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EX PARTE OR LATE FILED



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ORIGINAL

June 21, 2000 RECEIVED  
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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Hand Delivery

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

Re: EX PARTE -- CC Docket No. 00-657 Application of SBC Communications Inc. Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide InterLATA Services in Texas

Dear Ms. Salas:

This letter provides the latest information WorldCom, Inc. has obtained concerning Southwestern Bell's ("SWBT's") Operations Support Systems ("OSS"), and in particular discusses the May 23, 2000 letter SWBT sent to WorldCom concerning Line Information Database ("LIDB") issues, which SWBT attached to its June 9 ex parte submission to the Commission. This letter also responds to the Department of Justice's June 13, 2000 ex parte submission, in which the Department relied on SWBT's post-application improvements and conditionally recommended approval of SWBT's section 271 application for Texas. Notably, the Department's evaluation in May 2000 (at the time requested by the Commission) did not recommend approval of SWBT's application as filed, which is the relevant standard under the complete-when-filed rule. Instead, the Department stated that its view of SWBT's renewed application as filed was the same as its evaluation of SWBT's first application for Texas, that is, that the current application should be denied. The Commission must accord substantial weight to the Department's May evaluation if the Commission adheres to its complete-when-filed rule.<sup>1</sup>

<sup>1</sup>There is no doubt that SWBT's OSS was not ready in early April when SWBT chose to renew its section 271 application for Texas. If the Commission nonetheless chooses to approve SWBT's application at this time, it must contend with the fact that it is not applying the complete-when-filed rule. The Commission should not suggest in its order that SWBT's application was acceptable when filed. For example, if the Commission were to approve the application but take the position that it has not considered SWBT's May 27, 2000 OSS enhancement, future applicants might conclude that excessive reject rates and unnecessary address edits are acceptable.

There are, of course, vital policy reasons justifying adherence to the complete-when-filed

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Moreover, even evaluating SWBT's OSS as it stands today, SWBT's application should be denied as a result of OSS defects that include the "important qualifications" noted by the Department of Justice. DOJ June 13 *ex parte* at 1. In particular, the Department of Justice reaches no overall conclusion regarding the readiness of SWBT's OSS for UNE-P, instead recommending close Commission evaluation of that OSS. DOJ June 13 *ex parte* at 18-19. Close evaluation, however, reveals that most of the key systemic problems that stand in the way of robust local competition -- on which WorldCom has focused -- have not been fixed, as indicated by WorldCom's previous filings and the following updates.

**A. Integration of Pre-Order and Order Interfaces.** The Department of Justice appropriately expresses concern "about the apparent difficulty CLECs have had integrating SBC's pre-order interfaces with SBC's ordering interface." DOJ June 13 *ex parte* at 18. But the Department points to some "significant steps" SWBT has recently taken to alleviate this concern. *Id.* In particular, the Department relies on SWBT's May 27 change with respect to service addresses. *Id.* at 18 n.49. The Department is right that this change is an important one. Prior to this change, reject rates were extremely high. The May 27 change has helped significantly by reducing WorldCom's reject rate, but effective integration remains impossible. For reasons WorldCom has repeatedly made clear, this change does not eliminate the need for parsed customer service records ("CSRs"). Even after the May 27 change, CLECs must continue to type addresses into their back-end systems because SWBT still requires submission of addresses on some orders, such as orders for second lines, and CLECs must continue to submit directory addresses on orders to change directory listings, as well as have the information in their systems for billing purposes. Moreover, it is too soon to evaluate whether SWBT's May 27 change has had any of the negative effects about which WorldCom has expressed concern. The service address change thus does not eliminate CLECs' need to integrate address information obtained at the pre-order stage.

