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1 that minimizes that effect on the customer from
2 having two bills at the same time.
3 MR. WAKEFIELD: Jason Wakefield,
4 WorldCom. I can identify functionalities beyond
5 just the billing issues that are impacted. This
6 is just an example. When we were doing the
7 research on the LIDB issue, the PICC may not be
8 an issue, and we're -- we've received assurances
9 from Southwestern Bell that it is not an issue.
10 But there are also issues with -- for example,
11 if they change their ability to do collect calls
12 or third-party calling and there is a delay in
13 the posting, that impacts the customer's ability
14 to do that.
15 So there are functionalities that we've
16 identified that are impacted, and there may be
17 others. Apparently there is impact on the
18 information in the CSR. So, again, these are
19 just examples, but there are specific customer
20 functionalities that are impacted that go beyond
21 billing.
22 MS. DILLARD: And I think that's
23 why we're agreeing to look at 17.1 on a
24 diagnostic basis to see, you know, what the
25 performance looks like. We don't know that, but

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1 there are certain situations, as I mentioned,
2 that will not allow the order to post
3 immediately. So those are inherent in the
4 Legacy systems. That's just the way it is for
5 retail as it is for the CLEC customers.
6 MS. NELSON: Okay. I think what
7 we would like -- given the comments, we would
8 like, to the extent it's possible, for
9 Southwestern Bell to work with the CLECs on this
10 whole group of billing measures to see if you
11 can come to some sort of agreement before you do
12 the filing on Tuesday.
13 MS. EMCH: Can I ask a clarifying
14 question? This is Marsha Emch with WorldCom.
15 T.J. mentioned that in the New York experience,
16 the benchmark is three days. I just wanted to
17 point out that that benchmark is three days for
18 Bell Atlantic to post and send a notice to the
19 CLEC that they have actually completed the
20 billing. So it's actually three days for a
21 two-step process.
22 MS. NELSON: Okay. Did someone
23 join us by telephone?
24 MR. COWLISHAW: Lori, are you on
25 the phone?

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1 MS. HALL: Yeah. I'm on the
2 phone.
3 MS. NELSON: Could you just state
4 your name for the record, please?
5 MS. HALL: Sure. This is Lori
6 Hall with AT&T.
7 MS. NELSON: Okay. Thank you.
8 MR. COWLISHAW: And we will
9 certainly undertake to work with Southwestern
10 Bell along the direction that you suggested,
11 Judge Nelson. You know, we made a specific
12 benchmark proposal of 98 percent within five
13 days and think that five days, at a maximum,
14 ought to be the bogey to provide the competitive
15 opportunity in terms of the kind of problems
16 you've heard others discuss.
17 In terms of maybe making it diagnostic
18 and working on how we're going to collect it for
19 the next six months, we'll certainly have
20 further discussion with them. But in terms
21 of -- you know, if we agree on a diagnostic
22 measure and we look at doing it the way
23 Southwestern Bell proposes to do, we'll collect
24 that data, and we'll all come back and argue
25 with you about what the consequences of it ought

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1 to be. We're certainly not agreeing that
2 because 80 percent of them come back within 30
3 days, if that's what the data showed, that we
4 would say, "Gee, well that must be the
5 benchmark." That will be what we do at the next
6 step.
7 MR. SRINIVASA: Well, let me
8 clarify something. There is a proposal from
9 AT&T, 17.1. There is another proposal from
10 Southwestern Bell, the same 17.1. One of them
11 you are saying that the time elapsed between
12 completion and the posting, and then you're
13 trying to capture what percentage of that was
14 done within five days. Apparently it's taking
15 more than five days from completion date to the
16 posting.
17 But what Bell is proposing is from the
18 date -- the service order -- the LSR date --
19 whatever date the LSR was created -- or was it
20 completion date?
21 MS. DILLARD: Completion.
22 MR. SRINIVASA: It's not very
23 clear at all from the business rule. So you're
24 just looking at, you know, this measure includes
25 all SORD orders and is created from the posted

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1 service order database. What does that -- I
2 mean, it just says that from the day the order
3 was received, how long did it take to post?
4 MR. DYSART: No. We're looking at
5 the same interval that AT&T is.
6 MR. SRINIVASA: You are?
7 MR. DYSART: Yeah, the same
8 interval.
9 MR. SRINIVASA: That's what you
10 need to make clear in the business rule.
11 MR. DYSART: Right.
12 MS. NELSON: That's why this --
13 MR. COWLISHAW: We'll work on the
14 delta between those two.
15 MS. NELSON: Right. The billing
16 issue seems to still be -- there still seems to
17 be wildly divergent opinions, even among the
18 CLECs. So, if you could just try to narrow the
19 issues -- and I understand that even once we
20 have historic data, people will still have
21 arguments over what would the appropriate --
22 what the appropriate measure would be to the
23 extent there's not a parity measure. We
24 recognize that, and we're certainly not trying
25 to set anything in stone at this point for those

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1 that are new. So, with that disclaimer, I
2 guess, do we need any further discussion on the
3 billing issues at this point in time?
4 MR. COWLISHAW: I think, with
5 Ms. Hall on the phone, we can at least get a
6 question out to Southwestern Bell on something
7 that I was maybe too vague about earlier this
8 morning. Lori, that's on the issue around the
9 billing accuracy measure and what the trend or
10 tracking data is that we believe Southwestern
11 Bell has started to work on.
12 MS. HALL: Yes.
13 MR. COWLISHAW: Can you --
14 MS. HALL: Yes. AT&T has
15 bimonthly billing calls with Southwestern Bell,
16 and we have raised over and over again the need
17 to have controls to ensure billing accuracy.
18 Because historically it has been the CLEC -- in
19 this case, AT&T -- uncovering the billing issue.
20 So our account manager, Dana Blake, got Michael
21 Brundy from Southwestern Bell together for us
22 one day, and Michael Brundy went through some
23 tracking and trending data that he's capturing
24 to monitor deviations with the daily usage feed.
25 And we were hoping that somehow this tracking

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1 and trending analysis that he is doing could be
2 used to be put together to create a performance
3 measure of some type.
4 MR. COWLISHAW: Or I think even
5 that -- if we got a better feel for what it
6 was -- the information was, that that
7 information could be shared on some kind of a
8 basis. I think it may be aggregate CLEC
9 information, so we wouldn't be poking into other
10 people's individual business. That might be
11 more meaningful just to have that information
12 than to have what's coming out of PM 14 right
13 now.
14 MR. DYSART: Well, but PM 14 is
15 the bill itself. As I understood her comments,
16 PM -- this would more be applicable to PM 16,
17 the usage data, wouldn't it? Or am I off -- or
18 did I misunderstand?
19 MR. COWLISHAW: Lori, can you talk
20 about the relationship between the usage data
21 that would be covered by Mr. Brundy in that
22 activity and our bill accuracy?
23 MS. HALL: Yeah. We've asked for
24 some control to (inaudible) measures around --
25 not only just the daily usage files that we

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1 receive on a day-in and day-out basis, but also
2 to be able to do, like, a compare of the daily
3 usage file and then compare that to how that
4 data is being reflected on the CABS bill to
5 ensure the CABS bill. It's my understanding
6 that the information that Michael Brundy is
7 capturing could possibly be used to ensure the
8 CABS bill.
9 MS. DILLARD: I'm not familiar
10 with the situation that she's describing, so
11 we'll take it back and look at it.
12 MR. SRINIVASA: Okay.
13 MS. NELSON: Okay. Now I guess we
14 need to move on to change management. Is that
15 what you suggested, Nara?
16 MR. SRINIVASA: Right. To the
17 extent that we have some agreement on change
18 management, we can finish that up. It shouldn't
19 take that long, right, Mr. Dysart? Change
20 management?
21 MR. DYSART: Yeah.
22 MS. EMCH: This is Marsha with
23 WorldCom. We were only able to talk to our
24 change management SME over the lunch hour and
25 did not have enough time to discuss our proposed

1 changes and issues with Southwestern Bell prior
2 to this. We're more than willing to share them
3 here, or we can take it off-line and get back to
4 it later.

5 MR. SRINIVASA: So you --

6 MS. NELSON: Let's go off the
7 record for a minute.

8 (Discussion off the record)

9 MS. NELSON: Let's go back on the
10 record, then, and discuss that.

11 MS. DILLARD: This is Maria

12 Dillard. I'd prefer to get our subject matter
13 expert on the line, but just as an overall
14 statement, I think from the exclusion
15 standpoint, Southwestern Bell still feels that
16 the change management process has been
17 well-defined by the CLECs. It was a
18 collaborative process. So, when an exclusion
19 takes place, it is something that is mutually
20 agreed to, understanding the differences in
21 what's going on.

22 I think maybe what we'd like to do
23 is -- perhaps if we go with a change management
24 measure such as -- of notification such as
25 Measurement 123, is that perhaps we track

1 requirements, that that made some sense to us.

2 MS. DILLARD: Right.

3 MS. BOURIANOFF: But I think

4 Southwestern Bell agreed to go back and look at
5 the other three exclusions, which are for
6 certifications that fall under the exception
7 process, regulatory mandates, and emergency
8 fixes. Are you indicating that y'all are
9 standing on all four of those exclusions and
10 aren't willing to reconsider any of those other
11 three?

12 MS. DILLARD: Well, for emergency
13 fixes, that is something that takes place, and
14 it's necessary. So notification would come --
15 would obviously not follow the normal process.
16 It wouldn't follow a 120-day notification on an
17 emergency fix. You're going to get a
18 notification maybe today on something we're
19 going to fix tomorrow. So that, to me, is a
20 logical exclusion. You can't really measure
21 that. CLECs would want that fixed as
22 Southwestern Bell needs it to be fixed.

23 MR. SAUDER: T.J. Sauder with
24 Birch. Could you build the time frames in for
25 the exception process and the emergency

1 instead of use it as something that is -- that
2 Southwestern Bell is paying penalties on. If we
3 would track the exclusions in some way and come
4 back together -- or perhaps give it to the
5 change management committee and let them look at
6 it at that point and say, you know, what would
7 be a good measure here, because CLECs and
8 Southwestern Bell come to agreement on those
9 exclusions. So, you know, we'd like to throw
10 out that maybe we track it but it not become a
11 penalty. Because the CLECs have an opportunity
12 of a go, no-go. We've built in a lot of things
13 for the change management process.

14 MS. BOURIANOFF: Maria, you're
15 using the word "exclusion." I think you mean
16 the specific exception.

17 MS. DILLARD: Exception. I'm
18 sorry. Yes. The exceptions to the normal
19 process.

20 MS. BOURIANOFF: Right. I mean,
21 we talked yesterday off-line about there being
22 four exclusions. And I think the CLECs were
23 indicating that maybe we understood the
24 rationale behind Southwestern Bell's suggested
25 exclusion for CLEC-initiated changes to final

1 releases? Could you build separate time frames
2 into the measure just to make sure that they're
3 on time -- emergency release notification prior
4 to the emergency release?

5 MS. DILLARD: Okay. Well, again,
6 on the exception process, the whole change
7 management committee, which is now a 13-state
8 committee, is looking at an exception process --
9 that's exactly what it is. It's an exception,
10 and it does not follow the normal time frames.

11 MR. SAUDER: Right.

12 MS. DILLARD: So there is
13 agreement by the CLECs and Southwestern Bell and
14 now the other regions as to testing periods,
15 when we're going to do things. So it is -- it's
16 a very well-defined process that has been agreed
17 to by all the parties. That's the reason that I
18 indicate an -- the exception process, if you'd
19 like us, maybe we track it and we look at it
20 again in six months, or we hand it off to the
21 change management committee, because they are
22 all very, very close to this.

23 MS. BOURIANOFF: I mean, I
24 understand Southwestern Bell's position. I
25 mean, the CLEC concern is that I don't know of a

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1 time over the last year where the normal process
2 has been followed. I mean, it's the exception
3 process that's utilized. That's our concern. I
4 was just trying to get clear what Southwestern
5 Bell's position was on the four exclusions,
6 because y'all indicated yesterday you might be
7 willing to reconsider three of them. And I hear
8 you saying no, y'all are insisting on all four.

9 MS. DILLARD: That's correct.

10 MS. NELSON: Is that correct?

11 MS. DILLARD: Well, again, the
12 change management process is such that all of
13 these things have already been defined. If a
14 regulatory mandate is instilled on us for a --
15 we can't plan for those kind of missiles coming
16 in in the middle of a normal release. If we get
17 that missile and it says, "You have to do this,
18 and you have to do it within three months," that
19 will follow the exception process. There's no
20 way around it.

21 MR. SAUDER: Is there possible
22 notification time frames that can be set up with
23 that so that it is timely, that CLECs know well
24 enough beforehand to make the adjustments?

25 MS. DILLARD: Well, you-all would

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1 at. But you can't measure the exception process
2 on a normal interval.

3 MS. EMCH: Marsha Emch with
4 WorldCom. I think what we're trying to say is
5 that in the exception process, we believe that
6 CLECs and Southwestern Bell will come together
7 with each issue to a set of dates that they
8 agree to within the exception process. What
9 we'd like to see measured is for those dates
10 that are agreed to between Southwestern Bell and
11 the CLECs, do you follow those dates under the
12 exception process as, one, maybe disaggregation,
13 and the second one, under the normal 120 plus
14 days? We're just asking whatever is agreed upon
15 by CLECs and Southwestern Bell, do you follow
16 those dates? That's what we're looking for.

17 MS. DILLARD: And I am not in the
18 change management committee. Kathy King, who
19 was here before, was familiar with that process.
20 It was my understanding that there was not set
21 time frames in the exception process. If there
22 are, something said and agreed upon with the
23 CLECs and Southwestern Bell, then of course we
24 would consider that.

25 MS. NELSON: I'm not so sure that

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1 see the mandates the same time we would, and
2 then we've got to go back and work requirements.
3 And, yes, the CLEC and the telephone company
4 work together on those requirements.

5 MS. McCALL: Cindy McCall,
6 WorldCom. Within the exception process and the
7 timelines agreed upon within that exception
8 process, isn't there -- don't you have to
9 perform within those guidelines agreed upon?

