

ORIGINAL

WILLKIE FARR & GALLAGHER

EX PARTE OR CASE FILED

Three Lafayette Centre  
1155 21st Street, NW  
Washington, DC 20036-3384  
Tel: 202 328 8000  
Fax: 202 887 8979

December 4, 2001

*EX PARTE*

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
Room TW-A325  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

RECEIVED  
DEC - 4 2001  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

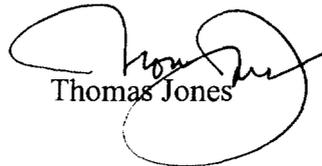
Re: CC Docket Nos. 96-98; 01-318

Dear Ms. Salas:

On December 3, 2001, Kevin Joseph, Mary Albert, Tony Parella, and Doreen Best of Allegiance Telecom and I met with Commissioner Martin and Sam Feder to discuss Allegiance's experiences with UNE provisioning and the need for national UNE performance requirements. The attached presentations were distributed at the meeting and comprised the basis for the Allegiance Telecom presentation.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), this letter and a copy are being filed for inclusion in the public record of the above-referenced proceedings.

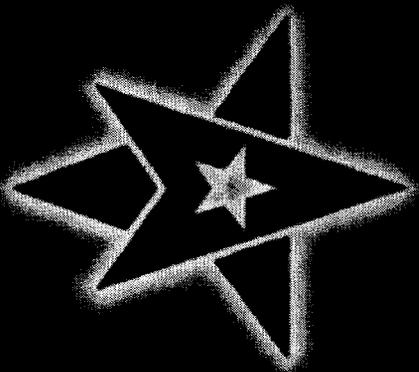
Sincerely,

  
Thomas Jones

Enclosures

cc: Commissioner Martin  
Sam Feder

No. of Copies rec'd 0+1  
List ABCDE



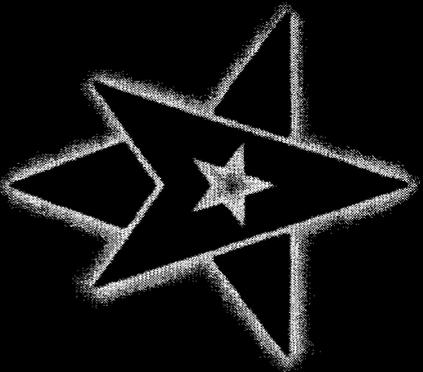
*allegiancetelecom, inc.*

THE NEW WAY FOR BUSINESS TO CONNECT

The Allegiance Telecom, Inc.

*FCC Presentation*

CC Docket No. 96 - 98



*allegiance telecom, inc.*

THE NEW WAY FOR BUSINESS TO CONNECT

**Tony Parella**

*Executive Vice President*

*FCC Presentation*

*CC Docket No. 96 - 98*



# Allegiance Telecom

Getting It Done in 2001

	1997	1998	1999	2000	2001E
Markets	0	9	19	27	36
Switches	0	7	15	26	35
SONET Fiber Networks	0	0	1	3	21
Collocations	0	101	327	636	> 825
Sales Headcount (1)	0	295	707	1,333	1,700
Lines Installed (000)	0	48	242	607	1,160

Notes: Sales Headcount includes Sales Team Managers, Account Executives and Sales Administrators.



# Allegiance Telecom

## 8-24 Lines

- Local Voice Services
- Long Distance/Toll
- Integrated/Dedicated Access
- Colocation & Dedicated Hosting
- Shared Hosting, E-mail, E-commerce, Domain Name

## 1-7 Lines

- Local Voice Services
- Long Distance/Toll
- Voice Mail
- Shared Hosting, E-mail, E-commerce, Domain Name