The Department of Justice points to improvements in SWBT's documentation and implies that CLECs may now be able to parse pre-order information themselves. It acknowledges, however, that the new documentation must be "closely evaluated." *Id.* Close evaluation reveals that SWBT still has not provided adequate documentation to enable CLECs to integrate pre-order and order interfaces. SWBT did post some parsing rules on its web site on June 2. Unfortunately, the June 2 documentation does not add much, if any, detail to the parsing rules SWBT provided via Accessible Letter in May. Key information continues to be missing. For example, SWBT still has not provided information to enable CLECs to separate the street name from the thoroughfare. Of course, by continuing to provide new parsing rules as late as this month, SWBT implicitly acknowledges that its prior documentation was incomplete.

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rule. The rule is important both for substantive reasons to ensure that systems needed to open local markets are robust enough not to fail during the 90-day review period, and for procedural reasons to permit the agencies and interested parties to analyze the application properly without chasing a moving target.

In addition to parsing issues, business rule conflicts remain a significant barrier to integration.<sup>2</sup> WorldCom has provided SWBT with two letters containing detailed descriptions of these conflicts. SWBT has now responded to the first of these letters. In its response, SWBT acknowledges the existence of numerous business rule conflicts. E-mailed Memorandum from Dawn Divincentis to Terri McMillon, June 13, 2000, attached hereto as Att. 1. SWBT states that it will correct many of the conflicts in its July 2000 EDI release, and that it will continue to investigate other conflicts. This is a welcome development. However, it does not show that SWBT's interfaces are integratable today, much less as of the time SWBT filed its application. In fact, it shows that SWBT's interfaces are not integratable.

**B. The Three Service Order Process.** SWBT's process of dividing Local Service Requests ("LSRs") for UNE-P into three service orders (the "N," "C" and "D" suborders) continues to cause significant problems because SWBT is failing to ensure that these three service orders remain coordinated. That process is one of the primary causes of the LIDB problems that WorldCom is experiencing, of some of the jeopardies WorldCom is receiving, and of other more fundamental problems for which WorldCom's LIDB problems seem to serve as a "marker."

In its June 9 ex parte, WorldCom discussed the fact that after SWBT informed it that the cause of erroneous information in LIDB was failure of the N order to post in a timely fashion, WorldCom determined that there were problems with the C and D orders as well. WorldCom June 9 ex parte at 7. SWBT still has not responded to WorldCom's e-mail detailing these problems, id. att. A, and in a meeting with WorldCom on June 15 appeared to be surprised that these problems exist. Absent timely information from SWBT, WorldCom still cannot determine all of the harmful effects that will be caused by missing C orders, multiple C and D orders, or delays in posting of the N or D orders.

Nonetheless, SWBT has acknowledged some potential impacts of these problems. First, at the June 15 meeting, SWBT acknowledged that missing C orders could indicate that the customer had been migrated to the wrong CLEC -- in effect a local slam caused by SWBT. The ordering CLEC would be unable to access the C order because it would appear to belong to a different CLEC. This is not a hypothetical possibility. WorldCom has concrete evidence that several WorldCom customers have been erroneously migrated to AT&T. A missing C order could also mean that the customer will continue to be billed by SWBT, even though WorldCom has already begun billing the customer.

Second, in an e-mail discussing some of the jeopardies it has been transmitting, SWBT acknowledged that delays in posting of the D order could cause transmission of unnecessary jeopardies to CLECs. In particular, SWBT explained that the reason WorldCom has received jeopardies for "facilities not available" on basic migration orders is that:

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<sup>2</sup>Many of the ongoing business rule conflicts have nothing to do with services addresses and thus are unaffected by SWBT's May 27 change.

the facility assignments are reused from the 'D' order to the 'C' order. [The jeopardy code for Pending Facilities Assignment] is simply indicating the 'C' order is awaiting facilities (in this case to be reused from the 'D' order).

E-mail from Mary Moya to Leslee Engelman, June 13, 2000, attached hereto as Att. 2. In other words, until the D order posts, SWBT's systems view the customer's existing facilities as unavailable for CLEC use. Thus, if the D order has not posted by the due date, SWBT's systems apparently cannot complete the C order and SWBT therefore transmits a jeopardy.<sup>3</sup> In addition, when the D order does finally post, the facilities are noted as available for reassignment, and if the related C order is not found, the customer may be disconnected. This appears to be the cause of lost dial tone for a number of WorldCom customers.

