miss.

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1 MS. KNIGHT: Is that on scheduled  
2 maintenance the "extraordinary maintenance"  
3 situation?

4 MR. DYSART: No, I don't believe  
5 that necessarily is -- extraordinary  
6 maintenance, really that wasn't our language.  
7 We decided -- I mean, that was what MCI  
8 proposed. I think what we would prefer is if  
9 the availability is what is on the Web site, if  
10 we tell you differently, then that's what we  
11 want to use, and we do that by an accessible  
12 letter.

13 MS. CHAMBERS: Randy, I think I  
14 like what I am hearing, but it is somewhat  
15 different than what used to be in the measure  
16 and then also I think the discussion that we had  
17 with Angie on May 2?

18 And I just want to make sure. I just  
19 want to clarify because used to the language  
20 read that Southwestern Bell will not schedule  
21 normal maintenance during business hours 8:00 to  
22 5:30. MCI's request was to actually expand that  
23 to reflect the OSS availability hours that are  
24 posted on the Web site.

25 My understanding was that Angie had

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1 indicated that, say, the hours are until 11:00  
2 p.M. Sometimes maintenance might start at 9:00  
3 p.M. I mean, that doesn't -- it is not  
4 consistent with the OSS availability schedule.  
5 If it is, then I think this language is -- that  
6 we would be in agreement.

7 MR. SRINIVASA: They apparently  
8 struck "8:00 a.m. to 5:30 p.M., Monday through  
9 Friday." Apparently if your position is that  
10 what was posted on the Web site for the OSS  
11 availability is different than 8:00 a.m. to  
12 5:30, that should be the applicable time frame.

13 MR. DYSART: I agree. Remember  
14 the reason why that was in there, the 8:00 to  
15 5:30? If you remember the history of it, people  
16 were concerned that we would say, "Okay. We are  
17 going to take the systems down at 4:00 in the  
18 afternoon." And what we put that in there for  
19 was assurance that we wouldn't do that during  
20 those periods of times.

21 I mean, we won't do that. I could keep  
22 it in there. We just took it out to be -- to do  
23 what we wanted to do here. And in your  
24 situation, if the hours of availability on the  
25 Web site are until 11:00 and we take it down at

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1 9:00, we miss the measurement because that's  
2 what's supposed to be out there on the Web site.  
3 Unless we have sent an accessible  
4 letter out that says, "We've got this condition  
5 and at 9:00 o'clock, we are going to have to  
6 take it down for maintenance because we are  
7 going to add some software" or whatever, then we  
8 notified you, but we wouldn't take it down  
9 between 8:00 and 5:30. I can leave that  
10 language in. That's fine.  
11 MS. CHAMBERS: Julie Chambers,  
12 AT&T. Perhaps that would just reinforce, I  
13 think, both positions. You could leave the  
14 language in as it was before and then set -- so  
15 it would read "Southwestern Bell will not  
16 schedule normal maintenance during business  
17 hours, 8:00 to 5:30 p.M., Monday through Friday.  
18 Outside of those hours Southwestern Bell will  
19 notify -- OSS hours of availability as posted on  
20 the CLEC Web site unless otherwise notified."  
21 Something like outside of those hours,  
22 Southwestern Bell will notify us via an  
23 accessible letter.  
24 MR. DYSART: I think we could just  
25 add one more sentence down at the bottom. I

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1 would take out "extraordinary maintenance  
2 situations" because I'm not sure how that  
3 applies, to be honest.  
4 MR. SRINIVASA: Extraordinary is  
5 not defined.  
6 MR. DYSART: I would add -- then I  
7 would add this -- "Southwestern Bell will  
8 not" --  
9 MS. BOURIANOFF: Randy, how about  
10 "Southwestern Bell will not schedule system  
11 maintenance during normal business hours, 8:00  
12 to 5:30 p.M., Monday through Friday"?  
13 MR. DYSART: That's what we had  
14 before. I can do that. That's fine.  
15 MS. BOURIANOFF: Just put that  
16 back in.  
17 MR. DYSART: Okay. In addition to  
18 that other sentence?  
19 MS. BOURIANOFF: Right.  
20 MS. McCALL: What we are trying to  
21 ensure is that normal maintenance is not  
22 scheduled during the hours of availability and  
23 that if an accessible letter comes out, we don't  
24 want that accessible letter to say that we are  
25 suddenly going to start scheduling normal

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1 maintenance, say, at 6:00 o'clock in the  
2 evening. That's what we are trying to get away  
3 from.  
4 So we are wanting some language that  
5 would capture or exclude that instance. We  
6 don't want an accessible letter that comes out  
7 and says, "Okay. From 6:00 to 7:00 we are now  
8 going to start a program of normal maintenance."  
9 MR. DYSART: No, no. Anything we  
10 would do in an accessible letter would be the  
11 extraordinary thing that would come up that we  
12 would need to do a one-time thing. It wouldn't  
13 be a normal maintenance.  
14 MR. SRINIVASA: Like a software  
15 upgrade.  
16 MR. DYSART: Right.  
17 MS. McCALL: Sure. I can  
18 understand that. I just didn't want an  
19 accessible letter coming to us that would say,  
20 "Okay. From 6:00 to 7:00 now from here on out  
21 from Monday through Friday we are going to start  
22 scheduling normal maintenance." Because that  
23 came out in an accessible letter, suddenly that  
24 would not be counted here in this performance  
25 measurement.

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1 MR. DYSART: No. The intent of  
2 this is only for those extraordinary things that  
3 may occur, you may need to change the hours of  
4 availability for this particular day or two, and  
5 that's all we are talking about here.  
6 MS. McCALL: Certainly. I  
7 understand that. Okay.  
8 MS. DILLARD: This is Maria  
9 Dillard, Southwestern Bell. I wanted to just  
10 add that in the 13-state change management  
11 procedures that are going on, we did agree to an  
12 interfold of notification on system downtime.  
13 So that will be taking place ongoing from the  
14 accessible letter standpoint.  
15 MR. SRINIVASA: But how many days  
16 ahead of time do you share the accessible  
17 letter?  
18 MS. DILLARD: There is an interval  
19 that's been discussed. I don't know what that  
20 interval is. But, yes, in the 13-state change  
21 management process, they have agreed to some  
22 interval with some notification.  
23 MR. SRINIVASA: I see some  
24 nodding. Is that correct?  
25 MS. McCALL: That's my