ALLEGIANCE TELECOM  
1000 W. COLLEGE AVENUE  
ANN ARBOR, MI 48106-1500  
734.769.1000

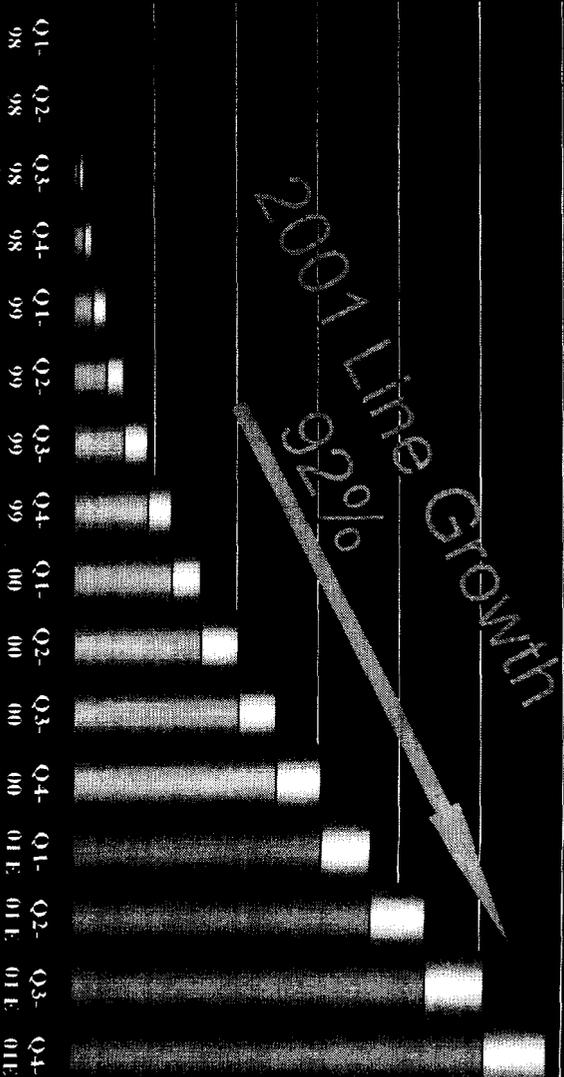
# Allegiance Telecom

Lines in Service

Estimated 1,160,000 lines  
in service by the end of  
2001

People  
Processes  
Execution

1,200,000  
1,000,000  
800,000  
600,000  
400,000  
200,000



Installs 1998 - 47,000      1999 - 194,000      2000 - 366,000      2001 - 560,000