Finally, SWBT has acknowledged a series of problems connected with delays in posting the N order. In its May 23 letter responding to WorldCom's questions concerning LIDB (attached to SWBT's June 9 *ex parte*), SWBT acknowledged that delays in posting the N order could cause: (a) a delay in updating the CSR information; (b) a delay in changing the zip code information in LIDB used for AIN routing; and (c) a delay in updating calling name information which potentially could affect caller ID. *Id.* at 2, 7. SWBT also stated that delayed N orders are the source of the erroneous PIC information WorldCom has found in LIDB. This will have a future impact on CLECs, because SWBT said that it plans to introduce a service to check the PIC information in LIDB when a customer makes a "0-" long distance call. *Id.* at 5-7.

SWBT apparently did not list all of the potential impacts of delayed N orders in its May 23 letter. In its June 15 meeting with WorldCom, SWBT stated that the N order is also used to establish the OCN (which drives billing of CLECs) for the new company, and thus could significantly affect timeliness and accuracy of CLEC bills. The N order also implements the customer's directory listing and branding. Thus, if the N order does not complete or completes incorrectly, the customer will not be listed in the directory and/or 411 and will receive incorrect branding on operator and directory assistance calls. Moreover, these significant problems are not measured in SWBT's performance data.

Hence, SWBT's inability to ensure that the three service orders it creates remain coordinated has resulted, and will continue to result, in significant problems for CLECs. Because this process triggers all of the key steps in SWBT's back-end systems, additional problems are almost certain to appear if SWBT does not find a way to better coordinate the three service orders, or dispense with the three-service-order process altogether.

**C. Manual Processing.** Along with the three service order process, SWBT's high level of manual processing appears to be a central cause of the problems that WorldCom is experiencing.

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<sup>3</sup>Many of the other jeopardies that SWBT is transmitting also appear to be related to SWBT's three service order process. WorldCom asked SWBT to provide an explanation of some of the jeopardies it was transmitting. SWBT's response, while difficult to understand, ties many of the jeopardies to problems with the "RRSO," which is the code SWBT uses to coordinate the three service orders.

SWBT has attributed WorldCom's LIDB problems, jeopardies, missing C orders, duplicate N and D orders, and a high percentage of troubles (such as lost dial tone) in part to manual errors.<sup>4</sup> In its June 15 meeting with WorldCom, SWBT explained that the manual errors are the result of a training problem due to recent increases in staff needed to handle a higher volume of additional orders. Thus, just as WorldCom always feared, an increased volume of orders has already led to significant manual errors -- something that is likely to become even worse as volumes increase further toward commercial levels.

Increased errors at higher volumes are particularly likely because SWBT is manually processing far more orders than its statements would suggest. In SWBT's May 23 letter to WorldCom at 5 (attached to SWBT's June 9 ex parte), SWBT states that of the MOG-eligible orders WorldCom submitted, which are orders designed to flow through, only 75% flowed through in April.<sup>5</sup> Even that low number appears to be significantly overstated. In the samples of orders WorldCom has checked in LIDB, WorldCom has experienced error rates on the order of 40%.<sup>6</sup> McMillon, Sivori & Lichtenberg Supp. Rep. Decl. ¶¶ 26-27. Since SWBT has attributed these errors to mistakes and delays in typing the N orders, it appears that at least these 40% of WorldCom orders are handled manually. Presumably the real number is much higher, because not every order SWBT processes manually results in an error in LIDB.

SWBT's exaggeration of its flow-through capability is also apparent from its explanation for why WorldCom orders have fallen out for manual processing. SWBT states that "reasons for the manual handling . . . could be end user name/telephone number/address don't match, invalid supplemental type, invalid BAN, invalid address and invalid feature activity." (May 23 letter,

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<sup>4</sup>In particular, SWBT has attributed WorldCom's LIDB problems to delays and errors in typing the N order; SWBT has attributed some of the jeopardies it has transmitted to the failure of SWBT representatives to add the RRSO code required to ensure that the N, C and D orders remain coordinated; and in its June 15 meeting with WorldCom, SWBT also attributed the missing C orders and the duplicate N and D orders to manual handling.

