

would have greater flexibility in performing its own rearrangement of elements.²¹

With a cross connect field, a CLEC can simply connect a loop to a port in its collocation arrangement to provide voice only service. To establish a line splitting arrangement, the CLEC could (1) connect a splitter to the cross connect field for the port and (2) also connect the splitter to the cross connect field for the xDSL-capable loop. The CLEC would then connect the splitter to a DSLAM or, if the splitter is integrated into the DSLAM, no further physical cross connections would be required to provision the service. To disconnect the data portion, the CLEC could disconnect the cross connect within the collocation arrangement that is attached to the port CFA, and disconnect the cross connect at the point within the collocation arrangement that is attached to the loop CFA. The CLEC could then connect the loop and port directly together by a simple cross connect on its cross connect field. The DSLAM (and separate splitter if applicable) would then be taken out of the circuit allowing for voice-only service. The only thing that still would be “tied up” in the CLEC’s collocation arrangement would be the two points connected to the CFAs on the CLEC’s cross connect field.

20. Lastly, a CLEC even has the ability to *virtually eliminate* service disruption (*i.e.*, eliminate even a few minutes of service disruption) in most cases where it wishes to provision voice only service over an xDSL-capable loop it has previously used in a line splitting scenario. The CLEC can do this by leaving the splitter (or splitter shelf) in the transmission path and simply discontinuing the DSL service. Some splitter shelves allow a voice path to be maintained even when the splitter

²¹ A cross connect field would also aid the CLEC in its ability to isolate and respond to trouble conditions, such as a faulty splitter port.

card itself is physically removed.²² Since these elements are already in combination, there is no physical disconnect of cross connects, and there would likely be no disruption of voice service.

“REUSE” OF THE XDSL CAPABLE LOOP IN A LINE-SPLITTING TO UNE-P CONVERSION

21. AT&T and MCI complain about Michigan Bell’s practice regarding the provisioning of a voice grade loop under its process for converting a line splitting arrangement to UNE-P.
22. At the outset, as SBC has explained, it is important to recognize that pursuant to the Telecommunications Act of 1996, SBC is under a legal obligation to provide UNEs in a nondiscriminatory manner. The Commission’s orders have defined nondiscriminatory access to UNEs to mean that the UNEs provided by an ILEC to a CLEC must be at least equal-in-quality to that provided to itself.²³ The Commission has further defined “nondiscriminatory access” to mean that where UNEs have a retail analogue, the ILEC must provide those UNEs in parity with its own retail service offering. Accordingly, SBC’s provisioning systems have been designed to provision the network element components of the UNE-P in a

²² MCI also complains about the fact that Michigan Bell will continue to charge MCI the price for an xDSL-capable loop, rather than the charge for a voice-grade loop, if MCI drops the data portion from the loop within its collocation arrangement. See Lichtenberg Declaration ¶ 68. The charge of an xDSL-capable loop in Michigan, however, has been approved by the MPSC. It is higher than the charge for a voice grade loop because the xDSL-capable loop product offered by Michigan Bell is designed as an all copper loop, and therefore can only be provisioned on all copper facilities, whereas the voice grade loop offered by Michigan Bell may be provisioned on digital loop carrier. Since MCI would still be receiving an xDSL-capable loop – and can use it to provide DSL service if it so desires – it is entirely appropriate for MCI to pay the MPSC-approved charge for such a loop.

²³ See First Report and Order, *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, 11 FCC Rcd 15499 (“Local Competition Order”), modified on recon., 11 FCC Rcd 13042, ¶ 312 (1996), vacated in part, *Iowa Utils. Bd. v. FCC*, 120 F.3d 753 (8th Cir. 1997), *aff’d in part, rev’d in part sub nom. AT&T Corp. v. Iowa Utils. Bd.*, 525 U.S. 366 (1999), decision on remand, *Iowa Utils. Bd. v. FCC*, 219 F.3d 744 (8th Cir. 2000), *aff’d in part, rev’d in part sub nom. Verizon Communications Inc. v. FCC*, 122 S. Ct. 1646 (2002).

nondiscriminatory manner vis-à-vis plain old telephone service (“POTS”), because POTS is the retail analogue of the UNE-P. Specifically, SBC’s Loop Facility Assignment and Control System (“LFACS”) has been designed to select and assign a voice grade loop to provision the UNE-P that is at least equal-in-quality to the voice grade loops it selects and assigns to SBC in a retail POTS arrangement.

