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April 2, 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"), I am attaching a copy of a filing that Michigan Bell made today with the Michigan Public Service Commission ("Michigan PSC"). See Attachment. The filing consists of revised compliance and improvement plans regarding Special and UNE Circuit Repair Coding Accuracy, Line Loss Notifier Communications, and Bill Auditability and Dispute Resolution. Michigan Bell revised these plans as recently directed by the Michigan PSC. See Opinion and Order, In the Matter, on the Commission's Own Motion, to Consider SBC's, f/k/a Ameritech Michigan, Compliance with the Competitive Checklist in Section 271 of the Federal Telecommunications Act of 1996, Case No. U-12320 (MPSC Mar. 26, 2002) (attached to Ex Parte Letter from Laura Chappelle, et. al, Michigan PSC, to Marlene H. Dortch, FCC (Mar. 26, 2003)).

In addition, I would like to inform you that Dorothy Attwood of SBC spoke yesterday on the telephone with Lisa Zaina of Commissioner Adelstein's office. They discussed various issues relating to the Application, including data integrity, billing, and change management.

Furthermore, representatives from SBC met today with Michelle Carey, John P. Stanley, and Marcus Maher to discuss billing issues. The following participated on behalf of SBC, both in person and on the telephone: James C. Smith, Rebecca L. Sparks, Jared Craighead, Glen Sirles, Michael E. Flynn, John R. Smith, Mark J. Cottrell, David Brandvold, Martin E. Grambow, John T. Lenahan, John D. Mason, and Geoffrey M. Klineberg.

Finally, William M. Daley, James C. Smith, Rebecca L. Sparks, and Geoffrey M. Klineberg on behalf of SBC met separately today with Commissioner Adelstein and his Legal

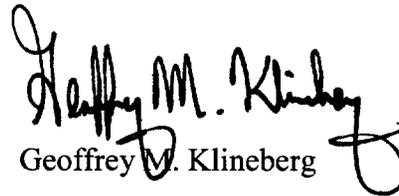
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**Ex Parte Presentation**

Advisor, Lisa Zaina, and with Commissioner Martin and his Legal Advisor, Daniel Gonzalez, to discuss data integrity, billing, and change management issues.

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

# **Attachment**

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion,	)	
to consider Ameritech Michigan's compliance	)	
with the competitive checklist in Section 271 of	)	Case No. U-12320
the federal Telecommunications Act of 1996.	)	
_____	)	

**SBC'S SUBMISSION OF REVISED IMPROVEMENT PLANS**

On January 13, 2003, the Commission approved a report in this proceeding finding that SBC had demonstrated compliance with Section 271 of the federal Telecommunications Act of 1996 and recommending to the FCC that SBC be granted authority to provide in-region interLATA services..<sup>1</sup> On the same date, in a separate order, the Commission determined that, notwithstanding SBC's compliance with Section 271, SBC should submit plans to improve its performance with respect to some aspects of its operations.<sup>2</sup>

SBC file proposed compliance and improvement plans on February 13, 2003. Following collaborative discussions with Staff and interested parties, SBC made significant revisions to the proposed plans, and filed revised plans on March 13, 2003. On March 20, 2003, four parties commented on the revised plans.

In its March 26, 2003 Opinion and Order in this matter ("the Order") the Commission approved SBC's compliance and improvement plans with respect to Customer Service Inquiry Accuracy, Directory Listings and Directory Assistance Database Update Accuracy, Pre-Order Processing Timeliness, and Change Management Communications without modification. With

<sup>1</sup> Minute Action (January 13, 2003).

<sup>2</sup> Opinion and Order (January 13, 2003).

respect to SBC's Special and UNE Circuit Repair Coding Accuracy, Line Loss Communication, and Bill Auditability and Dispute Resolution plans, the Commission directed SBC to modify and resubmit the plans by April 2, 2003.

In accordance with the Order, SBC modified the Special and UNE Circuit Repair Coding Accuracy Plan as provided for at pp 7 - 8 of the Order, the Line Loss Communications Plan as provided for at p 9 of the Order, and the Bill Auditability and Dispute Resolution Plan as provided for at pp 11 - 13 of the Order. SBC submits herewith the following modified plans, attached hereto as Attachments A – C, respectively:

- Special and UNE Circuit Repair Coding Accuracy Plan
- Line Loss Communications Plan
- Bill Auditability and Dispute Resolution Plan

Respectfully submitted,

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Dated: April 2, 2003

# **ATTACHMENT A**



**MPSC Case No. U-12320**

**Special and UNE Circuit Repair  
Coding Accuracy Plan**

**April 2, 2003**

**Repair Coding Accuracy Plan**

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## Repair Coding Accuracy Plan

### 1. Purpose

The purpose of this plan is to describe the actions SBC Midwest (“SBC”) proposes to take to improve accuracy and completeness<sup>1</sup> of closeout codes upon repair completion for Special Circuits and Unbundled Network Elements (UNEs). In Michigan, SBC originally proposed a trouble report closeout code improvement plan on October 30, 2002 (“October 30 Filing”). Pursuant to the Michigan Public Service Commission’s (“MPSC’s”) Order issued January 13, 2003 (“January 13 Order”), in Case No. U-12320 (SBC’s §271 Checklist Compliance Docket), the plan was revised and filed on February 13, 2003 as a draft. The February 13 draft further addressed the operational concerns with repair coding accuracy identified in BearingPoint’s Report, and those discussed in the technical workshop and submitted in written comments. SBC further modified this plan based on input received during the collaborative session held at the MPSC Offices in Lansing, Michigan on March 45, 2003. Additionally, SBC reviewed the changes with the MPSC Staff and collaborative participants on a conference call held on March 12, 2003. SBC has retained BearingPoint to evaluate SBC’s implementation of this plan. Final modifications were made to this plan in compliance with the MPSC’s Order issued March 26, 2003.

### 2. Issue Definition

BearingPoint, Inc. (f/k/a KPMG Consulting) first issued Exception 131 as part of the Third-Party Operations Support Systems (“OSS”) testing on June 27, 2002. In its report, BearingPoint stated that in reviewing trouble reports and close out code data, it determined that SBC had failed to meet a 95% accuracy benchmark for trouble ticket closure coding for Special and UNE circuits. The initial exception report for Michigan had included benchmark failures for Resale, UNE and Special circuits. In the course of resolving this issue, BearingPoint completed a retest of repair coding accuracy in August 2002 and reported that while Resale circuits had passed their test requirements, UNE and Special Circuits had not. This exception encompassed all five Midwest states. BearingPoint’s October 30, 2002 Michigan OSS Evaluation Project Report found that test criteria for TVV7-12 (p. 987) and TVV7-14 (p. 989) were “not satisfied.” The UNE coding has successfully closed in the other four SBC Midwest states and Special coding remains in retest in Illinois. Wisconsin has successfully completed Special circuit coding retesting.