In addition to manual processing of orders, SWBT continues to return a high percentage of rejects manually and to take too long to process those rejects. WorldCom's data show that SWBT is clearly taking significantly more than the 5 hours allotted under the benchmark.

<sup>5</sup>SWBT states that the rate was much higher in May (96%), which is highly unlikely since SWBT did not implement any systems change that would increase flow through, the type of orders WorldCom submitted remained the same, and WorldCom continues to experience LIDB errors.

<sup>6</sup>Amazingly, SWBT states that less than 2% of WorldCom's orders have encountered LIDB problems. (May 23 letter, attached to SWBT's June 9 ex parte at 4.) SWBT appears to reach this conclusion by dividing the number of errors WorldCom has found in the batches of orders it has sampled by the total number of WorldCom orders. This "methodology" relies on the astounding assumption that there are no LIDB errors other than those in the samples. WorldCom would welcome performance data from SWBT showing the accuracy of LIDB updates on all orders WorldCom submitted. Until SWBT does so, WorldCom has relied on a significant sample of 600 orders and found extensive errors.

attached to SWBT's June 9 ex parte at 3-4.) But basic – and typical – problems such as invalid address or features should lead to rejects, not manual ordering processes. SWBT has repeatedly stated that UNE-P orders will flow through (with certain designated exceptions such as some partial migrations). SWBT has never said that orders will fall out for manual processing if they have an invalid feature or address. SWBT's statements that orders do fall out for these reasons emphasizes the need for an audit to determine all reasons that orders fall out. It also emphasizes the high level of manual intervention in SWBT's systems which will no doubt cause increasingly significant problems as volumes grow.

**D. Jeopardies.** SWBT continues to send too many jeopardies, send jeopardies after the due date, and send jeopardies for inappropriate reasons. As stated above, SWBT has now explained that the jeopardies WorldCom is receiving for facilities not available result from deficiencies in the three service order process. It has attributed others to errors in manual processing – in particular to the failure of SWBT representatives to type the RRSO code that ensures the three service orders remain related. SWBT has not explained, however, why WorldCom continues to experience jeopardies on UNE-P migration orders for “missed appointments,” or “field visit determined address invalid,” or “frame due time can not be met.” These are not valid reasons for jeopardies on UNE-P migrations. Moreover, SWBT has not explained why it is transmitting so many jeopardies after the due date. As of June 15, 46% of the jeopardies WorldCom had received had been transmitted after the due date. SWBT typically returned these jeopardies days after the due date.

**E. Submission of Trouble Tickets Via Electronic Bonding.** SWBT remains unable to accept trouble tickets submitted via electronic bonding until orders have posted to billing. The Department of Justice does not discuss this important SWBT defect in its ex parte submission.

**F. LIDB.** The Department of Justice states that “some evidence in the record suggests that [a LIDB] problem persists.” DOJ June 13 ex parte at 19. This is a significant understatement. The evidence is uncontroverted that WorldCom continues to experience substantial problems with LIDB updates. WorldCom has demonstrated the existence of ongoing LIDB problems by presenting evidence of substantial errors on the ten separate batches of orders that WorldCom has checked in LIDB (with 60 orders checked per batch). WorldCom June 9 ex parte at 6-8. SWBT has never denied the existence of any of these errors. Indeed, SWBT has not even responded to the e-mail and voice mail messages that WorldCom has sent regarding the errors on the eighth, ninth, and tenth batches of orders that WorldCom checked in LIDB. WorldCom first contacted SWBT concerning these errors in late May. See, e.g., WorldCom June 9 ex parte att. 1.

