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March 20, 2003

**Ex Parte Presentation**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

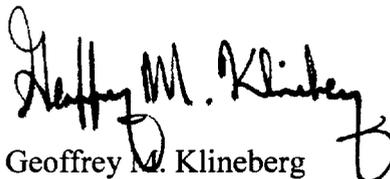
Re: *Application by SBC Communications Inc., et al. for Provision of In-Region,  
InterLATA Services in Michigan, WC Docket No. 03-16*

Dear Ms. Dortch:

On behalf of SBC Communications Inc. ("SBC"), and at the request of FCC Staff, I am attaching to this letter SBC's responses to some follow-up questions raised by Staff on March 18, 2003, regarding line-loss notifications. See Attachment.

In accordance with this Commission's Public Notice, DA 03-156 (Jan. 16, 2003), SBC is filing this letter and attachment electronically through the Commission's Electronic Comment Filing System. Thank you for your kind assistance in this matter.

Sincerely,

  
Geoffrey M. Klineberg

**Attachment**

cc: John P. Stanley  
Gina Spade  
Russ Hanser  
Michael Engel  
Marcus Maher  
Denise Coca

Susan Pié  
Layla Seirafi-Najar  
Dorothy Wideman  
Ann R. Schneidewind  
Qualex International

# **Attachment**

**SBC'S RESPONSES TO THE FCC STAFF'S ADDITIONAL  
QUESTIONS REGARDING LINE-LOSS NOTIFICATIONS**

1. During a conference call on March 18, 2003, FCC Staff asked whether there was any “overlap” between the data provided in Table 1 and the data contained in Table 2 of Attachment A to SBC’s March 14, 2003 ex parte letter.<sup>1</sup> As discussed on that call, Table 1 was intended to respond to Staff’s request that SBC provide data on the total number of inaccurate or untimely line loss notifications (“LLNs”) for all CLECs in the 5-state SBC Midwest region in the five months between September 2002 and January 2003. Table 2, on the other hand, was designed to provide an estimate of what the PM MI 13 results would have been for November 2002 through January 2003, had the new business rules been in effect during that time period. In particular, the new business rules (as opposed to the current ones) would have included LLNs resulting from “winbacks” by SBC retail. In other words, Tables 1 and 2 were designed to show different things.
2. The “inaccurate or incomplete” column of Table 1 includes LLNs for all CLECs that were inaccurate and/or late as a result of the specific system or process failures identified in the ex parte letter. To be very conservative, SBC also included LLNs that were handled as part of the “safety net” process, which was established for the purpose of identifying and correcting LLN error conditions.<sup>2</sup> Because Table 1 included “untimely” LLNs that either were captured in the current PM MI 13 (or would have been captured by the new PM MI 13 business rules had they been in place), there is overlap in the data contained in Tables 1 and 2.
3. At Staff’s request, SBC has created a Table 3, which simply adds results for the months of September and October 2002 to the data originally provided in Table 2 of Attachment A to the March 14 Ex Parte. Table 3 also updates the November 2002 through January 2003 data originally provided in Table 2, reflecting minor changes resulting from additional validation work on the data that SBC has conducted since the filing of the March 14 Ex Parte.<sup>3</sup>

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<sup>1</sup> See Ex Parte Letter from Geoffrey M. Klineberg, Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C., to Marlene H. Dortch, FCC (Mar. 14, 2003) (“March 14 Ex Parte”), Attach. A.

<sup>2</sup> See March 14 Ex Parte, Attach. A, at 5 n.6; see also SBC Ameritech Michigan’s Supplemental Report on the Line Loss Notification Issue (Feb. 28, 2002) (App. C, Tab 64, at 4-5) (describing the cross-functional team established by SBC for the purpose of examining daily transaction reports, identifying LLN error conditions, and correcting those errors when possible). The LLN review and correction activity conducted by the cross-functional team is referred to as the “safety net” process. See March 14 Ex Parte, Attach. A, at 3 (confirming SBC’s commitment to continue the cross-functional team for support of the “safety net” process in connection with the LLN improvement plan filed with the MPSC on March 13, 2003). Approximately 6,800 LLNs (electronic and manual) were also included in Table 1. See March 14 Ex Parte, Attach. A, at 5 n.6. The 6,800 include approximately 5,700 safety net LLNs, as well as the 1,150 LLNs referenced in the March 14 Ex Parte. See id. at 7 n.9. The 1,150 LLNs were included in Table 1 because of a specific process failure that impacted one CLEC, and were not captured as part of the safety net process.

<sup>3</sup> As part of the validation process, SBC also determined that during the September 2002-January 2003 timeframe, a few CLECs received mechanized LLNs via Issue 7 of LSOG 1. Although LLNs sent via Issue 7 were captured in original PM MI 13 results, they are not captured in the approximation of new PM MI 13 results

**TABLE 3**

Month	Mechanized Line Losses Sent Within 1 Day of Work Completion	Total Mechanized Line Losses	Percent Met	Original MI 13 Aggregate Result
Sep 2002	71,923	97,489	73.78% <sup>4</sup>	97.62%
Oct 2002	128,297	133,905	95.81%	99.39%
Nov 2002	96,282	106,293	90.58%	96.43%
Dec 2002	97,551	102,060	95.58%	97.61%
Jan 2003	122,884	126,283	97.31%	92.19%

4. At Staff’s request, SBC also created a Table 4 in order to provide two specific categories of information. First, the “Total CLEC LLNs” column reflects LLNs provided to CLECs for the months in question, including LLNs provided manually,<sup>5</sup> and via FAX when requested by the CLEC.<sup>6</sup> The “Total CLEC LLNs” column also includes LLNs delivered as a result of a

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displayed in Table 3 below. As discussed in the March 14 Ex Parte (Attach. A, at 6-7, n.8), EDI ordering via Issue 7 was retired October 2, 2002, while the ability to order UNE Loops via ASRs sent through EXACT was retired (together with the Issue 7 outbound translator) effective March 9, 2003. Accordingly, logic to capture Issue 7 LLN notifications was not included in the program logic for the new PM MI 13 business rules. SBC believes that the number of mechanized LLNs sent via Issue 7 during this time frame was small, because most CLECs already had migrated from Issue 7 to another EDI version.