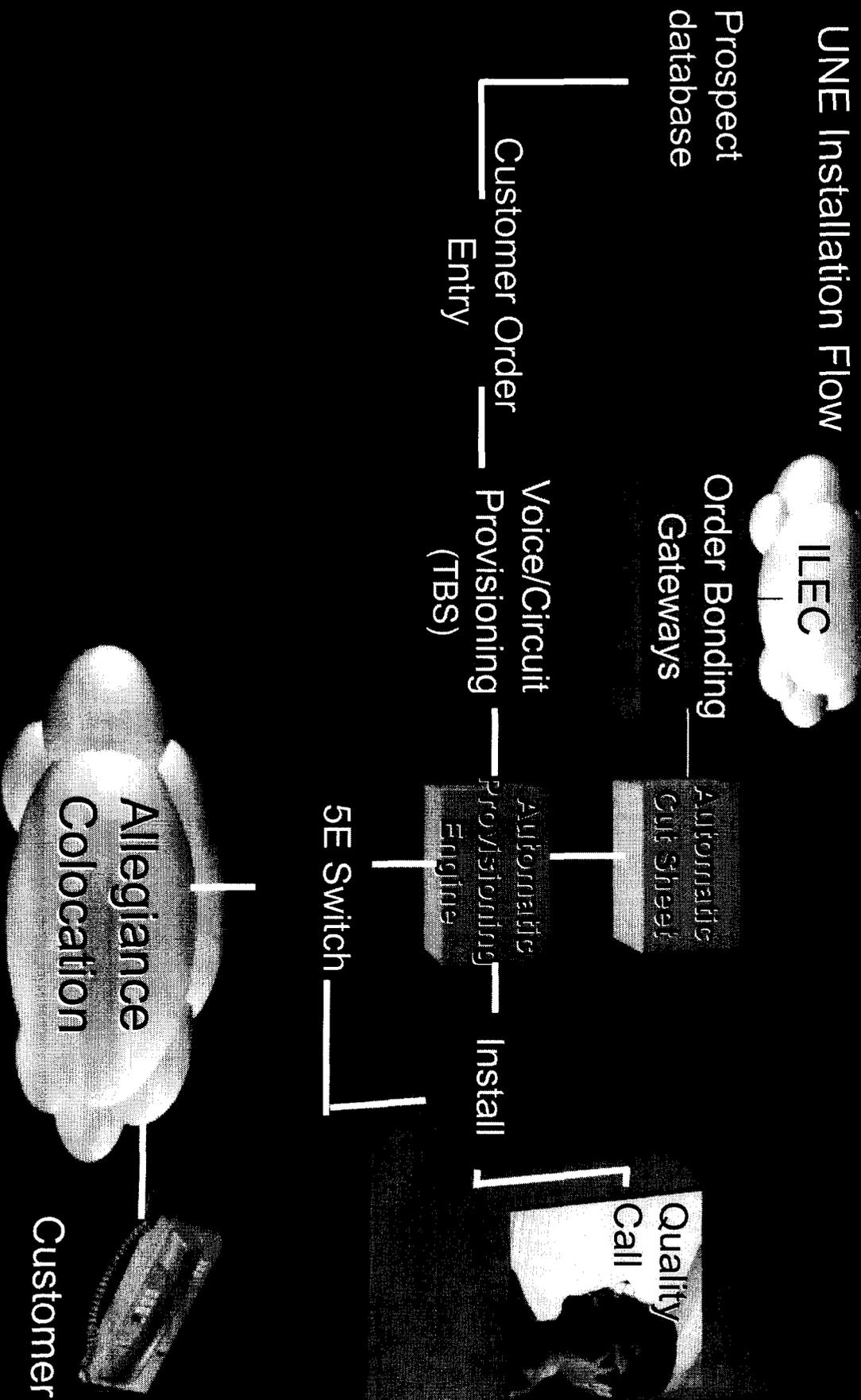
2001 Growth 22%

© 2001 Allegiance Telecom



# Allegiance Telecom

*Enabling UNE loop provisioning in the SME Market*



# Allegiance Telecom

Consolidated Order Entry

- Consolidated Order Entry
  - Eliminate re-keying of account data between sales tracking system and ordering system (TBS) by building shell of order straight out of sales system
  - Move data validation to the front of the order process and single place to check quality

Allegiance Telecom  
Consolidated Order Entry

# Allegiance Telecom

## PSR - Telecom Business Solution

- Telecom Business Solution (Metasolv)
  - COE front end has allowed ordering at the “factory” to be reduced to only feature specific detail for the PSR (Product Service Request)
  - TBS controls “provisioning plan” to direct the workflow for order execution
  - Next phase automation from COE will eliminate need to re-key feature specific detail as well (Customer Service Request upload)

# Allegiance Telecom

Local Service Request Bonding (LSR) /  
Local Service Request Upload (FOC)

- DSET Corp software based gateways between ALGX and ILECs send LSR (Local Service Request) electronically to their front-end system
- Upon FOC transmission back, circuit ID and ILEC order numbers upload back into TBS inventory - as supplied by the ILEC. This eliminates possible error re-keying that could introduce problems day of cut
- LSR bonding in production for Verizon South and Qwest as of April 2001, all Allegiance markets are now bonded except GTE areas

# Allegiance Telecom

## ACS - Automated Cut Sheet

- Automated Cut Sheet
  - Electronic presentation to field technicians of orders scheduled to cut over at the individual LSR level (with all required product information)
  - Allows “ready” scheduling of pre-cut testing
  - Reduces number of users required to access TBS for information throughout the day

# Allegiance Telecom

Process Management

- Backlog Management - automated tracking of Work In Progress through key checkpoints of order flow
- Cutover Process - pre and post test procedures have improved the customer experience

© 2013 Allegiance Telecom  
All rights reserved.