23. In addition, retail POTS and UNE-P loops must meet certain specific engineering design criteria for voice grade loops in order to meet parity requirements contained in CLEC interconnection agreements and any applicable performance measurements. Therefore, LFACS will attempt to select and assign a loop for both retail POTS and UNE-P that meets these specific engineering criteria for voice grade service. An xDSL-capable loop may not meet the same engineering criteria. More importantly, LFACS will select and assign a voice grade loop that meets the requisite engineering criteria in a nondiscriminatory manner, whether a customer is converted from (1) a line splitting arrangement to UNE-P on behalf of a CLEC or (2) a line splitting arrangement to retail POTS on behalf of SBC when it wins a customer back from a CLEC. Finally, as discussed in more detail below, in order to be available for selection and assignment by LFACS, an xDSL-capable loop must be in the LFACS inventory of loops available for reuse or reassignment in order to be even considered.
24. As SBC has explained, under the processes that are currently available in the SBC Midwest region for a conversion from line splitting to UNE-P, the CLEC is required to submit two LSRs (assuming the CLEC wishes to disconnect the xDSL-capable loop). One LSR is utilized to request the disconnect of the xDSL-

capable loop. The other LSR is utilized to request the establishment of a new UNE-P and the disconnection of the unbundled switch port provisioned to the CLEC collocation arrangement. With respect to the establishment of the new UNE-P, if the CLEC were to request the same due date on its LSR for the disconnection of the xDSL-capable loop as it requests on its LSR for establishment of the new UNE-P, in nearly every instance LFACS will select and assign a *new* voice grade loop for the UNE-P that meets specific engineering criteria.²⁴ From SBC's perspective, when a new voice grade loop is assigned, there would only be a brief disruption of service while SBC completed the central office work associated with connecting the new loop and switch port together.²⁵

25. In this scenario, the xDSL-capable loop will not be available in the LFACS inventory of loops for mechanized assignment because it is a "designed" circuit.²⁶ Under SBC Midwest's legacy systems and design processes, the physical work associated with the disconnection of an xDSL-capable loop (*i.e.*, the removal of the jumpers) is subject to a five business day due date process applicable to

²⁴ Michigan Bell's systems typically contain a variety of information concerning a given loop's physical characteristics, including information such as loop length, wire gauge, loop medium (copper or fiber), and information regarding any bridged tap, load coil, or repeaters present on the loop. Michigan Bell's systems do not, however, contain a "running history" of the loop that would show whether or not conditioning has been performed on the loop, or how much conditioning has been performed on the loop. In other words, when Michigan Bell conditions a loop at a CLEC's request, the loop make-up record is revised to reflect the post-conditioning physical characteristics of loop, but Michigan Bell's systems do not reflect *the fact that* conditioning was done on the loop, nor do they reflect the physical characteristics of the loop that existed prior to such conditioning. Thus, once a loop has been provisioned as an "xDSL-capable" loop, Michigan Bell cannot definitively determine, from its system records, whether or not the loop has or has not been conditioned. Furthermore, Michigan Bell's systems do not know whether or not a given stand-alone xDSL-capable loop was previously used to provision UNE-P, Michigan Bell retail voice service, or some other service arrangement.

²⁵ Although CLECs have claimed that there is a likelihood of facility shortages if SBC assigns a new loop, this simply is not the case. SBC currently has sufficient available loop facilities to provide a requested voice grade loop about 99% of the time.

²⁶ In SBC's Midwest region, all stand-alone unbundled loops provisioned to a CLEC's collocation arrangement follow a designed flow.

designed circuits.²⁷ In other words, the physical disconnection of an xDSL-capable loop does not actually occur until five business days after the requested due date. It is on that date (five business days after the requested due date) that the xDSL-capable loop facility becomes part of the inventory of loops available for assignment by LFACS.

26. Likewise, Michigan Bell is treated in the same manner when it wins the voice service of a customer that is currently being served over an xDSL-capable loop. In this winback situation, Michigan Bell provisions a new voice grade loop to serve that customer.²⁸ In that scenario, the xDSL-capable loop that the CLEC had been using to serve that customer would not be available for possible assignment as the new voice grade loop for the Michigan Bell retail voice service until five business days after the due date requested by the CLEC for disconnection of the xDSL-capable loop. Such requested due date would, of course, be something over which Michigan Bell has no control. Furthermore, because the CLEC has no obligation to even submit such a disconnect request, it is likely that the existing xDSL-capable loop will not be available for possible assignment as the new voice grade loop for Michigan Bell retail voice service.
27. As indicated in its July 7 and 9 Ex Partes, SBC is currently evaluating the feasibility of developing a new process that would increase the likelihood that the existing xDSL-capable loop facility would be reused if and when a CLEC

²⁷ See July 7 Ex Parte, Attachment at note 13. "Designed" circuits frequently require special provisioning and can include some additional costs. One benefit of the five business day hold is that it gives a customer some time to change his or her mind while the circuit remains in place. If this happens, SBC can reconnect the circuit without having to take the time and to devote the resources necessary to design a new circuit.

