

**Horst Reply Affidavit – Attachment C**

Southwestern Bell Telephone Company

Scope and Approach For Testing  
Southwestern Bell Telephone Company's  
REPORT OF MANAGEMENT ON TOTAL CLEC  
UNE-P LINE ACTIVITY BETWEEN LMOS/CABS  
DATABASE COMPARISONS

October 2, 2001

## Background

At the request of Southwestern Bell Telephone Company (SWBT), a subsidiary of SBC Communications Inc. (SBC), Ernst & Young (E&Y) was requested to perform an attestation examination and report on the methodology utilized by SWBT to calculate total Competing Local Exchange Carrier (CLEC) unbundled network element loop and switch port combinations (UNE-P) line activity during the periods between comparisons (see Assertion 3 below) of the Loop Maintenance Operations System (LMOS) and the Carrier Access Billing System (CABS).

Specifically, E&Y examined the following assertions made by SWBT:

1. SWBT conducts semi-monthly comparisons of UNE-P records maintained in the CABS and the LMOS databases. At the time of each database comparison, any UNE-P line records found to be working in CABS but disconnected in LMOS are updated to working status in LMOS.<sup>1</sup> UNE-P records found to be disconnected in LMOS but working in CABS are updated regardless of whether the disconnection is an error, or whether the disconnection subsequently would have been updated through the normal functioning of SWBT's systems.
2. Each of the following activity types has the potential to result in a disconnected LMOS line record that would be updated in a subsequent LMOS/CABS database comparison:<sup>2</sup>
  - a. UNE-P New Connects;<sup>3</sup>
  - b. Conversions of service from SWBT retail or CLEC resale to UNE-P;

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<sup>1</sup> In addition, the LMOS record is brought into agreement with the CABS fields necessary to update the LMOS record for trouble reporting purposes.

<sup>2</sup> The potential for a disconnected LMOS line record arises from the fact that these activity types involve both inward and outward activity. For example, on retail to UNE-P conversions, when the D ("disconnect") order posts to LMOS, the end-user line record is put into disconnected status – this is outward activity. When the C ("change") order subsequently posts, it establishes the new carrier as the service provider, and places the record into working status. This is inward activity. An improperly disconnected LMOS record may result if the inward and outward activity is not processed correctly on these transactions.

<sup>3</sup> In the case of a UNE-P New Connect, there would be no outward activity associated with the order itself. However, the LMOS database maintains a disconnected line record for previously assigned telephone numbers. On a UNE-P new connect using a previously assigned telephone number, the disconnected LMOS line record is updated with the C-in order. Therefore, if the C-in order does not post, the CLEC could encounter an improperly disconnected LMOS line record if it attempted to open a trouble ticket electronically on that line. LMOS must build an entirely new line record for UNE-P new connects that use new, "previously unassigned" telephone numbers. Because line activity on a UNE-P new connect with a previously unassigned number cannot result in a disconnected record in the LMOS database, RBQ USOCs with Inward Action Codes on previously unassigned telephone numbers were excluded from the denominator of the calculation used to compare the number of UNE-P line records updated in the LMOS/CABS database comparison to the total UNE-P line activity during the period in question.

## Background (continued)

- c. CLEC-to-CLEC UNE-P conversions;
  - d. CLEC UNE-P Billing Account Number (BAN) changes (i.e., the movement of UNE-P lines from one BAN to another);
  - e. CLEC UNE-P Outside Moves (i.e., movement of service to new address);
  - f. Changes to establish Hunting on existing UNE-P lines; and
  - g. Changes to Telephone Numbers on existing UNE-P lines.
3. In order to determine total CLEC UNE-P line activity resulting from each of the above activity types, SWBT reviewed the LMOS service order file<sup>4</sup> for every nightly update cycle that occurred between the August 2, August 21, September 10 and September 18, 2001 LMOS/CABS database comparisons. This same review also was conducted for the June 6 and July 19, 2001 database comparisons for the Houston and San Antonio Market Areas.<sup>5</sup>
  4. In each service order file, the UNE-P lines were identified through use of the Uniform Service Order Code (USOC) "RBQ." The activity types identified in ¶ 2 above were then identified by the presence of an Inward Action Code. All RBQ USOCs with an Inward Action Code since the last database comparison were then totaled. These totals are reflected in Attachment A, under the heading "Total CLEC UNE-P Line Activity."
  5. The numbers appearing under the heading "Percent Updated" on Attachment A were calculated using the number of LMOS UNE-P line records updated in the specified database comparison (the "Number Updated" in Attachment E) by the "Total CLEC UNE-P Line Activity" occurring since the previous database comparison. As such, this percentage represents the relationship between the number of UNE-P line records updated in SWBT's LMOS/CABS database comparisons, and the total UNE-P line activity that could have resulted in the need for such an update at the time of the comparison.

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<sup>4</sup> File Name: LMOS@.BE40211A.PACKETOT

<sup>5</sup> The LMOS@.BE40211A.PACKETOT service order files for the June 6 and July 19 database comparisons were not available for the other SWBT Market Areas.

## **Objective and Procedures**

### *Objective*

To determine, in all material respects, the accuracy of management's assertions noted above.

### *Procedures*

1. Reviewed the procedures performed relative to SWBT's comparison of the CABS and LMOS databases in the previously filed Attestation Scope and Approach document dated August 14, 2001.
2. Interviewed SBC personnel in Network Services and Information Technology to validate and understand the different types of service orders that have the potential to result in a disconnected LMOS line record.
3. Judgmentally selected a sample of 25 UNE-P C service orders and validated that the activity types included in Paragraph 2 of SWBT's assertion have the potential to result in a disconnected LMOS line record.
4. Obtained the total UNE-P line activity results of SWBT's queries of the LMOS service order file ("LMOS@.BE40211A.PACKETOT") for each of the dates listed in Attachment A to SWBT's assertion. Subtracted the number of "previously unassigned telephone numbers" described in footnote 3 above from the total UNE-P line activity results and then compared this total to the total CLEC UNE-P line activity results listed in Attachment A.
5. Obtained the program code used to query and total CLEC UNE-P line activity for each period and determined that the logic of the program code is consistent with Paragraph 4 of SWBT's assertion.
6. Recalculated the Percent Updated results on Attachment A to SWBT's assertion and determined the calculation was consistent with Paragraph 5 of SWBT's assertion.