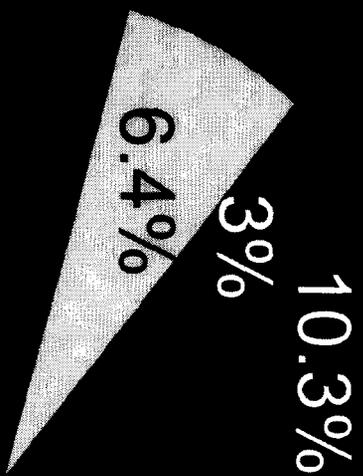
# Allegiance Telecom

## *Backlog Status for Unbundled Loops*

Backlog Status for Unbundled Loops (as of: 4/16/00)																	
State	Floor	%	Not Recv.	%	Rec./Rej.	%	Not Ent.	%	w/o LSR	%	Jep.	%	LSR Sent	%	FOC	%	Total
California	7	0	768	9	211	2	946	11	1605	18	534	6	1527	18	3124	36	8722
Avg Holding Days	0		3		8		9		13		11		7		0		
Colorado	0	0	100	17	14	2	14	2	2	0	8	1	56	10	389	67	583
Avg Holding Days	0		4		37		3		4		52		6		0		
Georgia	0	0	21	0	34	1	254	6	996	24	979	23	736	18	1182	28	4202
Avg Holding Days	0		4		93		11		25		49		18		0		
Illinois	131	4	122	4	187	6	304	10	419	14	89	3	819	27	995	32	3066
Avg Holding Days	0		3		31		17		16		60		9		0		
Maryland	2	0	81	3	14	1	473	18	1175	45	98	4	268	10	484	19	2595
Avg Holding Days	0		3		5		8		27		66		14		0		
Massachusetts	4	0	56	2	231	7	289	8	373	11	157	4	1173	33	1247	35	3530
Avg Holding Days	0		3		33		16		14		261		21		0		
Michigan	8	1	105	10	189	19	153	15	99	10	48	5	288	29	120	12	1008
Avg Holding Days	0		5		19		9		11		27		13		0		

# Allegiance Telecom

March - Pass to Install - March 2001



## Days to Install

- 0-15 (14,250 lines)
- 16-30 (11,400 lines)
- 31-45 (2,045 lines)
- 46-60 (963 lines)
- >60 (3,288 lines)

Interval between date entered into COE and date install is closed in TBS

# Allegiance Telecom

*LINE Lines - Days to Install - March 2001*

## Days to Install

- 0-15 (14,250 lines)
- 16-30 (11,400 lines)
- 31-45 (2,045 lines)
- 46-60 (963 lines)
- >60 (3,288 lines)

Interval between date entered into COE and date install is  
closed in TBS



# Allegiance Telecom

*OSS - What's Next?*

- B.I.F. (Billing Interface) - Automate COE/TBS information directly into billing system
- Trouble Ticket Bonding - Direct trouble ticket management with the ILEC systems through Allegiance trouble platform "Clarify"
- LSR Bonding - GTE portion of Verizon
- CSR Upload - Will eliminate need to key feature information on like-for-like local service orders