In response to BearingPoint’s evaluation, SBC has identified areas for improvement and implemented a number of corrective measures, which as summarized above, have improved the performance results in those states where the retest was conducted after those corrective measures were implemented<sup>2</sup>. In its final retest in Michigan, BearingPoint reported that 84.8% (56/66) of UNE closeouts and 82.1% (23/28) of Special circuits were coded correctly. Because these coding results were in parity with retail coding and SBC completed successful testing on trouble repair itself, these coding results did not result in a negative finding in regard to maintenance and repair (“M&R”) nondiscriminatory access. See MPSC Report, January 3, 2003 at p. 71.

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<sup>1</sup> AT&T stated, “accuracy is equally important as completeness.” See, 11/15/02 Connolly Affidavit, p. 36, para 83

<sup>2</sup> The retest in Michigan was completed prior to the implementation of these initiatives.

## Repair Coding Accuracy Plan

### 3. Root Cause Analysis

Trouble tickets are closed out by the repairing technician in the field or in the central office, either directly or through the Overall Control Center (“OCO”) which encompasses the Local Operations Center (“LOC”), the Special Services Center (“SSC”), and the Customer Service Bureau (“CSB”). When the repair is complete, the technician also enters the appropriate closure codes to the ticket. The closeout code faults reported by BearingPoint within this exception appeared to fall into one of the following general situations:

- 1) Situations in which a fault inserted by BearingPoint were subsequently reported as “No Trouble Found” (NTF) by SBC.
- 2) Situations in which the fault inserted by BearingPoint on the network side of the circuit were subsequently reported as being within the customer-owned portion of the circuit and for which CLEC billing was applied.
- 3) Situations the same as Item #2 above, but no CLEC billing was applied.
- 4) Situations in which the fault inserted by BearingPoint on the network side of the circuit was properly repaired, but the coding used did not accurately identify exactly where the fault had occurred.

Very few of the items in Situation #1 above involved cases in which SBC clearly miscoded the actual trouble cause and repair. Most of the cases involved situations in which BearingPoint had inserted multiple faults in the same test bed area for several test circuits. While dispatched to repair the fault on one circuit, the technician noticed faults placed on several additional circuits<sup>3</sup> and repaired them as well. The technician corrected the multiple faults but did not document the work performed on those additional circuits that needed repair, but were not listed on the trouble ticket for the test circuit. Therefore, when dispatches were made on the reported failures of the additional circuits, the dispatched technician appropriately closed the report as “NTF”.

For items that fell within Situation #2 and #3, the errors appear to have been caused by a lack of attention to, or unfamiliarity with, the meaning of each disposition code. Although such performance is unacceptable, it did not have a significant impact on either CLEC billing or repair performance reporting. Indeed in Michigan, of the 25 reported errors in coding (out of 136 total retests)<sup>4</sup>, only 3 would have resulted in either inappropriate billing or erroneous exclusion of data from performance results. This represents an overall billing/performance error rate of only 2.2 percent.

Similarly, the items found to fall into Situation #4 appear to be mostly due to errors by the repair technician or maintenance administrator. These types of closeout errors had no impact on overall billing/performance error rate because they incorrectly coded where in the SBC network that the fault was corrected.

Accordingly, with the exception of Situation # 1, the root cause for incorrect close out codes was repair technician error, either in the field, the central office or by the LOC Maintenance Administrators (“MAs”).

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<sup>3</sup> Usually jumpers opened and laid back on the Main Distributing Frame (MDF) in the Central Office.

<sup>4</sup> See BearingPoint Exception 131 Additional Information, August 29, 2002

## Repair Coding Accuracy Plan

### 4. Actions

The internal improvement plan proposed by SBC in its October 30, 2002 Filing was constructed to address the accuracy of trouble ticket closure coding for Special circuit and UNE repairs for various types of trouble conditions found including troubles noted as “No Trouble Found” (“NTF”) and Customer Premises Equipment (“CPE”). The plan included many of the steps identified in this plan.

The MPSC in its January 13 Order directed that an independent third party verify the results achieved from this plan. It also directed SBC to include evaluation criteria by which the third party could measure whether the corrective actions resulted in improved coding accuracy. In its comments, AT&T stated that the MPSC should require SBC to address this coding issue and stated that incorrect coding could lead to incorrect performance measurement results reporting. Further, AT&T was concerned that under SBC’s proposed Improvement Plan, the original source information would not be available for review.<sup>5</sup> AT&T also questioned the relationship between SBC’s proposed monthly quality reviews and improved accuracy and completeness of closeout coding. SBC has addressed the requirements of the MPSC and the comments of AT&T in the following enhanced plan.

The following activities identify the steps that SBC has taken or plans to take to improve the accuracy and completeness of trouble ticket closure coding for Special circuit and UNE repairs.

#### **Documentation Updates:**

During the course of its investigation of the errors noted by BearingPoint in Exception 131, SBC has initiated a number of improvements in the documentation available to technicians and their managers on proper coding techniques and application. These improvements include:

- The SBC document that is used as a reference for Cause Codes was updated to clarify use of Cause Code 600 in late June 2002. Cause Code 600 is used to identify those situations where SBC is unable to determine what caused a particular case of trouble. This documentation gap was identified via a number of cited trouble tickets for both Special and UNE circuits. The updates to the documentation provided a clearer description of the process currently followed by SBC technicians and addressed questions raised by BearingPoint. The updated SBC document was provided to BearingPoint for review on August 1, 2002.
- Local Operations Center Job Aid JA-27B has been updated to reflect additional steps for Maintenance Administrators to take that will improve coding accuracy when a mechanized loop test (“MLT”) indicates “Open Out”<sup>6</sup> following a circuit retest. MAs

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<sup>5</sup> See AT&T’s comments filed 11/15/02, Connolly affidavit at pp. 35-36, paras 80-83.

<sup>6</sup> “Open out” condition on a MLT means a circuit trouble is testing beyond the SBC Central Office.

## Repair Coding Accuracy Plan

and managing supervisors responsible for the accurate coding of closed trouble tickets in the LOC were covered on this process enhancement between August 1 and August 9, 2002.

