



401 9th Street, Northwest, Suite 400  
Washington, DC 20004

March 31, 2005

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
TW-A325  
445 12<sup>th</sup> St., SW  
Washington, D.C. 20554

Re: EX PARTE PRESENTATION  
**CC Docket No. 02-53, Presubscribed Interexchange Carrier Changes**

Dear Ms. Dortch:

Sprint, on behalf of its incumbent local telephone companies, hereby submits supplemental information regarding the time and resources needed to implement the new presubscribed interexchange carrier (PIC) change charge rate structure mandated by the *Report and Order* released on February 17, 2005 in this proceeding. As described below, successful implementation of the mandated changes will require far more than the 30 days currently allowed. Sprint therefore urges the Commission to extend the effective date of the *Order* to April 14, 2006 (one year from the current effective date).

Implementing the new PIC change charges involves far more than simply substituting a new number in a rate table. Currently, Sprint Local's billing and other operations support systems allow for only a single PIC change charge, and will neither accommodate a bifurcated rate structure (manual vs. electronic orders), nor distinguish (for PIC change charge billing purposes) between PIC and LPIC changes. Our current systems also do not make allowances for complications associated with PIC freezes.<sup>1</sup>

In order to comply with this *Order*, Sprint Local will need to make programming changes to the software in as many as four different service order entry systems in order to distinguish between electronic and manual PIC change orders and to recognize when a PIC and LPIC are changed simultaneously. This information must then be passed on to either Sprint's end user billing system (to charge end users when they make a PIC change), or to the carrier billing system (to charge IXCs when they opt to pay for the PIC change charge on behalf of their customers, or to charge CLECs on behalf of their customers). Sprint Local's billing systems also must be modified to track when a customer's PIC and LPIC were changed in order to provide the appropriate refund if that customer submits a slamming complaint, which can be filed up to two years after the incident.

Revising these systems requires significant time (up to 57 weeks) and resources:

---

<sup>1</sup> The *Order* (n. 54) allows assessment of the manual PIC change charge if the end user customer has a PIC freeze on his account, even if the PIC change order is submitted electronically by the IXC.

- Design phase - Sprint must set forth in detail the changes to be made to each affected system. This phase can take 3 to 5 weeks, depending on the magnitude of the changes.
- Analysis and Design phase – After Sprint has developed its system requirements, such requirements are given to our third-party vendor, which evaluates their feasibility and estimates the costs of their implementation. The project must receive Sprint management approval, and a contract must be negotiated with the third-party vendor.<sup>2</sup> The functional and system requirements must be finalized, an Application Architectural Blueprint must be completed, and a preliminary test plan must be developed. This phase takes approximately 16 to 25 weeks.
- Development or Build phase - The third-party vendor develops and tests the code for each of the system requirements, and secures Sprint approval to migrate the code into production. This phase is approximately 8.5 to 16 weeks.
- Deploy or Launch phase – Integrated testing and end-to-end system testing occurs, and any necessary “tinkering” with the code is made. Once error-free tests are completed, the final code is put on-line. This phase takes approximately 11 weeks.

It is clear that implementing the changes required by the *Order* cannot reasonably or responsibly be accomplished within the 30 days currently allotted to the task. Sprint therefore urges the Commission to defer the effective date of this *Order* until April 16, 2006.

I request that this letter, which is being filed electronically, be placed in the file for the above-captioned proceeding.

Please contact me at (202) 585-1915 with any questions.

Sincerely,



Norina Moy  
Director, Federal Regulatory  
Policy and Coordination

c:	Jennifer McKee	Steve Morris
	Judy Nitsche	Richard Kwiatkowski
	Gene Gold	R. L. Smith

---

<sup>2</sup> Sprint’s capital budget for the year has already been set, and the manpower (estimated to be thousands of man hours) and funding for this new system requirement must be approved and secured.