SWBT's primary response to WorldCom's LIDB problems is to argue that they have little impact. Much of SWBT's May 23 letter to WorldCom (attached to SWBT's June 9 ex parte) is devoted to its contention that the impact of incorrect PIC information in LIDB is minimal. However, SWBT fails to respond to WorldCom's request to explain all current uses of PIC information in LIDB, instead responding only to the specific examples WorldCom lists.<sup>7</sup> Id. at 5-

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<sup>7</sup> This is typical of SWBT's letter. SWBT fails to address many of the questions and issues that WorldCom raised. For example, SWBT suggests that most of the errors in LIDB

6. We suspect that there are important uses of PIC information in LIDB that SWBT has yet to identify. In addition, as noted above, even SWBT has acknowledged that the PIC information in LIDB will be used for a future service SWBT plans to offer.

Moreover, SWBT's discussion focuses on the impact of the erroneous PIC information in LIDB, not the impact of the manual processing and three service order process that cause this information to be erroneous. As explained above, manual processing and the three service order process are already causing jeopardies and a variety of problems with C, D and N orders. And in its May 23 letter, SWBT admits that delays in posting of the N orders can cause a variety of problems in addition to erroneous PIC information in LIDB. See supra. The manual processing and three service order process that are at the heart of SWBT's LIDB problems are certain to cause significant continuing problems if not fixed prior to SWBT's section 271 entry.

In addition, the problems causing erroneous PIC information in LIDB may also affect the PIC information in the switch. SWBT depicts the process of updating PIC information in the switch as entirely separate from the LIDB process, stating that "PIC information on the LSR is needed to update PIC selection on the end office switch." (May 23 letter, attached to SWBT June 9 ex parte at 6). But for PIC changes subsequent to initial orders, the only information CLECs submit is through the process to update LIDB. CLECs do not submit an LSR. SWBT does not explain how this information is then used to update the information in the switch. Nor does SWBT provide a clear explanation of how it knows that the PIC information in the switch is being updated correctly even on initial orders. SWBT merely states that "the LSC monitors exception reports that would provide a view of orders not yet posted" – hardly a basis for great confidence since similar monitoring is failing to detect extensive LIDB errors. (May 23 letter, attached to SWBT June 9 ex parte at 3.) SWBT also states that the C order updates PIC information in the switch, and the CLEC "can determine if a conversion C order completes when the CLEC views the end user's LIDB record." Id. at 2. As noted above, however, after doing just that, WorldCom has determined that a number of C orders are missing altogether.

Thus, the Commission cannot properly approve SWBT's section 271 application on the present record, much less on the record from early April. The Department of Justice appropriately states that, "the Commission should assure itself that this [LIDB] problem has indeed been resolved." DOJ June13 ex parte at 19. The problem has not been resolved, however. For this reason, as well as the other reasons described above and in WorldCom's prior filings, SWBT's section 271 application must be denied.

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result from delays in typing the N order but fails to explain how this could result in incorrect PIC information in LIDB.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Keith L. Seat". The signature is written in a cursive style with a large initial "K".

Keith L. Seat

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

# **ATTACHMENT 1**

From: DIVINCENTIS, DAWN M (SNET) [mailto:DD5363@ctmail.snet.com]  
Sent: Tuesday, June 13, 2000 9:06 AM  
To: 'terri.mcmillon@wcom.com'  
Cc: WILLIAMS, MARILYNN Y (SBC-MSI); COX, LORI E (SWBT); TOPPS,  
MONET (SWBT)  
Subject: Order/Preorder Response

Terri: Attached is a copy of our response to your letter for your  
review prior to our meeting on Friday. Any questions, let me know.  
Thanks! Dawn

<<MCI CSR Comp Rsp.doc>>

Dawn DiVincentis  
Account Manager - OSS  
MCI WorldCom Account Team  
530 Preston Avenue  
Meriden, CT 06450  
203-634-5264  
fax 203-235-6178

## Southwestern Bell Telephone Response to WorldCom Letter

1. This is provided in response to a document provided by WorldCom concerning parsing of the Customer Service Record (CSR) for Southwestern Bell Telephone (SWBT). SWBT reviewed WorldCom's document and provides the following status on the identified discrepancies.