- SBC updated internal Methods and Procedures (“M&P”) documentation (SBC 660-169-013) used to define accurate disposition coding of trouble tickets to include new disposition codes and clarify the use of existing disposition codes. Updates to the M&P were completed on August 16, 2002. These updates also generated the following outputs:
  - Installation and Repair (I&R) internal Job Aid (JA 170 - August 20) was updated to reflect the M&P changes/clarifications.
    - Awareness sessions were conducted 8/23/02 through 11/05/02 to review updated procedures.
  - A LOC “Flash” (02RC49) was issued 8/26/02 to reflect the new disposition codes.
  - The CSB Handbook was updated 8/26/02 to reflect the new disposition codes.
    - Issued a CSB “Flash” to notify CSB personnel of updated handbook procedures.
- December 16, 2002 Central Office Technician method and procedure documentation (SBC 002-216-298) was issued for documenting corrective maintenance trouble tickets in central offices (COs). A requirement for performing quality checks on coding has also been incorporated into the frame management document SBC 002-531-045 (“CO Managers Frame Reference Guide – AIT Region”).

### **Training Review Sessions:**

SBC has conducted comprehensive awareness and training sessions with personnel in each of the four work groups involved in trouble ticket closures. In those states where BearingPoint testing continued beyond the date(s) when such sessions were completed, test results indicated marked improvement in coding performance. These sessions included:

- SBC conducted training review sessions (a/k/a awareness sessions) to reinforce current procedures used for the close out of Cable Multiple tickets when wholesale account trouble tickets are attached to the lead cable trouble ticket number. Sessions covering all I&R Operations Center personnel were completed by August 13, 2002. A “Cable Multiple” ticket number is assigned to a damaged cable or cable failure that potentially impacts service to multiple subscribers served by the same cable. Individual subscriber (or CLEC) reports of service interruptions having individually assigned trouble ticket numbers may become attached to the lead or Multiple Cable Trouble Ticket Number (“CTTN”). SBC was made aware that in at least two audited instances, individual wholesale trouble reports attached to a Cable Trouble Ticket Number were closed as the CTTN closed and were not “detached” and tested to confirm restoration of the reported trouble. Reinforcement of current procedures to detach individual case trouble tickets from the CTTN and retest with the CLEC was completed for I & R Operations Center
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## Repair Coding Accuracy Plan

employees through Awareness Sessions conducted between August 8 and August 15, 2002.

- SBC conducted awareness sessions to reinforce current procedures used for the disposition coding of trouble reports closed when multiple faults are found on the same telephone line.
  - Sessions covering Installation and Repair field technicians in all manager groups were completed by August 12, 2002.
  - Additional training sessions with I&R personnel were conducted in November 2002.
- Additional review sessions for LOC personnel were conducted to reinforce accurate trouble closure procedures were completed by November 10, 2002.
- Review training sessions were conducted with Special Service Center personnel to reinforce correct trouble ticket coding procedures. These review sessions were completed by November 25, 2002.
- Review sessions were conducted through January 31, 2003 with SBC Midwest Central Office technicians in Michigan, Ohio, Indiana and Illinois<sup>7</sup> manager groups to review the newly created Methods and Procedures for documenting trouble tickets and established procedures for proper trouble ticket coding.
- On February 10, 2003, the LOC began conducting workshops to review closure codes and appropriate usage of these codes. These workshops will continue until the desired level of accuracy is achieved.
- On February 3, 2003, LOC associates were provided visual aids to identify commonly made coding errors and the recommended corrective actions.
- A coding refresher review session will be conducted within each of the four work groups (i.e., LOC, I&R, Special Services Center and Central Office) within one year of the training sessions described above.
- Training packages for new technicians in all four work centers already contain trouble disposition and coding and will continue to be part of the training program.

### **Management Review Activities**

To verify that the improvements to documentation and the training/awareness sessions have had the desired affect (i.e., improvement in coding performance), SBC is conducting its own internal reviews of trouble ticket closures in each of the four work groups involved. These reviews, which will be conducted over the next three years, focus both on closeout coding in general, as well as specific problems brought to the attention of SBC by individual CLECs (e.g., NTFs). These reviews include:

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<sup>7</sup> Since Wisconsin passed, trouble ticket coding these review sessions were not conducted.

## **Repair Coding Accuracy Plan**

### **1) LOC:**

- On October 30, 2002, LOC management had initiated monthly quality reviews of coding accuracy on employee trouble tickets closures.
- In December 2002, LOC management had also initiated bimonthly random reviews of trouble ticket closures. The results of these reviews are tracked and reported via an internal shared-access tracking mechanism.
- On February 10, 2003, LOC management initiated a "Ticket Closure Approval Team" for Resale/UNE-P trouble tickets. LOC MAs will be required to receive approval prior to closing a trouble ticket until an individual 95% accuracy rate is achieved.
- On February 10, 2003 LOC management also initiated a daily review of the prior day's UNE-Loop trouble ticket closures to validate correct trouble ticket and analysis codes. Individual MA errors are provided to the involved employee as well as the LOC staff, both as a method to improve the individual accuracy, as well as identify common misinterpretations.

### **2) Special Services Center**

- To monitor the accuracy and completeness of trouble ticket coding, the trouble ticket coding review has been incorporated into the regularly scheduled quality control measures utilized by the Special Services management. This effort began December 2002.

### **3) I&R Centers**

- The I&R management will incorporate coding accuracy into the current auditing processes to review the efficacy of the above-cited measures and identify corrective action when required to improve trouble ticket coding accuracy for Special and UNE circuit trouble reports.

### **4) Central Office**

- Beginning in March 2003, a monthly sample of closed CLEC trouble tickets in Michigan will be reviewed for narrative and coding accuracy.

In addition to these targeted coding review sessions SBC has incorporated trouble ticket coding into its internal ISO audits which are conducted approximately every three months within the various work centers. If significant ticket coding problems are identified during these ongoing audits, SBC will initiate new training/awareness sessions with the groups involved.

## Repair Coding Accuracy Plan

SBC acknowledges that the “original source information” as noted by AT&T<sup>8</sup> is not available in the above-cited improvement measures. However, SBC believes that these measures will improve the accuracy of trouble ticket coding based on the types of errors noted by BearingPoint in the test. This improvement will be demonstrated through the Third Party evaluation.