10 MS. DILLARD: We -- that's what
11 we're saying in these measurements, is that we
12 would follow the change management process as it
13 has been described and outlined in that
14 document.

15 MS. McCALL: Right. But in an
16 exception situation, there is an agreed upon
17 time frame or timeline, is there not?

18 MS. BOURIANOFF: No.

19 MS. DILLARD: I don't believe
20 there is. Again, if it's in the change
21 management document, then absolutely. What
22 we're saying is we follow that. If there's
23 something set in the exception process or the
24 committee decides to put something in there,
25 then I think that's a reasonable thing to look

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1 this is productive if Southwestern Bell's person
2 who does change management is not here.

3 MS. DILLARD: I can certainly get
4 her on-line if you'd like me to. She was
5 prepared to do that.

6 MS. EMCH: Could I just ask a
7 clarifying question? When you -- I just want to
8 clarify something. When you said there are not
9 set time frames in the exception process, my --

10 MS. NELSON: I don't think she
11 knows, so --

12 MS. EMCH: No. When she asked --
13 okay. I'll just ask my question. I'm not
14 saying that every single notice would have a
15 prescribed time frame under the exception --
16 that there be different dates within the --
17 according to what the notice is. That's what
18 we're looking to measure.

19 MS. DILLARD: Again, that is --

20 MS. EMCH: Not hard and fast.

21 MS. DILLARD: That's agreed to by
22 the CLECs and the telco when an exception is
23 requested or discussed. That is discussed at
24 that time.

25 MS. EMCH: Okay.

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1 MS. DILLARD: So it's all
2 different. There's no set time frame.
3 MS. NELSON: Mr. Cowlshaw.
4 MR. COWLISHAW: Yeah, I don't know
5 that we can -- I mean, we've got Lori on the
6 phone, who knows about this, but I -- it sounds
7 like once Michelle's question has been answered
8 the way it's been answered, unless we can make
9 some more progress off-line, we're probably
10 better off just developing the positions to
11 present to you.
12 MS. NELSON: Okay. Let's move on,
13 then, to --
14 MR. SRINIVASA: Mr. Dysart.
15 MR. DYSART: Could we do LIDB?
16 MS. NELSON: Sure.
17 MR. DYSART: Our LIDB person will
18 be here today. So, if we can get LIDB done,
19 that would be helpful.
20 MS. NELSON: Sure. That would be
21 fine. Do you want to start with LIDB?
22 MS. HALL: This is Lori Hall. I'm
23 going to sign off. I just wanted to tell you in
24 case you heard the dial tone.
25 MS. NELSON: Okay. Thank you.

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1 MS. NELSON: Do we start with 122?
2 MR. DYSART: I'm not sure there
3 are any changes on 122. Jason, do y'all have
4 any changes?
5 MR. SRINIVASA: Aren't there some
6 more LIDB measures? Let me see.
7 MR. DYSART: MCI proposed 124 --
8 well, there's one in here we have labeled 124.
9 MS. NELSON: But 124 is tied in to
10 the measures we just discussed regarding
11 billing.
12 MR. WAKEFIELD: That's correct.
13 Jason Wakefield for WorldCom. If we can get a
14 17.1 posting measurement that's disaggregated
15 for UNE-P, then we would be okay. The one
16 caveat -- and we had some discussion with
17 Southwestern Bell over this -- was that if the
18 PICC in LVAS, which is the LIDB database, ever
19 does have a customer impact -- if, for example,
20 Southwestern Bell does implement a functionality
21 down the road which relies on the PICC in LVAS,
22 then we may re-urge a measurement on the --
23 MS. NELSON: Okay.
24 MR. WAKEFIELD: But that's down
25 the road.

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1 MS. NELSON: But, for now, if 17.1
2 is disaggregated by order type --
3 MR. WAKEFIELD: That's correct.
4 COURT RIGHT: -- then you're
5 comfortable not adding 124?
6 MR. WAKEFIELD: That's correct,
7 Your Honor.
8 MR. DYSART: Can I ask one
9 question? Jason, if we disaggregated by CRIS
10 and CABS, would that be helpful, instead of
11 order type, or is order type really the thing
12 that would get us over the hump on that?
13 MR. WAKEFIELD: We could discuss
14 this off-line. If disaggregating by CRIS and
15 CRABS (sic) allowed us to, in essence, identify
16 what our UNE-P orders were, then we could do it.
17 I mean, what I would need to find out is if
18 UNE-P orders have different characteristics
19 from, for example, UNE-L orders or GSL orders so
20 that we could identify a particular set of
21 orders as UNE-P. That's maybe something we
22 could approach, but --
23 MS. NELSON: Just for the record,
24 I think Mr. Wakefield meant CRIS and CABS.
25 MR. WAKEFIELD: What did I say?

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1 MS. EMCH: CRIS and CRABS.
2 MR. WAKEFIELD: I apologize. I
3 already ate lunch, too. Maybe I want to be at
4 the beach. I don't know.
5 So the issue is we would like to be
6 able to identify the UNE-P orders. If we can do
7 so through a CRIS versus CABS split, then that
8 might be workable, but we need to make sure that
9 we can do so.
10 MS. NELSON: Okay. Going back to
11 122, under issues it says, "More discussion
12 under this performance measure."
13 MS. ROGERS: This is Jan Rogers.
14 I can probably clarify that in that we have this
15 measure available. However, no CLEC has chosen
16 to provide us facts -- updates for the LIDB for
17 the manual updates, so there is no data.
18 MR. WAKEFIELD: Jason Wakefield
19 for WorldCom. What WorldCom has done, as an
20 interim basis until LIDB 2 is implemented, is do
21 direct access to the LVAS. There are problems
22 that we've discussed ad nauseam on that, but
23 we're doing it as an interim basis. So there
24 may not be measurement data on this, so to the
25 extent there isn't data -- we could agree to

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1 delete it to the extent -- if it's not being
2 used.
3 MS. NELSON: Does Southwestern
4 Bell agree to that?
5 MR. DYSART: I think we probably
6 could agree to that.
7 (Laughter)
8 MR. DYSART: Reluctantly, I might
9 add.
10 MS. NELSON: Does anyone disagree?
11 (No response)
12 MS. NELSON: Hearing no
13 disagreement --
14 MR. WAKEFIELD: And I would note
15 that we would really hope that LIDB 2 is
16 implemented on time as outlined by the
17 Commission's order and that it's not pushed
18 back.
19 MS. NELSON: And if it is, I'm
20 assuming you'll want to revisit 122?
21 MR. WAKEFIELD: That would be one
22 thing we'd want to revisit, as well as others.
23 (Laughter)
24 MR. SRINIVASA: So we can say "122
25 held for future use"?

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1 MR. WAKEFIELD: I think we --
2 let's say we're hoping 122 never becomes an
3 issue because LIDB 2 is implemented.
4 MS. NELSON: Okay. Then that
5 should be it with LIDB. So I guess -- it
6 sounded like you're close on 124 and 17.1. So,
7 to the extent you need to have further
8 discussions off the record to come to closure on
9 that -- or to at least narrow the issues -- that
10 would be helpful.
11 MR. SRINIVASA: Let me see. What
12 happened -- oh, 123 is the BFR. Right?
13 MS. EMCH: I'm sorry. This is
14 Marsha Emch with WorldCom. There's a PM 135
15 under the LIDB section that we had also
16 recommended.
17 MS. NELSON: Okay.
18 MS. EMCH: And I just wanted to go
19 on the record and say that at this time we will
20 withdraw that request. We'll look at the
21 information based on how 17.1 and other issues
22 play out.
23 MS. NELSON: Okay.
24 MR. WAKEFIELD: Jason Wakefield
25 for WorldCom. In particular, if the N order or

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1 the posting order issue is what is driving the
2 LIDB issue, then there's no need for this. If
3 we discover that there's another root cause down
4 the line, then we can revisit.
5 MS. ROGERS: Southwestern Bell
6 agrees with that, and the -- it's the order
7 interface that you're -- or the ordering
8 situation that you want to look at. We know
9 that you've been using the interactive
10 interface, and I think that has given you the
11 visibility that you need at this point.
12 MS. NELSON: Okay.
13 MR. SRINIVASA: Let me see. What
14 is 123?
15 MR. COWLISHAW: That's that
16 proposed change management measure.
17 MS. NELSON: Right.
18 MR. SRINIVASA: Okay.
19 MS. NELSON: Okay. Should we
20 start with wholesale support, which I guess
21 would be under 21?
22 MR. DYSART: This is Randy Dysart,
23 Southwestern Bell. I think we agreed to
24 eliminate 21.
25 MS. NELSON: Okay. I'm sorry,

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1 Mr. Dysart.
2 MR. DYSART: Yeah. PM 21, I
3 believe we had all agreed that we can eliminate
4 that one.
5 MR. SRINIVASA: Right.
6 MS. NELSON: Okay. I think we
7 discussed these last week in the DSL forum, but
8 we wanted to revisit them with everybody here so
9 that anybody could comment on it.
10 MR. DYSART: The new PM 21.1
11 proposed by --
12 MS. NELSON: Before you go on, let
13 me just say does anybody have a problem with
14 eliminating 21?
15 (No response)
16 MS. NELSON: Okay. Go ahead.
17 21.1.
18 MR. DYSART: 21.1, average time
19 placed on hold at the LSC. Southwestern Bell
20 has looked at this, and we really don't believe
21 we can support this measurement. It's -- for a
22 couple of reasons. First of all, we place a
23 customer on hold, really, in order to serve the
24 customer. It's not -- we can't place the
25 customer on hold to answer another phone call to

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1 help our grade of service, for example. So this
2 is really dependent upon, a lot of times, the
3 customer -- in this case, the CLEC -- maybe not
4 wanting to be on-line -- or have to listen to
5 the service rep do whatever function they're
6 doing to gather information or whatever, so
7 they're put on hold. So we feel like this is a
8 lot out of our control, therefore we really
9 don't agree with this measurement.

10 MS. DILLARD: This is Maria
11 Dillard. In addition to that, there are -- we
12 did some research on the types of calls we are
13 receiving as to why we would put customers on
14 hold, and many, many of the cases we are seeing
15 is because customers are calling to check order
16 status -- which they do have a vehicle to do
17 that through the tool bar, so they have a
18 mechanical means of doing some of them -- check
19 line status or check order entry. There are
20 some questions that we receive on order entry,
21 and of course we are very willing to take those
22 calls. We think that's very good customer
23 service to do that.

24 So, in some cases, we are looking in
25 the LSOR for the customer and assisting them

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1 with order entry questions. So, in some cases,
2 they ask "Go ahead and put me on hold while you
3 do that research, because I don't want to call
4 back and get someone different," for example.
5 So there are a lot of reasons and a lot of
6 impacts that the CLECs would have on a hold time
7 as well.

8 In addition to that, we really have not
9 received complaints on being put on hold from
10 our customers. There have been no escalations
11 to the second and third level tiers, if you
12 will, on complaints of being put on hold.

13 MS. NELSON: Okay. Did anyone
14 else want to respond to that?

15 (No response)

16 MS. NELSON: I know this is
17 Rhythms' proposal, and I guess Rhythms isn't
18 here this afternoon.

19 MR. SIEGEL: Howard Siegel, IP
20 Communications. I just have a question.
21 Mr. Dysart stated that a rep couldn't be putting
22 someone on hold to answer another phone. I was
23 just wondering is there something technological
24 about the way the phones are set up that you
25 can't put -- you physically can't put someone on

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1 hold and answer another one, or is that just
2 policy?

3 MR. NOLAND: This is Brian Noland
4 with Southwestern Bell. It's our policy to go
5 ahead and take care of the customer that's on
6 the line coming in on a primary number. They do
7 have other numbers. I mean, most people in here
8 that are familiar with ACDS have what we call a
9 secondary number in our system that they have
10 use of that could be receiving a call, but it's
11 their understanding in the LSC that they take
12 care of the customer that they have on the line.

13 MS. DILLARD: And for the most
14 part, that secondary line is for out-going calls
15 or internal Southwestern Bell type calls coming
16 into the center. So you wouldn't receive a
17 customer call on that line.

18 MR. SIEGEL: And I guess just for
19 the folks that aren't on the DSL calls -- as
20 Judge Nelson said, this wasn't an IP
21 Communications proposal. What was described by
22 some of the parties -- and I can't confirm it,
23 because it wasn't my company -- was that
24 sometimes they would call up and they get a
25 "Would you mind holding" quickly on the call.

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1 Obviously that wasn't confirmed by Ms. Dillard
2 in her research, but that was the concern raised
3 by those CLECs.

4 MS. DILLARD: Well, Mr. Siegel,
5 what -- I'm not saying that could never happen.
6 Obviously if they're in the middle of discussing
7 something with someone and just say "Can you
8 hold for just a second" while they handle an
9 emergency situation they're standing there
10 working on -- but they would not have another
11 call at the same time is my point.

12 MR. SRINIVASA: Let me ask you
13 this. If they're already on another call -- if
14 someone calls from outside, why would you
15 transfer the call to that operator who's already
16 on a line?

17 MS. DILLARD: It couldn't be
18 transferred there. That's correct.

19 MR. NOLAND: Yeah.

20 MS. DILLARD: If the call is
21 coming in to the 800 number, it would go to the
22 next available service representative.

23 MS. NELSON: Okay. I think we
24 probably have enough information on this if
25 we're not going to come to some sort of

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1 agreement.
2 MR. SRINIVASA: Yeah.
3 MS. NELSON: And then 21.2.
4 MS. DILLARD: The way we
5 understand this proposal is that this would be a
6 call that would come in and then be redirected
7 in some way, and the ACD is not capable of
8 measuring that. So I'm not -- maybe someone
9 could clarify that further. But that's our
10 understanding of what this is requesting.
11 If a customer is asking to talk to a
12 specific person after they call in, then of
13 course that's their choice, and we would -- we
14 don't make that a practice. But if it's
15 definitely requested, we will transfer that call
16 to someone else. But then it's out of the ACD
17 for tracking.
18 MR. SRINIVASA: Is there something
19 like -- you know, when they call in and you give
20 them the extension number, and then you have to
21 dial the extension for the transfer?
22 MS. DILLARD: When you dial the
23 800 number, it will indicate "Press one for UNE.
24 Press two for resale," and they press that.
25 That's all measured with the normal ACD.