<sup>4</sup> September results were significantly impacted by the LLN outage discussed in the Cottrell/Lawson Joint Reply Aff. ¶¶ 103-104. A total of more than 20,000 LLNs were impacted by this incident. Although approximately two-thirds of those were actually missed in August, all of the missing LLNs were resent in September and therefore counted against September results.

<sup>5</sup> Manual LLNs are provided in those instances where the LLN cannot be provided electronically. These manual LLNs are included in the “Total Inaccurate” column of Table 4. See Accessible Letter CLECAM02-105 (Sept. 20, 2002)(App. J, Tab 32) (establishing “another safety net” by providing manual LLNs in those circumstances when an LLN is not sent due to a system or manual service order processing error and “for some technical limitation, cannot be re-flowed electronically.”). As further noted in that letter, “SBC will only fax or email a Line Loss Notification in the event all efforts have failed to produce it electronically.” See Cottrell/Lawson Joint Reply Aff. ¶ 118 (confirming that the percentage of LLNs processed manually for all CLECs due to system or service order error has averaged less than 0.30 % in the November 2002 – January 2002 timeframe). These manual LLNs are included in Table 4 but not in Table 3, see March 14 Ex Parte, Attach. A, at 9.

<sup>6</sup> CLECs may choose to have their LLNs delivered via EDI, LEX or FAX. See Ex Parte Letter from Geoffrey M. Klineberg, Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C., to Marlene H. Dortch, FCC (Mar. 17, 2003) (“March 17 Ex Parte”), Attach. A, at 12. LLNs that the CLEC chooses to receive via FAX are not included in Table 3 above (as these are not considered mechanized under the new PM MI 13 business rules), but are included in Table 4.

SBC Midwest “winback.”<sup>7</sup> This column does not include retail LLNs or LLNs delivered to ASI.<sup>8</sup> The “Total Inaccurate” column of Table 4 includes inaccurate LLNs that were not corrected and resent to the CLEC. If inaccurate LLNs were provided, but subsequently were corrected and resent to the CLEC, the resend is captured as “untimely” in Table 3. Those LLNs are not included as “inaccurate” in Table 4.<sup>9</sup>

**TABLE 4**

<b>All CLECs</b>	<b>Total CLEC Losses</b>	<b>Total Inaccurate</b>	<b>% Accurate</b>
<b>September 02</b>	100,066	235	99.77%
<b>October 02</b>	145,410	1,447	99.00%
<b>November 02</b>	109,104	600	99.45%
<b>December 02</b>	107,593	3,393	96.85%
<b>January 03</b>	131,207	3,764	97.13%
<b>5 Month Total</b>	<b>593,380</b>	<b>9,439</b>	<b>98.41%</b>

5. Although the December and January “% Accurate” figures appear to decline from prior months, in fact, the December “inaccurate” LLNs are primarily attributable to the AT&T-specific LLN incident discussed in the Cottrell/Lawson Joint Reply Affidavit, which impacted “less than 3,000 AT&T LLNs” (id. ¶ 109). The majority of the January “inaccurate” LLNs are due to the WorldCom delimiter issue (id. ¶¶ 111-113), which impacted “approximately 3,000 WorldCom LLNs” in January (id. ¶ 111). AT&T and WorldCom declined SBC’s offer to resend the impacted LLNs, because they were able to use the LLNs originally provided (id. ¶ 110, 112 & n.9). The exclusion of those LLNs from the

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<sup>7</sup> LLNs delivered to CLECs as the result of a SBC Midwest “winback” also are included in the “Total CLEC LLNs Provided” column of Table 1.

<sup>8</sup> Based on the data used to create Table 3 above, more than 96% of the LLNs on line-shared loops during this time frame were provided to ASI; LLNs on line-shared loops delivered to CLECs other than ASI are included in Table 4. In the March 14 Ex Parte, SBC stated that Table 1 “does not include the substantial number of LLNs provided to SBC Midwest’s retail units including ASI.” March 14 Ex Parte, Attach. A, at 6. Upon further review of the data, however, SBC has determined that ASI LLNs were inadvertently included in the “Total CLEC LLNs Provided” column of Table 1. ASI LLNs have been excluded from the “Total CLEC LLNs” column of Table 4.

<sup>9</sup> Tables 3 and 4 are based on data derived from SBC’s internal databases. They were created as described in this response and constitute the best information available at this time.

totals for December and January would bring the “% Accurate” for those months back above 99%.<sup>10</sup>

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<sup>10</sup> The remainder of the LLNs included in the “Total Inaccurate” column result from the ABS fax issue, see March 14 Ex Parte, Attach. A, at 6-7, and LLNs sent incorrectly as a result of the situation described in Accessible Letters CLECAM03-019 (Mar. 6, 2003) and CLECAM03-021 (Mar. 14, 2003). See March 14 Ex Parte, Attach. A, at 7; see also Ex Parte Letter from Geoffrey M. Klineberg, Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C., to Marlene H. Dortch, FCC (Mar. 13, 2003) and March 17 Ex Parte, Attach. A, Ex. 1. SBC also included 198 LLNs in September and 585 in October that were resent either manually or electronically as part of the safety net process, but which SBC could not easily confirm were captured in Table 3.