The following provides the timelines and current status of each of the items contained in the actions noted above:

Task	Begin	End	Status
1. Update documentation for Cause Code 600	6/01//02	06/30/02	Complete
2. Update LOC Job Aid JA-27B	07/31/02	08/01/02	Complete
A. Conduct Job Aid Training	08/01/02	08/09/02	Complete
3. Develop “awareness” training and conduct sessions with Installation & Repair Operations Center personnel to review procedures for “Cable Multiple” trouble tickets	08/01/02	08/08/02	Complete
A. Conduct “Awareness” sessions	08/08/02	08/15/02	Complete
4. Develop awareness training for I&R personnel to reinforce coding of trouble tickets when multiple faults are on the same line	8/10/02	08/11/02	Complete
A. Conduct awareness sessions	08/11/02	08/12/02	Complete
5. Update Methods and Procedures to include two new disposition codes and clarifications of existing codes.			
A. I&R internal job aids were updated to reflect M&P changes/clarification	08/20/02	08/30/02	Complete
B. Conduct I&R awareness sessions to review updated job aids	08/23/02	11/5/02	Complete
C. Issue LOC “Flash” to advise of new disposition codes	08/26/02	08/26/02	Complete
E. Issue CSB “Flash” to advise of handbook updates with new disposition codes	08/26/02	08/26/02	Complete
6. LOC management initiates “Ticket Closure Approval Team” for Resale/UNE-P	02/10/03	Ongoing	Ongoing
7. LOC management initiates “Trouble Closure Review” of UNE-Loop tickets closed by LOC	2/10/03	Ongoing	Ongoing
8. LOC will initiate ongoing workshops to review proper coding procedures as needed	2/10/03	Ongoing	Ongoing
9. Conduct LOC monthly reviews on employee trouble ticket closures	10/30/02	04/01/06	Ongoing

<sup>8</sup> See AT&T’s comments filed 11/15/02, Connolly affidavit at pp. 35-36, paras 80-83

<sup>9</sup> BearingPoint may elect to affirm SBC’s documentation improvements and internal reviews prior to this date.

## Repair Coding Accuracy Plan

Task	Begin	End	Status
10. LOC management will conduct bimonthly random reviews of trouble ticket closures	12/16/02	On-going	Complete
11. Update Central Office M&P for trouble ticket closure			
A. Conduct review sessions with Central Office technicians	12/17/02	01/31/03	Complete
B. Initiate internal reviews of closed CLEC trouble tickets	03/01/03	04/01/06	Ongoing
12. Conduct review training sessions with Special Service Center personnel	11/20/02	11/25/02	Complete
13. Incorporate quality reviews of trouble tickets into current Special Service Center quality control measures	12/01/02	04/01/06	Ongoing
14. Incorporate quality reviews of trouble tickets into current I&R quality control measures	12/01/02	04/01/06	Ongoing
15. Expected start of BearingPoint testing <sup>9</sup>	07/01/03		
16. Conduct refresher review session with all work centers	08/01/03	12/01/03	
17. New technician training for all four work groups includes repair coding accuracy and will be part of training program on-going	Ongoing	Ongoing	Ongoing

## 5. Third Party Examination Approach

This plan will be evaluated by a third party. While the third party selected, BearingPoint, will design its own work program and parameters, SBC anticipates that the third party evaluation will address and include a process evaluation and a review of actual commercial transactions as follows:

- The third party will evaluate SBC's implementations of the actions described in the "Actions" section of this plan by reviewing documents, conducting interviews, and performing site visits, as deemed necessary by the third party. This evaluation will include a review of SBC's quality review results. SBC expects this process evaluation to begin shortly after the MPSC approves this plan with a final report pursuant to BearingPoint's project plan.
- The third party will report on coding accuracy and completeness by comparing the trouble ticket coding applied to actual troubles found for UNE and Special Circuits to the narrative contained in the trouble report using a nonbiased sample from commercial production in the SBC Midwest region. The sample design and the evaluation methodology for this transaction analysis will be reviewed with

## Repair Coding Accuracy Plan

SBC and the MPSC staff prior to its implementation. In addition, BearingPoint may supplement its analysis using “ride-alongs” with repair technicians, consistent with its standard evaluation practices for UNE trouble reports in Michigan. SBC expects BearingPoint will begin its analysis of commercial production transactions no later than July 1, 2003 with a final report pursuant to BearingPoint’s project plan. The accuracy and completeness of closure codes for Special Circuit and UNE repairs is expected to improve when compared to BearingPoint’s test results of 82.1% for Special Circuits and 84.8% for UNE<sup>10</sup>. SBC’s target is 95% accuracy for UNE trouble ticket coding and 90 % for Special Circuit trouble ticket coding. If the third party evaluation does not show the target has been achieved, any further required actions will be determined by the MPSC.

- SBC will file bimonthly third party reports beginning with April-May 2003 period, to be filed by June 15<sup>th</sup>, until final process and transactions reports are completed. These reports will be filed with the MPSC by the 15<sup>th</sup> of the following month and served on the parties of record for MPSC Case No. U-12320.

## 6. Additional Reporting

SBC will provide quarterly reports for three years to the MPSC of the results of ongoing management activities, along with its assessment of whether the results indicate that further refresher training is appropriate or has been conducted. For each of the four work centers involved, the reports will include the following information:

- 1) the quantity of tickets reviewed;
- 2) percent or quantity found accurate;
- 3) follow-up activities taken (if needed).

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<sup>10</sup> See BearingPoint Exception 131, Disposition Report, December 20, 2002

# **ATTACHMENT B**



**MPSC Case No. U-12320**

**Line Loss Notifier Communications Plan**

**April 2, 2003**

# Line Loss Notifier Communications Plan

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## Line Loss Notifier Communications Plan

### 1. Purpose

The purpose of this plan is to describe action Michigan Bell Telephone Company (“SBC”) has taken and will take to improve communications regarding line loss notifiers (“LLNs”). This plan was first filed on October 30, 2002 (“October 30 Filing”). Pursuant to the Michigan Public Service Commission’s (“MPSC’s”) Order issued January 13, 2003 (“January 13 Order”), in Case No. U-12320 (SBC’s §271 Checklist Compliance Docket), the plan was revised and filed on February 13, 2003 as a draft. The February 13 draft addressed the specific issues identified in the January 13 Order regarding the communication between SBC and CLECs regarding operational concerns with LLNs and monthly reporting to the MPSC regarding such line loss issues for a minimum period of six months. SBC further modified this plan based on input received during the collaborative session held at the MPSC Offices in Lansing, Michigan on March 4-5, 2003. Additionally, SBC reviewed the changes with the MPSC Staff and collaborative participants on a conference call held on March 12, 2003. Final modifications were made to this plan in compliance with the MPSC’s Order issued March 26, 2003.

Specifically, this plan details the communications process that will be used when SBC determines that an interruption of LLNs could affect more than one CLEC (though this scenario is also covered). It also describes the monthly report that SBC will provide to the MPSC for at least six months following approval of the plan by the MPSC.<sup>1</sup>

### 2. Issue

BearingPoint, Inc. (f/k/a KPMG Consulting) performed testing of line loss notification as part of the Third-Party Operations Support Systems (“OSS”) testing. Two types of tests were performed: one using Test CLEC transactions that tested the entire line loss process and transaction flow (Line Loss Timeliness), and a second test using a large sample of production orders to further confirm the logic used by SBC to generate line loss notifications (Line Loss Accuracy). Both of these tests initially resulted in the issuance of Exceptions (74 and 94), however each test was concluded satisfactorily through subsequent retesting by BearingPoint.