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1 MR SRINIVASA: Okay.
2 MS. DILLARD: But if you call and
3 you get a particular person and you ask to be
4 transferred to a manager or transferred to
5 another person, then once that leaves that ACD,
6 it's out of --
7 MS. NELSON: Okay. Under No. 22,
8 at the very top it says "Agreed to," but then
9 underneath it says "Southwestern Bell ACD SME to
10 discuss issues with Cindy from MCI."
11 MS. DILLARD: This was discussed
12 in the last DSL discussion, I think. We did
13 talk about this, and we thought that grade of
14 service had been covered. It was just a matter
15 of how does it work, and we explained that.
16 MR. SRINIVASA: Is --
17 MS. McCALL: Cindy McCall,
18 WorldCom. Not off-line. The information that I
19 gained was actually in the meeting, but I don't
20 know that I feel comfortable with a true
21 explanation of how the whole system works. So
22 perhaps we could have that discussion off-line
23 sometime.
24 MS. DILLARD: Okay. Sure.
25 MR. SRINIVASA: You can take that

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1 off -- you know, the note that you have on the
2 bottom there.
3 MS. NELSON: No. I think they
4 still need to discuss it off-line, so --
5 MR. SRINIVASA: Well, you just
6 want to know how these things work.
7 MS. McCALL: That's correct. We
8 had some issues based upon the knowledge we
9 didn't have about the ACD, and so we talked --
10 we talked around that in the last discussion --
11 the xDSL discussion that we had last week. And
12 we -- I feel pretty comfortable with those
13 discussions that we had, but as to all of the --
14 answering all of my questions, no, it hasn't.
15 So I can take that discussion off-line.
16 MS. DILLARD: And, Cindy, I do
17 apologize. Off-line I had talked to Ann from
18 Rhythms, I believe.
19 MR. SRINIVASA: This is grade of
20 service PM. It's a percentile measure, which is
21 within 20 seconds, what percent of calls
22 answered. That's what it is tracking. I mean,
23 do you think your discussions are going to
24 change anything in this measure?
25 MS. McCALL: The issues that we

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1 had actually dealt with the LSC and the ACD --
2 the ACD in the LSC. So they revolved around
3 being able to track calls that were coming not
4 necessarily in the 1-800 number, but in another
5 number within the LSC, as well as hold time was
6 an issue, et cetera.
7 MR. SRINIVASA: Oh. Some of the
8 other numbers also go through that same ACD,
9 like the 800 --
10 MS. McCALL: That's what I was
11 trying to understand.
12 MR. DYSART: Well, maybe we can
13 just take this off-line after this meeting and
14 get this cleared up.
15 MS. NELSON: Okay. That would be
16 great. No. 23 has been agreed to?
17 MR. DYSART: It's my understanding
18 it has been.
19 MS. NELSON: Okay. And No. 24 --
20 MR. SRINIVASA: It's the same
21 deal, but it's the local operating center.
22 MS. NELSON: Right. It said,
23 "Agreed to eliminate on DSL conference call.
24 Rhythms said they did not agree at 6-1 meeting."
25 Rhythms is not here today, so --

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1 MR. DYSART: Basically it's the
2 same philosophy as we eliminated the average
3 speed of answer on the other one. So I
4 really --
5 MS. NELSON: Does anyone else have
6 a problem with eliminating this measure?
7 MR. SRINIVASA: I think Rhythms is
8 trying to propose 24.1 and 24.2, similar to what
9 they had on the other. It's the same issue.
10 MS. NELSON: Okay.
11 MR. SRINIVASA: 25.
12 MR. DYSART: Yeah. 25 we have a
13 couple of changes, I think, that we talked about
14 yesterday. One of the issues that came out
15 yesterday was maintenance calls. We were going
16 to provide a little bit more descriptive
17 description of that and reference the -- I think
18 the 1-800 number that you call in. That was
19 going to be parity with the CSB. Provisioning
20 calls DSL, we had proposed a 90 percent within
21 20 second benchmark. Provisioning calls all
22 other, instead of parity with the IECC, we're
23 going to do the 90 percent within 20 seconds.
24 MR. SRINIVASA: Can you tell me
25 what IECC is?

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1 MR. DYSART: Interexchange carrier
2 center. And I think the name has changed, I
3 heard yesterday.
4 (Laughter)
5 MR. DYSART: I don't know what
6 it's changed to, so --
7 MR. COWLISHAW: But you're not
8 proposing it?
9 MR. DYSART: We're not proposing
10 it now, so --
11 MS. EMCH: This is Marsha with
12 WorldCom. We agree to the new -- making that --
13 the provisioning all others on the benchmark.
14 We were the ones that were disagreeing with
15 that, so we agree with that.
16 MS. NELSON: Okay. Thank you.
17 MR. DYSART: I think the issue
18 down here "proposed new measurement for hold
19 time," we've included one in here. So that's
20 really not an issue in this measurement.
21 MS. NELSON: "This measurement"
22 being?
23 MR. SRINIVASA: 25.1?
24 MR. DYSART: 25. We proposed one
25 similar to the hold time -- well, we didn't

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1 propose it. MCI proposed it, and we just put
2 the language in here as a placeholder.
3 MS. NELSON: 25?
4 MR. DYSART: 25.1. I'm sorry.
5 MS. NELSON: Okay. Are there any
6 other issues under 25?
7 MR. COWLISHAW: You're going to
8 supply some new language on the levels of
9 disaggregation?
10 MR. DYSART: More descriptive,
11 particularly on the maintenance. Rather than
12 just maintenance calls, more descriptive of the
13 actual ACD piece there.
14 MS. NELSON: Okay.
15 MR. SRINIVASA: Has MCI looked at
16 this proposal, 25.1?
17 MR. DYSART: This is MCI's
18 proposal. We took the liberty of putting
19 language in there as a placeholder for you. If
20 it's not how you wanted it --
21 MS. McCALL: It looks just like
22 21.1?
23 MR. DYSART: Right. That's what
24 we tried to do. Now, we don't -- we have the
25 same objections as we did previously, but --

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1 MS. McCALL: I understand.
2 MR. DYSART: We wanted to make
3 this a joint document, so --
4 (Laughter)
5 MR. SRINIVASA: Okay.
6 MS. NELSON: Is it acceptable to
7 MCI, even though it's not acceptable to
8 Southwestern Bell?
9 MS. McCALL: Oh, the language?
10 MS. NELSON: Yes.
11 MS. McCALL: If it's like 21.1,
12 then it's acceptable. And I'm taking your word
13 for it that it is.
14 MR. DYSART: We tried. I mean,
15 feel free to scrutinize it and make the changes
16 that you feel comfortable with, but we -- you
17 know, our same argument applies here, so I don't
18 think --
19 MS. NELSON: Right. You can't
20 support it for --
21 MR. DYSART: Right.
22 MS. McCALL: And glancing at this
23 very quickly, it looks almost identical.
24 MR. DYSART: Okay.
25 MS. NELSON: Okay. So subject to

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1 check, you're happy with it?
2 MS. McCALL: Yes, we're happy.
3 MR. DYSART: 26, again we'll make
4 the same changes here, and levels of
5 disaggregation would be a better descriptive of
6 that. The benchmark -- parity with CSB for the
7 maintenance calls, as described here.
8 Provisioning calls for DSL, we took this back
9 and looked at it and would like to go with a
10 1 percent benchmark for both of those.
11 MR. SRINIVASA: For provisioning
12 calls --
13 MR. DYSART: DSL provisioning
14 calls all other at 1 percent.
15 MS. NELSON: Maintenance calls is
16 CSB. Again, CSB is Southwestern Bell's --
17 MR. DYSART: The reason we didn't
18 go with CSB is just -- it's the maintenance
19 number. These are a little bit different than
20 what the CSB handles. The CSB handles typically
21 just a trouble ticket. These are actually
22 handling provisioning type issues. So it's a
23 little bit different. These take a little bit
24 longer than a typical maintenance call, and
25 that's why we wanted 1 percent.

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1 MR. SRINIVASA: What about the
2 CAST group? Is that resolved now? There was an
3 issue concerning outside of -- "If a call comes
4 into the LOC outside of the general LOC call
5 queue; for example, a CAST group. Tier 1
6 maintenance is something that was -- apparently
7 it's a different number rather than --
8 MR. DYSART: It's my understanding
9 that the CAST group is like a Tier 2 support.
10 It's not something you would call into on a
11 normal basis. It's -- if all else fails, it's a
12 Tier 2 support group. So we don't really feel
13 like it's really appropriate to measure that
14 since it is -- you don't call that all the time.
15 It's sort of -- it's just an added --
16 MS. DILLARD: That's an escalation
17 type process, if you will, so it would be no
18 different than calling a manager directly on
19 their line and escalating.
20 MS. NELSON: Are there any CLECs
21 that want to address that, disaggregation for
22 CAST?
23 (No response)
24 MR. SRINIVASA: Hearing none,
25 we'll move on.

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1 MS. NELSON: Are there any other
2 issues that need to be discussed under 26?
3 MR. DYSART: I don't believe so.
4 MS. NELSON: Okay. Then let's
5 move on to whole number portability. We can
6 start with INP, which is 87.
7 MR. SRINIVASA: Proposal to
8 eliminate, and it's agreed to?
9 MR. DYSART: That's my
10 understanding.
11 MS. NELSON: Okay. Is there
12 anyone who disagrees with eliminating No. 87?
13 (No response)
14 MS. NELSON: Okay. Is there
15 anyone who disagrees with eliminating 88, 89, or
16 90?
17 MS. EMCH: Marsha with WorldCom.
18 I just have a clarifying point. I thought Randy
19 said that, although we would delete these
20 measures, if there was any occurrence that
21 they'd be captured in other performance
22 measurements.
23 MR. DYSART: That's correct.
24 There isn't very many that -- we'll put them in
25 the UNE pieces.

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1 MS. EMCH: And with that caveat,
2 yeah, we agree to delete them.
3 MS. BOURIANOFF: Randy, would you
4 put them in UNE pieces or in the LNP or
5 coordinated conversion?
6 THE REPORTER: I'm sorry. The
7 what conversion?
8 MS. BOURIANOFF: Coordinated
9 conversion.
10 MR. DYSART: Well, I guess it
11 doesn't matter a whole lot to me. I thought
12 we -- my first thought would be that we would
13 put them in the UNE and maybe just have separate
14 disaggregation if we wanted -- until the time
15 that absolutely nothing happens on them.
16 There's not much now, particularly in Texas, but
17 I -- I don't have a big preference either way.
18 MS. NELSON: Does AT&T have a
19 preference?
20 MS. BOURIANOFF: I -- I don't know
21 that we do. I was just wanting to clarify.
22 MR. DYSART: I'd almost like to
23 keep LNP just clean, but --
24 MS. NELSON: Okay. So you'd put
25 it under UNES and disaggregate it?

1 MR. DYSART: Yeah.
2 MS. NELSON: Okay. Let's move on
3 to 91, then.
4 MR. SRINIVASA: It's agreed to.
5 That's what --
6 MR. DYSART: I believe that's
7 correct.
8 MS. NELSON: Okay. 91 and 92 are
9 agreed to. Does anyone disagree with that
10 statement?
11 (No response)
12 MR. SRINIVASA: 93, propose to
13 eliminate.
14 MR. DYSART: We have taken this
15 back, and we will keep it if that resolves this
16 issue.
17 MS. NELSON: Okay. That would
18 seem to address AT&T's concern.
19 (Laughter)
20 MR. COWLISHAW: I'm trying to
21 figure out what to complain about.
22 MS. NELSON: Okay. No. 94 says
23 "agreed to." It can be eliminated because it
24 has been incorporated into PM 5?
25 MR. DYSART: That's correct.

1 MR. DYSART: Well --
2 MR. SRINIVASA: There's LNP only,
3 loop only, and LNP with loop.
4 MR. DYSART: Yeah. What you're
5 saying, I guess, is maybe incorporate 96 into
6 114?
7 MR. SRINIVASA: What do the CLECS
8 think? Do you want to keep that separate? This
9 is another number.
10 MR. BOURIANOFF: The one reason I
11 would think we'd want to keep it separate is
12 when we request the raw data -- the backup to
13 reconcile it -- the difference in the number of
14 LNP only orders we have and coordinated hot cuts
15 is pretty significant.
16 MR. DYSART: I think it would be
17 my preference right now to leave it separate and
18 maybe combine it later.
19 MR. SRINIVASA: That's fine.
20 MS. NELSON: Okay.
21 MR. SRINIVASA: Less than or equal
22 to the 2 percent benchmark. Do we have any
23 comments?
24 (No response)
25 MR. SRINIVASA: I don't see any

1 MS. NELSON: Does anyone disagree
2 with that?
3 (No response)
4 MS. NELSON: Wow. We're speeding
5 right along. No. 95?
6 MR. SRINIVASA: Eliminated.
7 MS. NELSON: Eliminated?
8 MR. SRINIVASA: It's agreed to.
9 MS. NELSON: It says, "Check with
10 Time Warner, Tim Kagel." He's not here, so --
11 MS. KNIGHT: We're fine.
12 MS. NELSON: Okay. On 96, the
13 only issue is benchmark?
14 MR. DYSART: Yeah. And the
15 benchmark on this one I guess is like 114. And
16 I know -- Sarah DeYoung and I have been
17 discussing benchmarks on several of these, and
18 we really haven't finalized these as of yet.
19 MR. SRINIVASA: You know, there is
20 another coordinated hot cut -- there's LNP with
21 loop and loop only.
22 MR. DYSART: Correct.
23 MR. SRINIVASA: Can you
24 disaggregate it there, or pretty much your
25 disconnect measure there and just have LNP only?