²⁸ See March 24 Ex Parte, Attachment at 4.

requests conversion from a line splitting arrangement to UNE-P. This evaluation is the result of a request submitted by MCI through the CLEC User Forum, as clarified on a conference call between SBC and interested CLECs on June 25, 2003. Based on its initial evaluation, SBC believes that it *can* develop such a process that would force the reuse of the existing loop facility, and that also would allow the same due date for disconnection of the xDSL-capable loop, disconnection of the unbundled switch port, and establishment of the new UNE-P (thus bypassing the five day hold requirement for designed circuits). SBC estimates that, under this new process, the existing unbundled xDSL-capable loop facility would be reused approximately 90% of the time.²⁹

28. This new process, however, would require SBC to bypass its existing provisioning processes, whereby LFACS assigns a voice capable loop for UNE-P that is equivalent to that which would be provided for SBC retail POTS service meeting the requisite engineering criteria. Also, because at the CLEC's request SBC would be reusing the existing xDSL-capable loop facility even if it would not have been selected to provide voice service to that address under the requisite engineering criteria, SBC would first need agreement from the CLECs that (1) SBC not be subject to claims of discriminatory treatment because the loop selection processes and procedures utilized to furnish a loop for the UNE-P in this scenario would not be the same as that used to furnish a voice grade loop for SBC retail POTS service, and (2) these xDSL-capable loops reused to provide UNE-P

²⁹ The new conversion process we have described herein, once developed, tested, and implemented, might result in reuse of the xDSL-capable loop facility at a level of frequency substantially greater than 90%. However, at this time – there has been little real world experience with these type of conversions at all, and the process still has to be developed – SBC simply cannot guarantee that the existing xDSL loop would be reused in all cases.

for the CLECs would be exceptions from the applicable performance measurements designed to ensure nondiscriminatory treatment in the provisioning and maintenance and repair of UNE-P and POTS loops.³⁰ If the CLECs provide such a commitment, and subject to the various other factors identified in SBC's July 7 and 9 Ex Partes (e.g., cost recovery, operational limitations, systems modification and development work, and anticipated order volumes), SBC is prepared to develop and test such a process with any interested CLECs.³¹

MCI'S CLAIM THAT MICHIGAN BELL'S PROCESS FOR CONVERTING LINE SPLITTING TO UNE-P IS CUMBERSOME

29. MCI complains generally that Michigan Bell's internal processes for converting line splitting to UNE-P are cumbersome.³² Michigan Bell disagrees. As explained above, under the processes currently available in the Midwest region for converting line splitting to UNE-P, the CLEC is required to submit one LSR requesting the new UNE-P and the disconnection of the unbundled switch port provisioned to the CLEC collocation arrangement.³³ On the due date, Michigan Bell will provision the new voice grade loop. Once the new loop has been established, Michigan Bell will remove the jumpers connecting the stand-alone switch port to the CLEC's collocation arrangement and install jumpers connecting

³⁰ In addition, it might also be necessary to seek approval from the relevant state commission for any changes to interconnection agreements or state-approved performance measurement and remedy plans.

³¹ On page 6 of the AT&T Comments to Renewed Application, AT&T reasserts its claim that the processes Michigan Bell makes available for converting line splitting to UNE-P are "discriminatory" because they are not the same as what happens when data is dropped from a line shared loop. See March 24 Ex Parte, Attachment at 4, for SBC's response to that contention.

³² Lichtenberg Declaration ¶¶ 60-62.

³³ MCI also complains about that it must submit the LSR to convert line splitting to UNE-P via fax, and that this fax process "will be entirely unacceptable as volumes expand." *Id.* ¶ 60. The process is manual because this is a process that is not currently being used by CLECs in any of the SBC Midwest states in any material quantity. Any CLEC that believes enhancements to this order process are necessary for future business plans may pursue such enhancements through Change Management, and also is free to discuss them with their Michigan Bell account team.

the loop and port elements that make up the new UNE-P. There would only be a brief disruption of service to the NID while Michigan Bell completed the central office work associated with disconnecting the existing switch port from the collocation arrangement and connecting the new loop and switch port that make up the UNE-P.³⁴

