

Cusolito Affidavit – Attachment A

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)
)
Application by SBC Communications Inc.,)
Pacific Bell Telephone Company, and) WC Docket No. 02-_____
Southwestern Bell Communications Services,)
Inc. for Provision of In-Region,)
InterLATA Services in California)

AFFIDAVIT OF DOMENIC J. CUSOLITO

AFFIDAVIT REGARDING THE LOCAL OPERATIONS CENTER

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I, DOMENIC JOHN CUSOLITO, of lawful age, being duly sworn, depose and state:

PROFESSIONAL EXPERIENCE AND EDUCATIONAL BACKGROUND

1. My name is Domenic John Cusolito. I am Associate Director – Local Operations for Pacific Bell Telephone Company/Nevada Bell Telephone Company (“Pacific/Nevada”). My business address is 177 East Colorado Boulevard, Pasadena, California 91105. In this position, I am responsible for monitoring Local Operations Center (“LOC”) performance and investigating complaints involving or impacting LOC operations. I coordinate changes within the LOC as necessary to comply with regulatory requirements. In addition, I provide requested information and testimony to regulatory bodies regarding LOC operations.
2. I am a graduate of Pepperdine University, Malibu, California, with a Bachelor of Science degree in Business Management. I have been employed by Pacific since 1984 and have held non-management and management positions. My work history includes 13 years with Network Operations and 2 years in Business Consumer Sales. I joined Industry Markets - Local Operations in July 1999.

PURPOSE OF AFFIDAVIT

3. The Pacific/Nevada Local Operations organization includes the Local Operations Center (the “Pacific LOC”), which acts as the central point of contact for the provisioning, maintenance and repair of interconnection facilities, resale services, unbundled network elements (“UNEs”), and Local Number Portability (“LNP”)

products and services for competitive local exchange carriers (“CLEC”). This affidavit demonstrates that the Pacific LOC provides CLECs with access to provisioning, maintenance and repair functionality on a nondiscriminatory basis, in compliance with the requirements of the Act.

LOC ORGANIZATIONAL STRUCTURE

4. As noted above, the Pacific LOC was established for the purpose of providing CLECs with nondiscriminatory access to provisioning, maintenance and repair services. The Pacific LOC operates on a regional basis, and is divided into four separate locations, three in California and one in Nevada, with at least one Area Manager overseeing the operations and personnel at each location. In California, the LOC operates one provisioning center in Reseda (which primarily handles CLEC provisioning needs, including the coordination of “To Be Called Cuts” or “TBCCs”)¹, one maintenance center in Pasadena (which primarily handles CLEC maintenance and repair requests), and one maintenance center in Riverside (which primarily handles maintenance and repair requests for Pacific’s affiliate Advanced Solutions, Inc.).² The same Methods and Procedures, and the same maintenance and repair systems, are utilized by LOC employees at the Riverside and Pasadena

¹ The “To Be Called Cut” or “TBCC” process in California is analogous to the coordinated hot cut (CHC) process in the SWBT states.

² The Pacific LOC also operates one center located in Reno, which generally handles the CLEC provisioning, maintenance and repair activities for Nevada.

locations. All four locations balance their workloads between the centers as necessary for timely and efficient handling.

LOC PROVISIONING, MAINTENANCE AND REPAIR ACTIVITY

5. The Pacific LOC currently employs more than 275 Maintenance Administrators (“MAs”), who use the same maintenance and provisioning systems that are used by retail repair call centers to perform a variety of provisioning and maintenance functions on behalf of CLECs. The LOC is a seven days a week, 24 hour per day operation; CLECs may contact the LOC by calling the LOC toll free number provided in the CLEC Handbook at any time to report trouble or request maintenance.

6. MA provisioning responsibilities include coordinating and tracking TBCC conversions with and without loop,³ assisting with the acceptance testing process, and providing status on the provisioning of other wholesale products. In addition, the provisioning MAs work loop installation trouble reports on the due date, which CLECs may report directly to the provisioning group using the LOC toll free number and call tree.⁴

³ See the Joint Affidavit of Domenic J Cusolito, Ginger L. Henry, Gwen S. Johnson, and Richard J. Motta (“Joint Hot Cut Affidavit”) (App. A, Tab 5) for a more detailed discussion on the TBCC with loop process.

⁴ See Accessible Letter CLECC99-156 (May 6, 1999) (App. G, Tab 17), and CLEC Online Handbook at <https://clec.sbc.com/clec/> – CLEC Handbook – California – Products and Services – UNE – Unbundled Loop – “LOC Process Installation Problems”.