1 understanding in the change management  
 2 procedure.  
 3 MR. DYSART: So with that change,  
 4 are we okay on this one?  
 5 MR. SRINIVASA: 4.1, preorder  
 6 backend system availability. This was discussed  
 7 during the previous session. I believe this is  
 8 your written proposal. There are still some  
 9 issues with this?  
 10 Apparently this is a measure for  
 11 which -- it is a diagnostic measure. There are  
 12 no benchmarks at this point in time.  
 13 MR. DYSART: Well, from my  
 14 perspective -- Southwestern Bell's perspective,  
 15 we are not sure what other issues are out. I  
 16 see there is a need to define partial  
 17 availability. I think that is similar to  
 18 probably the same definition as what is defined  
 19 in PM 4. That may be from a -- more of the  
 20 backend system-wise.  
 21 But then I'm not sure of any further  
 22 disaggregation that's been brought up to us.  
 23 MS. CHAMBERS: I don't know about  
 24 further disaggregation necessarily, Randy. But  
 25 we actually experienced an issue on Thursday

1 at a lower level detail that for service  
 2 availability it's specific EASE tables. Maybe  
 3 they are housed within EASE. Maybe they're  
 4 housed within CRIS, but the specific underlying  
 5 databases that are the source for these queries,  
 6 would be what is captured in this measure.  
 7 MR. SRINIVASA: So let me  
 8 understand. You're saying the customer service  
 9 records, service availability and the CLLI code,  
 10 not all of them are from the CRIS.  
 11 MR. COWLISHAW: I think we are  
 12 uncertain based on this week's experience.  
 13 MS. CHAMBERS: Yeah, we don't  
 14 know.  
 15 MR. COWLISHAW: What was said in  
 16 the prior second tier was these three all came  
 17 out of CRIS. And service availability, you will  
 18 remember, is one of the transactions that  
 19 Ms. Cullen said actually takes a different path  
 20 for CLECs than it does for Southwestern Bell.  
 21 For CLECs what she said was it goes to  
 22 CRIS. For Southwestern Bell this information is  
 23 built into an EASE table was the description.  
 24 And the experience this week when service  
 25 availability was unavailable to us, the report

1 where service availability query was not  
 2 functioning appropriately. And this is where  
 3 this measure would come into play because it  
 4 would measure the fact that -- actually what  
 5 occurred was their corrupt EASE tables, which  
 6 provided the data for that particular query.  
 7 And currently we have that in parens  
 8 CRIS as the database next to the service  
 9 availability disaggregation. And I'm curious  
 10 based on the -- maybe this actually leads to  
 11 disaggregation because if service availability  
 12 was not functioning appropriately but the CSR  
 13 and the CLLI queries were, then would that be  
 14 captured or reflected in this measure?  
 15 And is service availability really  
 16 CRIS? Is that accurate given that it was an  
 17 EASE table that was corrupt?  
 18 MR. DYSART: I'll have to get back  
 19 to you. I don't know. I don't know if we have  
 20 anybody.  
 21 MR. SRINIVASA: So that is a  
 22 further disaggregation?  
 23 MS. CHAMBERS: Or it may be that  
 24 the appropriate system that could potentially  
 25 impact this measure is not CRIS but needs to be

1 was there's a problem with a corrupt EASE table.  
 2 That came as something of a surprise because it  
 3 doesn't jive with we are supposed to be getting  
 4 service availability out of CRIS.  
 5 And so it has raised for us the  
 6 question of is CRIS really the right reference  
 7 here and then the further question of -- if  
 8 these are really in separate places, then  
 9 lumping the three of them together may not be  
 10 appropriate.  
 11 MR. DYSART: Well, I would make  
 12 this commitment: If we find out that it is an  
 13 EASE table but service availability utilizes  
 14 that EASE for that function, then we would need  
 15 to split that out. I just don't know.  
 16 MS. BOURLANOFF: Can I ask: Is  
 17 Beth Lawson or Liz Ham or Angie or someone  
 18 available by phone? I mean, this workshop on  
 19 OSS measures has been scheduled for a month.  
 20 I'm quite frankly a little disappointed that we  
 21 don't have the people here with the expertise to  
 22 answer these questions. It sounds like we are  
 23 going to have to have another workshop on this.  
 24 MR. DYSART: We won't have to have  
 25 another workshop. I will verify at lunch and

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1 find out. In fact, I am sending her a message  
2 right now.  
3 MR. SRINIVASA: So we'll find out  
4 before the end of the day?  
5 MR. DYSART: I'll definitely try  
6 to find out by the end of the day.  
7 MR. SRINIVASA: Okay. Does that  
8 address your concern?  
9 MR. COWLISHAW: Looks like some of  
10 the business rule is just taking language from  
11 4, and about halfway down, there is -- in the  
12 business rule, there is a line that starts "to  
13 5:30 p.M.," close paren.  
14 And then there is a reference to  
15 interfaces experiencing partial unavailability.  
16 I don't know if given the change that we are  
17 talking about in these backend systems, if it  
18 really makes sense to be referring to interfaces  
19 experiencing partial unavailability or backend  
20 systems or what the appropriate database is.  
21 When one of these databases experience partial  
22 unavailability maybe would be more precise.  
23 MR. DYSART: I will get a  
24 clarification on that also.  
25 MR. SRINIVASA: For different

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1 market regions, do you have different sources  
2 for database? So in one market region, it may  
3 be unavailable, and other market regions it may  
4 be available.  
5 MR. DYSART: I think the only  
6 system that that may be the case would have been  
7 EASE, and I don't believe that's the case.  
8 Again, I'll have to verify that.  
9 MR. SRINIVASA: If service is  
10 available off the EASE table --  
11 MR. DYSART: It is potential. I  
12 just don't know.  
13 MR. SRINIVASA: Anybody else have  
14 a comment?  
15 MR. SAUDER: T.J. Sauder with  
16 Birch Telecom. This measure is supposed to be  
17 measuring just the backend system availability.  
18 And I think it is kind of what Pat was getting  
19 at. There shouldn't be any partial  
20 unavailability to a backend system. It should  
21 be all or none based on the levels of  
22 disaggregation, whether it is available or not  
23 to process a request.  
24 MR. DYSART: I can't say that  
25 because I am not an OSS expert. So I think