1 listed in here.
2 MR. DYSART: I still think that's
3 pending Ms. DeYoung's and my final discussions
4 on these issues.
5 MS. NELSON: Okay. So
6 Southwestern Bell and AT&T are working on this
7 off-line?
8 MR. DYSART: Correct.
9 MS. NELSON: Can you --
10 MR. COWLISHAW: Just -- not to be
11 mysterious about it, the -- part of the
12 discussion is trying to -- is discussing whether
13 there's a way, as I understand it, to get out
14 the different kinds of outages that can occur in
15 coming up with a benchmark that would operate
16 across maybe two or three measures so that -- so
17 that if the -- the outages one month might be
18 more premature disconnects. The outages another
19 month might be made up more of ones that started
20 on time but stayed disconnected too long.
21 Another month might be the time where they got
22 it put back together but it didn't really work.
23 And instead of having a separate benchmark on
24 each one of those, somehow trying to move them
25 all into -- not for measurement purposes, but

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1 for some kind of benchmark purposes, some
2 overall test. That might end up affecting this
3 one, but --
4 MR. DYSART: Right. What's
5 happened is Sarah DeYoung and myself, we talked
6 with the statisticians -- as you recall, we were
7 off-line with -- we had a statistician and AT&T
8 had one. We sort of threw the statisticians out
9 and decided that wasn't going to work.
10 (Laughter)
11 MR. DYSART: We got tired real
12 quickly.
13 MR. COWLISHAW: I think on this
14 one we can probably say this is okay where it is
15 unless we come back and tell you something
16 different.
17 MS. NELSON: Okay.
18 MR. COWLISHAW: With a different
19 proposal.
20 MR. DYSART: So we can agree, and
21 then if something happens --
22 MS. BOURIANOFF: Agree subject to
23 check.
24 MR. DYSART: Okay.
25 MR. SRINIVASA: We did not have --

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1 did we have a benchmark on this before?
2 MR. COWLISHAW: On 96?
3 MR. SRINIVASA: 96 was reported --
4 let me see if --
5 MS. NELSON: Yeah, it says
6 benchmark on here.
7 MR. COWLISHAW: 2 percent.
8 (Simultaneous discussion)
9 MR. SRINIVASA: Let me look at
10 some historic data -- oh, you want to look at
11 all the historic data to --
12 MR. DYSART: Yeah. I'll --
13 MS. NELSON: Right.
14 MR. SRINIVASA: Okay.
15 MS. NELSON: Okay. So let's go to
16 97, and it says "Agreed to."
17 MS. FETTIG: Right.
18 MS. NELSON: Does anyone disagree
19 with that?
20 (No response)
21 MS. NELSON: Okay. 98, it looks
22 like there's no disagreement on this. It says,
23 "WorldCom withdraws its request for extension to
24 30 days if the troubles from 11 to 30 days are
25 captured in another PM."

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1 MR. DYSART: Right. I think we
2 need to discuss this, because we've done some
3 investigation.
4 MS. NELSON: Okay.
5 MR. DYSART: An LNP only trouble
6 report, we've made special arrangements to
7 capture that for 10 days, feeling that if you're
8 going to have a problem with an LNP -- the
9 porting -- it's going to happen within ten days.
10 If it happens -- if something happens outside of
11 ten days, it's not going to be a porting issue.
12 So, for example, if you purchased a loop from us
13 initially and now you've done a porting
14 separately -- and I assume some people do
15 that -- we would pick it up, then, on the
16 circuit ID of the loop. But if it's just the
17 LNP issue and something happens after ten days
18 and you say, "Well, there's still a porting
19 issue," it's not picked up in the measurement.
20 MS. EMCH: Can I just -- Marsha
21 Emch with WorldCom. Can I just ask what made
22 you pick ten days instead of five? Seven? 12?
23 13?
24 MR. DYSART: Well, typically what
25 we do is an I-10 report on a lot of issues.

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1 Because something like this is going to show up
2 pretty quickly. If you can't receive a call or
3 you can't make a call, it's going -- you're
4 going to notice it right away. Whereas the ones
5 we use 30 days, it's typically the specials
6 type -- the data circuits where troubles are a
7 little bit -- you might have a data bit error
8 somewhere down the line that may not show up or
9 you may not notice it for a while. That's kind
10 of the reasoning behind that. Most of these
11 troubles will show up within the first day or
12 two. That's why we picked ten days.
13 MR. SRINIVASA: So ten days --
14 within ten days after installation, if something
15 happens, you pick it up?
16 MR. DYSART: From a porting
17 standpoint.
18 MR. SRINIVASA: What happens if
19 there is -- after ten days, a regular trouble
20 report? You won't capture -- normally it
21 shouldn't, but if there is a program glitch or
22 something -- well, not for all -- if there is
23 some error in someone else porting -- they
24 entered the number wrong on a later date, and
25 then it was already ported and then gets dropped

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1 out, human error.
2 MR. DYSART: Being -- I'll let my
3 LNP expert here answer that.
4 MR. NOLAND: I mean, we're still
5 going to go ahead and take that report and work
6 that trouble if there's something else
7 associated with that. I guess what -- I'm not
8 sure -- are you talking about like a calling
9 from and to type situation?
10 MR. SRINIVASA: Well, somebody
11 that's got their own switch and they have their
12 own cable to the customer and some -- well, that
13 may not be a good -- a number was ported.
14 MR. NOLAND: Okay.
15 MR. SRINIVASA: It's an LNP only
16 that was ported, and it was working fine.
17 Subsequent to that, you know, some other
18 customer in the same office building switched to
19 a different provider, and they were also switch
20 based, and that number had to be ported also.
21 Accidentally, whoever programs that, enters the
22 wrong number. And the number that was ported
23 now gets transferred to some other switch.
24 Their end use customer has lost that
25 functionality. That will be a trouble, but it's

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1 not an I-10.
2 MR. NOLAND: I'm trying to think
3 about --
4 MS. FETTIG: I think it's
5 maintenance.
6 MR. SRINIVASA: Well, is there a
7 category for maintenance -- apparently it's not
8 captured there. That's what you're telling me
9 here.
10 MR. NOLAND: Yeah. Because at
11 that point in time, the number has been ported
12 out of the Southwestern Bell switch. And I
13 guess in the scenario you described, it's now
14 going to another provider in error, I believe is
15 what I was hearing. So that would have been --
16 well, at that point in time, that would have
17 been porting between two other CLECs. I'm not
18 sure Southwestern Bell would be involved. I was
19 just trying -- it could be that a number gets
20 ported in error. Yes, if it's with Southwestern
21 Bell today and it's ported in error, there would
22 definitely be a trouble report taken on that
23 telephone number. And it would be handled
24 either on the retail side, if it was a retail
25 Southwestern Bell customer. If it was a resold

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1 account -- I mean, there would be a trouble
2 report that could be taken on that telephone
3 number, and it would be captured.
4 MR. SRINIVASA: Oh, it will be
5 captured?
6 MR. NOLAND: Yeah. But that's
7 provided it hasn't been ported out previously.
8 MS. EMCH: And only if it's
9 reported within the ten days?
10 MR. NOLAND: No. In that case --
11 what we're talking about, it would just be a
12 regular trouble report that we would take.
13 MR. COWLISHAW: Associated with
14 what item? A loop?
15 MR. NOLAND: A telephone number in
16 this case.
17 MS. EMCH: What PM captures that
18 exactly? That is my concern.
19 MR. NOLAND: That's what I was
20 saying. I guess it would depend on the
21 situation. But if it was an existing -- either
22 a resold account that was ported inadvertently,
23 as we were talking here, or if it was a retail
24 Southwestern Bell customer, then it would be
25 reported to the appropriate serving bureau for

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1 that end user. And it would be captured in the
2 appropriate report rate, actually. It would
3 just be captured in the report rate.
4 MR. SRINIVASA: The trouble report
5 rate?
6 MR. NOLAND: The trouble report
7 rate.
8 MS. EMCH: If that's true -- I
9 mean, that was our concern, if there was -- just
10 capturing those troubles after the 10th day. As
11 long as they're captured --
12 MR. DYSART: I'm not sure that's
13 the case, Marsha. I don't --
14 MR. LOCUS: I think -- hang on.
15 This is John Locus with Southwestern Bell. What
16 makes these difficult to capture, period, even
17 within the ten days is these are customers that
18 would disconnect from the Southwestern Bell
19 network and, through the LNP process in a
20 database that's maintained by another company,
21 the porting information is set up. In the first
22 ten days, we have an order that's disconnecting
23 from Southwestern Bell, so if a trouble report
24 comes in from the CLEC, we try to match up the
25 trouble report to this disconnected order.

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1 After some period of time, we lose the
2 disconnected order, but the customer isn't
3 Southwestern Bell's customer. There's nothing
4 to take a trouble report against. They've
5 disconnected from our network, and the only --
6 the only reason we're involved is that at one
7 point they were a customer, and there's this
8 relationship to the LNP -- I guess they call it
9 the NPAC.
10 So it's -- in the case you were
11 mentioning earlier, Your Honor, where there's a
12 problem with porting later on, that may or may
13 not have anything to do with Southwestern Bell
14 since that's handled by that separate industry
15 provider.
16 MR. SRINIVASA: See, there is a
17 number -- the order number for that end use
18 customer that still resides at your switch. So
19 the reason for reporting is they're still
20 dialing the same order number that's in your
21 switch, and somewhere it sends a signal, you
22 know, to the third-party database. And the day
23 that they translate it, say that they put
24 somebody else's CLLI code -- the switch address
25 and they route it.

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1 MR. LOCUS: Right.
2 MR. SRINIVASA: What happens is in
3 the same building somebody else that was your
4 customer moved to another CLEC.
5 MR. LOCUS: Right.
6 MR. SRINIVASA: When you're
7 entering, you entered the number to that new
8 CLEC -- accidentally the same number that was
9 ported to them, you re-enter it and then route
10 it to some other switch.
11 MR. LOCUS: I don't think that can
12 happen by the way LNP works. Because the way
13 that works is the second provider, in your
14 example, is going to send us an LSR, and then
15 we're going to send back an FOC. At the same
16 time, the other provider is sending a notice to
17 the NPAC saying this is a new customer that
18 needs to be ported.
19 So there isn't an issue of we would
20 send something different than the CLEC, because
21 if there is, then the number won't port.
22 Because the NPAC is going to say, "I didn't get
23 a confirmation from Southwestern Bell." So I
24 don't know that --
25 MR. SRINIVASA: So that may never

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1 happen, even for a partial migration
2 situation -- one customer partially migrated to
3 one CLEC, and the other numbers migrate to some
4 other CLEC?
5 MR. LOCUS: Well, I think we would
6 catch that in the first ten days. I don't think
7 there would be a case where you'd see that after
8 the first ten days. And in the POTS world that
9 we have, we use ten days as -- and these are
10 kind of POTS conversions. We use ten days as
11 the number, because we think that within the
12 ten-day period, you would capture 100 percent of
13 the customers that had problems dialing --
14 either receiving calls or dialing out.
15 MS. EMCH: Marsha Emch with
16 WorldCom. I was just talking to Counsel, and we
17 can let this issue rest for now.
18 MS. NELSON: Thank you. Okay.
19 No. 99 is agreed to?
20 MR. DYSART: Yes, I believe it is.
21 MS. NELSON: Okay. And PM 100,
22 Southwestern Bell needs to clarify exclusion for
23 network element?
24 MR. DYSART: Yeah. This is Randy
25 Dysart, Southwestern Bell. We've decided to

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1 eliminate that exclusion.
2 MS. NELSON: Okay.
3 MR. COWLISHAW: There's a --
4 MS. FETTIG: Which one is this?
5 MR. DYSART: The fourth bullet,
6 "Southwestern Bell network STP maintenance
7 windows and system upgrades."
8 MS. FETTIG: Oh, okay.
9 MS. NELSON: The last one?
10 MR. DYSART: Yes.
11 MR. SRINIVASA: That's the same as
12 what was there before, then.
13 MS. NELSON: Okay. Let's go --
14 MR. COWLISHAW: We had a question
15 on this one. And I guess -- we had some
16 discussion around this in the prior call, and
17 we're still trying to find out whether there is
18 a way for Southwestern Bell to break out
19 stand-alone LNP versus LNP with loop for
20 purposes of this measure. Because as we
21 understand it, what this measure is capturing
22 are actual out-of-service conditions, and it
23 could be either LNP or LNP with loop. It's
24 where the out-of-service condition is caused by
25 translation -- or activation being untimely.

1 So the porting portion of it hasn't
 2 worked -- the customer can't get incoming
 3 calls -- and what came out in our calls is that
 4 those outages -- the no incoming call outages
 5 associated with coordinated conversions for loop
 6 with LNP are in fact only being captured under
 7 Measure 100 right now. They're not being
 8 captured anywhere either in existing PMS 114
 9 through 116 or in currently proposed changes to
 10 114 and 116. And when they're in 100, they're
 11 lumped together with the LNP only. The universe
 12 of LNP only is a much bigger number than LNP
 13 with loop. So we have a place here where we
 14 can't -- we don't really know how many of these
 15 type of outage conditions may be associated with
 16 loop with LNP orders. And I don't know if we
 17 had any --

18 MR. SRINIVASA: Well, let me
 19 understand. LNP with loop orders, but the
 20 outage may be related to the LNP portion of
 21 that?

22 MR. COWLISHAW: Right.

23 MR. SRINIVASA: Okay.

24 MS. NELSON: So were you going to
 25 propose some sort of disaggregation or

1 was out due to an LNP related problem, it's
 2 captured in here. Apparently NPAC -- you know,
 3 whatever you get is for all LNP related outages
 4 anyway. Regardless whether it was LNP only or
 5 LNP with loop, if the outage was related to LNP,
 6 this captures it.

7 MS. BOURIANOFF: And I think,
 8 Nara, the concern is not that it's not being
 9 captured in the performance measure, but we were
 10 trying to get an idea of what performance
 11 Southwestern Bell is providing to us for
 12 coordinated conversions, either CHC or FDT.
 13 Because this isn't disaggregated, we can't get
 14 that picture. So we're not saying it's not
 15 being picked up. We just want it disaggregated
 16 so we can take that information on coordinated
 17 conversions being captured in 100 and look at it
 18 in comparison with 114 through 116.