7. MA maintenance and repair responsibilities include accepting maintenance and repair requests on wholesale services submitted manually by CLECs, performing remote testing using a Mechanized Loop Test (“MLT”) for trouble on resale POTS, UNE-Platform (“UNE-P”) lines and UNE loops, and when necessary, coordinating testing on UNE loops with the Central Offices (“CO”).⁵ In addition, MAs are responsible for dispatching tickets to the appropriate Network organization for repair, and providing status and trouble history to CLECs upon request. See the Affidavit of Gwen S. Johnson (App, A, Tab 12) and the Joint Hot Cut Affidavit (App. A, Tab 5) for information concerning Pacific’s performance in meeting the provisioning and maintenance standards set by the CPUC.

ESCALATION PROCESS

8. Pacific CLECs may receive contact or escalation lists for LOC management personnel at the different LOC facilities via either the Industry Markets Account Management Team or the CLEC Online Handbook.⁶ See Attachment A. These escalation lists provide CLECs a handy reference for identifying Pacific management contacts that may be called to expedite either a maintenance or

⁵ Trouble tickets for Special Services (e.g., DS1 and above) require advanced testing of network elements. Therefore, the LOC routes manual trouble reports on Special Services to the appropriate Network organization for handling. See the Affidavit of Richard J. Motta regarding Network Operations for additional information concerning provisioning and maintenance and repair flows in the Pacific region.

⁶ See the CLEC Online Handbook at <https://clec.sbc.com/clec/csi/csi.cfm> – CLEC Specific Reports – “Escalation Matrix”. A CLEC password is required.

provisioning request. The escalation process provides four levels of contact numbers to be followed sequentially to the next highest level as needed.

LOC SCALABILITY

9. The LOC is committed to providing sufficient resources to meet the needs and demands of CLECs. To this end, LOC management personnel have developed a force model that anticipates future force requirements based on existing volumes and capacities. The LOC force model is based upon average work times for the various units of work performed in the LOC. Units of work for the LOC include provisioning and maintenance incoming calls, provisioning lines, intra-company coordination and trouble tickets. The force model takes into account the impact on available resources of non-production adjustments, vacations, illness, and training. The force model is updated monthly, providing a forward-looking view of LOC work volumes and number of employees required. The model is used by the LOC to balance hiring and training with CLEC demand.
10. Spikes in provisioning or maintenance activity are generally handled by transferring responsibility between locations, reallocation of workforce between wholesale products, and, when necessary, authorizing overtime. LOC MAs complete three to six weeks of technical classroom training, including training on trouble analysis and interpretation, mechanized loop testing, workgroup interfacing, customer contact skills development, maintenance report entry, and various internal systems. In addition to classroom training, MAs receive three to

four weeks of extensive and in-depth on-the-job training. The total training period is completed in approximately six to ten weeks. Because this training encompasses provisioning, and maintenance and repair functions for a variety of wholesale products, the LOC is able to reallocate its employees among products as necessary to handle shifts in demand.

11. The LOC force model was evaluated by Cap Gemini as part of the Pacific OSS Test.⁷ Specifically, Cap Gemini performed an analysis to determine Pacific's ability to increase the number of personnel available as necessary to perform certain manual functions. This analysis included a review of the LSC and LOC force models, as well as LSC/LOC contingency plans to meet dramatic increases in CLEC order volume, disaster recovery plans and the scalability of recruiting and training programs.⁸
12. Cap Gemini found that the LSC and LOC force models included the required full time employees for each product, projected call volumes and 24-month growth rate, and accounted for the impact of such items as vacation, illness and training on the available workforce.⁹ Cap Gemini commented that the LOC force model represents an established process for forecasting expected business growth and for

⁷ The Cap Gemini Ernst & Young ("Cap Gemini") Final Report of the Pacific Bell Operations Support Systems, Version 1.2, dated February 12, 2001 ("TAM Final Report") (App. D, Tab 212). See also the joint Affidavit of Steven D. Huston and Beth Lawson (App. A, Tab 11).

⁸ TAM Final Report §§3.2.2 and 4.2.2.2

⁹ Id., §4.2.2.6.2.4

determining the validity and accuracy of those forecasts – and that the force models are actively used by LOC Management and Staff.¹⁰

13. Based on its review, Cap Gemini concluded that the results of the Capacity Test, together with the scalability analysis provided “sufficient information to determine the commercial readiness and robustness of Pacific’s OSS under test condition[s].”¹¹
14. Pursuant to Part II. E. of the Consent Decree entered into between SBC Communications Inc. and the Federal Communications Commission, released on May 28, 2002, see Order, In the Matter of SBC Communications, Inc., 17 FCC Rcd. 10780 (2002), the undersigned hereby affirms that he 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 my training and review and understanding of the Guidelines; and (4) complied with the requirements of the SBC Compliance Guidelines.
15. This concludes my affidavit.