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1 until I would agree or disagree with you, I need  
2 to talk to them. And I will see if maybe we  
3 can't get Angie Cullen on the phone this  
4 afternoon to try to clarify some of these issue.  
5 MS. FAGAN: That would be very  
6 helpful.  
7 MR. SRINIVASA: PM 5, percent FOCs  
8 returned on time for LSR requests. I see there  
9 is an issue involving queuing. It is still  
10 there? It hasn't been resolved yet? It's been  
11 there for a long time.  
12 MR. DYSART: I think I have an  
13 answer a little bit about queuing. Maybe I do.  
14 Is this related to input queue times for EDI,  
15 the input queue times for EDI from a FOC  
16 perspective?  
17 MR. COWLISHAW: This issue is  
18 queue time -- LSR coming into the system before  
19 the MBS process.  
20 MR. DYSART: What we have done  
21 over the last three weeks is actually taken a  
22 look at that and gotten some averages. It  
23 apparently doesn't open it. But it is basically  
24 based on the MBS job name. And the thing we are  
25 talking about here is -- in fact, the week of

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1 5/19, it ran 24 seconds. On 5/26, it was 19  
2 seconds, and on 6/2 it was 16 seconds. So you  
3 are talking about seconds.  
4 So when you are measuring in  
5 perspective of hours, a few seconds doesn't seem  
6 to be -- it is not going to negatively impact or  
7 positively impact the measurement.  
8 MR. COWLISHAW: What's the unit?  
9 MR. DYSART: Seconds.  
10 MR. COWLISHAW: What is happening  
11 on average 24 seconds during the week of May 19?  
12 Is it -- the representation last time was it is  
13 not like an LSR is going through.  
14 MS. DILLARD: Right.  
15 MR. COWLISHAW: It is something  
16 else you are looking at.  
17 MR. DYSART: I'll try to --  
18 MR. COWLISHAW: I hit the limit?  
19 MR. DYSART: You hit the limit of  
20 my knowledge. I apologize. But, again --  
21 MR. SRINIVASA: The packets cannot  
22 be disassembled at this point in time? It's  
23 still --  
24 MR. DYSART: No, it's not  
25 disassembled. It is just sitting there in

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1 the -- they are taking it on the MBS job name  
2 and looking at it. This takes it this long to  
3 process. After that, I'm beyond my limitation.  
4 MS. DILLARD: And since this is  
5 the FOC measure and it is being measured on a  
6 time clock of a five-hour and we are not able to  
7 disaggregate the queuing portion of this, is it  
8 still an issue here for FOC? There is not a way  
9 to break apart that file -- that's the extent of  
10 my knowledge as well -- to break out that file  
11 to put it into the disaggregated levels.  
12 So we just wanted to do that research  
13 up front based on your questions to give you a  
14 view of how much time it is taking.  
15 MS. CHAMBERS: Julie Chambers with  
16 AT&T. I appreciate that. I think that is what  
17 we were talking about at the last meeting if  
18 Southwestern Bell could do some monitoring of  
19 that file, and I just can't remember either the  
20 relation from that file to the individual LSR  
21 and how many LSRs are we talking about that  
22 would be within that file and would different  
23 levels of capacity or potential limitations that  
24 Southwestern Bell codes into that queuing  
25 mechanism -- how that would affect that time, if

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1 it would be significant.  
2 MR. DYSART: If we could just kind  
3 of maybe go through these -- any, like, LSC  
4 issues, we can address those. Any OSS -- I will  
5 get somebody on the phone this afternoon.  
6 MS. FAGAN: Why don't we pause and  
7 suspend the OSS PMs altogether, and we will move  
8 on to one of the other items until you can get  
9 somebody on the phone because there is no sense  
10 in backtracking.  
11 MR. SRINIVASA: You need to  
12 answer --  
13 MR. DYSART: That would be fine.  
14 MR. SRINIVASA: After lunch you  
15 will have somebody?  
16 MR. DYSART: Yes. We will have  
17 somebody. If you can give me a number.  
18 (Pause)  
19 MR. SRINIVASA: Before we go off  
20 on the lunch break, change management measure  
21 that is also listed here for discussion, do we  
22 have a proposal, change management PM now?  
23 MS. DILLARD: Maria Dillard,  
24 Southwestern Bell. I believe that the CLECS  
25 have put some proposal forward, and we did -- we

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1 weren't prepared to have a discussion on that  
2 today.  
3 MS. FAGAN: Is it in here  
4 somewhere?  
5 MR. DYSART: The MCI proposal is  
6 at the end.  
7 MR. SRINIVASA: Could you give me  
8 the PM number?  
9 MR. DYSART: Their proposed PM  
10 number is, I believe, 123. There is actually  
11 two of them, though. There is one based on  
12 timeliness and one based on -- there is one  
13 based on accuracy, I believe.  
14 It is Page 215 of the document that we  
15 passed out this morning.  
16 MS. FAGAN: 123 is one of them,  
17 and you said there is another one?  
18 MR. DYSART: There is one before  
19 that doesn't have a number on there. But one  
20 deals with timeliness of notification, and the  
21 other one deals with software.  
22 MS. FAGAN: Okay. So those are  
23 the only two on Pages 215 and 216?  
24 MS. CHAMBERS: Julie Chambers,  
25 AT&T. We had a variation to this measurement

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1 that is not, for whatever reason, captured in  
2 the document that Southwestern Bell passed out  
3 but was in our original comments filed.  
4 MS. FAGAN: It would be helpful if  
5 you-all could gear up a copy of that or at least  
6 identify it further. After lunch I will bring  
7 with me my copies of the documents you guys  
8 filed if you can identify --  
9 MS. BOURIANOFF: It is proposed as  
10 Performance Measure 122 in the matrix that we  
11 attached to our April 6 filing, and we would be  
12 glad to make copies of the matrix pages and pass  
13 them out. It won't obviously be in the same  
14 form as Southwestern Bell's.  
15 MR. SRINIVASA: So apparently it  
16 didn't get consolidated into this set. What  
17 AT&T proposed is not in this set of documents?  
18 MS. DILLARD: Right. I'm sure  
19 that was just an oversight, but Julie, if you  
20 wouldn't mind giving us a copy and make I --  
21 MR. COWLISHAW: It is in the  
22 consolidated Southwestern Bell matrix as well  
23 that was done sometime ago.  
24 MS. DILLARD: Okay. We will find  
25 it.

