

**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- ____
Southwestern Bell Communications Services,)	
Inc. for Provision of In-Region, InterLATA)	
Services in Michigan)	

**SUPPLEMENTAL JOINT 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:

INTRODUCTION

1. My name is Mark J. Cottrell. I am Executive Director – Long Distance Compliance-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 supplement the record with additional evidence, further establishing SBC’s compliance with the operations support systems (“OSS”) requirements of the Telecommunications Act of 1996 (“Act”).

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 January 15, 2003) (“Cottrell Affidavit”)(App. A, Tab 6).

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. 3, 2003) (“Cottrell/Lawson Reply Affidavit”) (Reply App., Tab 5).

MICHIGAN OSS TEST

4. As explained in the Cottrell Affidavit, using a military-style, test-until-pass philosophy, BearingPoint evaluated SBC Midwest's³ OSS based on 498 applicable evaluation criteria covering all five OSS functions – pre-ordering, ordering, provisioning, maintenance and repair, and billing – along with general OSS management. In its October 30, 2002 Report,⁴ BearingPoint concluded that SBC Midwest passed the third-party test with flying colors, satisfying over 93 percent (464 out of 498) of the applicable evaluation criteria for the operational test, which includes transaction validation, processes and procedures review, and volume testing. See Cottrell Affidavit ¶ 5.
5. Since its October 2002 Report, BearingPoint has continued testing SBC Midwest's OSS. On April 30, 2003, BearingPoint filed its final update on Michigan OSS Operational test results with the Michigan Public Service Commission ("MPSC"), finding that SBC Midwest now has "satisfied" four test criteria that were found to be "not satisfied," and one test criteria that was found to be "indeterminate" in the original BearingPoint evaluation test results.⁵ Additionally, one test criterion, previously graded as "indeterminate," now has been moved to "not satisfied." With these changes,

³ When used in this affidavit, the term "SBC Midwest" refers collectively to the five local exchange telephone company operations of Illinois Bell Telephone Company; Indiana Bell Telephone Company, Incorporated; Michigan Bell Telephone Company; The Ohio Bell Telephone Company; and Wisconsin Bell, Incorporated.

⁴ See BearingPoint, Michigan Bell OSS Evaluation Project Report (Oct. 30, 2002) ("BP Michigan October 2002 Report") (App. C, Tab 114).

⁵ See BearingPoint, Michigan Bell OSS Evaluation Project Report, Transaction Verification and Validation and Processes and Procedures Review, Final Results Update (Apr. 30, 2003) ("BP Michigan April 30, 2003 Report") (Supp. App. C, Tab 15). Per the MPSC Order on January 13, 2003 in Docket U-12320, this is the final update for the Processes and Procedures Review (PPR) & Transaction Verification and Validation (TVV) sections of the OSS Test. See Opinion and Order, In the Matter, on the Commission's Own Motion, To Consider SBC's, f/k/a Ameritech Michigan, Compliance With the Competitive Checklist in Section 271 of the Federal Telecommunications Act on 1996, Case No. U-12320 (MPSC Jan. 13, 2003) (App. C, Tab 134).

BearingPoint's new report confirms that SBC Midwest now has satisfied 469⁶ of the applicable 498 test criteria related to the operational test, with an overall success ratio of 94 percent. The findings in BearingPoint's April 30, 2003 Report are discussed below.

6. Paragraph 58 of the Cottrell Affidavit notes that observations in two ordering categories, ISDN Primary Rate Interface and Resale Private Line, resulted in a "not satisfied" finding for TVV1-4 in the BP Michigan October 2002 Report, but that these order types were "expected to be satisfied in the normal course of retesting." As expected, on December 17, 2002, BearingPoint closed both observations after retesting. These two criteria, and TVV1-4 as a whole, are now "satisfied."⁷
7. Paragraph 61 of the Cottrell Affidavit states that in "the only exception noted by BearingPoint for notifications (TVV 1-30), BearingPoint found that Michigan Bell EDI systems did not return the 'Frame Due Time' field on FOCs for Local Number Portability ("LNP") migration orders. Michigan Bell implemented a system fix on September 25, 2002 to resolve this issue, which BearingPoint has satisfactorily retested." On December 17, 2002, BearingPoint closed this observation, and BearingPoint's updated report confirms that TVV1-30 has been satisfied.⁸
8. Paragraph 74 of the Cottrell Affidavit discusses BearingPoint's findings that SBC Midwest failed to satisfy the test criteria for TVV 7-7, related to "close out codes" for resale end-to-end trouble reports. As the Cottrell Affidavit explained, SBC Midwest has implemented several initiatives to improve its coding of trouble reports, including