30. MCI states that “based on one order it submitted in Texas” where a customer lost dial tone for a substantial period, it is “concern[ed]” about SBC’s processes for converting a line splitting customer to UNE-P. Lichtenberg Declaration ¶ 62. SBC’s has a three LSR process in its Southwest region for converting line splitting to UNE-P.³⁵ Difficulties were encountered in provisioning this particular conversion request because the LSRs were handled by two different Local Service Centers (“LSCs”). The SBC Midwest region, in contrast to the SBC Southwest region, has a single LSR (or two-LSR process if the CLEC wishes to disconnect the xDSL-capable loop) process available for converting line splitting to UNE-P. The difficulties in provisioning this Texas request, therefore, are not directly relevant to whether such difficulties would be experienced in the SBC Midwest region. Nonetheless, each of the four SBC regions are creating a dedicated “line splitting” unit that would be located in one LSC per region. August 1, 2003 is the targeted implementation date of this change for the Midwest region. Although SBC reserves the right to make adjustments in work location and allocation where

³⁴ MCI notes that this process may result in “a different path not only from the switch to the terminal nearest the customer’s home but also use of a different drop into the customer’s home.” Lichtenberg Declaration ¶ 64. Because SBC has yet to receive any significant quantities of orders for line splitting to UNE-P, it has no data on how often this would occur. However, SBC has requested that interested CLECs engage in joint testing with SBC in order to identify issues and help determine specific process improvements that may be beneficial.

³⁵ The three LSRs include and LSR requesting disconnection of the xDSL-capable loop. If the CLEC does not wish to disconnect the xDSL-capable loop, only two LSRs would be needed.

needed to meet the needs of the business, SBC's intent is to process all line splitting related work in each region at one LSC.³⁶ SBC's intention is to streamline processes to increase its ability to handle all CLEC orders efficiently, with minimal possible service disruption.

MICHIGAN BELL'S CHARGES FOR A LINE SPLITTING TO UNE-P CONVERSION

31. MCI also takes issue with Michigan Bell's charges for converting line splitting to UNE-P. All of these charges, however, have been approved by the Michigan Public Service Commission. Further, it is not true, as MCI asserts, that the charges "exist only because the loop is changing." Lichtenberg Declaration ¶ 66. On the contrary, they exist for cost recovery purposes based on the necessary work that Michigan Bell must perform to effectuate the transition to UNE-P. MCI confuses the issue by discussing the Michigan UNE-P migration charge of \$0.35. Moving from a stand alone UNE port and/or stand alone UNE loop (both of which are cross-connected to a CLEC collocation cage) to a UNE-P arrangement (where both loop and port are directly cross-connected at a Michigan Bell central office frame) requires physical work to be performed in the central office by a Michigan Bell technician in every instance. Furthermore, in many cases, the technician is not stationed at the central office and must be dispatched to the central office location. It is completely different from moving an end user from Michigan Bell retail (or resale) voice service to UNE-P where, as a general rule, no central office technician work is involved. It is absurd to imply, as MCI does, that Michigan Bell's central office technician costs (including any necessary

³⁶ I would also note that SBC has repeatedly offered to work with MCI to handle orders on a test or friendly user trial basis in order to iron out any "bugs" in the process. To date MCI has not chosen to work with SBC in this manner.

dispatches) to convert a line-splitting arrangement to UNE-P can be recovered for 35 cents.

OTHER ISSUES RAISED BY AT&T AND MCI REGARDING LINE SPLITTING

TROUBLE REPORTING

32. MCI also generally complains about Michigan Bell's processes for reporting and resolving trouble in connection with line splitting.³⁷ The processes, however, are more than adequate. In situations of trouble for UNEs used in a line splitting arrangement (as well as other UNE service types), whether it be on a conversion in progress, a recently completed conversion, or on an existing account, the Local Operations Center ("LOC") is the CLEC's point of contact. In instances where a conversion has not yet completed, the CLEC can contact the Provisioning Group in the LOC, and on completed conversions or existing accounts, the CLEC can contact the LOC's Maintenance Group.
33. CLECs have the option of reporting trouble for UNEs used in a line splitting arrangement to the LOC manually (via a phone call) or electronically (via EBTA-Electronic Bonding Trouble Administration). The CLEC is responsible for isolating trouble occurring on the affected component of the line splitting arrangement and thereby determining if trouble exists on the data portion of the arrangement (*e.g.*, no data transmission to the end user) or the voice portion (*e.g.*, no dial tone). The CLEC must report data transmission troubles on the loop component of the service; however, in no dial tone situations, the CLEC must determine the portion of the line splitting arrangement where trouble exists (the loop or the switch port) through internal testing.