19 MR. SRINIVASA: But the NPAC --
 20 you know, if the information is obtained from
 21 the NPAC, they don't know whether it was
 22 coordinated or it was FDT -- they have no idea
 23 whether it was LNP only or LNP with loops. It's
 24 only the LNP's that -- apparently the start time
 25 is the receipt of the NPAC broadcast activation

1 something?
 2 MR. COWLISHAW: Well, we proposed
 3 some disaggregation, and I think the push back
 4 when we talked about that on the call was a
 5 question about whether that could be done in the
 6 context of the way 100 was set up. That was
 7 what I was hoping to see if we had any progress
 8 or --

9 MR. DYSART: This is Randy Dysart,
 10 Southwestern Bell. We're investigating that.
 11 The problem we have here is that this is based
 12 on the NPAC and the LSMS. It doesn't know
 13 whether there was a loop involved or not. It's
 14 just involved -- concerned with the porting of
 15 the number. So there's no way to be able to
 16 break this out by whether it had a loop or
 17 didn't have a loop.

18 I guess the thought behind this was it
 19 doesn't matter on a port whether it had a loop
 20 or not. The time frame is the same, and there
 21 is no way to do it. I understand the concern,
 22 but we simply don't have a way to do that.

23 MR. SRINIVASA: Well, even if the
 24 order -- you know, there was an LNP with the
 25 loop, then if there was an outage -- if service

1 message. So NPAC wouldn't know that. Right?

2 MS. BOURIANOFF: The end time is
 3 when it's successfully completed in one of
 4 Southwestern Bell's systems.

5 MR. NOLAND: I guess -- this is
 6 Brian Noland with Southwestern Bell. The
 7 activation is initiated by the new provider.
 8 Then once that's done, then it starts the time.
 9 It is then captured -- that's what we're
 10 capturing once the activation is initiated by
 11 the new provider.

12 MR. SRINIVASA: I don't know how
 13 that can be disaggregated technically.

14 MS. NELSON: I mean, does AT&T
 15 dispute that it can be done technically? I
 16 guess that's the question.

17 MS. FETTIG: We need to probably
 18 take that back to see if there might be a way.
 19 I guess just kind of from the spirit of customer
 20 service where we were looking for is if there
 21 was less of a risk of going out of service, we
 22 would probably swing the customer -- order loop
 23 with LNP, swing the customer over to our switch,
 24 and then do the loop conversion separately
 25 ourselves. So, if that would prevent customers

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1 from going out of service, we may move customers
2 in two steps versus doing this one step and
3 swinging the customer and putting them on our
4 own loop.

5 So we use -- when we do an LNP only
6 conversion, we're using our own loops, and we're
7 seeing customers go out of service. So I think
8 what we're thinking of is if we can provide a
9 better comfort to our customers for not going
10 out of service, we would want to try that. But
11 I don't think -- if the data -- if we can't
12 disaggregate the data and show that, we probably
13 don't want to try -- risk trying it and have our
14 own little trial there.

15 MS. NELSON: Okay.

16 MR. SRINIVASA: The data
17 collection difficulty, how do you --

18 MS. FETTIG: Yeah, I don't know
19 how we'd hurdle that. We might have to go back
20 and -- you know, I just don't know.

21 MS. NELSON: Okay. 101?

22 MR. DYSART: On 101, we were
23 asking -- we'll take out the maintenance window.
24 But then there was one other issue on this one
25 we would ask for your consideration. It's that

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1 what we've done is make diagnostic the average,
2 but --

3 MR. COWLISHAW: Right, where it's
4 a benchmark measure.

5 MR. SRINIVASA: We would make this
6 high and high?

7 MR. COWLISHAW: Make 101
8 high-high.

9 MR. DYSART: And 100 none-none?

10 MS. NELSON: Yeah.

11 MR. DYSART: Okay.

12 MS. NELSON: Is there anyone else
13 that -- is there anyone who disagrees with that?

14 As modified, 100 would be none-none. Under
15 Tier 1 and Tier 2, it would be diagnostic. 101
16 would be changed from medium-medium to
17 high-high.

18 (No response)

19 MS. NELSON: Okay. Hearing no
20 disagreement, we can I guess take up the 911
21 issues next. What I would like to do is take a
22 break right now, but before we go on break, I
23 want to go off the record for just a moment. I
24 want to have a short discussion among staff, and
25 then I want to talk to everybody.

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1 currently 100 is a high-high which measures a
2 similar -- and 101 is a similar -- a measurement
3 of the same thing. It's just a percent less.

4 And then we have 100 is the average. So we're
5 getting -- I guess it's our feeling we're
6 getting penalized here twice. So we would ask
7 for one of these to be kind of a diagnostic.

8 MS. NELSON: Does anybody else --

9 does any CLEC want to respond to that?

10 MR. COWLISHAW: Which one were you
11 looking at?

12 MR. DYSART: 100 and 101.

13 MR. SRINIVASA: So you'll get rid
14 of the exclusion -- the fourth bullet point even
15 here. Right?

16 MR. DYSART: Correct.

17 MR. SRINIVASA: Okay.

18 MR. DYSART: And then the Tier 1,
19 Tier 2 -- we just feel like one of these --
20 either 100 or 101 should be none. We had 101
21 marked as none, but either way we -- we would go
22 that direction.

23 MR. SRINIVASA: One is percent,
24 and the other one is average.

25 MR. DYSART: Correct. Typically

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1 (Recess: 2:51 p.m. to 3:25 p.m.)

2 MS. NELSON: Okay. Let's go on
3 the record. And now we're down to 9-1-1 issues,
4 starting with PM 102. It appears as though PM
5 102, 103, 104 -- well --

6 MR. DYSART: I don't believe
7 there's any issues with those. There is a new
8 one on 4.1 --

9 MS. NELSON: Okay.

10 MR. DYSART: -- WorldCom proposed.

11 MR. SRINIVASA: Let me see if I
12 can see it.

13 MS. NELSON: So, 102, 103 and 104
14 are all agreed to?

15 MR. COWLISHAW: 102 is not.

16 MR. DYSART: Right.

17 MR. COWLISHAW: It's not
18 implemented yet.

19 MR. DYSART: Right.

20 MS. NELSON: Right.

21 MR. DYSART: We're still waiting
22 on software from Lucent.

23 MS. NELSON: Let's discuss 104.1
24 if Southwestern -- MCI wants to outline its
25 proposal.

1 MS. McCALL: Cindy McCall,
2 WorldCom.
3 Randy, the last time that we had
4 talked, you had indicated that your -- that you
5 would get ahold of your 9-1-1 SME and
6 investigate about unlocking. Have you had an
7 opportunity to do that?
8 MR. DYSART: We have him here.
9 MS. McCALL: I'm sorry.
10 MR. DYSART: We have him here
11 today.
12 MS. McCALL: Super. And he was
13 going to explain to us a little bit about
14 unlocking.
15 MR. BLACK: I'm Terry Black,
16 Southwestern Bell. Maybe I can if you can give
17 me specific questions. Unfortunately, I have
18 not been working on that portion of 9-1-1 in my
19 job. I've been on the job for five months and
20 I'm not prepared to talk about unlocking.
21 MS. McCALL: Oh.
22 MR. BLACK: From -- other than
23 from a FRDBMS viewpoint after it gets there.
24 How 9-1-1 --
25 MS. McCALL: I'm not sorry, I'm

1 still showing as your customer but really is our
2 customer and they need to get ahold of the phone
3 company, the phone company of that customer, the
4 end-user customer, that they would waste
5 precious time because they would be getting --
6 they would be contacting the wrong phone
7 company.
8 MR. SRINIVASA: Let me understand
9 this here. They're switched base provider with
10 this customer. Now there's ALI database, the
11 FRDBMS, which does the (inaudible) routing
12 (inaudible) switching the router to the
13 appropriate PSAP.
14 Now, if they are switched base, all of
15 the information related to, you know, the
16 address and all of that, it's still going to be
17 in the ALI database that's maintained by you or
18 are they going to maintain their own, do you
19 transfer it or how does it work.
20 MR. BLACK: This is Terry Black.
21 That is correct. It would still be in our
22 database. It would never leave there. It's in
23 there until that unlock record and the migrate
24 overlays it, it's under -- they're under our
25 Southwestern Bell NINA telephone ID.

1 not familiar with that term.
2 MR. DYSART: We also have the
3 other piece covered. So we have both pieces. I
4 think between these two gentlemen here, we can
5 address that.
6 MR. NOLAND: Yeah, I think --
7 Cindy, I guess -- this is Brian Noland with
8 Southwestern Bell.
9 I guess the unlock is unique to LNP.
10 Correct? That's what we're talking about, the
11 9-1-1 record?.
12 MS. McCALL: Yes.
13 MR. NOLAND: So, I mean, what your
14 proposed measurement here, I guess, is the time
15 from service order completion until the unlock
16 occurs. Correct?
17 MS. McCALL: Yes.
18 MR. NOLAND: Let me find the
19 measurement. I thought I had it.
20 MS. McCALL: And WorldCom's
21 concern was that from the time that it was your
22 customer and it's now our customer and it's
23 still showing in the database that it's your
24 customer, that if the emergency agency has a
25 problem with someone who is in the database

1 And after that record is unlocked and
2 the migrate record overlays it, then the CLEC's
3 telephone company ID would be on that record
4 when the 9-1-1 call comes into the answer point.
5 MS. McCALL: Right. And it's that
6 period where it's really our customer but it is
7 shown as your customer that we're concerned
8 about. That time -- that brief time period.
9 MR. BLACK: I understand.
10 MR. SRINIVASA: How long -- So
11 you're trying to find out how long does it take
12 to transfer that -- you would be doing the
13 routing at the -- you know, the customer moves.
14 If that customer makes a 9-1-1 call, it's your
15 FRDBMS equal -- it could be part of the switch
16 or could be external, you know, the PSAP.
17 MS. McCALL: The PSAP thinks it's
18 still your customer, do they not?
19 MR. BLACK: That is correct.
20 MS. McCALL: And so if the PSAP
21 needs to get a hold of the phone company, the
22 end user who is calling 9-1-1 -- or let's say
23 they're calling 9-1-1 but they can't speak or
24 there's a problem with the emergency agency
25 wanting to talk with the person on the other end

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1 and they want to call the phone company
2 immediately to find out, okay, this person can't
3 talk or whatever, we need to find out
4 information about this, and they want to call
5 and talk to the phone company, it's still
6 identified as you and it's not identified as us.
7 MR. BLACK: Until that record is
8 unlocked and your migrate overlays it, you're
9 correct.
10 MS. McCALL: And it's my
11 understanding now it takes about five days. Is
12 that correct?
13 MR. BLACK: I would -- I don't
14 have any data on that, but I would think that
15 that's not correct. It takes considerably less
16 than that in most cases. But I've seen
17 instances, yes, when it has taken that.
18 MS. McCALL: My SME had indicated
19 to me it's taking about five days. And it's my
20 understanding that NINA is recommending that it
21 be 24 hours.
22 MR. BLACK: I understand that NINA
23 does recommend 24 hours.
24 MS. McCALL: So that's our concern
25 around -- and what precipitated creating this

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1 performance measurement.
2 MR. SRINIVASA: So is there a way
3 to capture that information? From the
4 completion date you have a start clock and
5 somewhere you have to have a record when did you
6 transfer it -- migrate it over to them. That
7 would be a stop time.
8 Is there a way to mechanically capture
9 that? Mechanically means, you know, rather than
10 going and manually doing it.
11 MR. NOLAND: Yes, there is a way
12 that -- to capture that information obviously.
13 I mean, you've got the service order completion
14 as they've got here in the calculation and the
15 unlock of the 9-1-1 record.
16 So, I mean, Southwestern Bell is --
17 we'd be willing to have this measurement and
18 have a diagnostic -- as a diagnostic --
19 MR. SRINIVASA: I see nodding
20 there, so on a diagnostic basis you would
21 collect that then? Okay.
22 MS. McCALL: Yes. To take a look
23 at that data would be wonderful. And if it
24 looks like there are issues with it, then
25 perhaps in the future it will become not

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1 diagnostic.
2 MR. DYSART: Fine.
3 MR. SRINIVASA: So are you going
4 to put this in a format like the other PMS?
5 MR. DYSART: We'll do that. As
6 long as this language is the way you want it,
7 we'll put it in that format.
8 MR. NOLAND: Was there any other
9 changes to the format, Cindy?
10 MS. McCALL: No, I think this is
11 okay unless you have some suggestions that would
12 be helpful to make it more explicit.
13 MR. NOLAND: Yeah, we may have
14 some other subject matter experts that want to
15 take a look at it and may add some additional
16 verbiage to the language.
17 MS. McCALL: That would be fine
18 and I would encourage that.
19 MR. NOLAND: All right.
20 MR. SRINIVASA: And also reports
21 to -- I don't think you need to report that by
22 Southwestern Bell affiliate. It will be just
23 individual CLEC and all CLECs.
24 MR. DYSART: Right.
25 MS. NELSON: Okay.

