

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of

Application by )  
Qwest Communications International, Inc. )  
For Authorization to Provide )  
In-Region, InterLATA Services ) WC Docket No. 03-11  
In New Mexico, Oregon and South Dakota )

**DECLARATION OF SHERRY LICHTENBERG**

1. My name is Sherry Lichtenberg. I have twenty years of experience in the telecommunications market. Prior to joining WorldCom, Inc. (WorldCom), I was Pricing and Proposals Director for AT&T Government Markets, Executive Assistant to the President, and Staff Director for AT&T Government Markets. I also held a number of positions in Product and Project Management. I have been with WorldCom for six years. I am currently employed by WorldCom as a Senior Manager in the Mass Markets local services team. My duties include designing, managing, and implementing WorldCom's local telecommunications services to residential customers on a mass market basis nationwide, including Operations Support Systems ("OSS") testing in the Qwest region and elsewhere. I have been involved in OSS proceedings throughout the country, including the proceedings at the FCC regarding Qwest's prior section 271 applications.
2. In response to Qwest's prior section 271 applications, I explained that Qwest's OSS was fundamentally deficient. But I now know those deficiencies are even worse than I previously understood. Today, I know more about Qwest's OSS because WorldCom has entered the market using its own systems. At the time of Qwest's prior applications,

WorldCom had entered the Qwest market but was placing orders UNE-P orders in conjunction with Z-Tel through Z-Tel's OSS. WorldCom was also attempting to develop its own systems. But WorldCom was not yet placing production orders through its own systems, somewhat limiting our visibility into Qwest's OSS.

3. Now that WorldCom has begun placing orders through its own systems, I can report that the problems WorldCom is experiencing are even worse than I anticipated. Thus, while the Commission granted Qwest's prior section 271 application despite the OSS deficiencies that existed, it should deny this one. Qwest's OSS is simply the worst in the country and constitutes a major impediment to competition.
4. I have described in many previous declarations the problems caused by Qwest's failure to implement migrate-by-telephone number and industry standard migrate-as-specified. I will not repeat my discussion of the problems caused by these failures. But it is now clear that the impact of these failures is significantly magnified by the erroneous information Qwest provides to CLECs attempting to develop systems to use its unnecessarily complex OSS. Moreover, Qwest's repeated assurance to the Commission that it will implement industry standard migrate-as-specified in April appears to have been largely false. Qwest has recently indicated that it will not implement industry standard migrate-as-specified in April for so-called "complex" features, which include common features such as call forwarding.
5. WorldCom began transmitting orders in the Qwest region via its own systems on January 18. Almost all of our initial orders rejected as a result of erroneous information provided by Qwest to WorldCom during development, in conjunction with the complex nature of Qwest's systems. WorldCom actually had to stop submitting orders for nearly two weeks

to reconfigure its systems based on new information Qwest provided. This reconfiguration took significant work and only solved one of the problems WorldCom discovered with Qwest's OSS. WorldCom still faces significant obstacles to successful use of Qwest's OSS as a result of problems that can be traced directly to Qwest.

#### **Failure to Include Telephone Numbers in Feature Detail Information**

6. Qwest rejected approximately 60% of WorldCom's initial orders as a result of erroneous information provided by Qwest to WorldCom regarding the location of telephone numbers on the Customer Service Record ("CSR"). Because WorldCom designed its systems based on that incorrect information, WorldCom was unable to retrieve the feature information it needed to place on the orders.
7. As I have previously explained, unlike other ILECs, Qwest requires CLECs to differentiate on their orders between features that customers wish to retain after migrating to the CLEC and features they want to add for the first time. A CLEC must therefore determine the features the customer already has with the ILEC for each telephone number the customer is migrating, rather than simply listing the features the customer wants from the CLEC. To find the relevant features on the CSR, the CLEC must first associate the features with a particular telephone number.
8. Based on information provided by Qwest during the course of development, WorldCom designed its systems to extract the telephone numbers from the feature detail information associated with each feature and to then determine the features associated with the telephone numbers. But when WorldCom began placing orders, it found that Qwest did not include telephone numbers in the feature detail information for most single-line customers. Except for those single-line customers who once had a second line, the

telephone numbers of single line customers were listed separately on the CSRs from the feature detail information. Thus, when WorldCom's systems looked in the feature detail information for the telephone numbers, they did not find them. As a result, they could not associate features with a telephone number and therefore treated all of the features the customer was ordering as new. Because many of the features were not new, however, WorldCom's orders for these single-line customers rejected. Approximately 60% of WorldCom's initial orders were rejected as a result of this problem.

