

LMOS Reply Affidavit – Attachment A

LMOS/CABS Comparison and Update
Effective August 21, 2001

STATE OR AREA	TOTAL CABS UNE-P RECORDS	TOTAL LMOS RECORDS DISCONNECTED/ WORKING IN CABS	TOTAL LMOS RECORDS PLACED IN WORKING STATUS/UPDATED	% UPDATED
DALLAS	344847	414	414	0.12%
HOUSTON	388867	674	674	0.17%
SAN ANTONIO	483710	515	515	0.11%
TEXAS TOTAL	1217424	1603	1603	0.13%
MISSOURI	61203	70	70	0.11%
KANSAS	54934	47	47	0.09%
ARKANSAS	7753	21	21	0.27%
OKLAHOMA	26599	28	28	0.11%
MOKA TOTAL	150489	166	166	0.11%
SWBT TOTAL	1,367,913	1,769	1,769	0.13%

LMOS/CABS Comparison and Update

Effective September 10, 2001*

STATE OR AREA	TOTAL CABS UNE-P RECORDS	TOTAL LMOS RECORDS DISCONNECTED/ WORKING	TOTAL LMOS RECORDS PLACED IN WORKING STATUS/UPDATED	% UPDATED
DALLAS	348567	530	530	0.15%
HOUSTON	395511	3363 †	3363	0.85%
SAN ANTONIO	486050 ‡	2043 ‡	2043	0.42%
TEXAS TOTAL	1230128	5936	5936	0.48%
MISSOURI	61874	28	28	0.05%
KANSAS	55606	40	40	0.07%
ARKANSAS	8092	11	11	0.14%
OKLAHOMA	27232	9	9	0.03%
MOKA TOTAL	152804	88	88	0.06%
SWBT TOTAL	1,382,932	6,024	6,024	0.44%

* Originally scheduled for September 5, 2001. The September 5 CABS extract files for Houston and San Antonio, however, were made available too late for processing during the scheduled September 5 comparison and update; the September 5 CABS extract file for Missouri did not contain current data. SWBT then conducted a second comparison and update for all seven market areas on September 10, 2001. For Dallas, Oklahoma, Kansas, and Arkansas, the number of records updated reflects records updated on both dates.

† The CABS file provided for Houston for use in the September 10, 2001 comparison and update process was dated September 7, 2001 (the business day preceding the comparison). However, on the night of September 7, 2001, the CF114 file for Houston was not included in that night's BJ501 file for posting to LMOS and other downstream systems. As a result, the comparison on September 10 identified a number of line records as working in CABS but disconnected in LMOS, for which the C order was included in the BJ501 file on the night of September 10. SWBT is unable to quantify the number of line records affected.

‡ On September 19, 2001, SWBT discovered that, due to a change in the name of the file containing the CABS extract for San Antonio, the comparison for San Antonio was inadvertently conducted using CABS data from September 5, 2001. As a result, a number of line records that were correctly placed in disconnected status after September 5 – but which were working as of September 5 – were updated and placed in working status on September 10. (The total CABS UNE-P records figure for San Antonio is also based on September 5 data.) SWBT is unable at this time to quantify the number of line records affected. On October 1, SWBT returned to disconnected status those LMOS line records that were correctly in disconnected status on September 5; however, SWBT left in working status those lines that had been returned to working status by service order activity between September 5 and October 1.

LMOS/CABS Comparison and Update
Effective September 18, 2001*

STATE OR AREA	TOTAL CABS UNE-P RECORDS	TOTAL LMOS RECORDS DISCONNECTED/ WORKING IN CABS	TOTAL LMOS RECORDS PLACED IN WORKING STATUS/UPDATED	% UPDATED
DALLAS	350860	2805 †	2805	0.80%
HOUSTON	397906	113	113	0.03%
SAN ANTONIO*	490802	458	458	0.09%
TEXAS TOTAL	1239568	3376	3376	0.27%
MISSOURI	62266	56	56	0.09%
KANSAS	56042	15	15	0.03%
ARKANSAS	8417	2	2	0.02%
OKLAHOMA	27606	4	4	0.01%
MOKA TOTAL	154331	77	77	0.05%
SWBT TOTAL	1,393,899	3,453	3,453	0.25%

* On September 19, 2001, SWBT discovered that, due to a change in the name of the file containing the CABS extract for San Antonio, the comparison for San Antonio on September 18 was inadvertently conducted using CABS data from September 5, 2001. As a result, a number of line records that were correctly placed in disconnected status after September 5 – but which were working as of September 5 – were updated and placed in working status on September 18. Upon identifying this issue, on September 20, SWBT returned to disconnected status those LMOS line records that were correctly in disconnected status on September 18; however, SWBT left in working status those lines that had been returned to working status by service order activity between September 5 and September 20. SWBT then conducted a comparison and update for San Antonio on September 24, 2001.

† The number of line records updated in Dallas on September 18 was impacted by an error subsequently discovered in the BE294 program used by LMOS. See LMOS Aff. at 18 n.25. SWBT is currently working to isolate the source of this error and to correct the BE294 programming accordingly.

LMOS/CABS Comparison and Update
Effective October 1, 2001

STATE OR AREA	TOTAL CABS UNE-P RECORDS	TOTAL LMOS RECORDS DISCONNECTED/ WORKING IN CABS	TOTAL LMOS RECORDS PLACED IN WORKING STATUS/UPDATED	% UPDATED
DALLAS	352619	519	519	0.15%
HOUSTON	401294	1894†	1894	0.47%
SAN ANTONIO*	490460	1534†	1534	0.31%
TEXAS TOTAL	1244373	3947	3947	0.32%
MISSOURI	63662	81	81	0.13%
KANSAS	58628	1119‡	1119	1.91%
ARKANSAS	8607	2	2	0.02%
OKLAHOMA	28896	12	12	0.04%
MOKA TOTAL	159793	1214	1214	0.76%
SWBT TOTAL	1,404,166	5,161	5,161	0.37%

* A San Antonio-only comparison and update was conducted on September 24, 2001. See LMOS Reply Aff. Attach. A-3.

† The CABS file provided for Houston and San Antonio for use in the October 1, 2001 comparison and update process was dated September 28, 2001 (the business day preceeding the comparison). However, on the night of September 28, 2001, the CF114 file for these two market areas were not included in that night's BJ501 file for posting to LMOS and other downstream systems. As a result, the comparison on October 1 identified a number of line records as working in CABS but disconnected in LMOS, for which the C order was included in the BJ501 file on the night of October 1. SWBT is unable to quantify the number of line records affected.

‡ The LMOS line records associated with nine CABS BANs established in Kansas after the September 18 comparison and update had not been manually created at the time of the October 1 comparison and update. As a result, UNE-P line records associated with those BANs could not be built automatically. SWBT believes that a substantial portion of the 1119 line records requiring correction resulted from this issue, although it is unable to quantify precisely the number of records affected. The line records associated with those BANs have now been built and SWBT is in the process of automating the building of these line records in the future.