³⁷ See Lichtenberg Declaration ¶ 58.

34. If the CLEC isolates trouble to the data portion of the line (the loop) (e.g., no data transmission), the CLEC must open a trouble ticket including CLEC test results identified through their trouble isolation process, the loop circuit identifier, CFA and customer access hours with the LOC. Dependant upon the information provided by the CLEC, the Michigan Bell network technician would investigate the loop circuit to ensure service from the CLEC CFA in the Central Office to the end user's Network Interface Device ("NID"). Any Michigan Bell trouble (e.g., bad F1, faulty cable, defective CO wiring) that may inhibit the service from working would be repaired upon discovery. The results of the trouble isolation from the Michigan Bell technician would be communicated to the CLEC upon restoral of the service using the same means (electronically or manually) by which the CLEC reported the trouble.
35. If the CLEC isolates trouble to the voice only portion of the line (switch port) (e.g., no dial tone or missing feature), the CLEC must open a trouble ticket including CLEC test results identified through their trouble isolation process, switch port circuit identifier, CFA, and telephone number with the LOC. Dependant upon the information provided by the CLEC, the Michigan Bell network technician would investigate the switch port circuit to ensure service from the CLEC CFA in the Central Office to the Michigan Bell switch. Any Michigan Bell trouble (e.g., line translations, defective CO wiring, etc.) that may inhibit the service from working would be repaired upon discovery. The results of the trouble isolation from the Michigan Bell technician would be communicated to the CLEC upon restoral of the service dependant upon the means by which the trouble was reported (electronically or manually).

36. CLECs also have the option of reporting trouble for UNE-P service to the LOC manually (via a phone call) or electronically (via EBTA). After CLEC trouble isolation (*e.g.*, no dial tone, missing feature), the CLEC must open a trouble ticket including CLEC test results identified through their trouble isolation process, telephone number, and end user access hours with the LOC. Dependant upon the information provided from the CLEC, the network technician would investigate the UNE-P line to ensure service from the Michigan Bell central office switch to the end user's NID. Any Michigan Bell trouble (*i.e.*, line translations, defective wiring, etc.) that may inhibit the service from working would be repaired upon discovery. The results of the trouble isolation from the Michigan Bell technician would be communicated to the CLEC upon restoral of the service by the means by which the trouble was reported (electronically or manually).
37. Once trouble is reported, the LOC coordinates investigation and repair for trouble that may reside within Michigan Bell's responsibility.

E-911

38. AT&T and MCI both raise E911 issues related to line splitting.³⁸ The supplemental reply affidavit of Bernard Eugene Valentine addresses most of these issues (Supp. Reply App., Tab 10). However, I will address AT&T's suggestion that the need for CLECs to submit address change information to Michigan Bell is related to the loop reuse issue discussed. It is not. The E-911 issue is a simple one. If a CLEC is currently providing service to an end user using a stand-alone unbundled switch port with transport, the CLEC has the ability to connect the existing switch port within its collocation arrangement to a loop facility serving a

³⁸ See Willard Declaration ¶¶ 17-19; Lichtenberg Declaration ¶ 71.

different physical address. A CLEC might opt to do this, for example, if its end user moved to a new location but wanted to keep his or her existing phone number. If the CLEC does move the end user's voice service in this manner, it should provide the new address information to Michigan Bell so that the E911 database will reflect the correct information. Although AT&T claims there is no reason a CLEC would choose to do this, AT&T concedes that it is possible for a CLEC to perform this type of activity.³⁹ In any event, the CLEC would not provide this type of address update unless it *had* changed the physical location served by the switch port.

MICHIGAN BELL'S WILLINGNESS TO WORK WITH CLECS ON LINE SPLITTING ISSUES

39. MCI suggests that Michigan Bell is unwilling to work with CLECs on line splitting issues. MCI claims, for instance, that no progress was made on the loop reuse issue during the meeting between Michigan Bell subject matter experts and interested CLECs that was set up to respond to CLEC questions.⁴⁰ This is not true. Michigan Bell provided responses to the CLECs, and MCI provided additional information that Michigan Bell needed in order to understand the specific needs that MCI wanted addressed. Both MCI and Michigan Bell have action items from the meeting. MCI agreed to work with their account team regarding anticipated volumes for their request. Michigan Bell agreed to look into potential solutions that would meet MCI's needs.

³⁹ See Willard Declaration ¶ 18.

⁴⁰ See Lichtenberg Declaration ¶ 85.