In its October 14, 2002 Disposition Report for Exception 74 regarding Test CLEC line loss testing, BearingPoint reported that, based on their testing associated with that Exception and the resulting 96.2% success rate, “the issues identified in this Exception Report have been addressed.” This finding, coupled with BearingPoint’s test results associated with Exception 94 for Line Loss Accuracy testing, confirm that the process improvements implemented by SBC during the period of the OSS Evaluation had the intended result, i.e., a reliable process for delivery of line loss notifications to CLECs. BearingPoint’s line loss test results are contained in its October 30, 2001 Michigan OSS Evaluation Project Report as TVV4-28 (accuracy) and TVV4-29 (timeliness) at pp. 935-936.

As a result of discussion with its CLEC customers, however, SBC determined that improvements in communication of status of the line loss notifier process could still be made. Consequently, in its October 30 Filing, SBC proposed a plan to improve that communication; the plan was based on discussions during the technical workshops held on October 14 - 18, 2003. Based on subsequent

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<sup>1</sup> This plan does not address any additional changes to Performance Measure MI 13. Modification to PM MI 13, and the creation of an additional measure MI 13.1, were approved by the MPSC on February 20, 2002 in Case No. U-11830 and will be implemented for March 2003 results, reported in April 2003.

## **Line Loss Notifier Communications Plan**

CLEC comments regarding that plan, the MPSC's direction in its January 13 Order, and the aforementioned Collaborative activity in March 2003, SBC has enhanced that plan.

### **3. Actions**

#### **A. Definition of Line Loss Notification Interruption**

A "line loss notification interruption" would require the issuance of an accessible letter to all CLECs in the Midwest region, if it affected more than one CLEC. The "line loss notification interruption", which includes any winback situations, would be included in the monthly report filed with the MPSC if it affected any CLEC. (See, paragraphs 3(B) and 3(C) below, respectively.) A "line loss notification interruption" includes any of the following:

- (i) Missing LLNs, which includes any delay in transmission of mechanized LLN by SBC for more than four (4) business days from completion of work. The determination of whether a LLN was sent shall be calculated as provided in the Performance Measure Business Rules, including all exclusions, for PM MI 13.1, "Average Delay Days for Mechanized Line Loss Notifications."
- (ii) Inaccurate line loss notifications, which includes LLNs that were transmitted but contained either inaccurate or missing required data, such as conversion dates or affected telephone numbers.
- (iii) Improperly formatted LLNs, which include LLNs transmitted in a format other than expected (e.g., missing fields).
- (iv) Systemic transmission of LLNs in a mode, either an EDI 836 transaction, LEX GUI, or fax, that does not match the LLN mode contained in the CLEC's profile for LLNs. This excludes LLNs manually generated proactively by SBC.

Note: Any issues arising from a mix up in LSOR versions will be accounted for within this process, but dependent upon the particular situation, may vary as to which of the above categories this issue fits into.

#### **B. LLN Accessible Letters**

In its October 30 Filing, SBC proposed a plan for line loss notifiers that proposed improvements in communications from SBC to CLECs should future incidents occur related to the delivery of line loss notifiers. The improvement in communication was based on the issuance of Accessible Letters ("ALs") to provide pertinent information to CLECs in a timely manner.

SBC implemented enhanced communication procedures in November 2002 that include an initial notification upon identification and then a follow-up notification upon resolution for line loss issues that affect more than one CLEC. Accessible Letter CLECAMS02-122 issued November 12, 2002, is an example of an initial notification to CLECs of a line loss notifier interruption. CLECAMS02-123 issued November 13, 2002 was then issued to provide follow-up information regarding the same incident. This follow-up AL provided further information regarding the interruption as soon as it was available to SBC.

## **Line Loss Notifier Communications Plan**

In response to the January 13 Order and the comments of CLECs regarding the initial version of the plan, SBC will provide the following information to CLECs regarding line loss notice interruptions that could affect more than one CLEC:

- Within one business day<sup>2</sup> of SBC determining that a line loss notification interruption has occurred, as defined above in paragraph 3(A), that could affect more than one CLEC, SBC will issue an Accessible Letter (“AL”) to all CLECs in the Midwest region. The AL will include any details available at the time of issuance, that SBC has confirmed to be accurate and complete, concerning the cause, scope and duration of the LLN issue.
- Within 1 business day of SBC identifying the affected CLECs, SBC (Account Teams and/or OSS Managers) will contact those affected CLECs directly using the currently-designated customer contact maintained by the SBC OSS Support organization. Each situation varies in complexity and so the timeframe, as to when the affected CLECs will be identified, cannot be further defined.
- Because SBC will act as soon as there is a reasonable indication of a line loss issuance incident, the initial AL may not contain complete information. As soon as such information can be determined and confirmed, SBC will issue follow-up AL(s) and contact affected CLECs as needed with CLEC-specific information. Upon resolution of the issue, a final follow-up AL will be provided to all CLECs in the Midwest region.
- If SBC changes its line loss notifier procedures, including those contained in this plan, it shall immediately provide appropriate notification. Notification will be provided for any change to the procedures for delivering the actual line loss notification that would affect the format, data content, delivery method (other than normal changes via established processes, such as a new CLEC profile), or criteria for issuance of line loss notification transactions. Such notification will be provided in the manner defined by Change Management Process (“CMP”) guidelines, including the communications improvements noted in a separate plan filed simultaneously with this one. Where notification is appropriate but not covered by CMP, an AL will be issued.
- SBC commits to continuation of its cross-functional team that supports the “safety net” process for the review and evaluation of timely and accurate LLN issuance. SBC will evaluate the need for continuation at the end of the MPSC’s required reporting period and provide the MPSC with a 30-day notice of any discontinuance.

### **C. Monthly Reporting to the MPSC**

SBC will provide monthly reports to the MPSC regarding line loss issues for a minimum period of six months after the MPSC approves this plan. Reporting began with the activity for the calendar month of January 2003. The reports will be due by the 10th day of the following month.

The report will include information regarding line loss issues that have been identified by SBC during the reported calendar month; their cause, duration, scope of loss notifiers affected, number of LLNs affected by month (including both region-wide and state specific numbers where available), number of

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<sup>2</sup> The MPSC Order notes that these accessible letters should be sent “within 24 hours of determining that an interruption of line loss notification issuance has occurred ..” This plan proposes that such letter be sent within one business day to conform to SBC’s operational schedule and to be consistent with PM MI 13.