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1 MR. SRINIVASA: Okay. Then poles,
2 rights and conduits is agreed to, right?
3 MS. NELSON: Right.
4 MR. SRINIVASA: Okay.
5 MS. NELSON: Okay. Let's talk
6 about NXX measures which start with 117. Okay.
7 Is No. 117 a disagreement limited to what the
8 proposed benchmark should be or whether there
9 should be a benchmark?
10 MR. DYSART: Yes -- this is
11 Southwestern Bell. Yes, that's correct.
12 MS. NELSON: So Southwestern Bell
13 is proposing a benchmark in lieu of --
14 MR. DYSART: No, we're proposing
15 parity and someone proposed 100 percent
16 benchmark.
17 MS. NELSON: Would the CLEC who
18 proposed a 100 percent benchmark like to explain
19 why?
20 MR. WAKEFIELD: Jason Wakefield,
21 WorldCom. (Inaudible) although I vaguely
22 remember if this is the measurement -- it was
23 Time Warner that proposed it.
24 MS. NELSON: No one from Time
25 Warner is here. So what we'll probably do then

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1 is just let this stand the way it is. And
 2 Southwestern Bell, when the CLECs file their
 3 responses, can explain it.
 4 MS. FETTING: We're curious about
 5 that change to the business rule. This is Eva
 6 Fetting from AT&T.
 7 MR. DYSART: I think we put that
 8 in there to address someone's concern as I
 9 recall.
 10 MS. FETTING: Yeah, I remember on
 11 the last call I brought up the issue where we're
 12 adding points of interconnection once the switch
 13 is up. But I don't know if this really kind of
 14 got crafted to what our point was.
 15 MR. DYSART: We'd be happy to
 16 change it. I think we tried to address your
 17 concern. If you want to --
 18 MR. LOCUS: John Locus with
 19 Southwestern Bell. As I recall, the wording
 20 "initial interconnect trunk groups" was what
 21 was -- the part that you thought was not
 22 description enough. So what was added in was
 23 the issue of point of interconnection.
 24 We were trying to capture the idea that
 25 it wasn't the initial interconnection trunk

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1 group at a particular switch or -- if you
 2 already established a point of interconnection
 3 within that, once they have (inaudible) then the
 4 next set of trunks wouldn't start off as another
 5 initial set or what have you be excluded. I
 6 mean, we weren't doing that to begin with, but
 7 just to clarify how we're attaching the data --
 8 MR. WAKEFIELD: Jason Wakefield
 9 for WorldCom. The discussion that occurred
 10 off-line was intended to not predetermine the
 11 issue of what point of interconnection was
 12 required. In other words, if a particular point
 13 of interconnection was required then that had to
 14 occur prior to the commencement of the
 15 measurement, but the idea was to simply apply
 16 whatever the Commission thought was appropriate
 17 on appeal.
 18 MS. NELSON: As a performance
 19 measure.
 20 MR. DYSART: And that's why we put
 21 the word "appropriate."
 22 MS. FETTING: Right. So maybe if
 23 you would take out "whichever is longer" because
 24 it's not whichever is longer. It's either the
 25 effective date -- based on the LERG effective

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1 date or completion of the interconnection trunk
 2 group.
 3 MR. LOCUS: This is John Locus
 4 with Southwestern Bell. I think the reason it's
 5 "whichever is longer" is there's two different
 6 (inaudible) involved here.
 7 MR. COWLISHAW: Right. But
 8 it's -- what I think --
 9 MR. LOCUS: So it would be the
 10 LERG effective date if the other wasn't already
 11 established. It would be the point in time that
 12 the other was established.
 13 MR. COWLISHAW: Right. I think
 14 your clarification is a better way of saying it
 15 than "whichever is longer." And once you've got
 16 the -- because what you've got is it's either
 17 going to be the LERG effective date or in those
 18 circumstances where an appropriate point was not
 19 established prior to the LERG effective date,
 20 then it's going to be the completion of the
 21 initial trunk group.
 22 MR. LOCUS: That's what we want,
 23 yeah.
 24 MR. DYSART: Okay. We can take
 25 that out.

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1 MR. LOCUS: Whatever is the best
 2 way to word that.
 3 MS. NELSON: Okay. So --
 4 MR. SRINIVASA: -- instead of
 5 having an interconnection point you can't
 6 transfer it. The date the interconnection
 7 trunks are established, after that the LERG
 8 effective date starts. Right? LERG establishes
 9 a time period by which it's got to be finished,
 10 the NXX migration.
 11 MR. DYSART: Correct.
 12 MR. SRINIVASA: But you have to
 13 establish and interconnection point prior to
 14 that.
 15 MR. DYSART: We have to have some
 16 way to test it, so there has to be something
 17 there. And I'm not familiar with all --
 18 MS. FETTING: But when we do
 19 augments on a switch, we might open another
 20 code, for example, off that switch. We were
 21 trying to capture augments so that we would use
 22 that switch to go into a new area, for example.
 23 MR. SRINIVASA: So you already
 24 have --
 25 MS. FETTING: We already have the

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1 point of interconnection, but -- because the
2 switch is already in place but we're
3 establishing a new code. So we were trying to
4 capture kind of that, going into a new city or
5 town --
6 MR. SRINIVASA: Okay. You have to
7 do -- yeah, that's another situation. Augment
8 would be, you already have an interconnection
9 point --
10 MR. DYSART: Right. Right.
11 MR. SRINIVASA: There also, if you
12 open up a new NXX, LERG has a time period by
13 which it's got to be transferred. There's
14 another -- that kicks in any way. Right?
15 MS. FETTING: Right.
16 MR. DYSART: I think we agree.
17 MS. FETTING: Right. We agree. I
18 think we were just trying to figure out how best
19 to say it in the --
20 MR. SRINIVASA: Oh, the
21 language --
22 MS. FETTING: -- sentences that it
23 was descriptive enough for people to understand.
24 MR. DYSART: If it's simply taking
25 out "whichever is longer" I'm fine with that.

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1 MS. FETTING: Yeah, I think that
2 probably works.
3 MR. DYSART: Okay.
4 MR. COWLISHAW: Let me see if I
5 can get Randy to confirm one other
6 understanding. We currently have between our
7 companies an issue that's in arbitration about
8 where the point of interconnection has to be and
9 how -- within how small an area and how many
10 points of interconnection there need to be. The
11 word "appropriate" here was chosen deliberately
12 to avoid any implication about anybody's
13 position on point of interconnection. It's not
14 meant to pre-judge whether any party's position
15 is right on that issue and so we put the vague
16 word "appropriate" in there.
17 MR. DYSART: That's correct.
18 Absolutely.
19 MS. NELSON: So what was the
20 agreement that -- before that last little
21 discussion? What was the agreement on modifying
22 this language?
23 MR. DYSART: I think we were going
24 to just take out whichever is longer.
25 MS. NELSON: "Whichever is

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1 longer"? Okay. Thank you.
2 MR. SRINIVASA: Parity, which
3 is -- we still don't know who proposed -- Time
4 Warner proposed 100 percent?
5 MS. NELSON: Right. So we're just
6 going to have to deal with that in briefing.
7 Okay. 118 is agreed to?
8 MR. DYSART: Yes.
9 MS. NELSON: Okay. 119?
10 MR. DYSART: We agreed to
11 eliminate that and move that to -- anything that
12 happened on this would be captured in PM 67.
13 MS. NELSON: And the CLECs -- does
14 anyone disagree with eliminating it?
15 MR. DYSART: Yeah, they were going
16 to --
17 MR. SRINIVASA: Was this per
18 measure damage whereas the other one is per
19 occurrence?
20 MR. DYSART: I think it was all --
21 I don't recall, Nara.
22 MR. SRINIVASA: NXX was a per
23 measure -- we might want to double check that
24 before we --
25 MR. DYSART: Was it on mean time

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1 or was it just on the other one?
2 MR. SRINIVASA: Mean time to
3 repair. It's a high -- high -- Tier 1 high and
4 Tier 2 high.
5 MR. DYSART: Right. I wasn't sure
6 if mean time was per measure or --
7 MR. COWLISHAW: Anything on NXX
8 would have been per measure just because of
9 the --
10 MR. SRINIVASA: Nature of the --
11 MR. COWLISHAW: -- nature of it
12 being so small.
13 MR. SRINIVASA: So in trouble
14 reports, if it's a per-occurrence basis, you
15 don't separate them out. You're not
16 disaggregating it for NXX separately for trouble
17 report mean time to clear. You're averaging
18 everything else.
19 MR. DYSART: Well, we wouldn't
20 disaggregate it on a mean time to repair --
21 MR. SRINIVASA: That's why it may
22 not --
23 MR. DYSART: -- reported on a per
24 line basis.
25 MR. SRINIVASA: So the loop and

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1 NXX is created equally in --
2 MS. BOURIANOFF: So just to
3 clarify, Randy, if there's a problem with an
4 NXX, you report it per line that has a problem
5 with the NXX?
6 MR. DYSART: It's my understanding
7 you would report to the -- you would report a
8 trouble to the LOC that my customer can't
9 receive calls from whatever. And then they'll
10 code that ticket out to a particular code that
11 says, okay, this was an NXX issue. But it's
12 reported on a line basis, not saying, well, in
13 general, something, you know, NXX is broke or
14 something or wasn't loaded.
15 MS. FETTING: Yeah. So what's
16 going to happen is, they're going to call in a
17 trouble for Joe Smith who's got problems with
18 his line. And then the next guy who calls in
19 that has trouble, so we'll -- and then what
20 Southwestern Bell will do is say, oh, well, it
21 looks like all of these tickets, you know, are
22 due to the NXX problem.
23 MR. DYSART: Correct.
24 MS. FETTING: So there would be --
25 the frequency will increase, but they will be

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1 captured in that 67 measure.
2 MS. NELSON: So is anyone opposed
3 to just capturing it in 67?
4 MR. SRINIVASA: Well, in 67, say
5 if there were 10,000 lines involved, you're
6 going to count that as 10,000-line trouble
7 report?
8 MS. NELSON: Except for Nara.
9 (Laughter)
10 MR. SRINIVASA: I mean, I'm trying
11 to understand --
12 MR. DYSART: Well, I know --
13 MS. FETTING: -- think they're
14 going to capture --
15 MR. DYSART: -- typically you
16 wouldn't call it 10,000 --
17 MR. SRINIVASA: You wouldn't
18 (inaudible) 10,000 line.
19 MR. DYSART: You typically
20 wouldn't call it and capture it here 10,000
21 lines either.
22 MS. BOURIANOFF: -- more than one.
23 MR. COWLISHAW: Well --
24 MR. DYSART: It's the number that
25 they call it on. I mean --

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1 MR. COWLISHAW: You have had a few
2 of them reported.
3 MR. DYSART: Correct.
4 MR. COWLISHAW: Can you describe
5 any? Like you've got four trouble reports in
6 March for the state of Texas for under this
7 119 --
8 MR. SRINIVASA: It was less than
9 ten --
10 MR. COWLISHAW: -- what those
11 were --
12 MR. DYSART: Well, it would have
13 been trouble reports that were coded out to NXX
14 issue. And it was probably on a per-line basis
15 because everybody wouldn't necessarily call one
16 in. I was trying to look here and see --
17 MR. SRINIVASA: Under our
18 performance remedy plan, if there's less than
19 ten they missed, they had to pay for each one as
20 per measure category. When it gets lumped into
21 per occurrence, nothing gets paid into the other
22 measure. Apparently the impact is greater than
23 NXX entire -- that's what I wanted to find out.
24 If the CLECs don't have a problem, I don't have
25 a problem.

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1 MR. DYSART: Let me clarify one
2 thing here. The measures -- I happen to have a
3 copy of the T2A somebody had. The measures that
4 are subject to the per measure damages of
5 PM 117, not PM 119, and that the 117's percent
6 loaded tests are prior to the LERG effective
7 date. That's the one that's subject to --
8 MR. SRINIVASA: This one is
9 also -- 119 is high high.
10 MR. DYSART: It's high -- I'm not
11 debating it's high high --
12 MR. COWLISHAW: It's per
13 occurrence.
14 MR. DYSART: It's per occurrence.
15 MR. SRINIVASA: Oh, this is per
16 occurrence?
17 MR. DYSART: Yeah. 117 is the
18 measure that's subject to a per measure --
19 according -- at least according to the appendix
20 that I'm looking at.
21 Is it all right to eliminate it pending
22 your verification of what I said.
23 MR. DYSART: Right. Okay.
24 MS. NELSON: Yes. Okay. Let's
25 move to 120, and it looks like that's agreed to.

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1 And 121, BFR process?
2 MR. DYSART: Right.
3 MS. NELSON: Are they both agreed
4 to, no changes?
5 Okay. Then it looks like we're ready
6 to move on to directory assistance and OS, which
7 I guess starts at No. 79. No. 79 is agreed to?
8 MR. DYSART: I believe so.
9 MS. NELSON: No. 80 doesn't have
10 any notes. I'm assuming it's agreed to, or
11 there were no changes to it.
12 MR. DYSART: There were no
13 changes.
14 MS. NELSON: Okay. No. 81, the
15 agreement is to eliminate the measure?
16 MR. DYSART: One comment on the
17 previous one. We did make a change. It was
18 requested that we put the substantive rule time
19 down, and that's what we did.
20 MS. NELSON: Okay. 5.9 second
21 average?
22 MR. DYSART: Right.
23 MS. NELSON: Thank you.
24 81? Everyone agrees it should be
25 eliminated. Is that correct? Does anyone

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1 disagree?
2 Okay. Thank you.
3 No. 82, looks also like you inserted
4 the Substantive Rule time.
5 MR. DYSART: Correct.
6 MS. NELSON: Otherwise, no
7 changes?
8 No. 83, it looks as though CLECs -- 83,
9 84, 85 and 86, CLECs were to review to see if
10 they were agreeable to eliminating those
11 measures. Are there any CLECs that would be
12 opposed to eliminating any of the measures 83
13 through 86?
14 MR. SRINIVASA: That's fine.
15 MS. NELSON: Okay. Hearing no
16 opposition, we'll move on.
17 Okay. So there's another group of
18 measures -- have we discussed all directory
19 assistance database, starting with 110?
20 Okay. Let's move to those right now.
21 Okay. 110 is agreed to. 111 is agreed
22 to, 112, 113. So there's no disputes as to 110
23 through 113, but 113 is not implemented yet?
24 MR. DYSART: That's correct.
25 MS. NELSON: Why is that?