40. MCI also claims that Michigan Bell “refused to document” the conference call.⁴¹ This statement is incomplete and misleading. As MCI notes, the meeting in question was an “off-line” meeting. Michigan Bell had not planned to provide meeting minutes and, as a result, did not take the type of detailed notes necessary to create minutes. Instead, Michigan Bell believed that each participant would make its own notes for its issues. At the end of the call, MCI asked, for the first time, when Michigan Bell would provide the meeting minutes. Michigan Bell explained that it could not provide minutes because it had not taken the requisite detailed notes. In the end, as MCI indicates, Michigan Bell did agree to have each of the subject matter experts develop written responses for the information provided during the call.
41. MCI also mentions a response it received to a change management request related to line splitting, and suggests that Michigan Bell is using delaying tactics.⁴² This is not the case. MCI had submitted a request for mechanized process. The process that MCI is seeking is currently under consideration in a proceeding in Texas. MCI’s request was for a 13-state process. As such, it does not make sense for Michigan Bell to begin work on mechanization for the process until it knew the requirements (if any) that would result from the Texas proceeding.

CONCLUSION

42. Pursuant to Part II. E. of the Consent Decree entered into between SBC Communications Inc. and the Federal Communications Commission, *see Order, SBC Communications, Inc.*, 17 FCC Rcd 10780 (2002), the undersigned hereby

⁴¹ *Id.*

⁴² *See* Lichtenberg Declaration ¶ 86.

affirms that she has (1) received the training SBC is obligated to provide to all SBC FCC Representatives; (2) reviewed and understand the SBC Compliance Guidelines; (3) signed an acknowledgment of her training and review and understanding of the Guidelines; and (4) complied with the requirements of the SBC Compliance Guidelines.

43. This concludes my affidavit.

STATE OF TEXAS

)

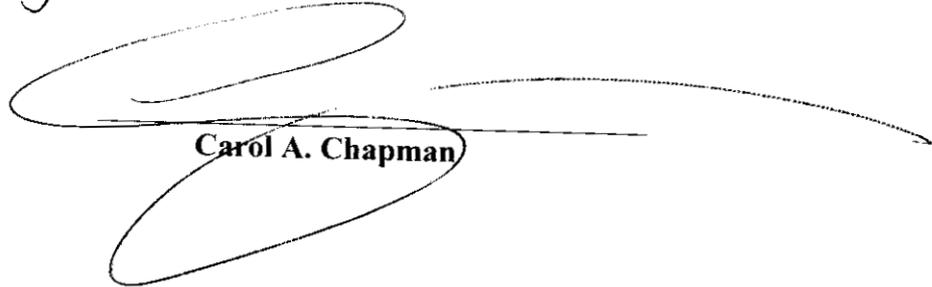
COUNTY OF DALLAS

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

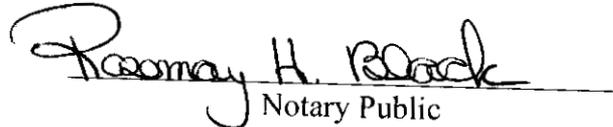
Executed on July 17, 2003.



A large, stylized handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

Carol A. Chapman

Subscribed and sworn to before me this 17th day of July, 2003.



A handwritten signature in black ink, appearing to read "Rosamary H. Black", written over a horizontal line.

Notary Public

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
 Application by SBC Communications Inc.,)
 Michigan Bell Telephone Company, and) WC Docket No. 03-138
 Southwestern Bell Communications Services,)
 Inc. for Provision of In-Region, InterLATA)
 Services in Michigan)

**SUPPLEMENTAL JOINT REPLY AFFIDAVIT OF
MARK J. COTTRELL AND BETH LAWSON
REGARDING OPERATIONS SUPPORT SYSTEMS
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We, MARK J. COTTRELL and BETH LAWSON, being of lawful age, being duly sworn, depose and state:

1. My name is Mark J. Cottrell. I am Executive Director – Long Distance Compliance – Operations Support Systems (“OSS”) for the Michigan Bell Telephone Company (“Michigan Bell”). My background and qualifications are provided in the Affidavit of Mark J. Cottrell for the Michigan 271 application filed on January 16, 2003.¹
2. My name is Beth Lawson. I am employed by SBC Management Services, Inc. as Executive Director – Regulatory Compliance. My background and qualifications are provided in the Reply Affidavit of Mark J. Cottrell and Beth Lawson filed in the previous Michigan application.²
3. The purpose of this affidavit is to respond to CLEC allegations in this proceeding regarding SBC’s Change Management Process (“CMP”) and other miscellaneous issues as well as to update the record with respect to certain OSS-related matters. While this reply affidavit may not address all the issues to which SBC Midwest takes exception, the following addresses those issues where CLECs provided adequate information in their allegations. The fact that we have not addressed every detail of all opponents’ declarations does not mean that SBC believes the other parties’ claims have merit.