⁶ BP Michigan April 30, 2003 Report, at 6, incorrectly shows a total of 468 satisfied evaluation criteria. BearingPoint has confirmed that the correct total is 469 satisfied criteria. SBC Midwest anticipates BearingPoint will update the MPSC with the correct number.

⁷ See BP Michigan April 30, 2003 Report at 7.

⁸ Id. at 17.

holding awareness sessions with technicians to reinforce current procedures for coding trouble reports and updating methods and procedures documentation to more accurately record close out coding. These initiatives have been successful, with BearingPoint now finding that SBC Midwest has satisfied the evaluation criteria for TVV7-7.⁹

9. Paragraphs 78 and 79 of the Cottrell Affidavit confirm that SBC Midwest satisfied 23 of the 24 test criteria for bill production and distribution processes. The sole not satisfied test criterion (PPR13-4) involved SBC Midwest's processes for validating CABS bills. Paragraph 79 detailed the mechanized and manual processes put in place by SBC Midwest to improve performance in validating CABS bills. The BP Michigan April 30, 2003 Report validates these review procedures, and finds that PPR13-4 has been satisfied.¹⁰
10. Paragraph 80 of the Cottrell Affidavit states SBC Midwest's carrier bills satisfied 30 of the 31 applicable test criteria for the billing functional usage evaluation. The sole indeterminate test point (TVV9-32) resulted from BearingPoint's inability to evaluate certain UNE-P service orders due to the migration of UNE-P billing from the Resale Billing System ("RBS") to the CABS system in the latter half of 2001.¹¹
11. BearingPoint subsequently was able to evaluate whether UNE-P bills reflected timely service order activity under TVV9-32 in Illinois, Indiana, and Wisconsin. Pursuant to the Michigan Master Test Plan ("MTP"), BearingPoint was directed to review the results from third-party tests conducted in other SBC Midwest states and, if applicable, make recommendations if the results from these other states could be included in Michigan

⁹ Id. at 20.

¹⁰ Id. at 25.

¹¹ See BP Michigan October 2002 Report at 1011.

OSS test results. Following these guidelines, BearingPoint specifically recommended to the MPSC that the satisfactory TVV9-32 test results for Illinois, Indiana and Wisconsin be included in the Michigan test, and found that the test point had been satisfied for Michigan.¹² The MPSC staff has reviewed and adopted BearingPoint's recommendation.

12. The single test criteria previously listed by BearingPoint as "indeterminate" and now categorized as "not satisfied" (TVV7-15) involves Mean Time To Restore ("MTTR") for Special Circuits. BearingPoint's test on 97 Special Circuits resulted in a MTTR of 8.5 hours. These results were skewed by the inclusion of a single repair interval of 236.18 hours, which was caused by a miscommunication between Michigan Bell and BearingPoint (acting as the Test CLEC) on the need for and scheduling of joint testing for the repair in question. Removal of this one repair instance (which BearingPoint acknowledged did not represent a real-world trouble situation)¹³ from the test results would have lowered the average MTTR for the remaining test cases to 6.126 hours – a response time lower than the 6.6 hour average MTTR experienced by Michigan Bell's retail customers during the initial test period, as measured by PM 52. Rather than using the PM standard approved by the MPSC for this test point, BearingPoint used a substitute benchmark of 6.0 hours. In establishing this substitute benchmark, however, BearingPoint noted that the MTTR retail averages for other companies ranged from a low of 9.3 hours to a high of 24.2 hours during the time of their testing.¹⁴ While not satisfying the test criteria established by BearingPoint, Michigan Bell's performance on

¹² See BP Michigan April 30, 2003 Report at 22-24; see also Supplemental Affidavit of Justin W. Brown, Mark J. Cottrell and Michael E. Flynn ("Brown/Cottrell/Flynn Affidavit") (Supp. App. A, Tab 2) (additional information concerning TVV9-32).