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1 MR. SRINIVASA: We may have to  
2 take this up after we get the other. Maybe we  
3 should go ahead and break for lunch now and  
4 probably take up the OSS at that time.  
5 MS. FAGAN: Why don't we break  
6 until 1:00. Is that plenty of time?  
7 (Lunch recess: 11:55 p.m. to 1:00 p.m.)  
8  
9 AFTERNOON SESSION  
10 TUESDAY, JUNE 6, 2000  
11 (1:13 P.M.)  
12 MS. FAGAN: Let's go back on the  
13 record. And before we broke for lunch, I  
14 believe we were in the middle of the OSS PMS,  
15 and I believe Angie Cullen is on the line. Is  
16 that correct?  
17 MS. CULLEN: Yes, I'm here.  
18 MS. FAGAN: And hopefully Angie  
19 will be able to answer some of the previous  
20 issues that came up, and we'll be able to get  
21 through the remainder of these OSS PMS.  
22 And I apologize, Mr. Dysart. What was  
23 the first issue that came up that we need to  
24 backtrack?  
25 MR. DYSART: Well, I think PM-1 we

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1 were okay. PM-2, the question was asked, "Will  
2 we do the disaggregation at 90 and 95 percent"?  
3 I think I confirmed with Angie that we would do  
4 that.  
5 MS. CULLEN: Yes. We can report  
6 that.  
7 MR. DYSART: So that's cleared up.  
8 So I think we're really on --  
9 MR. COWLISHAW: That's for the  
10 CORBA and EDI protocol?  
11 MR. DYSART: Right.  
12 MR. SRINIVASA: So you can do both  
13 the average and the percentage?  
14 MR. DYSART: Right. I would  
15 propose just doing some percentage within 90  
16 percent, some within 95 percent to get a  
17 diagnostic to see what it ends up being. Right  
18 now we don't know.  
19 MR. SRINIVASA: Okay. Also there  
20 were some issues concerning the queuing. I  
21 believe that was -- what PM was that?  
22 MR. DYSART: Yeah. There was  
23 another issue, wasn't there, on 4.1 --  
24 MS. CHAMBERS: Yes.  
25 MR. DYSART: -- regarding the EASE

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1 thing.  
2 MR. SRINIVASA: Service  
3 availability?  
4 MS. CHAMBERS: Right. Hi, Angie.  
5 It's Julie Chambers, with AT&T.  
6 MS. CULLEN: Hi, Julie.  
7 MS. CHAMBERS: Hi. One of the  
8 questions that I brought was on 4.1, which is  
9 the preorder backend system availability measure  
10 that we worked out the last time that we were  
11 here, one of the disaggregations is requests for  
12 summary CSR, service availability and CLLI.  
13 We have in parentheses here that -- and  
14 I believe you indicated that that went to the  
15 CRIS backend database.  
16 MS. CULLEN: Yeah. It's stated in  
17 our CRIS -- that our CRIS system interfaces  
18 with, yeah.  
19 MS. CHAMBERS: Okay. Well, let me  
20 talk you through an issue that occurred on  
21 Thursday with AT&T. The service availability  
22 query was not working, and the explanation that  
23 came back from Southwestern Bell was that it was  
24 a corrupt EASE table.  
25 MS. CULLEN: Right.

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1 MS. CHAMBERS: So could you just  
2 help me understand how that would be reflected  
3 in this measure?  
4 MS. CULLEN: Sure. I can explain  
5 that. First of all, the data comes from EASE,  
6 but we are loading it for efficiency purposes  
7 into databases that are maintained out of the  
8 CRIS application, and that's what DataGate uses  
9 and Verigate uses to retrieve that information.  
10 So the data is the same. And the  
11 data -- when they were talking about the data,  
12 it's because the data comes from EASE, is why  
13 the reference was made that it had to do with  
14 EASE data, not that we are physically going to  
15 the EASE system to get it, but that it's the  
16 EASE data that we're retrieving.  
17 So just in case that caused some  
18 confusion -- I know Randy had asked me about  
19 that. Does that make sense? Do you understand  
20 that?  
21 MS. CHAMBERS: I think so, Angie.  
22 In that scenario, in what occurred on Thursday  
23 with the table within CRIS, is what I'm hearing  
24 you say, is not functioning properly, then would  
25 that be captured? Because CRIS worked for the

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1 CSR and the CLLI, but did not work --  
2 MS. CULLEN: Right. How we would  
3 show that is -- well, first of all, we are still  
4 investigating whether the data was actually  
5 corrupt in EASE also or if it was just as the  
6 data was loaded into CRIS, if that was where the  
7 problem arose. And to be honest, I don't have  
8 an answer for that yet.  
9 It's being investigated. So I don't  
10 know if the data itself was corrupted or if the  
11 data stored that DataGate and Verigate were  
12 using is corrupt.  
13 That makes a big difference when we're  
14 talking about how we're going to treat that in  
15 the measurements. In either case, we will show  
16 in 4.1 if the backend impacted -- did impact the  
17 service availability function. And so we would  
18 show that as a partial availability of service  
19 availability.  
20 If it turns out that EASE was fine for  
21 our retail customers and even for CLEC customers  
22 that EASE was unaffected and it was only the  
23 data stored that DataGate and Verigate used that  
24 were impacted, we will report that in PM-4 as  
25 well as partial unavailability, because that

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1 function was not available to the CLEC and was  
2 available to SWBT retail.  
3 And, again, at this point, I just don't  
4 know the answer to that.  
5 MS. CHAMBERS: Okay. I'm  
6 following you. On the 4.1 measure, though,  
7 because of the way it's currently identified --  
8 because all three of those queries use the  
9 CRIS -- or I guess access the CRIS database or  
10 system, it's proposed to be aggregated together  
11 with this -- I guess reporting out on an  
12 aggregated basis for those three queries.  
13 Would there not be a reason to break  
14 those out on an individual query basis in the  
15 fact that -- I mean, you know, what we  
16 experienced Thursday was the CSR and CLLI were  
17 fine, but the service availability data was --  
18 you know, allowed the query to not function at  
19 all.  
20 MS. CULLEN: So you were just  
21 referencing 4.1, separated by query and not  
22 grouped by a backend system? I'm fine with  
23 that, to be honest. It doesn't really make a  
24 big difference in terms of how we collect the  
25 data.