2. In accomplishing this review SWBT eliminated all fields that are concatenated into the Concatenated Address Information (CAI), the Service Address Location (SALO), Listed Name (LISTNM), Listed Address (LSTADR), and Delivery Address (DELADR) fields. The parsing of these fields has already been addressed in the Uniform Operational Support System (U-OSS) Plan of Record (POR). These fields will be provided in a parsed format when the SBC/Ameritech Uniform interfaces are introduced.

3. The remaining conflicts identified will be addressed in the following methods:

A. The following fields require updates to the Local Service Pre-Ordering Requirements (LSPOR) document. These will be included with the upcoming 7/22/00 release.

- Hunting Type Code (HNTYP) – Valid values will be changed to match the Local Service Ordering Requirements (LSOR) document.
- Signaling (SGNL) – Valid values will be changed to match the LSOR document.
- Type Of Account (TOA) – Valid values will be changed to match the LSOR document and OBF Practice 122.
- White Pages Products (WPP) – Valid values will be changed to match the LSOR document.

B. The following fields require updates to the LSPOR document and updates to field usage in LSPOR. These will be included with the upcoming 7/22/00 release.

- InterLATA Presubscription Indicator Code (PIC) – Valid values will be changed to match the LSOR document plus the field usage will be changed from required to conditional.
- IntraLATA Presubscription Indicator Code (LPIC) – Valid values will be changed to match the LSOR document plus the field usage will be changed from required to conditional.
- Block Exceptions (BLOCK) – Valid values will be changed to match the LSOR document plus the field usage will be changed from 1/AN to 1A to match OBF Practice 122. Note – The MCI document states that this field is not applicable for ordering but this is incorrect.
- Pulsing Type (PUL) – This field will be changed from 'Not Used' to 'Conditional'. The valid values will be shown to match the LSOR document and OBF Practice 122. Note: The notes shown on the WorldCom document do not match what is shown in the LSOR and LSPOR.
- Directory ID Type (DIRTYP) – This field will be changed from 'Not Used' to 'Conditional'. The valid values will be shown to match OBF Practice 122. Note: Although this field is not required for the order it will be provided to clarify the types of directories delivered as shown in the DIRQTYA field.

C. The following fields require updates to field usage in LSPOR document. These will be included in the upcoming 7/22/00 release.

- Zip Code (ZIPCODE) – Field length will be changed from 5/N to 10/AN to match OBF Practice 122. Note: SWBT only uses the first five digits and will only return the first five, however to be consistent with OBF the field length will be changed and a note added to the field page. The five-digit zip code is all that is required for ordering.
- Terminal Numbers (TERS) – Field length will be changed from 10/N to 10AN to match OBF Practice 122. Note: This field and the TER field on the order provide the same basic information however, the pre-ordering field allows a range of terminals to be returned where ordering does not. This accounts for the difference in field format and length between ordering and pre-ordering.

D. The following fields are identified on the WorldCom document as having conflicts between ordering and pre-ordering. These fields are all returned as part of the concatenated fields. Further explanation for the source of the conflict for these fields is needed. Request WorldCom provide more specifics.

- Service Address Street Directional (SASD) – Provided in CAI field
- Service Address Street Name (SASN) – Provided in CAI field
- Service Address Street Thoroughfare (SATH) – Provided in CAI field
- Floor (FLOOR) – Provided in SALO field
- Room (ROOM) – Provided in SALO field
- City (CITY) – Provided in CAI field
- Directory Address Street Directional (DDASD) – Provided in DELADR
- Directory Address Thoroughfare (DDATH) – Provided in DELADR
- Directory Address Locality (DDALOC) – Provided in DELADR
- Style Code (STYC) – Provided in LISTNM
- Listed Address Street Directional (LASD) – Provided in LSTADR
- Listed Address Thoroughfare (LATH) – Provided in LSTADR
- Listed Address Locality (LALOC) – Provided in LSTADR

E. The following fields are identified on the WorldCom document as being required for ordering but not provided by pre-ordering. This is incorrect, these fields are provided as follows:

- State (STATE) – Provided in CAI
- Bill Name (BILLNM) – Provided in the Feature/Feature Service fields. Note: OBF did not provide fields for this information.
- Address Indicator (ADI) – Provided in LSTADR

F. One field identified on the WorldCom document as being required for ordering but not provided by pre-ordering is not part of OBF Practice 122.