# Allegiance Telecom

*Colocation strategy vs. Building specific strategy*

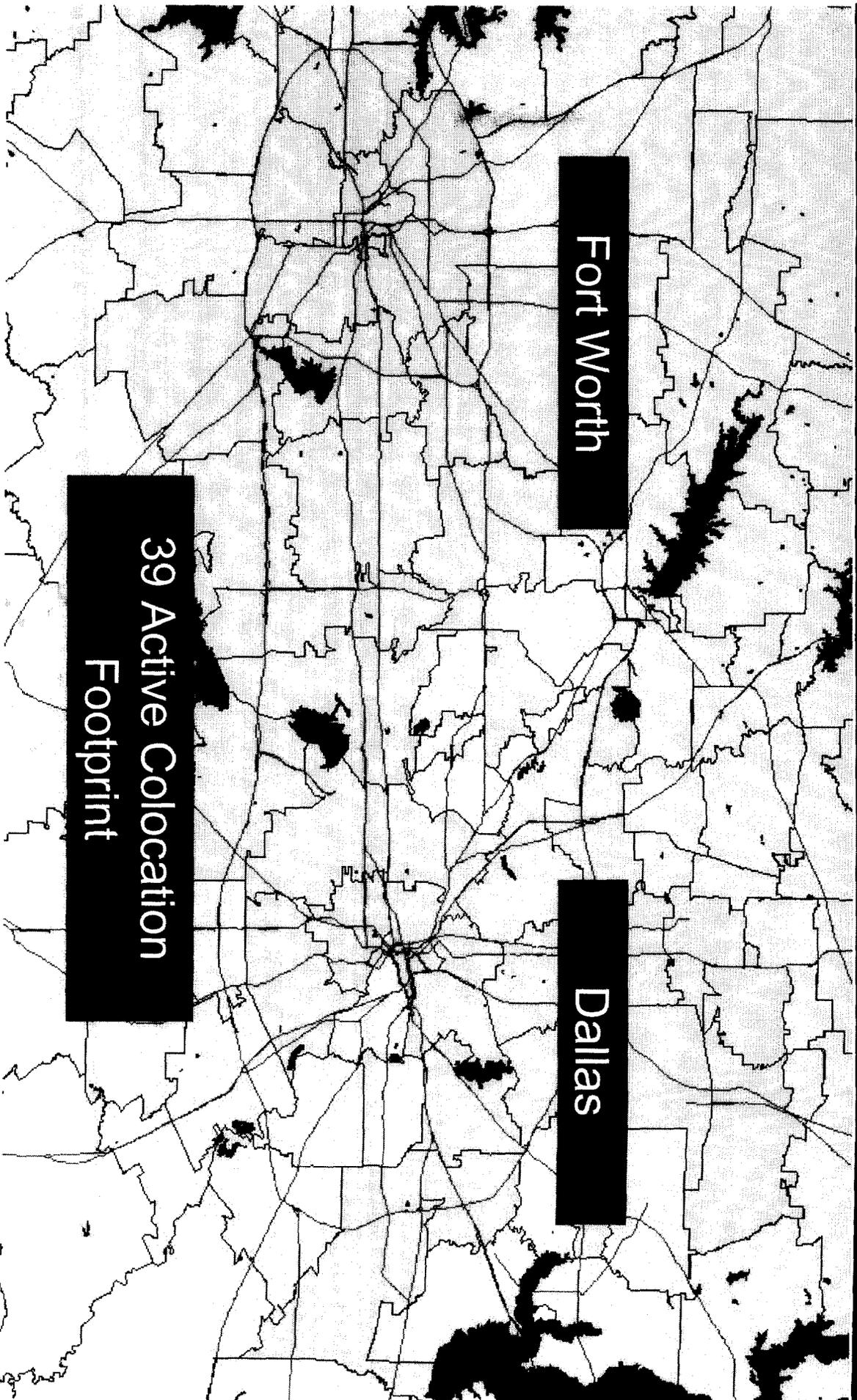
Allegiance VS Competitors

- ✓ Large Addressable market
- ✓ We can serve anyone "Bell" can serve
- ✓ Capital Efficient
- ⊘ Limited Addressable market
- ⊘ Restricted footprint
- ⊘ Capital Intensive