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1 And as long as Randy doesn't have a  
2 problem with it, I don't.  
3 MR. SRINIVASA: If you were to  
4 disaggregate it, you're going to disaggregate it  
5 by a backend system that contains customer  
6 service records, a backend system that contains  
7 service availability data, and a backend system  
8 that contains CLLI code information.  
9 But the service availability, what I  
10 heard is that you have EASE and then some -- it  
11 goes through another interface. It's working in  
12 tandem with the DataGate or some mid level. If  
13 one of them breaks, it's unavailable.  
14 If either one breaks, it's unavailable.  
15 Right?  
16 MR. DYSART: The way I understood  
17 what Angie was saying -- and, Angie, correct me  
18 if I'm wrong -- and I'll put this in real  
19 simplistic terms because that's, at least -- I  
20 think that's the way I understand it -- they  
21 almost copy what's in EASE; put it on CRIS and  
22 that's what they use.  
23 MS. CULLEN: That's correct,  
24 Randy.  
25 MR. SRINIVASA: Let me ask you

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1 this: When someone sends in a query, is it  
2 happening -- like the data retrieval, as they  
3 send in the query, is it going in there and  
4 getting that information and putting it in  
5 there?  
6 MR. DYSART: It's just going into  
7 CRIS. It's not going into EASE. They've  
8 already copied -- have a duplicate information  
9 in CRIS and there is one in EASE.  
10 And what happens, I assume, is it goes  
11 into CRIS for the CLECs, and if you're using  
12 EASE, the CLEC or Southwestern Bell would go  
13 into the one in EASE.  
14 MR. SRINIVASA: Are there periodic  
15 updates to the CRIS database?  
16 MR. DYSART: That's my  
17 understanding. Angie, do you know how often  
18 they update that?  
19 MS. CULLEN: Could you hang on one  
20 second? I'm sorry. Sorry. Room service.  
21 (Laughter) I'm sorry.  
22 MR. DYSART: Do you know how often  
23 a new copy is made?  
24 MS. CULLEN: I believe it's  
25 nightly. That particular data does not change

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1 during an on-line day. It's not dynamic  
2 information. So it doesn't change during the  
3 day.  
4 So I believe we load nightly or on some  
5 frequency like that, because those tables that  
6 contain service availability information aren't  
7 like real-time tables that change during a day.  
8 So every night -- and, again, I don't  
9 know this for sure off the top of my head, but I  
10 believe it's nightly -- every night we take an  
11 extract from EASE and load it into the CRIS  
12 database. So when the query happens in  
13 real-time, that query goes through DataGate to  
14 CRIS, and it stops there.  
15 CRIS provides the information back. We  
16 don't interact with the EASE system to retrieve  
17 the information. Did that clarify that a little  
18 bit?  
19 MR. SRINIVASA: So CRIS makes  
20 sense. CRIS is the interface for you, then?  
21 MS. CHAMBERS: Yes, based on  
22 Angie's explanation. Right.  
23 MR. DYSART: If Angie is okay  
24 disaggregating those three, I'm fine with that,  
25 too. So we would have a separate one for each

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1 one of those, if that's --  
2 MR. SRINIVASA: Do you even need  
3 to disaggregate it if CRIS is out?  
4 MS. CHAMBERS: But in that  
5 instance, CRIS was not out. It was data within  
6 CRIS, and that rendered that feature query or  
7 the service availability query, you know,  
8 unworkable. It was unavailable.  
9 MS. CULLEN: CRIS was still  
10 available. It was just that particular data  
11 store that had a problem.  
12 MS. CHAMBERS: Could that also  
13 occur on the PREMIS queries that we have  
14 combined that address verification would work,  
15 but perhaps PIC would not?  
16 MR. DYSART: Why don't we do this:  
17 Why don't we just disaggregate them, and if it  
18 happens it happens, and then we'll catch it,  
19 because this diagnostic -- if in six months we  
20 find it never happens, then we can combine them.  
21 MS. CULLEN: Technically we do use  
22 the different transactions, but the situation  
23 would be very odd for that to occur in a system  
24 like PREMIS, but I'm fine with disaggregating  
25 them that way.

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1 MR. SRINIVASA: Okay.  
2 MS. CHAMBERS: That would be  
3 great.  
4 MR. SRINIVASA: So you will change  
5 the document to reflect that.  
6 MS. BOURIANOFF: Angie, this is  
7 Michelle Bourianoff. If we're disaggregating  
8 out customer service record, service  
9 availability, CLLI, PIC, all of those, do we  
10 need to rephrase the measurement to be preorder  
11 backend database availability or something,  
12 because we're no longer really capturing it on a  
13 system level?  
14 We are not capturing it by CRIS or  
15 PREMIS. We're now capturing it by -- I don't  
16 know what the right word would be -- database or  
17 query or --  
18 MS. CULLEN: I don't have the  
19 verbiage right in front of me.  
20 MR. DYSART: Angie, it says,  
21 "Preorder backend system availability," is  
22 currently the name of it.  
23 MS. CHAMBERS: And the definition  
24 reads, "percent of time backend systems used for  
25 preorder are available compared to scheduled

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1 availability."  
2 MR. DYSART: That's okay.  
3 MS. CULLEN: Randy, I don't know  
4 what you're comfortable with in terms of that  
5 language, but whatever we feel is most  
6 reflective, I'm okay with.  
7 MS. BOURIANOFF: I think if you  
8 disaggregate out the way you-all were talking  
9 about and we changed the title and the  
10 definition from "system" to whatever is  
11 appropriate, database or query or something,  
12 that might also solve the problem or the issue  
13 in the business rule about partial  
14 unavailability, because I don't think that  
15 language will be necessary -- the "partial  
16 unavailability" language will be necessary if  
17 you're tracking this on a query-by-query basis.  
18 MS. CULLEN: Well, Michelle, the  
19 only point I would make there is, I do believe  
20 that language is necessary there, because many  
21 of these backend operating multiple reads have  
22 various regional pieces.  
23 For example, there is a PREMIS North  
24 and a PREMIS South. And "partial availability"  
25 would come into play when only one region would

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1 be impacted versus another region, or if one  
2 particular part -- I mean, it is even possible  
3 to have particular subfunctions that are  
4 problematic rather than the whole query.

5 So I do think we would still want  
6 partial availability in there, but I'm okay with  
7 changing it to a query base. I would prefer not  
8 to use the term "database" because we're not  
9 always talking about a database. We could be  
10 talking about a transaction or something like  
11 that, but "query" is fine.

12 MR. SRINIVASA: Well, even for the  
13 measurement definition or measurement title,  
14 preorder backend system availability is  
15 disaggregated by different databases.

16 So why not leave it "preorder backend  
17 systems"? I mean, even the level of  
18 disaggregation, it's pretty clear that you are  
19 disaggregating it by different databases.

20 MR. DYSART: That's fine with us.

21 MS. FAGAN: Does that also solve  
22 the issue of the partial unavailability  
23 language?

24 MS. BOURIANOFF: I think Angie's  
25 explanation helps with our question about why

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1 there was partial unavailability. I do have a  
2 question, Angie. You talked about there being  
3 like two different CRIS, like CRIS North and  
4 CRIS South, I think you said.