- Line of Information (LOI)

G. The other fields that are identified as being required for ordering but not provided by pre-ordering will need to be investigated.

- Service Address Descriptive Location (SADLO)
- Service Center 1 (SC1)
- Omit Telephone Number (OMTN)
- Line of Text (LTEXT)
- Listing Text Type (LXTY)
- Line of Text Reference Number (LTXNUM)
- Directory Sub Section (DIRSUB)
- Omit From Secondary Directory (OMSD)

H. One field may require an update to the ordering interface. This will be provided to the ordering point of contact for investigation.

- White Pages Products (WPP) – OBF Practice 122 and the LSPOR show a length of 12/AN, LSOR shows a length of 1 – 5/AN

# **ATTACHMENT 2**

Date: Tue, 13 Jun 2000 13:33 -0500 (CDT)  
From: "MOYA, MARY E (SWBT)" <MM8783@txmail.sbc.com>  
To: leslee.w.engleman@wcom.com  
Return-receipt-to: MM8783@txmail.sbc.com  
Subject: RE: #2 - Cancelled Orders and Rejected Order Corrections

Hi Leslee,

Please see your answers listed below. Call me if you have any questions.

thanks,  
Mary Moya  
SWBT ACCOUNT MGR.-UNE 13 States  
MCIW ACCOUNT TEAM  
ofc. 214 464-2470  
pgr. 888 561-9512

-----Original Message-----

From: Leslee W. Engleman [mailto:Leslee.W.Engleman@wcom.com  
<mailto:Leslee.W.Engleman@wcom.com> ]  
Sent: Tuesday, June 13, 2000 12:49 PM  
To: MOYA, MARY E (SWBT)  
Subject: #2 - Cancelled Orders and Rejected Order Corrections  
Importance: High

Mary,

You had said the PFA (awaiting facilities assignment) doesn't play a role in UNE-P and that's the reason that the LSC couldn't explain it. Could you please ask your SME's the below two additional questions regarding this?

- 1) Why is WCOM getting this message, since WCOM is ONLY ordering UNE-P?

SWBT ANSWER:

PFA does not play a role in the UNE-P ordering process however it does in the provisioning process which is why you are able to view under POS. The LSC is only responsible for ordering and not provisioning. MCIW is getting this message because even though field work is not required on reconfiguring existing combinations to UNE-P, your UNE-P orders must flow through our provisioning systems as the combination is reconfigured to UNE-P. As you know, the facility assignments are reused from the "D" order to the "C" order. PFA is simply indicating the "C" order is awaiting facilities (in this case to be reused from the "D" order). I hope this clears things up, if not, I don't mind getting on a conf bridge to explain to your people.

- 2) Under what circumstances would a residential customer MIGRATING to WCOM need to have their facilities reassigned? Please be specific and list all instances that this would occur.

SWBT ANSWER: In a migration there would be no instance that this would occur.

Thanks,

Leslee

Forwarded message:

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Date: Thu, 01 Jun 2000 10:03 -0500 (CDT)  
From: "MOYA, MARY E (SWBT)" <MM8783@txmail.sbc.com>  
To: leslee.w.engleman@wcom.com  
CC: "MEGGER, ANTONINE M. (AIT)" <Antonine.M.Megger@ait4.ameritech.com>, "DIVINCENTIS, DAWN M (SNET)" <DD5363@ctmail.snet.com>  
Return-receipt-to: MM8783@txmail.sbc.com  
Subject: RE: Cancelled Orders and Rejected Order Corrections

Hi Leslee,

Yes and No, I've been referred a couple of times but hope to have an answer today or tomorrow. I can tell you what I know thus far, which you may already know, PFA stands for "Pending Facility Assignment" it is viewable via Toolbar under POS-Provisioning Order System. Since this is generated during provisioning and not generated upon ordering or have to do with the ordering process, the LSC would have no knowledge of this acronym. I am checking with the LOC M&P SME and the Toolbar SME to understand it's role in the UNE-P ordering or provisioning process. I hope this helps and as I mentioned I hope to have closure soon. Thanks for your continued support.