¹⁰ Id., Table 4.2.2-2.

¹¹ Id., §4.2.2.2

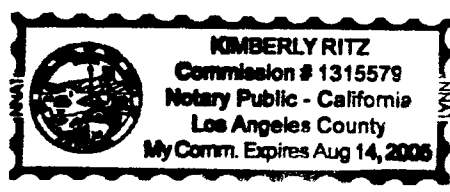
STATE OF CALIFORNIA)
)
COUNTY OF LOS ANGELES)

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

Domenic John Cusolito
Domenic John Cusolito

Subscribed and sworn to before me this 10TH day of SEPT, 2002

Kimberly Ritz
Notary Public



Cusolito Affidavit – Attachment A

LOCAL OPERATIONS - INDUSTRY MARKETS

IT IS OUR POLICY IN PACIFIC BELL TO ALWAYS STRIVE TO RESOLVE CUSTOMER INQUIRES AT THE INITIAL POINT OF CUSTOMER CONTACT. ALL MANAGERS AND ASSOCIATES WILL WORK TOGETHER TO FACILITATE TRANSPARENT RESOLUTION OF A CUSTOMER REQUEST.

The purpose of this document is to provide our Local Service Provider customers with clear and concise definitions and escalation procedures.

Escalations

Escalations are defined as those issues, problems and service requests that are not meeting the Local Service Provider's expectations at the maintenance level.

Prioritization

All escalations will be handled as expedient as possible. The prioritization is as follows:

- Medical Emergencies
- Business Out of Service (No Dial Tone)
- Pacific Bell error
- Civil emergency services

Requirements

(What we need from you)

Maintenance

Trouble report number, telephone number, circuit ID, or service order number if on or after the completion date. An explanation of the circumstances requiring the escalation.

Provisioning TBCC, LNP, FDT

Purchase order number (PON), service order number, due date, pin and lug information, and if the number is ported. An explanation of the circumstances requiring the escalation, and the name and telephone number of the person(s) at Pacific Bell that have been working with you.

What you can expect from us

A courteous response to your request and our best effort to resolve your problem as quickly as possible.

Local Operations Center Escalations

Any changes or updates - please call 626-356-6834

The LOC is a 7 day a week, 24 hour per day operation. Because service assurance is not a scheduled or predictable quantity, our management team is available for escalations 7 days a week, 24 hours a day.

Requests to escalate a trouble report start with the LOC 800 number:

800-662-4664

- The Local Operations Center is the single point of contact for all service troubles on or after the service order completion date.
- Pacific Bell will strive not to leave an end user out of service for an extended period of time. If service interruptions occur on weekends, evenings or holidays, the service will be restored through our "out of hours" procedures.
- The LOC Maintenance Administrator personnel are responsible for determining if a service order or an ISR/LSR exists and confirming the Local Service Provider report.
- The Local Operations Center will take trouble reports on all service outages, begin the repair process, and correct the paper work if necessary.

The Local Operations Center will handle all requests in a timely manner. We ask that all requests for escalations come through our "800" number.

Our Maintenance Administrators are trained to handle most requests, and if requested will gladly transfer your call to the first available Manager or duty manager if the call is after hours.

We request that all escalations begin at the Maintenance Administrator level and progress through management.

First and Second Level Manager escalations start with the LOC number, 800-662-4664. Please follow the menu options to direct your call to maintenance or provisioning.

Any changes or updates - please call 626-356-6834

Maintenance	Title	Escalation Level	Contact number
Sarah Hurst	Manager	1	800-662-4664
Rachel Rendon	Manager	1	800-662-4664
(Eve) Darlene Kuyat	Manager	1	800-662-4664
(Eve) John Limcaco	Manager	1	800-662-4664
Ramon Cruz-Chamchong	Manager	1	800-662-4664
Cynthia Freeman	Manager	1	800-662-4664
Duty Manager Pager		1	626-245-2246
Charlene Edgar	Area Manager	2	Office: 626-578-3930 Cell: 626-318-7900
Provisioning	Title	Escalation Level	Contact Number
JoAnn Quintero	Manager	1	800-662-4664
Patricia Morris	Manager	1	800-662-4664
Celia Fitzgerald	Manager	1	800-662-4664
Toni Sanchez	Manager	1	800-662-4664
Duty Manager Pager		1	818-712-1008
Christeen Griggsby	Area Manager	2	Office: 818-708-4643 Cell: 818-468-0953
Greg Unger	General Manager	3/4	Office: 626-578-4766 Cell: 626-487-3771
Debbie Barba	Vice President	5	925-823-7700

Questions or comments can be directed to:
Domenic Cusolito 626-356-6834

Any changes or updates - please call 626-356-6834