5 MS. CULLEN: PREMIS.

6 MS. BOURIANOFF: PREMIS North and  
7 PREMIS South. Do Texas CLECs use both of those  
8 databases? Would they use both PREMIS North and  
9 PREMIS South, or is one allocated for Texas  
10 CLECs?

11 MS. CULLEN: We report OSS  
12 interface availability on a five-state basis.  
13 But to answer your question specifically, I  
14 believe you would -- Texas would only use the  
15 South region.

16 MS. BOURIANOFF: Okay. So it's  
17 not like if South went down, that Texas CLECs  
18 could start using PREMIS North. There is a way  
19 it could be routed and have redundant capability  
20 or something.

21 MS. CULLEN: No. That's not how  
22 PREMIS would work.

23 MR. SRINIVASA: So that being the  
24 case, then how could that be partially  
25 unavailable?

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1 MS. CULLEN: Because we're  
2 reporting it on a company basis, on a five-state  
3 basis.

4 MR. SRINIVASA: But you're working  
5 on reporting Texas-specific data also.

6 MS. CULLEN: Not for PM-4.

7 MR. DYSART: Well, I think one of  
8 the issues you have to look at here, though, is,  
9 PM-4 we don't do the backend systems, and there  
10 is only one DataGate and one Verigate to do the  
11 preorder. PM-4.1 -- now you've entered another  
12 picture -- PREMIS.

13 So, Angie, to alleviate this, should  
14 this just be PREMIS South that we look at, or  
15 can you do it that way?

16 MS. CULLEN: Sure. We can do it  
17 that way.

18 MR. DYSART: If that's the one  
19 Texas CLECs would use.

20 MS. CULLEN: If you want PM-4.1 to  
21 be specific to Texas CLECs, if that's the  
22 desire, then we can make sure that that is  
23 appropriately reported for, for example, only  
24 the South region of PREMIS, only the Texas  
25 regions of CRIS.

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1 I don't know -- I think we would be  
2 okay. We can report it that way.

3 MR. SRINIVASA: Is that the only  
4 system that is separated out by region, or is  
5 there another -- CRIS is all a five-state  
6 region?

7 MS. CULLEN: No. CRIS is divided  
8 into subregions. There are three Texas  
9 divisions.

10 MR. SRINIVASA: Within Texas there  
11 are three divisions? If one of them is out, the  
12 other two are, like --

13 MR. DYSART: I still think we may  
14 need partial unavailability due to simply that.

15 MS. CULLEN: Yes. We still do  
16 need partial unavailability. For example, if  
17 CRIS San Antonio is unavailable, but CRIS  
18 Houston and Dallas are fine, we would count that  
19 as partial availability.

20 MR. SRINIVASA: Okay.

21 MS. BOURIANOFF: So, Angie,  
22 besides PREMIS and CRIS, are SORD or LFACS or  
23 Loop Qual, do they have Texas specific --

24 MS. CULLEN: Oh, I'm sorry. I  
25 should have answered all of those. SORD has

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1 three Texas regions, and LFACS has a North and  
2 South just as PREMIS does. Loop Qual is one  
3 Loop Qual for all states.  
4 MS. BOURIANOFF: So is LFACS like  
5 PREMIS where Texas would be in the South LFACS?  
6 MS. CULLEN: Yes.  
7 MS. CHAMBERS: Angie, just for  
8 clarification, are any other states -- do any  
9 other states also access PREMIS South or LFACS  
10 South?  
11 MS. CULLEN: The way I understand  
12 it's separated is that Missouri, Oklahoma,  
13 Kansas and Arkansas use PREMIS North, and that  
14 Texas all use PREMIS South.  
15 MS. CHAMBERS: And is that the  
16 same for LFACS as well, to your knowledge?  
17 MS. CULLEN: Yes.  
18 MS. CHAMBERS: Okay. Great.  
19 Thank you.  
20 MR. SRINIVASA: Okay. And there  
21 was the issue of queuing. Right? That was the  
22 next one, I think, that was brought up.  
23 MR. DYSART: PM-5.  
24 MR. SRINIVASA: PM-5.  
25 MR. DYSART: Angie, the issue here

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1 is the e-mail you sent me. I relayed that  
2 information on the number of seconds in the MBS  
3 transaction or whatever that -- the MBS job.  
4 MS. CULLEN: Right. What we were  
5 able to isolate, based on the last meeting that  
6 we had when Ms. LaValle and I talked for a long  
7 time about this issue, we -- I did take that  
8 back, and our mainframe folks and our EDI  
9 folks -- our EDI folks were able to identify the  
10 name of the jobs that are in schedules with the  
11 MBS system that will do the bringing in of the  
12 transactions into EDI.  
13 And our mainframe folks were able to,  
14 one -- some sort of utility to capture the  
15 information for that job name and give us the  
16 average amount of time that those jobs sit on  
17 the MBS queue waiting to be picked up and  
18 processed.  
19 And what we -- we have that now on a  
20 weekly basis. We're getting that information.  
21 And the first week we were about 24 seconds, the  
22 second week 19, and the third week 16 seconds,  
23 was the amount of time that the average job  
24 spent on the queue waiting to be processed.  
25 So that tells me our configurations are

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1 set pretty well, that those jobs are only  
2 sitting there for a very short amount of time  
3 before they are picked up and processed.  
4 MR. SRINIVASA: Well, when you say  
5 "job," is that a file or an individual LSR? Do  
6 you know?  
7 MS. CULLEN: That's based on  
8 files. It could be multiple files. It's not a  
9 single file necessarily. It could be a single  
10 file or it could be multiple.  
11 MR. SRINIVASA: So multiple files  
12 constitute one job. Right?  
13 MS. CULLEN: Yeah.  
14 MS. EMCH: This is Marsha Emch,  
15 with WorldCom. I have a comment and a question.  
16 MCI WorldCom is working with Southwestern Bell  
17 to address what we're calling a handshake  
18 problem, because -- we don't have final results  
19 on this, but we're understanding that at least  
20 in some cases we're experiencing what we're  
21 calling a handshake problem, a queue time  
22 greater than 24, 19 and 16 seconds.  
23 We'll report back once we finalize  
24 that. But the question for Angie would be: For  
25 those odd circumstances where something happens,

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1 that it is a lot longer than this, is it being  
2 measured? Will that be picked up in your  
3 analysis, and what will be done?  
4 MS. CULLEN: Let me clarify. This  
5 time is the time spent -- and, Marsha, MCI is  
6 coming in through the interactive agent, which  
7 is a different architecture than what we are  
8 talking about here.  
9 The time that we're talking about here  
10 is on the mainframe -- and this was very  
11 specific to what Ms. LaValle and I discussed --  
12 was from the time that the job is -- the file  
13 arrives on the system.  
14 The trigger automatically puts it on  
15 the MBS queue to be processed. How long from  
16 the time it gets put on the queue until it gets  
17 processed, that was the question, and that's  
18 with these 24, 19 and 16 seconds represent.  
19 The issue that is happening with the  
20 handshake issue, that's at the interactive agent  
21 level, which happens prior to the job being  
22 scheduled on MBS. And I do know that our folks  
23 are working with your folks on what the scenario  
24 is and how those handshakes are being handled,  
25 but that is not represented in that time frame.