9. As Qwest has admitted, nothing in its documentation informed WorldCom that telephone numbers were located on a separate place on the CSR for most single-line customers than they were for multi-line customers. Nor did the documentation differentiate between single-line customers who were once multi-line customers and other single-line customers. In fact, Qwest itself did not understand its own CSR format. When WorldCom initially told Qwest that some of its orders were rejecting because the customer's telephone number was not in the feature detail information, Qwest said this was only so in its Eastern region. But after WorldCom provided examples from Qwest's Central and Western regions, Qwest agreed that the issue existed throughout Qwest's territory.
10. The erroneous information Qwest provided led to rejection of so many of WorldCom's initial orders because most of WorldCom's orders are single-line migrations. WorldCom therefore stopped transmitting orders and attempted to revamp its systems based on the new information it received. WorldCom shut down its systems on January 21, 2003 only three days after it began submitting orders. It took almost two weeks to revamp the

systems. WorldCom did not begin transmitting orders again until February 1, 2003.

WorldCom hopes that the problem has now been resolved.

11. But such trial and error development is expensive not only because of the development costs themselves, but also because it delays CLECs ability to submit orders. WorldCom experienced such trial and error development during the many months leading up to production. This was unacceptable then and continues to be unacceptable.
12. Moreover, Qwest has ensured that other CLECs continue to face trial and error development even with respect to the exact problem that WorldCom faced. Although Qwest has agreed that it would eventually change its documentation to reflect the actual makeup of the CSR, it has provided no date for this change. In the interim, Qwest has refused to announce to all CLECs that telephone numbers for single line customers are generally not included in feature detail information. As a result, other CLECs who develop EDI interfaces are likely to face the same problem as WorldCom. Qwest must communicate significant OSS problems like this one to other CLECs. All other ILECs would have announced such a problem immediately.

**Failure to Include Area Codes for “Forward To” Numbers**

13. In addition to rejecting WorldCom orders because of the telephone number issue, Qwest rejected many WorldCom orders because the call forwarding number pulled from the Qwest CSRs did not include the area code required by Qwest on orders. Because Qwest has not implemented an industry standard migrate-as-specified ordering process, Qwest requires CLECs to list on every order for call forwarding both the number to which the customer will have calls forwarded as a CLEC customer and the number to which the customer had calls forwarded when he was a Qwest customer (assuming the customer

had call forwarding when he was a Qwest customer). Qwest's documentation states that the CLEC can extract the old "forward to" number from the CSR and place this on the order. Indeed, during the prior section 271 proceedings, Qwest repeatedly touted the ability of CLECs to integrate pre-ordering and ordering by pulling just such information from the CSR.

14. But it turns out that the "forward to" number on the CSR often does not include the area code and that Qwest rejects orders if the area code is not included. Qwest rejected WorldCom orders that did not include the area code in the "forward to" number even though WorldCom pulled the number directly from the CSR. The rejects said that WorldCom had not included a "forward to" number in the form "nnn nnn-nnnn," meaning WorldCom had not included a 10-digit call forwarding number.
15. This is a major problem. WorldCom's primary residential product, the Neighborhood, includes call forwarding for every customer. As a result, for every WorldCom customer who had call forwarding with Qwest, WorldCom must determine the old call forwarding number from the CSR. But the CSR often does not include the full number that is necessary to place an order. But, based on Qwest's documentation, WorldCom already programmed its systems to extract the "forward to" number from the CSR and place it on orders. Thus, when the CSR only includes a 7-digit number, without the area code, WorldCom's order will reject.
16. It is still too early to determine how often the CSRs include only a 7-digit call forwarding number without the area code, and Qwest has refused to say. But WorldCom received 9 rejects for this reason on its initial batch of approximately 100 orders. And WorldCom appears to be receiving at least as high a percentage of rejects for this problem on the

second batch of orders it has submitted. Thus, the problem is likely to cause rejects on a high percentage of orders.

17. And WorldCom has no ready way to correct these rejects. WorldCom cannot determine the area code of the customer's old "forward to" number based only on the 7-digit number on the CSR.<sup>1</sup> WorldCom will therefore be forced to call customers to ask them the area code on the old "forward to" number. Not only is this time-consuming for WorldCom and frustrating to the customer, but often it will not work. If the customer forwarded calls to Qwest's voice mail platform, for example, the customer may well not know the area code of the "forward to" number but instead may have programmed the number into an auto dialer from which he is unable to extract it.<sup>2</sup>
18. Qwest has acknowledged that the old "forward to" number listed on the order must include ten digits in order to pass the initial edits in the Business Process Layer, and Qwest has acknowledged that its documentation did not make this clear. Nonetheless, Qwest has refused to implement a work-around to avoid rejection of orders. In response to a WorldCom request for a work-around, Qwest simply repeated that "If there is a change to the call forwarding number, WorldCom needs to provide the area code." This is so even though Qwest could readily implement a work around simply by lift the edit requiring CLECs to transmit an area code on the old forward to number. Qwest should not need this number at all since this is a number the customer will no longer be using.