¹ See Affidavit of Mark J. Cottrell, Application by SBC Communications Inc., Michigan Bell Telephone Company, and Southwestern Bell Communications Services, Inc. for Provision of In-Region, InterLATA Services in Michigan, WC Docket No. 03-16 (FCC filed Jan. 16, 2003) (“Cottrell Affidavit”).

² See Joint Reply Affidavit of Mark J. Cottrell and Beth Lawson, Application by SBC Communications Inc., Michigan Bell Telephone Company, and Southwestern Bell Communications Services, Inc. for Provision of In-Region, InterLATA Services in Michigan, WC Docket No. 03-16 (FCC filed Mar. 4, 2003) (“Cottrell/Lawson Reply Affidavit”).

CHANGE MANAGEMENT

DOCUMENTATION

4. MCI complains that while the CMP once “worked relatively effectively,” it is “now functioning ineffectively at best.” Declaration of Sherry Lichtenberg ¶ 74, attached to Comments of MCI, Application by SBC Communications Inc., et al., for Authorization to Provide In-Region, InterLATA Services in Michigan, WC Docket No. 03-138 (FCC filed July 2, 2003) (“Lichtenberg Decl.”). For support, MCI points to SBC’s three most recent releases, which MCI claims required multiple sets of documentation changes. Id. ¶ 75. Contrary to MCI’s complaint, however, SBC’s documentation changes are both envisioned by the CMP and are issued in compliance with CMP guidelines.
5. First, in conjunction with CMP, some documentation changes may occur in production releases during the implementation process for a new release. Thus, when the Initial Requirements and Final Requirements Accessible Letters (“AL”)³ were issued for Local Service Ordering Requirements (“LSOR”) version 6.00, the same ALs provided information on required corresponding documentation changes for LSOR versions 5.02 and 5.03. Indeed, all production versions of SBC documentation may be impacted by changes implemented as part of a quarterly release. For example, when the change that allows CLECs to utilize the Local Service Provider Authorization (“LSPAUTH”) field on the Local Service Request (“LSR”) (to accommodate line splitting arrangements with other parties) takes effect, this enhancement will be implemented in all LSOR production versions – not just the most recent version – which will require SBC documentation changes to all active LSOR versions.

³ Accessible Letters are SBC’s method of notifying CLECs of changes to SBC’s documentation.

6. Second, documentation changes may result from CLEC walkthroughs conducted by SBC to review all proposed documentation updates. For all proposed changes to requirements and corresponding documentation changes, a walkthrough is conducted, followed by an AL delivered to CLECs outlining the results of the walkthrough, including additional CLEC-proposed updates and answers to CLEC questions. Thus, after the walkthroughs of the Initial and Final Requirements, and any other coding change described below, a subsequent AL (or more) containing updates to the documentation for all applicable versions is distributed as a result of issues raised at the walkthrough.
7. Third, documentation updates can also occur in LSOR versions already in production as a result of changes to fix defects. Whenever CLECs are notified of CLEC-impacting changes via an AL pursuant to the Change Management Communication Plan (“CMCP”), a walkthrough occurs and new documentation may be distributed.
8. Finally, changes to documentation may also be required for other reasons. For example, post-release documentation changes may be made as a result of CLEC testing, SBC implementation weekend testing, CLEC questions, CLEC production issues, and further documentation validation performed by SBC. These changes are provided to CLECs within a few weeks of release implementation. Moreover, as with any document, there may be typographical errors. When dealing with technical documentation, where a misplaced space or character may affect the success of an LSR, immediate correction of these errors is critical. All changes to LSOR/LSPOR documentation follow CMP guidelines, including CLEC walkthroughs of the proposed changes.
9. Although SBC has complied with the CMP in issuing documentation changes, SBC has taken, and continues to take, numerous steps to improve the quality of SBC

documentation. For example, in January 2003, SBC reorganized its OSS Design and Support business team to consolidate the development of business rules and the writing of internal business requirements within two distinct teams. SBC has also taken an additional step to ensure its documentation is accurate by dedicating additional resources to the review and preparation of its 13-state LSOR/Local Service Pre-Ordering Requirements (“LSPOR”) documentation. In addition to organizational changes, SBC designed a new template to be utilized in the development of business requirements. This template was completely revamped to ensure that all variables necessary for a change request to be implemented were cared for and specifically, to ensure that LSOR/LSPOR-related requirements were appropriately updated.