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1 MS. EMCH: Okay. Thank you. I  
2 was confusing the two, then. We have an issue,  
3 obviously, on the handshake end, but we're  
4 working with Southwestern Bell to work on that  
5 one.  
6 MR. WAKEFIELD: Jason Wakefield,  
7 WorldCom. Angie, the question would be, I  
8 guess -- and this may be for Randy as well -- if  
9 we -- by "we" I mean WorldCom sends an order and  
10 there is a handshake issue where you don't  
11 return a FOC because you didn't receive the  
12 order, would that be captured in one of the  
13 measurements?  
14 MS. CULLEN: No. I assume --  
15 Jason, is that you?  
16 MR. WAKEFIELD: Yeah, Angie.  
17 MS. CULLEN: No. I don't think  
18 that would be captured. If we don't have the  
19 LSR, we can't measure it. If that handshake is  
20 unsuccessful and we don't get the LSR, then I  
21 can't measure it.  
22 MR. WAKEFIELD: Okay. And I  
23 appreciate that. That may be something that if  
24 we see that this is happening frequently -- I  
25 mean, right now we're working on it at an

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1 account team to account team level and we're  
2 trying to get it fixed.  
3 If it starts happening frequently, we  
4 may need to raise it, and I guess we could do it  
5 in the next six-month review process if we're  
6 having repeated handshake problems.  
7 MR. SRINIVASA: So right now the  
8 PM we have does not capture that anyway.  
9 MR. WAKEFIELD: That's correct.  
10 MR. SRINIVASA: So is that  
11 something you're going to bring up? If there is  
12 a problem, then you may want to propose a  
13 measure to capture that in the next six-month  
14 review.  
15 MR. WAKEFIELD: That's correct.  
16 MR. COWLISHAW: Maybe sooner.  
17 MS. CHAMBERS: Yeah. This is  
18 Julie Chambers, with AT&T. We actually sent out  
19 to the parties a proposed lost-order measure,  
20 because I think similar -- I don't know if it's  
21 specific to MCI's specific issue, but we have  
22 had orders that we're working with our account  
23 team on, but would definitely need to be  
24 captured in a performance measure.  
25 And, for example -- and, Eva, feel free

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1 to provide more details. Basically AT&T had  
2 some fixed wireless orders. There is different  
3 subsets of those, some of which, I think,  
4 parties are trying to find out whether 997s were  
5 actually sent or received; others of which did  
6 have to be -- it's our understanding, Angie --  
7 and you might can provide more insight into  
8 this -- that they did have to be resubmitted to  
9 the MBS processor.  
10 It's somewhat related to the issue we  
11 are talking about here as far as queue time, in  
12 that if orders were sitting waiting to be  
13 processed and never got processed and then had  
14 to be resubmitted or forced through to the  
15 processor, then that's a much longer queue time  
16 than the 24 seconds that has been mentioned.  
17 MS. CULLEN: And let me clarify  
18 that a little bit. What we can capture with the  
19 queue time is just the scenario that I described  
20 before, where the transaction has been passed to  
21 the MBS queue and where it's waiting to be  
22 processed.  
23 The scenario of what happens to those  
24 particular LSRs, Julie, that you're discussing,  
25 it didn't get that far. So it would not be

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1 captured in there. Now, what we have done and  
2 what you would see in a situation of -- and,  
3 again, this had never happened before, and we  
4 have a new audit report that we're putting in  
5 place to ensure that if a scenario like that did  
6 occur for some reason, that we would be alerted  
7 to it right away.  
8 But be assured -- and my team issued  
9 the request to adjust the measurements. What we  
10 have done is, we will go back and start the FOC  
11 clock from the time that those LSRs hit our  
12 system. So your FOC time will reflect the time  
13 that those transactions -- those LSRs -- hit our  
14 system, and that's what we're doing to make sure  
15 that that data, that performance, is accurately  
16 reflected in the performance measurements.  
17 So I don't see the need for an  
18 additional performance measurement, because we  
19 will take a hit on those LSRs and our FOC or our  
20 reject or whatever -- I assume it would probably  
21 be either FOC or reject times for those, because  
22 we will go back and adjust for those particular  
23 PONs a reporting -- we're making a reporting  
24 adjustment -- to say that when those PONs came  
25 in, that's the time that we're going to start

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1 the clock on those.  
2 That was a very, very unique situation.  
3 But I do want to make sure that you understand,  
4 we will report our performance accurately on  
5 those LSRs by making that adjustment. But that  
6 is really truly nothing that I can capture  
7 mechanically on an ongoing basis. That was a  
8 very unique situation, and it will take manual  
9 intervention to make sure those LSRs have the  
10 appropriate time stamp.  
11 MS. CHAMBERS: And, Angie, I'm not  
12 sure where -- I thought that I heard you say  
13 that the PONs were lost before it hit the MBS  
14 processor. And my understanding was that the  
15 time stamp was not put on those PONs until it  
16 hit the processor.  
17 So what time are you utilizing to  
18 suggest that that's when it was actually  
19 received?  
20 MS. CULLEN: Well, what we're  
21 actually doing is going and looking at those  
22 particular files and seeing when they are  
23 created. For simplicity purposes, the issue  
24 occurred on May 13th, sometime between 6:00 a.m.  
25 and 8:30 a.m.