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<sup>1</sup> Even if WorldCom could obtain the area code and resubmit the order, it might be that Qwest would then reject the order because the "forward to" number differs from the one on the CSR. Although Qwest requires a 10-digit number presumably because it edits orders against the number in the switch, it may be that Qwest also edits the orders against the CSR. Thus, it may be that there is no way to submit an order when there is a 7-digit number on the CSR.

<sup>2</sup> For every customer with WorldCom's Neighborhood product, calls are forwarded to WorldCom's voice mail platform, meaning the "forward to" number is always changed upon migration. Thus, the area code in the new forward to number will not provide any information about the area code in the old number.

Indeed, as I have noted in prior declarations, other ILECs do not require CLECs to list any existing features on their orders, much less feature detail such as the customer's old call forwarding number.

19. Moreover, WorldCom has recently discovered that this problem will not be corrected when Qwest implements migrate-as-specified in April. Although the whole point of CLECs' request for migrate-as-specified was to avoid the need to list existing features and feature detail, Qwest will apparently continue to require feature detail for "complex" features. This is a critical failure that may render largely useless one of the two key changes that WorldCom has emphasized as essential in every filing it has made in Qwest 271 proceedings. Indeed, in response to WorldCom's past comments on this score, Qwest repeatedly stated it would implement migrate-as-specified in April based on a CLEC change request. Now we learn, only months before it is scheduled to occur, that Qwest's implementation of this change will apparently be limited to the simplest situations. That is entirely unacceptable.

#### **Failure to Update Tables**

20. Qwest rejected some WorldCom orders because Qwest failed to properly update its back-end tables in Oregon. In Oregon, Qwest rejected WorldCom orders that included the "TTB" USOC, indicating that WorldCom customers desired touch-tone service. This was so even though WorldCom asked Qwest during development whether this USOC was necessary and Qwest told WorldCom that it was necessary in three states, including Oregon.
21. After WorldCom orders began rejecting, Qwest told WorldCom that perhaps it should not be transmitting the TTB USOC. Subsequently, however, Qwest changed its mind and

found that the rejects were caused by its failure to properly update tables in its back-end systems to include the TTB USOC. This shows just how little competition has existed in the Qwest region to date. It is extraordinary that Qwest would not by now have made changes to tables that are needed to enable CLECs to order touchtone service. Qwest has now made these changes, and hopefully WorldCom's orders will now complete.

22. But it is likely that WorldCom will continue to uncover such problems as it places further orders. Indeed, when WorldCom resumed placing orders on February 1, 2003, it received rejects based on transmission of the NKS and RCU USOCs, which appear to be similar problems to that experienced with TTB. WorldCom is exploring with Qwest whether that is the case.

#### **Failure to Enable CLECs to Access All Addresses in PREMIS**

23. In previous declarations in Qwest section 271 proceedings, I have emphasized the problems caused by Qwest's requirement that CLECs include a customer's service address on a migration order, rather than allowing migration to occur based on the customer's name and telephone number. I have also explained the problems caused by Qwest's requirement that CLECs use an address, rather than a telephone number, to access the customer's CSR. But the problems are worse than I previously understood.
24. During the course of WorldCom's OSS development, Qwest had led WorldCom to believe that it could obtain the customer's address by entering the customer's telephone number into the Qwest's address validation function. However, it turns out that this is not so if the telephone number the CLEC enters is for the customer's second line. Unlike every other ILEC, Qwest will not provide an address in response to such an inquiry.

25. When Qwest fails to return an address in response to an address validation inquiry, WorldCom customer service representatives will then type the address onto the order. Of course, typing the address leads to rejects as a result of typing errors. This problem is particularly acute because many customers in the early stages of competition are willing to migrate a second line to a CLEC but not a primary line. Thus, many CLEC orders involve migration of second lines.

**Failure to Update CSRs in a Timely Manner**

26. Qwest's OSS has proven worse than anticipated not only for initial orders but also for supplemental orders. In prior declarations, I explained the difficulties caused by Qwest's failure to update CSRs for days after an initial order is transmitted and Qwest's inability to accept supplemental orders in the interim. Qwest responded that by stating that it would accept supplemental orders in the interim if the CLEC requested the order be manually processed. Although I did not believe this work-around process to be adequate, the FCC viewed it as acceptable. And the FCC also believed Qwest's claim that CSRs are generally updated in 3 to 5 business days.
27. Unfortunately, however, WorldCom's review of its initial orders that did complete suggests that CSR updates generally take longer than 3 to 5 business days. And Qwest's much-touted process for submitting CSRs in the interim does not even work. WorldCom tried to submit supplemental orders soon after submitting migration orders and requested manual processing of these orders. Thus, based on Qwest's explanation of its workaround process, these orders should have completed. But the orders rejected at the Business Process Layer, because they did not pass the initial "ownership" edits. Qwest

has now acknowledged that it will not accept supplemental orders before the CSR is updated even if the CLEC requests manual processing.