Dawn/Tonine, since this crosses over your areas as well I am including you on this mail.

Mary Moya  
SWBT ACCOUNT MGR.-UNE 13 States  
MCIW ACCOUNT TEAM  
ofc. 214 464-2470  
pgr. 888 561-9512

-----Original Message-----

From: Leslee W. Engleman [mailto:Leslee.W.Engleman@wcom.com  
<mailto:Leslee.W.Engleman@wcom.com> ]  
Sent: Tuesday, May 30, 2000 12:58 PM  
To: MOYA, MARY E (SWBT)  
Subject: Re: Cancelled Orders and Rejected Order Corrections  
Importance: High

Mary,

I just wanted to follow up on the answer for #2, have you heard from your SME yet?

Thanks,

Leslee

+++++  
From: MOYA, MARY E (SWBT)  
Sent: Friday, May 19, 2000 3:26 PM  
To: 'leslee.engleman@wcom.com'  
Subject: FW: Canceled Orders & Rejected Order Corrections

Hi Leslee,

Please see your answers listed below. Also, #2 is pending, I will have to you in the next day or so but I wanted to get you the rest of the answers.

Call me if any questions.

thanks,

Mary Moya  
SWBT ACCOUNT MGR.-UNE 13 States  
MCIW ACCOUNT TEAM  
ofc. 214 464-2470  
pgr. 888 561-9512

-----Original Message-----

From: Leslee W. Engleman [mailto:Leslee.W.Engleman@wcom.com  
<mailto:Leslee.W.Engleman@wcom.com>  
<mailto:Leslee.W.Engleman@wcom.com <mailto:Leslee.W.Engleman@wcom.com> > ]  
Sent: Wednesday, May 10, 2000 6:52 PM  
To: DIVINCENTIS, DAWN M (SNET); MOYA, MARY E (SWBT)  
Cc: Carl.Benson; WILLIAMS, MARILYNN Y (SBC-MSI)  
Subject: Cancelled Orders & Rejected Order Corrections  
Importance: High

Dawn and Mary,

I'm not sure who can answer these questions because it relates to both of your areas, I would appreciate if one of you could please help us.

The following questions stem from Southwestern Bell's letter to the TX PUC dated May 3rd in response to "MCI's Correspondence Regarding Status of MCIW's Residential Market Launch".

1.) A reference was made to 31 orders that had been Cancelled by MCI (No FOC due), can you please provide the PONs for those specific orders? ANSWER: Per our conversation, I will wait for you to send me your list and will forward our list accordingly.

a.) Can you provide a clear definition of what SWBT considers to be a "cancelled" order? ANSWER: SWB considers an order canceled when we receive a request ( SUP 1 ) from the CLEC to do so.

b.) How would MCIW know that SWBT has rejected an order due to a cancellation? ANSWER: Any subsequent request sent on a PON that has been canceled, completed will receive a fatal error of LS0210

2.) Can you please give us a brief explanation as to the role of the PFA designation in the UNE-P ordering process? ANSWER: OPEN

3.) In general, we would like to know if SWBT has a specific time frame that you expect a rejected order to be corrected by the CLEC?

a.) If so, what is that time frame? ANSWER: In order to provide the best customer service to the end-user, disposition on a reject should be made as soon as possible. Generally speaking, we try to verbally contact the CLEC if we have not gained resolution in a 90 day time frame.

b.) If the order is not corrected within that time frame or a reasonable amount of time what do you do with the incomplete

order? How is the CLEC notified? ANSWER: The order will remain in the system until the CLEC sends a subsequent request to correct the LSR or cancel.

Thank you,

Leslee Engleman  
MCI WorldCom  
Carrier Management  
972-656-1567



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