## Line Loss Notifier Communications Plan

providers affected, and actions taken to address the issues.<sup>3</sup> Providing a comparison to the total number of LLNs sent for the reporting month is not possible within the current stated reporting timeframe. The total numbers of all LLNs sent during the reporting month would not yet be available on the 10<sup>th</sup> of the next month. As a result, SBC will provide the total number of LLNs sent during each of the three months prior to the month of reporting, at both a regional and state level. These monthly LLN totals will be provided with every monthly report. This will allow the MPSC to compare the number of LLNs reported for that month, as a percentage of the total number of LLNs sent out by SBC on a monthly basis. Additionally, any referenced accessible letters will be provided with the report.

Further, if an identified issue has not reached resolution during the calendar month identified, it will be repeated in subsequent month(s) until resolved so that all required information is known and can be reported.

SBC will use the definition of line loss notification interruption provided in section 3(A) above when determining what should be included in the report.

The monthly report for February 2003 was filed on March 10, 2003; note the inclusion of information regarding cause, duration, scope of loss notifiers affected, number of CLECs affected, and actions taken to address the issues. The report for March 2003, as well as the updated reports for January 2003 and February 2003, to be filed on April 10, 2003, will provide the additional data, including monthly totals, as identified above.

## 4. Status Reporting

SBC will file its monthly line loss issues report with the MPSC on the 10<sup>th</sup> of the following month, for a minimum of six months following the MPSC approval of the plan, with service on the parties of record for MPSC Case No. U-12320.

SBC will file modified reports for January and February 2003 on April 10, 2003 to conform with the requirements of the MPSC in its Order of March 26, 2003. These modified reports will be also served on the parties of record for MPSC Case No. U-12320.

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<sup>3</sup> Per the January 13 Order, page 6.

# **ATTACHMENT C**



**MPSC Case No. U-12320**

**Bill Auditability and Dispute Resolution Plan**

**April 2, 2003**

# **Bill Auditability and Dispute Resolution Plan**

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## Bill Auditability and Dispute Resolution Plan

### 1. Purpose

A number of CLECs raised issues relating to billing auditability and the billing dispute resolution process in their respective comments made or filed during November 2002. For the most part, the comments made were general in nature with few actionable specifics provided.<sup>1</sup> In its January 13, 2003 Order, the Michigan Public Service Commission (“MPSC”) required Michigan Bell Telephone Company (“SBC”) to “include in its February 13, 2003 filing an improvement or compliance plan to address these issues.” Based on the CLEC comments and information gathered from its account managers and other staff involved in providing support to CLECs, SBC understood the billing auditability issue to be difficulties in reconciling CABS billing statements and with utilizing SBC’s billing dispute resolution process when issues arise. SBC filed its draft on February 13, 2003 to address these concerns. SBC further modified this plan based on input received during the collaborative session held at the MPSC Offices in Lansing, Michigan on March 4-5, 2003. Additionally, SBC reviewed the changes with the MPSC Staff and collaborative participants on a conference call held on March 12, 2003. Final modifications were made to this plan in compliance with the MPSC’s Order issued March 26, 2003.

This plan addresses the general bill auditability and dispute resolution process concerns that have been raised. Status on these actions will be monitored by SBC and filed with the MPSC, with service on the parties of record for MPSC Case No. U-12320. This plan does not address the CLEC-specific billing questions submitted. SBC has addressed those issues on an individual basis with the questioning CLEC and will continue to do so consistent with then existing processes and procedures.<sup>2</sup>

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<sup>1</sup> See Transcript of November 25, 2002 MPSC Public Hearing on 271 Matters specifically comments of: TDS Metrocom (T5953) and ZTel T5961, T5967). Also, see XO Michigan, Inc’s November 5, 2002 Comments on Three Months of Ameritech Performance at p. 5.

<sup>2</sup> On January 27, 2003, James Denniston of WorldCom submitted specific questions regarding particular USOC and rate element applications for UNE-P via e-mail to counsel for SBC. On February 25, 2003, SBC’s Account Team responded.

## Bill Auditability and Dispute Resolution Plan

### 2. Issue Definition

#### A. CABS Billing Auditability

The billing auditability concerns appear to be focused on the Carrier Access Billing System (“CABS”). SBC Midwest implemented CABS BOS BDT<sup>3</sup> format billing for all UNE products in October 2001, consistent with the FCC’s Uniform and Enhanced OSS Plan of Record (the “POR”). The CLECs in general, and WorldCom in particular, were strong proponents of the move to CABS billing. As WorldCom stated, CABS billing “results in a highly dependable and auditable bill.”<sup>4</sup>

CABS is an industry standard format for billing that has been in use for years in the interexchange access business as well as by CLECs. These industry standards are defined by the Ordering and Billing Forum (“OBF”) which includes CLEC representation. As an OBF member, SBC adheres to the CABS billing requirements set by the OBF. This adherence ensures that all SBC Midwest CLEC customers receive a standard, non-discriminatory bill format which is documented and subject to an externally controlled change process. Accessible letters are issued to notify the CLECs of software changes to CABS; these notices include illustrative exhibits when appropriate.

SBC understands that not all CLECs may be conversant in reviewing their billing statements for auditing purposes. SBC CLEC Billing Workshops are available in each of the SBC regions to help CLECs read and interpret the CABS, LEC Services Billing (“LSB”), and Resale Billing System (“RBS”) bills received from SBC. This 1-1/2 day workshop includes information on identifying the components that make up the CABS, LSB and RBS bills as well as using Daily Usage Files (“DUF”) and Ameritech Electronic Billing System (“AEBS”) files. The workshop is available on an ongoing basis for scheduling; additional sessions can be added as needed based upon CLEC demand. Requests for any "on demand" courses are typically added to the schedule within a few weeks. In 2002, this Billing workshop was conducted seven times with 20 CLECS participating in one or more sessions.<sup>5</sup> Three workshops were cancelled due to no enrollment.

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<sup>3</sup> CABS BOS BDT stands for Carrier Access Billing System Billing Output Specifications Bill Data Tape, which is a guideline format overseen by the Ordering and Billing Forum, an industry organization that provides standard billing guidelines.

<sup>4</sup> Direct Testimony of A. Earl Hurter on Behalf of MCImetro Access Transmission Services, Inc. dated September 25, 2000, pg 5, line 12-13. Mr Hurter also indicates in his testimony that the CABS BOS format provides “efficient bill receipt, audit and payment is predicated on a predictable, well defined electronic bill format which allows for levels of summarization by end office, jurisdiction, LATA and state”. (pg 2, lines 17-19)

<sup>5</sup> Of the CLECs commenting on this issue, none participated in the available training in 2002.