¹³ See BearingPoint Michigan Observation 656 (Oct. 30, 2002) (attached hereto as Attachment A).

¹⁴ See BP Michigan October 2002 Report at 987, n.224.

this test point is more than sufficient to demonstrate that it provides CLECs with non-discriminatory access to repair functionality for Special Circuits.

CHANGE MANAGEMENT

13. As discussed in the Cottrell Affidavit, the Change Management Process (“CMP”) in effect in the SBC Midwest region is the exact same CMP utilized by SBC throughout its 13-state region; it is the exact same CMP that was reviewed by the FCC in connection with its approval of the 271 applications for Arkansas, Missouri, California, and, most recently, Nevada; and it is the exact same CMP followed by SBC for all of its releases since March 2001.¹⁵

COMPLIANCE WITH CMP

14. SBC has complied, and continues to comply, with the terms of the 13-state CMP in the Midwest region.¹⁶ For example, in its most recent release, effective June 14, 2003 (“June 2003 Release”), SBC implemented LSOG 6 for ordering (LSOR version 6.00) and pre-ordering (LSPOR version 6.00). At the same time, SBC retired LSOG 4 (LSOR version 4.02 for ordering, and LSPOR version 4.01 for pre-order) in the Midwest Region; LSOR version 3.06 and LSPOR version 2.5 in the West and Southwest Regions; and LSOG 4 in

¹⁵ The CMP is Attachment N to the Cottrell Affidavit.

¹⁶ At the June CMP meeting, AT&T claimed that SBC had taken the position in a regulatory dispute that, under the terms of the CMP, certain OSS changes requested by AT&T should have been brought to the CMP before being taken to the Texas State Commission. AT&T indicated it did not believe CLECs were required to discuss their change requests at the CMP prior to pursuing regulatory relief, and requested that certain CMP sections related to this issue be redrafted pursuant to CMP § 8.5.2. A drafting team was established, and a face-to-face meeting was scheduled for July 8. Additionally, at the June CMP meeting CLECs questioned why certain changes to the CMP that had been agreed upon in previous drafting team meetings had not yet been incorporated into the document. SBC confirmed that although the CMP document has not yet been updated, SBC has implemented and is following the agreed-upon changes. See Accessible Letter CLECALLS03-008 (Jan. 20, 2003) (Supp. App. K, Tab 1).

the SNET Region.¹⁷ Thus, effective with this release, the same LSOR/LSPOR versions (5.02, 5.03 and 6.0) are in place throughout SBC's 13-state region.

15. SBC has complied with all CMP notification, documentation, and testing requirements that applied to the June 2003 Release. For example, SBC first notified CLECs of the June 2003 Release at the May 16, 2002 CMP meeting. SBC's 12-Month Development View, which is attached to the minutes of the May 2002 meeting, specifically references SBC's plan to implement LSOG 6 and retire the oldest versions in a release to occur in June 2003.¹⁸ Moreover, as required by the CMP, SBC provided CLECs with a "Release Announcement" for LSOR/LSPOR 6.00 more than seven months prior to the scheduled release date.¹⁹ SBC also provided CLECs with Release Requirements and access to testing for the new release in accordance with the CMP.²⁰
16. Because SBC has complied with the CMP at every step for implementing the June 2003 Release, CLECs had ample notice and time to prepare for the implementation of LSOR 6.0, and the corresponding retirement of LSOR 4.02. On March 21, 2003, SBC sent Accessible Letter CLECALLS03-036 (Supp. App. K, Tab 3), reminding CLECs of the upcoming retirement and urged them to schedule their test windows as early as possible

¹⁷ See CMP § 3.4.2. See also CMP § 3.4.1.

¹⁸ See Accessible Letter CLECAM02-239 (June 5, 2002) (App. H, Tab 30). See also CMP § 3.3.2 ("SBC will prepare a preliminary package of the then known required changes and share these plans at a scheduled Change Management meeting nine (9) to twelve (12) months in advance of the target implementation date. SBC will share its plans as part of its 12-Month Development View on a quarterly basis or more often as necessary;") *id.* § 8.2.2 ("During the CMP meetings, SBC will share with the CLECs a non-binding, 12-Month Development View, with scheduled release dates.").