SYSTEM DEFECTS

10. In addition, MCI alleges that SBC releases are “beset with system defects,” and that the “sheer volume of defects and documentation flaws is so significant” that MCI avoids moving to the latest version, preventing it “from taking advantage of the latest functionality.” Lichtenberg Decl. ¶¶ 75, 77. MCI is incorrect on both counts.
11. Although MCI complains generally about the number of defects for the version 5.02, 5.03 and 6.00 releases, it vaguely cites only one purported defect for the version 5.02 release with a “significant CLEC impact.” Despite careful review of the Enhanced Defect Report (“EDR”), SBC was unable to identify any open defect matching MCI’s description.⁴ Notably, MCI’s operational staff communicates with SBC on a more or less daily basis and, since MCI migrated to 5.02 on May 5 and 5.03 on June 21, SBC has not

⁴ According to MCI, this purported defect results in an extra service order being generated for end users “who move but want to retain their phone number.” See Lichtenberg Decl. ¶ 76. Given that the EDR lists defects by number and version, MCI could easily have provided that information in connection with its allegation if, in fact, there was such a defect on the report.

received any reports from MCI of critical defects that would have affected MCI's ability to migrate to a higher version or that would have prevented MCI from placing orders. Additionally, SBC met with MCI operational contacts on July 10, 2003 and, upon SBC's inquiry, MCI responded that there were no major issues or defects affecting its operations in the Midwest region.

12. The high overall quality of SBC Midwest's releases can easily be seen in the successful implementation of LSOR version 6.00, effective June 16, 2003. As discussed in the Cottrell Affidavit in the initial Michigan proceeding, LSRs are processed by LASR and SBC Midwest's other downstream systems in the exact same manner, regardless of whether the LSR was sent by the CLEC using LEX or EDI.⁵ Because LEX is not versioned, all LEX users move to the highest LSOR version (in this case, 6.00) on the Monday following the release weekend. Thus, the overall impact of any defects in the LSOR version 6.00 release is best quantified by looking at the volume of orders placed over LEX. For the three weeks following the June release (June 14 – July 5), more than 45,000 unique PONs⁶ were submitted via LEX and processed on version 6.00 in the Midwest region, while more than 161,000 unique PONs were submitted throughout SBC's 13-state region. Notably, the LEX volumes processed in the Midwest during the three week period both before June release (and therefore processed on version 5.03) and after the June release are almost identical. The fact that CLECs are able to submit this volume of requests for local service demonstrates first, that any defects in the release are

⁵ See Cottrell Affidavit ¶ 149 & n.57.

⁶ "Unique PONs" do not include subsequent iterations of the original LSR. This means that if an LSR has two associated supplemental ("supp.") LSRs (for example, because the original and the first supp. were rejected), this request is counted only once rather than three times.

not CLEC-impacting to any significant effect and, second, that no defects associated with the latest release should prevent a CLEC from moving to LSOR version 6.00.⁷

13. In fact, one CLEC migrated to version 6.00 the week of June 16, and by the end of June, it had submitted more than 17,000 LSRs in the Midwest region. The overall commercial volumes for EDI and LEX transactions (see Attachments A and B) also more than sufficiently demonstrate that release defects are not inhibiting or preventing CLECs from submitting LSRs on any of the three current versions in the SBC Midwest region.
14. The limited nature of the defects associated with the version 6.00 release is further demonstrated by a review of the defects themselves. As of July 11, the EDR reflected approximately 44 open defects for the LSOR 6.00 release potentially impacting the SBC Midwest region. Of these, a total of 11 were assigned SBC's highest impact ratings (6 pre-ordering defects and 4 ordering defects were assigned Severity Level 2; one ordering defect was assigned Severity Level 1).
15. Two of the six pre-ordering defects were cancelled as opened in error, and two have been fixed. These four are reflected as "Closed" on SBC's external defect report. Root cause analysis associated with the remaining two Level 2 pre-ordering defects has shown one defect to be a problem with a feature value and the other to impact the information for only a single address.

⁷ SBC's versioning model provides CLECs with a great deal of flexibility in determining if and when to move to a release version. Many CLECs avoid moving to a newer version as long as possible, in order to save the associated time and development costs – opting instead to limit coding activity only to those releases/versions that will be available for the longest time. In fact, it has become a common practice for many CLECs is to move off the retiring version to the most current version in production a few months prior to the older version's retirement, making it unlikely that these CLECs would migrate to another, newer release only a few months later.