## Bill Auditability and Dispute Resolution Plan

BearingPoint conducted extensive testing of SBC Midwest's CABS billing, evaluating the billing of recurring, non-recurring, and fractional charges as well as sums and cross totals on CABS bills. BearingPoint found that SBC exceeded the 95% benchmark for each of these categories. The BearingPoint Michigan OSS Evaluation Project Report issued on October 30, 2002 specifically evaluated recurring charges on UNE-P bills and determined that 98.9% of these charges were consistent with applicable tariff and/or contract. (See TVV9-6, at p. 1000.) Non-recurring and fractional rates on UNE-P bills were evaluated under TVV9-9 testing and the results indicated 99.2 % of the rates were consistent with applicable tariff and/or contracts. (See p. 1002)

### B. Billing Dispute Resolution

SBC's billing claims and adjustments process begins with the Local Service Center ("LSC") Claims/Dispute organization, which is responsible for processing CLEC billing claims and disputes. SBC's billing claim dispute resolution process is documented on CLEC Online and references the escalation procedures available to a CLEC dissatisfied with the disposition of its claim.<sup>6</sup> If the CLEC is still dissatisfied after the escalation process is complete, it can enter into the Informal Dispute Resolution ("IDR") process as outlined in the CLEC's interconnection agreement.<sup>7</sup> The IDR process generally begins with the Account Manager working with the CLEC to resolve the billing dispute, then notifying the LSC of the resolution. If the CLEC is still not satisfied with the resolution, escalation procedures are generally provided for in the IDR process to bring the issue to SBC senior management. A CLEC that does not have an interconnection agreement at the time of the billing dispute would also use its account manager to escalate and resolve billing disputes.

BearingPoint conducted comprehensive testing of SBC Midwest's support of CLEC billing related claims and inquiries. Testing included documentation reviews, interviews with SBC personnel and on-site observations of help desk operations. BearingPoint found that the billing support process clearly included procedures for accepting, acknowledging, investigating, tracking, and closing CLEC claims, issues, and inquiries. (See PPR10-3 through PPR10-5, pp. 668-671)

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<sup>6</sup> Go to <https://clec.sbc.com/clec>, click on CLEC Handbook, choose a state's handbook i.e. Michigan, and then select Billing from the menu provided on the left side of the screen.

<sup>7</sup> Go to <https://clec.sbc.com/clec>, click on Getting Started as a CLEC, choose Account Management Responsibilities, and then select Dispute Resolution under the General Responsibilities heading.

## **Bill Auditability and Dispute Resolution Plan**

### **3. Actions**

#### **A. CABS Billing Auditability**

SBC will take the following actions to address the CLEC and MPSC concerns regarding billing auditability. When a CLEC raises a bill auditability issue, SBC will:

First, confirm that the CLEC is familiar with the support that is available -

- When contacted, SBC account managers will advise CLECs interested in modifications to the CABS BOS standards (e.g. call flows, interconnection agreement pricing schedules, tariff page references, additions) to submit their business need to the OBF.
- SBC Midwest Account Managers will remind their clients, as appropriate, of the ongoing availability and value in attending the SBC CLEC billing workshops. A general reminder also will be provided at the SBC CLEC User forum during or before April 2003.

Second, clarify with the CLEC the specifics of its concerns -

- Given the nonspecific nature of the Bill Auditability comments submitted by many of the CLECs, the issue will be added as an agenda item to the April 2003 SBC Midwest CLEC User Forum.
- At that forum, SBC will extend to the CLEC community, an invitation to schedule on an individual basis, a working session with SBC to discuss company specific billing auditability concerns.

Third, identify additional available support options -

- SBC will investigate the availability of bill auditability training sessions offered by external vendors and provide results of that investigation to the account managers and for CLEC Online updates. Initial evaluation was completed by March 15, 2003, however SBC will continue to research other avenues and provide status at the April 2003 Midwest CLEC User Forum
- SBC will evaluate the need to develop a CABS billing overview presentation to be delivered during a SBC Midwest CLEC User forum. Initial evaluation will be completed by March 31, 2003.
- SBC will assess the viability of posting limited industry documentation on the CLEC Online website. Initial evaluation was completed by March 15, 2003; SBC will provide status on findings at the April 2003 Midwest CLEC User Forum.
- SBC will develop USOC reference guides as follows:
  - A USOC reference guide which will map USOCs to the multi-state generic interconnection agreement; it will be presented at the April 2003 SBC Midwest CLEC User Forum.
  - A USOC reference guide for Tariff MPSC No. 20R, Part 19 (UNEs) and Tariff MPSC No. 20R, Part 23 (Interconnection/Collocation) by June 1, 2003. This

## **Bill Auditability and Dispute Resolution Plan**

document and its associated CLEC Online location will be provided at the June 2003 Midwest CLEC User forum.

- On a going forward basis, CLEC interconnection agreement USOC mapping requests should be provided to, and will be handled through, the specific CLEC's account manager.
- The review of the existing complement of CLEC workshops and Operation Support System classes is an ongoing activity. Participant feedback from the 2002 Billing Workshop sessions are considered in identifying course improvements. The review of the CLEC Billing Workshop, along with any related course material updates, will be completed by June 30, 2003.
- SBC will evaluate the feasibility of other training delivery methods. Evaluation will be completed by September 30, 2003.

### **B. Billing Dispute Resolution**

SBC will take the following actions to address the Dispute Resolution Process concerns raised.

The following actions will be taken to improve the CLECs' understanding of the billing dispute resolution process.

- Managers from the LSC's Claims/Dispute Resolution organization were scheduled to provide an overview of the claim submission process at the February 2003 SBC Midwest CLEC User Forum meeting. During that forum, the CLECs indicated they understood the claim process and preferred to discuss more specific bill dispute issues. A subcommittee, with representation from the various impacted SBC organizations and the CLECs, was created to address claims/dispute related issues; the subcommittee's first call took place on March 5, 2003. The subcommittee is expected to continue to meet periodically into the second quarter, with evaluation of continuation made at that time.
- When contacted, the Account Management teams will work with the LSC to schedule CLEC specific meetings to address their billing claim issues.

The following SBC internal training and documentation improvements will be implemented to improve the quality of the billing dispute resolution process.<sup>8</sup>

- The LSC Billing representative initial training course will be updated to address the gaps identified by the CLEC comments (i.e. stress process and communication with the CLEC, UNE-P product knowledge).
  - Classroom exercises will be incorporated to ensure sufficient practice occurs and mastery testing is complete.
  - The enhancements will be included in the new initial class scheduled in April 2003.

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<sup>8</sup> See Z-Tel November 5, 2002 Comments on Three Months of Ameritech Performance Results at pp.6-8. Similar comments are made in the Transcript of November 25, 2002 MPSC Public Hearing on 271 Matters; see T5968-T5969.