28. But Qwest has now suggested another work-around process. Qwest has said that if WorldCom wants to issue a supplemental order before a CSR has been updated, WorldCom must resubmit the “original” order with a different Purchase Order Number, (instead of simply submitting a supplemental order), must mark the LSR for manual handling, and must populate on the order the order number that Qwest returned on the original Firm Order Confirmation or Service Order Completion. But WorldCom cannot use such a process. WorldCom’s systems do not allow it to resubmit an order that it has already submitted unless it cancels the original order. Moreover, attempting to perform all of the steps listed by Qwest would be very complicated. And even if WorldCom did successfully attempt this, it is very doubtful that it would work. Most likely, Qwest would again reject the second order because there was a pending order for the same line in Qwest’s systems. Thus, Qwest’s delay in updating CSRs is a much bigger problem than Qwest led this Commission to believe. There is no simple work around to submit supplemental orders before a CSR has been updated.

### **Inaccurate Documentation**

29. Qwest’s poor documentation is responsible for many of the problems WorldCom has experienced with the initial orders it has submitted using its own systems. I have previously explained the inadequacies of Qwest’s documentation and the problems that it was causing during development. It is now clear, however, that these problems also have a significant impact on production orders.

30. While it developed its OSS, WorldCom pointed out to Qwest all of the deficiencies in its documentation. In response to that criticism and the criticism WorldCom made to the Commission, Qwest agreed to meet with all CLECs in December to discuss making improvements to its documentation. Unfortunately at those meetings, Qwest indicated that it would take thousands of hours to change its existing documentation, demonstrating just how deficient that documentation is, and said that use of resources to correct documentation would detract from resources available to implement CLEC change requests. That should not be. Accurate documentation is a fundamental requirement that should not detract from functional improvements.
31. Nonetheless, CLECs agreed that Qwest only needed to ensure that future documentation was accurate. WorldCom gave Qwest a list of guidelines for future documentation, based on the problems it had already observed: (1) Explain any differences between interface functionality (EDI vs. GUI) or explain that functionality will never differ; (2) provide field level detail for both inquiry and response transaction that is now sometimes missing (what special characters apply); (3) provide all valid entries for each transaction type; (4) define acronyms; (5) define usage rules; (6) define references or provide links; (7) provide complete business rules; (8) clearly define restrictions; (9) provide business rules to support usage, and (10) establish process to synch up EDI documentation (disclosure documents and appendices). Qwest has not yet agreed to these basic principles and certainly has not shown it can follow these principles.

**Failure to Meet Performance Metrics**

32. Although most of the problems I have discussed are not ones that can be measured readily in performance metrics, Qwest's poor OSS does also result in failure of some

important metrics. Qwest repeatedly misses many metrics, as apparent from the attached spreadsheet, which is based on Qwest's entire region. The spreadsheet does not include all of Qwest's missed performance metrics, only those that are particularly egregious or that are of particular interest to WorldCom. From WorldCom's perspective, the most critical of these missed metrics relate to UNE-P ordered via EDI, line sharing, and EELs. These misses include the repair repeat trouble report rate for UNE-P (MR-7C), which Qwest has missed 11 of the last 12 months; repair appointments met (MR-9A), which Qwest has missed each of the last 12 months; billing accuracy (BL-3), which Qwest has missed 10 of the last 12 months; billing completeness (BL-4), which Qwest has missed for 11 of the last 12 months; trouble rate percentage for line sharing (MR-3), which Qwest has missed for the last 3 months; almost all of the repair metrics for line sharing, which Qwest has missed repeatedly; trouble rate for E911 (MR-8), which Qwest has missed in 6 of the last 12 months; and installation commitments for EELs in Zone One for each of the 11 of the last 12 months (OP-3D). Qwest's missed performance metrics further underscore what is readily apparent: Qwest's OSS is far from ready to support meaningful competition at commercial volumes.

### **Conclusion**

33. This concludes my declaration on behalf of WorldCom, Inc.

I declare under penalty of perjury that the foregoing is true and correct.

\_\_\_\_\_/s/\_\_\_\_\_  
Sherry Lichtenberg

Executed on: February 5, 2003