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1 MR. SRINIVASA: And also 9-1-1
2 measure, one of the --
3 MR. DYSART: I'll verify -- I know
4 why the 9-1-1 measure isn't.
5 MR. SRINIVASA: I understand five
6 and there was a program that you were waiting
7 for, and this was discussed in the December 16th
8 Open Meeting and there was a deadline set for
9 that. I mean, it's past.
10 MR. DYSART: I understand that.
11 But the reason 9-1-1 is that Lucent hasn't
12 delivered that information -- the programming.
13 That one I know. I'll get back with you on this
14 one. I don't know.
15 MS. NELSON: Okay. Thank you.
16 MR. COWLISHAW: Can we have a
17 second on 111?
18 MS. NELSON: Excuse me?
19 MS. BOURIANOFF: Can we have a
20 minute to look at 111?
21 MS. NELSON: Sure.
22 (Brief pause in the proceedings)
23 MR. COWLISHAW: Yeah, the 111 in
24 the existing 1.6, and it's repeated here in the
25 proposal, the benchmark is 48 hours. It says

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1 this benchmark will be reevaluated in six
2 months, referring to what we should have been
3 doing now, and --
4 MR. SRINIVASA: Let's look at some
5 historical --
6 MR. COWLISHAW: And if you look at
7 the historical data for the last 12 months, the
8 average is 25.5 hours. And for the first nine
9 months, of the last twelve, performance was
10 always below 30. Something is that -- there's
11 been some slower performance the last three
12 months, but that looks like it should support a
13 shorter benchmark than 48 hours.
14 MS. NELSON: Mr. Dysart?
15 MR. SRINIVASA: What's the median
16 or mode? I'm trying to see what's going on with
17 the frequency of that. I see 19.8, 21.2. there
18 are only some instances of -- in March it was
19 41.8. And that -- the lowest is 18.5. If we
20 get rid of the lowest and the highest, probably
21 36.
22 MR. DYSART: Well, one of the
23 reasons it was set at 48 was that, in retail,
24 it's a 72-hour commitment. So the commitment we
25 have here is 48, which is less. And if you're

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1 saying -- what did you say, 36?
2 MR. SRINIVASA: 36.
3 MR. DYSART: Let us take that and
4 look at it --
5 MS. NELSON: Okay.
6 MR. DYSART: -- if we can, and that
7 will be an issue that we'll look at.
8 MR. SRINIVASA: And also that's
9 based on the historical data. So you're going
10 to look at that critical Z.
11 MR. DYSART: Right.
12 Thanks for pointing that out, Pat.
13 Glad you came today.
14 (Laughter)
15 MS. NELSON: Okay. The only thing
16 we have left on today's agenda is general
17 overview measures and comments. And I think
18 there's some that Mr. Srinivasa would like to
19 discuss.
20 But before we do that, I know AT&T has
21 made several recommendations regarding overview
22 comments. Are y'all in a position to kind of
23 outline those right now?
24 MR. COWLISHAW: I can get in
25 position.

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1 MS. NELSON: You had some
2 proposals with regard to revising the remedy
3 plan, I guess?
4 MR. COWLISHAW: Yeah. We made
5 some specific recommendations on -- I think
6 the -- and we can discuss these on the day we
7 did the backsliding discussion --
8 MS. NELSON: Now, you don't need
9 to repeat that. But to the extent there are
10 ones that you -- that we haven't discussed
11 before or if you just want to briefly go over
12 those.
13 MR. COWLISHAW: I think the main
14 issue for us remains the concern about the
15 operation of the per-occurrence scheme, where
16 volumes are relatively low. It was toward that
17 end that we proposed a minimum per-measure
18 penalty, and that probably would be the per
19 measure damage, so that we use the per-
20 occurrence scheme but we'd have some minimum
21 per-violation, per-measure damage amount set.
22 MS. NELSON: And what would that
23 be?
24 MR. COWLISHAW: The recommendation
25 that we made was to take the -- simply take the

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1 per measure quantity that the Commission had set
2 for particular measures that were expected to
3 come in at low volumes, like the NXX measure we
4 were discussing a minute ago, and apply that
5 quantity as a sort of minimum, across the board
6 remedy whenever the per-occurrence scheme would
7 yield a smaller amount.
8 MS. NELSON: Does Southwestern
9 Bell want to respond to that?
10 MR. DYSART: Well, not
11 surprisingly, we don't agree. And basically one
12 problem that we would have with that is that, in
13 this situation, we're paying damages down at a
14 level of one. So if we have one miss, that can
15 be -- is subject to damages in this plan if it's
16 Tier 1 or Tier 2. So it's not statistically
17 reliable.
18 Given that, and given that we're paying
19 on per-occurrence for that level of miss, it
20 doesn't seem appropriate that you would have a
21 minimum payment -- I think here on one of these
22 a low measure is \$5,000 if I miss one
23 occurrence. Or if it's a high measure, \$75,000
24 to miss one item out of there. That seems to be
25 more punitive than it is to recoup for a

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1 situation that may not even result in a customer
2 that's been lost.
3 So it doesn't seem that the punishment
4 is fitting the crime. We think the
5 per-occurrence is a methodology that does do
6 that. So we would be opposed to this point.
7 MR. COWLISHAW: And I don't think
8 we really -- I mean, if we started working on
9 something, I think we'd probably be prepared to
10 address the one occurrence scenario. The
11 problem that we're trying to get at is the
12 measures that are -- where a CLEC is doing
13 business, and the nature of the service is such
14 that you're going to be reporting in the dozens
15 of transactions, and that's liable to be the
16 business level for some time for some services.
17 When those -- when performance issues
18 arise in that context, then applying the \$25 to
19 \$150 per occurrence formula is where we had the
20 concern. And I would agree we need to look at
21 some minimum level probably before that
22 per-measure remedy would kick in.
23 MS. NELSON: Wouldn't you need to
24 really go through all the measures and evaluate,
25 given the measure and the historic data and the

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1 importance of the measure? For instance,
2 collocation -- what the appropriate minimum
3 would need to be, instead of just setting a one
4 size fits all minimum?
5 MR. SRINIVASA: You know, most of
6 the PMs are disaggregated. And, say, for
7 example, UNES are disaggregated by different
8 types of UNES. Should they have a different
9 weight for different kind of UNES? And you may
10 have to look at -- (inaudible) a PM at a
11 disaggregated level.
12 Say, for example, if it's just a 8dB
13 loop, you know, if you set it high, they're only
14 paying \$14 on the average. It's set at ten
15 times the 150 per occurrence.
16 MR. COWLISHAW: I mean, that -- I
17 mean, you know, you might look at the Tier 2
18 measures and go through those and look at some
19 volume, and without getting, you know, too far
20 into too extensive a task, be able to say that
21 for the kind of volumes that coordinated
22 conversions are running at, in the state of
23 Texas, and have been for some months, that with
24 volumes at that level that you would put a
25 multiplier on rather than a -- or some minimum.

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1 I mean, the changes that were made in
2 the last months of '99 to address the so-called
3 advanced on nacent services issue, when the
4 FCC's staff came out with their letter on that
5 subject, put in a set of changes that only
6 apply -- I think they only apply to Tier 2. So
7 they don't affect damages payments to the CLECs.
8 And they also end as soon as there's 100
9 transactions statewide.
10 So that's -- the difficulty we're
11 seeing with the operation of the per-occurrence
12 plan is you've got CLECs doing business maybe in
13 more than 100 transactions statewide, but at
14 \$25, \$50 \$100 a transaction, the per-occurrence
15 scheme may still not be yielding much in the way
16 of a remedy when there is a problem. So I --
17 you know, there are some different ways we could
18 try and work on getting at if if there was some
19 willingness to address that issue.
20 MR. SRINIVASA: You know, the
21 advanced and nacent services now you have
22 implemented that starting April, you're
23 calculating the Tier 2 damages for that -- what
24 the FCC said when a statewide average basis --
25 MR. DYSART: Yeah, we're --

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1 MR. SRINIVASA: -- starting April
2 you have -- you took some time to implement
3 that, so April you started it.
4 MR. DYSART: Yes.
5 MR. SRINIVASA: So they are --
6 that advanced nacent services, statewide basis,
7 the number of data points is less than a
8 hundred, than the per-occurrence damage was
9 three times what the amount stated to be.
10 MR. COWLISHAW: Right.
11 MR. SRINIVASA: That's how they
12 have done that now.
13 You're saying that it should be done
14 for some of the other -- other than the advanced
15 and nacent services, that type of --
16 MR. COWLISHAW: I think our
17 concern about the advanced and nacent services
18 were that it didn't address damages payments to
19 the CLEC at all because it's only related to
20 Tier 2. And that just because you've got 100 --
21 I mean, you've got 101 transactions statewide,
22 you know, that may be somebody doing 50 and
23 somebody doing 30 and somebody doing 21. And if
24 the performance for that CLEC is out of whack,
25 they're still looking at, you know, \$25 times

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1 some fraction of 21 transactions or \$150 times
2 some fraction of 21 transactions, and it does
3 not provide the appropriate incentive. That's
4 the issue.
5 MS. NELSON: I guess from a staff
6 perspective, it's difficult for us to analyze
7 this without something more concrete in terms of
8 what would be proposed.
9 MR. COWLISHAW: Beyond the
10 across-the-board-per --
11 MS. NELSON: Right.
12 MR. SRINIVASA: Right.
13 MS. NELSON: Because I have
14 concerns about the across-the-board because of
15 what Mr. Dysart articulated. And so if AT&T
16 could make a proposal, that would be a little
17 more concrete and that would be -- you know,
18 measure by measure I guess it would probably be
19 more useful.
20 MR. COWLISHAW: Okay.
21 MR. WAKEFIELD: Your Honor, Jason
22 Wakefield for WorldCom. We would join in AT&T's
23 comments. Our proposal had been to do per
24 measurement across the board. Consistent with
25 your direction, we'll get with AT&T and try to

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1 come up with a hybrid approach that would be
2 evaluating each measurement to see where it
3 would be appropriate.
4 MR. SRINIVASA: And also in
5 Tier 2, you know, the way they -- the language
6 is right now, there was some confusion.
7 Percentage versus the averages that, you know,
8 Tier 2 is repayable if you miss that for three
9 months in a row. And to calculate the number of
10 observations that are subject to payment, should
11 you apply the third month or do you calculate
12 the number of observations that are subject to
13 payment for each month and then calculate the
14 average for those three months? I believe
15 that we -- instead of saying third consecutive
16 month, the three -- each of three consecutive
17 months you have to calculate the number of
18 observations, then you compute the average, and
19 you may need to clarify that.
20 MR. DYSART: Yeah.
21 MR. SRINIVASA: You would make
22 that correction there and propose that anyway,
23 right? This is in the Attachment 17 performance
24 remedy plan?
25 MR. DYSART: Yeah, we can make

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1 that change in there.
2 MR. COWLISHAW: We'll just ask to
3 see whatever the --
4 MR. DYSART: Sure.
5 MR. SRINIVASA: It was calculated
6 correctly for the percentage. It wasn't done
7 the same way for the average. We need to -- you
8 have to --
9 MR. COWLISHAW: You're talking
10 about just how to arrive at the three-month
11 rolling --
12 MR. SRINIVASA: Right.
13 MR. DYSART: There was an -- for
14 averages and percentages there were two
15 different terminologies in there that made them
16 somewhat inconsistent. And I think the attempt
17 is to make them consistent to the methodology
18 that Mr. Srinivasa described. And I can make
19 that change and --
20 MR. COWLISHAW: Okay.
21 MR. DYSART: -- and do that.
22 MS. NELSON: Okay. AT&T also made
23 a suggestion on access to the raw data and
24 agreement on the format of the raw data. Is
25 that correct?

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1 MS. BOURIANOFF: Yes.
2 MR. COWLISHAW: That's correct.
3 And I think it was our -- let me start with the
4 raw data.
5 MS. NELSON: While you're looking
6 that up, I think Mr. Srinivasa --
7 MR. SRINIVASA: Also in relation
8 to that calculation of the Tier 2 observations
9 rolling average, because there was some
10 confusion -- you know, it was calculated
11 differently for up to the month of March, I
12 think, on a going-forward basis. Starting from
13 April I would like you to use the --
14 MR. DYSART: Right. And we have.
15 MR. SRINIVASA: Okay.
16 MR. WAKEFIELD: Your Honor, before
17 we get off the remedy issues real quick, we had
18 generally indicated a desire to address remedy
19 issues. In an earlier workshop, Southwestern
20 Bell stated that they weren't interested in
21 revisiting those, so we did not put any concrete
22 proposals beyond what we had proposed earlier on
23 in the 271 process.
24 The other issue that we had raised was
25 the intermediate caps, in other words, the per

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1 measurement caps. We would generally advocate
2 removing those caps.
3 But if that's not something the Staff
4 is interested in considering, would you be
5 interested in considering, at least, a targeted
6 proposal where we would identify specific
7 measurements where a cap might be contrary to
8 the public interest similar to what we're doing
9 on the low volume issue?
10 MR. SRINIVASA: Would you repeat
11 that one more time?
12 MR. WAKEFIELD: Sure. There are
13 the per-measurement caps. In other words, caps
14 on the amount of liability on a specific
15 measurement. For example, the interconnection
16 trunks and another example being FOCs. We would
17 generally advocate removing those caps because
18 they keep the total remedy amount artificially
19 low so you never even have to worry about the
20 overall cap that -- and you're familiar with
21 those arguments that we've made.
22 Would the Staff be interested in a more
23 focused evaluation, consistent with what we just
24 discussed, where we would look at specific
25 measurements and justify why the cap should be

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1 eliminated for those, or increased for those
2 specific measurements and the rationale behind
3 that?

4 MR. SRINIVASA: Mr. Dysart, do you
5 want to respond to that?

6 MR. DYSART: This is Randy Dysart,
7 Southwestern Bell. The whole issue of changing
8 the premise that the remedy plan is based upon
9 is going to be an issue with Southwestern Bell.
10 I just need to make everybody clear of that.

11 You know, we had the basic agreement in
12 the MOU that -- here's the penalty plan. The
13 tweaking of high/low measures, I think that's
14 appropriate here. But as far as changing the
15 overall design of the plan could cause some
16 serious problems from our perspective.

17 MR. WAKEFIELD: And I understand
18 the position. We want to make it clear that we
19 have concerns and would like to see changes to
20 the remedy plan.