## Bill Auditability and Dispute Resolution Plan

- Training for existing Billing Service Representatives will be developed and delivered to reinforce product understanding, highlight the importance of proper status with the customer and detailed claim responses, and review most common systems used for their segment. Development of the training is scheduled for completion on 3/31/03. Training sessions will be scheduled in April through July 2003.
  - This will be an interactive session that will allow students to take time for hands-on practice.
  - At the conclusion of the training, the participants will be given a mastery test.
- A Claim/Dispute resolution checklist was developed and implemented with the claim/dispute service representatives on February 19, 2003. This checklist enables the service representative to perform the claim process steps in a methodical manner ensuring that every step is covered. The checklist will include direction for the service representative to include reference information, such as TN, repair ticket number, and/or interconnection agreement or tariff reference as appropriate. The revised checklist will be trained and in use by 4/21/03. The checklist will continue to be updated going forward based on internal review and CLEC feedback.
- SBC Midwest developed and implemented an internal quality review process to perform a random sampling of processed claims to ensure accuracy and completeness; the sampling will be from actual claims made and products covered will be dependent upon claims submitted. The process was implemented on March 3, 2003.

The following table provides the schedule for the actions discussed in this section:

Task	Begin	End	Status
<b>Bill Auditability Support Actions</b>			
Clarify the Issue(s)			
• Schedule issue for future CLEC User Forum agenda schedule for high level discussion	2/20/03	2/21/03	Completed
• Conduct CLEC forum discussion	April 2003	April 2003	-----
• Identify External Bill Audit Training & Documentation			
• Identify external CABS BOS/BST training sources	1/27/03	3/31/03	In Progress
• Identify external industry documentation and publications	1/27/03	3/31/03	In Progress
• Update CLEC Online w/findings (if applicable)	3/3/03	3/31/03	In Progress
• Provide read-out on findings at CLEC user forum	April 2003	April 2003	-----
• CLEC Training's review/update of CLEC Billing Workshop	2/17/03	6/30/03	In Progress
• Explore alternate delivery of CLEC training	4/1/03	9/30/03	-----
• Evaluate need for CABS billing overview presentation	3/4/03	3/31/03	In Progress

## Bill Auditability and Dispute Resolution Plan

Task	Begin	End	Status
• Develop USOC reference guides			
• Develop a USOC to multi-state generic ICA reference guide	3/10/03	4/2/03	In Progress
• Present USOC reference guide at CLEC User Forum	4/2/03	4/2/03	-----
• Develop a USOC to Tariff MPSC No. 20R, Part 19 (UNEs) and Tariff MPSC No. 20R, Part 23 (Interconnection/Collocation) reference guide	4/1/03	6/1/03	In Progress
• Provide USOC to Tariff MPSC No. 20R, Part 19 & Part 23 reference guide at CLEC User Forum	June 2003	June 2003	-----
<b>Dispute Resolution Process Improvements</b>			
• Claim Submission Process Overview Presentation at CUF	2/10/03	2/19/03	Closed
• Work with Billing Subcommittee formed during CUF and report progress to MPSC.	3/5/03	TBD	In Progress
• Provide immediate team coaching at core meeting, team meeting & January & February Segment meetings on importance of complete/accurate dispute disposition responses	12/19/02	2/28/03	Completed
• Identify additional process improvements via weekly LSC segment meetings	1/29/03	Ongoing	Ongoing
• Design and implement a Billing Claim/Dispute response checklist and provide training to all Billing Claim/Dispute Service Representatives.			
• Determine and assign resource to lead checklist development	1/27/03	1/27/03	Completed
• Develop checklist for SR to use when processing claims	1/27/03	2/14/03	Completed
• Conduct Training	2/17/03	2/18/03	Completed
• Implement Checklist revisions	4/3/03	4/21/03	
• Develop and implement a quality review process for validating the completeness of CLEC billing claim resolution responses			
• Develop Service Rep validation scorecard	2/10/03	2/28/03	Completed
• Conduct validation sampling process	3/3/03	Ongoing	Ongoing
• Develop and deliver enhanced training to all Billing Claim/Dispute Service Representatives.			
• Determine and assign resource to lead development effort	02/03/03	7/31/03	In Progress
• Produce training package	02/03/03	03/31/03	In Progress
• Create training schedule	03/14/03	03/31/03	In Progress
• Conduct Training	April 2003	7/31/03	-----

## **Bill Auditability and Dispute Resolution Plan**

### **4. Status Reporting**

Additionally, SBC will file a report regarding its progress on this plan to the Commission for its review and serve a copy of the report on the parties of record in MPSC Case No. U-12320 in April, July, and October 2003. These quarterly reports will address status of both bill auditability and billing dispute resolution. SBC will file interim reports should significant changes or improvements occur which the MPSC should be advised of. Specifically, with respect to bill auditability, SBC will provide a status of the SBC and externally available training options available for CABS, LSB and RBS that have been communicated to CLECs during the period under review. With respect to USOC support materials, SBC will report out on its analysis of the appropriate approach to providing such information, as well as its progress. With respect to billing dispute resolution, SBC will summarize the status of the CLEC User Forum sub-committee addressing this issue during the period under review. This status will include progress related to the on-going discussion on how to measure time frames for dispute resolution, as well as which time frames to incorporate into the dispute resolution performance measure currently under discussion in the performance measure six-month review. SBC will provide status of training provided to the LSC representatives responsible for resolution of billing disputes during the period under review. SBC will provide results of the quarterly quality assurance review programs described above during the period under review. Where applicable, details on deviations and corresponding corrective actions will be provided including any additional on-going training needs identified.

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion,	)	
to consider Ameritech Michigan's compliance	)	
with the competitive checklist in Section 271 of	)	Case No. U-12320
the federal Telecommunications Act of 1996.	)	
_____	)	

PROOF OF SERVICE

STATE OF MICHIGAN     )  
   ) ss.  
 COUNTY OF INGHAM     )

Mindy D. Smith, being first duly sworn, deposes and says she is employed at Dickinson Wright PLLC; and that on April 2, 2003 she served a copy of *SBC's Submission of Revised Improvement Plan Proposals* upon the attached service list via email and first class mail by depositing the same in a United States postal depository, enclosed in an envelope, bearing postage fully prepaid in Lansing, Michigan.



\_\_\_\_\_  
Mindy D. Smith

Subscribed and sworn to before me,  
a Notary Public in and for said County,  
this 2<sup>nd</sup> day of April, 2003.



\_\_\_\_\_  
Alicia M. Ball, Notary Public  
Ingham County, Michigan  
My Commission Expires: 01/07/06

**SERVICE LIST – MPSC CASE NO. U-12320**

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