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1 We're backing all of those up to the  
2 13th of May at 6:00 a.m.  
3 MR. WAKEFIELD: Angie, this is  
4 Jason, with WorldCom. Is this the same issue  
5 that we were facing -- by "we" I mean, WorldCom?  
6 MS. CULLEN: With the interactive  
7 agent handshake?  
8 MR. WAKEFIELD: Correct.  
9 MS. CULLEN: No, a completely  
10 different scenario.  
11 MR. WAKEFIELD: Okay. So if there  
12 was an issue -- would the similar logic apply to  
13 ours, though, if we were having trouble sending  
14 them and it turned out to be something that was  
15 on Southwestern Bell's end -- and I know we're  
16 still doing a root-cause analysis -- but if it  
17 were, then would you start the FOC clock, I  
18 guess, when we sent the initial LSR?  
19 MS. CULLEN: Well, the scenario is  
20 a little bit different, in that we successfully  
21 received the LSR from AT&T in the scenario that  
22 I just discussed with Julie. So it did arrive  
23 on our system.  
24 It just was mishandled in terms of  
25 getting it processed all the way through. The

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1 important difference with this handshake issue  
2 is that we never do get it. We're not getting  
3 the LSR. So that makes the adjustment very  
4 difficult.  
5 Now, I don't know how this will end up  
6 and what we'll decide to do, but I'm sure we can  
7 work out something with Randy in terms of what  
8 the expectation is, how we would count those  
9 items.  
10 MR. WAKEFIELD: Great. And I  
11 agree that we need to get the root-cause  
12 analysis and find out exactly --  
13 MS. CULLEN: But do you understand  
14 the difference in the scenario?  
15 MR. WAKEFIELD: Yes. That's  
16 helpful. Thanks.  
17 MS. FETTIG: This is Eva Fettig,  
18 from AT&T. I guess -- can you explain to me  
19 again why we wouldn't need to separate out and  
20 have a measure separate and distinct to capture  
21 this and why you think it's included in the  
22 other measures?  
23 That part I didn't quite understand.  
24 MS. CULLEN: It's real simple.  
25 What we have in place with this new -- what

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1 we'll have is an audit report, to make sure that  
2 anything that would fall out in that scenario  
3 would be captured.  
4 And then anything that -- and, again,  
5 we can't even anticipate what would cause this  
6 to happen again. But we would adjust this  
7 starting time stamp for those particular LSRs  
8 back to when we showed that our system received  
9 the files.  
10 And we would take what -- go back and  
11 look at the specific situation that occurred and  
12 say, "Okay. When should that have been picked  
13 up from processing," and use that as the  
14 starting time stamp. And, therefore, the  
15 existing measurements for FOC and rejects would  
16 include any time that was spent during that  
17 delay period if something should occur.  
18 MS. FETTIG: Okay. And so how  
19 would that process go? We would get a list of  
20 PONs and then report those manually back to you  
21 and then you would take those and then manually  
22 change the dates on them?  
23 MS. CULLEN: What we will now have  
24 is an audit report. So this report would tell  
25 us if there is anything that we need to go back

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1 and make sure that we're taking -- to put that  
2 back into the system and to make whatever time  
3 stamp adjustments are necessary.

4 Again, given this is such an odd  
5 scenario, we would probably work that through  
6 the account teams to make sure that both parties  
7 agreed on what the starting time stamp should  
8 be.

9 MS. FETTIG: Okay. So you're  
10 going to -- that audit report would be provided  
11 to each CLEC.

12 MS. CULLEN: Yes. We've already  
13 agreed to do that in our conversation that we  
14 had last week with AT&T.

15 MR. SRINIVASA: So in reporting  
16 the aggregate CLEC data, you are going to go  
17 back and correct that manually? Apparently the  
18 DataGate gets collected. It's mechanized. Now,  
19 if this occurs -- apparently what you stated is  
20 that you had to go back and manually change the  
21 time stamp back to the time --

22 MS. CULLEN: It's actually -- what  
23 we're actually doing is, in our reporting  
24 process, we're -- and we have this all  
25 documented in our change management process

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1 tool -- but we're documenting an exception where  
2 we're going to treat certain records.

3 We're going to essentially override the  
4 original measurement that was taken with this  
5 corrected time stamp. So we do have a process  
6 that we've worked out where we will say, "For  
7 these particular PONS, we're going to apply a  
8 corrected time stamp to them through the  
9 reporting process."

10 MS. FETTIG: And do those start  
11 anywhere so that you know either in the raw data  
12 or through a cursory look that you would be able  
13 to capture and get a gauge of how many of those  
14 corrected time stamps are in a given month for a  
15 given CLEC?

16 MS. CULLEN: This is an extremely  
17 rare scenario. We've never had to do anything  
18 like this before.

19 MS. CHAMBERS: And, Angie, this is  
20 Julie Chambers. I keep hearing you say that,  
21 and we would like it to be a very rare, if  
22 never, occurrence. However, even with some  
23 UNE-P orders, we're working right now with our  
24 account team on some very similar issues of  
25 orders that are either lost or have not been

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1 processed, and it's premature because we're  
2 working the issues as we speak, but it's not  
3 premature to suggest -- (talking  
4 simultaneously).

5 MS. CULLEN: ...those efforts are  
6 going on, but that is a real different scenario  
7 than what we're talking about with the  
8 particular LSRs that happened on May 13th.

9 The other things that are going on are  
10 research in terms of those particular LSRs and  
11 what happened to them on their -- we show them  
12 as having been processed in FOC. The difference  
13 is, on one side or another, we have a different  
14 interpretation.

15 But what happened on May 13th was a  
16 very, very different scenario than even the  
17 other investigations that are going on now with  
18 some of the UNE-P orders. So I do want to  
19 really draw that distinction between what  
20 happened on May 13th as something that is truly  
21 unique and never happened before.

22 MS. CHAMBERS: Irrespective of how  
23 often it's going to happen or not, I think one  
24 of the reasons AT&T proposed separate measures  
25 was to get at actually identifying when those

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1 occurrences do happen and not embedding them  
2 into other performance measures.

3 Yes. I agree that FOCs would be  
4 affected, but rejects would be affected. I  
5 mean, other measures would be affected. And so  
6 it gets somewhat diluted. You don't have as  
7 much of a one place to look and identify, you  
8 know, those lost orders or orders that have  
9 truly not processed as they should.

10 MS. FETTIG: And this is Eva  
11 Fettig, of AT&T -- (talking simultaneously)

12 MS. CULLEN: ...appropriately  
13 reported in our FOC and our reject numbers if  
14 those were held and failed to process in a  
15 timely manner. We will take a hit on FOC. We  
16 will take a hit on reject. So, again, I just  
17 don't see another need for another performance  
18 measure when that performance is already  
19 captured in the measurements that we have.

20 MS. FETTIG: Yeah. This is Eva  
21 Fettig, of AT&T. I guess I would think that we  
22 would want to be able to capture the rareness.  
23 I mean, you keep talking about how rare this  
24 occasion has happened, and this was the first it  
25 happened.