21 We also understand consistent with what
22 Southwestern Bell is saying that this is not the
23 forum, so we just want to make sure that it's
24 not represented in other forums that we didn't
25 raise the issue.

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1 And Randy may want to talk about it.
2 There's -- I know there is a meeting that
3 Southwestern Bell is undertaking later this
4 month and AT&T has made some requests to them
5 about that meeting to try and make it as
6 productive as can be. I think it's apparent
7 we're not going to come out of this workshop
8 here -- we're not going to be able to have
9 Southwestern Bell write something, I don't
10 think, in a document next Tuesday that's going
11 to say here's how the raw data is going to be
12 provided and the CLECs say, yeah, we're in
13 agreement with that. This is going to take
14 somewhat longer than that.

15 I guess what I'd like to have come out
16 of the workshop, this six-month review, is some
17 sense of direction from, hopefully, the parties
18 and from Staff that this is something that's not
19 going to get lost between now and the next
20 six-month review, but that we are kind of under
21 a common direction, to get to, a standardized,
22 usable format for production of raw data. And
23 that, you know, we would be expected to report
24 to you on some regular basis about progress on
25 that until we've got it done. And getting it

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1 MS. NELSON: Right. I understand.

2 MR. COWLISHAW: I'm trying to say,
3 for the record, in as non-inflammatory a way as
4 possible, that AT&T was not a party to the MOU.

5 (Laughter)

6 MR. SRINIVASA: Noted.

7 MR. DYSART: You didn't inflame me
8 very much.

9 (Laughter)

10 MS. NELSON: Okay. So let's go
11 back to the raw data issue.

12 MR. COWLISHAW: On raw data, we
13 had some discussion, I think, about this both --
14 we had some discussion about this in our
15 conference call to address today's agenda a week
16 or two ago. And AT&T's concern is that we get
17 to a standardized format for receipt of the raw
18 data for all these measures, something that
19 makes it relatively easy to request results in
20 timely -- provision of raw data, and it's
21 provided in a way that people understand what
22 the fields mean in the raw data and that that's
23 all -- and that we have some stability in the
24 way that the raw data is reported to us from
25 month-to-month when we request raw data.

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1 done would hopefully be something more in the,
2 I don't know, 30-60 day frame rather than six
3 months from now.

4 MS. NELSON: Okay. Staff is
5 really interested in resolving this issue also.
6 So, I think that -- I know that -- requests have
7 been made to do -- have Southwestern Bell do a
8 workshop and Southwestern Bell agreed to do
9 that. I think initially it came up in terms of
10 the coordinated hotcut data, but I'm assuming
11 that the workshop is not going to be limited to
12 that data.

13 MR. DYSART: This is Randy Dysart,
14 Southwestern Bell. Now, it's going to be -- try
15 to address as many issues as we can in -- during
16 the workshop. I mean, it is our goal to make
17 this as -- collecting the raw data and getting
18 it to the CLEC -- as easy as possible. We've
19 got a dedicated team now working on that. And
20 it's a whole 'nother director that's doing it,
21 so I don't know a lot of the detail. But I
22 envision it to be very simple.

23 I can't for sure it would be on a
24 website, but, I mean, if we can make it that
25 easy for you to go get your raw data, that's

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1 what we'd like to do. And I think you'll find
2 out a lot more information during that workshop
3 and the plans to do that.
4 MR. SRINIVASA: Mr. Dysart, if you
5 recall the December 16th Open Meeting, you made
6 a commitment saying that you are going to change
7 the system. Instead of using the Excel format
8 you would be moving towards database system?
9 MR. DYSART: Right.
10 MR. SRINIVASA: And has that --
11 you know, your target date to complete that was
12 sometime in May of this year. Have you already
13 done that? And also, you said you might as well
14 make the raw data available in the same format
15 and there may be an FTP site wherein they can go
16 in there and download it. Is that --
17 MR. DYSART: What's being worked
18 on as far as the access database is more from
19 the reporting side. And that is up -- I believe
20 up and running as of this week in tandem mode
21 with the Excel site. And that was kind of
22 as-planned. And then hopefully with June data
23 we'll have -- be able to make that comparison to
24 validate. So I think that's on track.
25 The raw data issue is sort of a

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1 different -- the FTP issue was to download the
2 results in an FTP format so that you wouldn't
3 have to go out and pull it off a website in
4 whatever format is done there that you could
5 just straight FTP it.
6 At one point, when we had had some
7 meetings, that was an issue -- on the wish list
8 for the CLECs so they could dump it into a
9 database of their own. That's being looked at
10 with this access process.
11 The raw data is a little bit different
12 issue because it's -- in some cases it's a huge
13 amount of data. So there's another kind of --
14 this group is looking into how to best to do
15 that.
16 MS. NELSON: What I would propose
17 that we do is -- at the end of the day, we're
18 going to set some time frames. What I would
19 propose is that I think this issue can be
20 resolved between -- or among Southwestern Bell
21 and the CLECs. So what I would propose to do is
22 exactly what Mr. Cowlshaw outlined, which is
23 set a time frame for Southwestern Bell and the
24 CLECs to come to closure, come to agreement on
25 how the raw data will be handled. So...

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1 MS. BOURIANOFF: Your Honor,
2 there's one issue with regard to this workshop
3 that's been scheduled for June 27th that we have
4 actually --
5 UNIDEN. SPEAKER: It's been moved
6 to June the 28th because of the DSL workshop.
7 MS. BOURIANOFF: Okay. And I
8 don't know if it's still a half-day workshop on
9 the 28th --
10 UNIDEN. SPEAKER: -- AT&T's request
11 that it be made a full day.
12 MS. BOURIANOFF: Right.
13 MS. NELSON: Okay.
14 MS. BOURIANOFF: That's because of
15 the importance of these issues and the
16 complexity, we have requested it be made a
17 full-day workshop.
18 MS. NELSON: Okay. Yeah. I think
19 that would probably be a good idea. So I would
20 encourage Southwestern Bell to do that.
21 Are there other -- before we move on to
22 the timing issues, are there other general
23 issues that parties have raised that need to be
24 discussed today?
25 MR. COWLISHAW: We had made, I

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1 guess, two other recommendations. I think I'd
2 like to at least mention one of them.
3 MS. NELSON: Okay.
4 MR. COWLISHAW: And that's the
5 reporting of exclusions. We have -- as we kind
6 of have been reminded, looking at all these
7 measures -- many exclusions, exclusions for many
8 of the measures, and an awful lot of exclusions
9 that are in the nature of excluding transactions
10 where the problem is thought to be caused by the
11 CLEC or the CLEC's customer. All of those, no
12 matter what words we put around it in the
13 business rules, whether the performance measures
14 are implemented fairly and accurately depends on
15 people getting it right when they classify a
16 particular transaction as CLEC-caused versus
17 Southwestern Bell-caused.
18 To facilitate the CLECs at least being
19 able to try and get a handle on that regularly
20 in looking at the data that's reported on the
21 website, it had been our suggestion that, kind
22 of the way 70.1 works for PM 70, which is the
23 reporting of the excluded blocked calls, 70.1 is
24 the blocked calls that Southwestern Bell doesn't
25 count against itself in Item 70 because it

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1 thinks that those calls fell within one of the
2 several bullet point exclusions under PM 70,
3 that we would have the measures reported in such
4 a way that the CLEC, when it got its data, would
5 at least get for each measure how many
6 transactions Southwestern Bell has actually
7 excluded from the measure in that month for the
8 CLEC. They have to count those -- I mean, they
9 have to go through the process of excluding them
10 to do the reporting.

11 MR. SRINIVASA: Let me ask
12 Mr. Dysart this: There is an audit provision in
13 the performance remedy plan. Any CLEC can
14 request an audit if they think the reported data
15 is not correct. In order to, you know -- if an
16 audit is requested, if the auditor requested
17 what exclusions did you take, do you have the
18 data, do you store them some place? Do you keep
19 them?

20 MR. DYSART: Yes, we have to keep
21 those. And to address Mr. Cowlshaw's concern,
22 I don't inherently have a problem with that. It
23 will take some time to implement.

24 I mean if we agree to do that, don't
25 expect me to have it next week or next month

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1 because it will take some reformatting of
2 reports and --

3 MS. NELSON: Could you just get
4 back to us in terms of --

5 MR. DYSART: Yeah. But, I mean,
6 inherently I don't necessarily have a problem
7 with what's being asked.

8 MS. NELSON: Okay. Let's talk
9 time frames now. Southwestern Bell initially
10 had agreed to make the changes to the
11 performance measures and have those to the
12 parties by Tuesday. Now we have placed another
13 request on Southwestern Bell and that is, in the
14 instances where they don't agree with CLECs,
15 that they include a pretty comprehensive
16 discussion as to why they don't agree.

17 In light of that, I'm going to ask that
18 Southwestern Bell file the performance measures
19 business rules and the explanation by next
20 Thursday, the 15th. And then the CLECs will
21 file a response by the following Thursday, the
22 22nd.

23 And I thought it would probably be
24 advisable to go ahead, because we're going to
25 shoot to get these to the Commissioners at the

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1 July 12th meeting, which means we have to have
2 it to them by July 5th.

3 So there's not much time in between
4 there, so I thought it would be advisable at
5 this point to go ahead and set something up, in
6 case Staff does have questions.

7 Okay. Let's go ahead and set it for
8 the afternoon of the -- June 26th, which is a
9 Monday.

10 MR. SRINIVASA: And June 27th we
11 have ADSL.

12 MS. NELSON: Right, from 12:00 to
13 6:00. That's actually the time that this room
14 is available on that day.

15 MS. EMCH: Can you repeat that?

16 MS. NELSON: Sure. June the 26th.
17 And it's -- I think we're just going to have to
18 go ahead and plan on meeting that day because --
19 since we're not going to get the CLEC comments
20 until the 22nd, it's probably going to be hard
21 for us to analyze whether we need to meet on the
22 26th and give y'all notice in time. So we'll
23 just plan on meeting on the 26th. It may not be
24 a really long meeting, but --
25 Okay.

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1 MS. EMCH: Do you envision a
2 bridge number being set up?

3 MS. NELSON: Sure.

4 MS. EMCH: Those of us coming from
5 out of town --

6 MS. NELSON: Sure. We've always
7 agreed to set up a -- agreed to all parties to
8 set up a bridge to the extent that -- I mean,
9 that's not our first preference.

10 MS. EMCH: But if it's only going
11 to be for three hours, the plane ride down is
12 longer than that.

13 MR. WAKEFIELD: Jason Wakefield,
14 WorldCom. We will set up a conference bridge.

15 MS. NELSON: Okay. Thank you.
16 That would be easier because if Staff doesn't
17 have very many questions, you won't have wasted
18 a trip.

19 MS. EMCH: Thank you.

20 MS. NELSON: And then, in terms of
21 the raw data issue, I guess I'd like a
22 suggestion in terms of timing. If we should
23 say -- if this workshop is going to be on the
24 28th, I think I'd like to say that it be
25 resolved within 60 days of the 28th and that

1 Southwestern Bell and the CLECs make a joint
 2 filing then by, like, August 28th or -- if
 3 that's not a weekday, just the closest weekday
 4 to that.

5 MR. COWLISHAW: It's a Monday.
 6 MS. NELSON: Okay. August 28th,
 7 then.

8 And then, I would also like AT&T to
 9 file -- AT&T, MCI and any other CLECs who are
 10 interested -- the proposals regarding the remedy
 11 plan by this next Thursday, the 15th. And then
 12 Southwestern Bell would have until the 22nd to
 13 respond to those.

14 Tomorrow -- and we'll get an order out
 15 at least by Monday on these time frames because
 16 I know there are a lot of DSL parties who are
 17 not here.

18 And tomorrow the issues are UNE, UNE-P
 19 resale specials. Does anybody have anything
 20 else to add?

21 MR. SAUDER: This is T.J. Sauder
 22 with Birch. I believe we have a definition of
 23 simple and complex orders for the UNE-P side
 24 that they're going to have by end of the week,
 25 from two weeks from today or somewhere in that

1 time frame? The 23rd or 24th that they were
 2 going to file?

3 MR. DYSART: We're searching for
 4 the date, sometime --

5 MR. SAUDER: You said you had a
 6 meeting next week to discuss and then --

7 MS. KLAMERT: This is Abbie
 8 Klamert with Birch Telecom. If we're talking
 9 about having a clarification meeting with Staff
 10 on the 26th and if we -- I recall 6-24 was the
 11 date for the simple and complex, that doesn't
 12 give us -- or something like that, that doesn't
 13 give Birch enough time --

14 MS. NELSON: Well, we really need
 15 to have all of Southwestern Bell's proposals by
 16 the 15th.

17 MS. KLAMERT: That's what I would
 18 recommend.

19 MR. DYSART: We'll try to get what
 20 we consider simple and complex by the 15th.

21 MS. NELSON: Okay. Thank you.
 22 Let's adjourn for the day. Thank you-all.
 23 (The proceedings adjourned at
 24 4:25 p.m.)
 25

1 CERTIFICATE

2

3 STATE OF TEXAS)
 4 COUNTY OF TRAVIS)

5 We, Steven Stogel and Lou Ray,
 6 Certified Shorthand Reporters in and for the
 7 State of Texas, do hereby certify that the
 8 above-mentioned matter occurred as hereinbefore
 9 set out.

10 We FURTHER CERTIFY THAT the proceedings
 11 of such were reported by us or under our
 12 supervision, later reduced to typewritten form
 13 under our supervision and control and that the
 14 foregoing pages are a full, true, and correct
 15 transcription of the original notes.

16 IN WITNESS WHEREOF, we have hereunto
 17 set our hand and seal this 9th day of June 2000.

18

19

20 Steven Stogel
 21 Certified Shorthand Reporter
 22 CSR No. 6174 - Expires 12/31/00
 23 Kennedy Reporting Service, Inc.
 24 800 Brazos, Suite 340
 25 Austin, Texas 78701.

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2

3 Lou Ray
 4 Certified Shorthand Reporter
 5 CSR No. 1791 - Expires 12/31/01
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 8 Austin, Texas 78701.

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