# Allegiance Telecom

*Dallas / Fort Worth - Allegiance Colocation Map*



Fort Worth

Dallas

39 Active Colocation  
Footprint

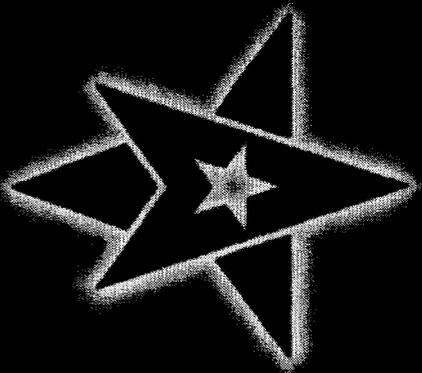
# Allegiance Telecom

People

Balance Sheet      Execution

Back Office      Colocation      Provisioning  
Strategy      Methods





*allegiance telecom, inc.*

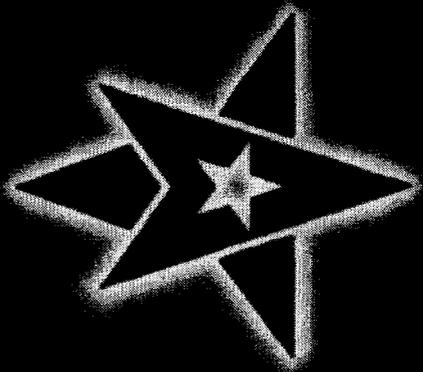
THE NEW WAY FOR BUSINESS TO CONNECT

**Tony Parella**

*Executive Vice President*

*FCC Presentation*

*CC Docket No. 96 - 98*



*allegiance telecom, inc.*

THE NEW WAY FOR BUSINESS TO CONNECT

Process & Performance Discussion

# Allegiance Telecom

## MINIMUM PROCESS REQUESTS

- I. Firm Order Confirmations should include a complete engineering check to verify that facilities are available
- II. Order success must be measured by first FOC date – customers will not tolerate multiple date changes
- III. Electronic Order Conversion - the industry needs to reduce or eliminate down time during UNE conversion
- IV. Database Reconciliation - ILECs must develop processes to reconcile internal databases housing CLEC information including Customer Facility Assignment (CFA) and Circuit ID's.
  - a. Allow CLEC's to use their own facilities (busy CFA's)
  - b. Stop overbilling

# Allegiance Telecom

## PROCESS REQUESTS CONT'D

- V. Standardize Billing – ILEC' must provide billing data electronically in a standard CABS format billed by LATA. Different formats do not allow electronic auditing of bills.
- VI. Access to POI – Provisioning and maintenance work can be done at the POI to eliminate 'No Man's Land'. When a CLEC has dial tone at the collocation but the ILEC has none at the frame, trouble resolution is lengthy.
  - a. Access to the Main Distribution Frame
  - b. Ownership of cable between the ILEC frame and the CLEC collocation cage
- VII. Aggressive Anti-competitive Winback Programs Must be Stopped
  - a. Technicians making anti-competitive statements to customers
  - b. ILEC's calling customer and offering discounts after CSR is pulled

ALLEGIANCE TELECOM  
10000 W. 10TH AVENUE  
DENVER, CO 80201

# Allegiance Telecom

## MINIMUM PERFORMANCE REQUESTS

### I. PROVISIONING

- a. Timeliness and Accuracy of Firm Order Confirmations (“FOC”)
- b. Provisioning intervals for interoffice transport should be at parity with ILEC retail provisioning intervals.
- c. Standards for UNE hot cut intervals need to be 4 minutes per line. (NEW)

### II. INSTALLATION

- a. Delivery of facilities should meet the install date provided on the FOC. This date should also meet the published install intervals per ILEC.
- b. If no facilities, ILEC must provide accurate delivery date within 24 hours after receipt of an acceptable, clean LSR. Notification needs to be automated.



# Allegiance Telecom

## PERFORMANCE REQUESTS CONT'D

### III. MAINTENANCE

- a. A measure should be adopted requiring that the Mean Time to Repair (MTTR) standard be 24 hours or less for all out of service conditions.
- b. A measure for Mean Time Between Failure (MTBF) and repeat Trouble Tickets must be adopted. (NEW)
- c. Verification of NTF charges for trouble tickets (NEW)
- d. Modifications to the Circuit ID need to be communicated to the CLFC within 24 hours and the ILEC's must provide a process to acquire the correct Circuit ID when the one in the CLFC records shows to be incorrect. (NEW)