¹⁹ See CMP § 3.3.3 ("SBC will provide a Release Announcement delivered to CLECs via an email Accessible Letter."). See also Accessible Letter CLECALLS02-160 (Dec. 20, 2002) (App. K, Tab 19).

²⁰ See generally CMP §§ 3.3 and 6.3 and subsections.

to assist SBC in accommodating their plans.²¹ Despite lengthy notification of the upcoming retirement, many CLECs waited until the last minute to conduct joint testing for migration to a newer release (for example, two CLECs converted June 12, two CLECs converted June 13, and five CLECs scheduled their migration to newer LSOR versions the weekend of June 14-15 – the weekend of the LSOR version 4.02 retirement). Nevertheless, SBC made every effort to accommodate the last minute rush to test and migrate to newer LSOR versions, and any CLEC not completely ready to order services for their end users via EDI on Monday, June 16 had the option to fax requests or utilize SBC's GUIs to submit LSRs or pre-order inquiries to SBC prior to updating its EDI platform.²²

17. In addition to implementing common LSPOR/LSOR versions across SBC's 13-state region, some other highlights of the June 2003 release include:

- Line loss notifications are now "Provider Notifications,"
- Enhancements to flow through,
- Implementation of EDI mapping changes, additional edits, and modification of edits for pre-ordering and ordering,
- Elimination of Directory Service Request ("DSR") form for some services – now use LSR, End User ("UE"), and Directory Listing ("DL") forms,
- Addition of new Hunt Group Information ("HGI") form, and
- Enhanced Verigate and LEX enhancements and changes to fields and screens.

²¹ Due to the number of CLECs waiting until the last minute to test their migrations from retiring versions, some CLECs could not be scheduled to begin testing on the date they initially requested. However, all CLEC requests to test were accommodated.

²² One CLEC intends to convert to a newer version sometime after June 16 and will utilize LEX until its conversion is complete.

CHANGE MANAGEMENT COMMUNICATIONS PLAN IMPLEMENTATION

18. In SBC Midwest's Michigan 271 application filed in January 2003, CLECs claimed that SBC failed to comply with the terms of the CMP by failing to provide notice to the CLECs of certain programming changes on SBC Midwest's side of the interface that resulted in unintended impacts to CLEC ordering transactions. While SBC acknowledged that it failed to provide notice under the CMP for one of the changes complained of by AT&T, CMP notice was not required for the remainder of the changes. Those changes constituted programming designed either to make SBC Midwest's systems run more efficiently or to address defects on SBC's side of the interface, and which should not have impacted CLEC pre-order or order activity.
19. Nonetheless, SBC has responded to CLEC concerns regarding this issue, by working collaboratively with the CLECs under the auspices of the MPSC to develop a process to provide CLECs with sufficient notice of CLEC-impacting programming changes made outside of normal release schedules. The result of this collaborative process is the Change Management Communications Plan ("CMCP"), which was filed by SBC with the MPSC on March 13, 2003. See SBC's Modified Compliance and Improvement Plan Proposals, In the Matter, on the Commission's Own Motion, To Consider SBC's, f/k/a Ameritech Michigan, Compliance With the Competitive Checklist in Section 271 of the Federal Telecommunications Act on 1996, Case No. U-12320, Attach. F (MPSC filed Mar. 13, 2003) (Supp. App. C, Tab 8).
20. This detailed plan, which addresses how, when, and under what conditions SBC will provide CLECs with notice of CLEC-impacting programming changes, should resolve any remaining CLEC concerns over the unintended impact of such programming

changes. As the MPSC explained in its March 26 Order adopting the CMCP, while recognizing that it had already found SBC's existing 13-state CMP to be compliant with 271 requirements, the "additional communication tools [in the CMCP] can assist greatly in diminishing issues that may arise regarding changes not already specifically addressed in the present 13-state Change Management Process."²³

21. Indeed, the new CMCP addresses many of the CMP compliance issues raised by AT&T and other CLECs in the initial Michigan 271 application. Specifically, if it had been in effect, the CMCP would have required SBC to provide CLECs with notification (explained in more detail below) before implementing the programming changes that led to the reject conditions raised by AT&T in its comments:

- H325 rejects – See Cottrell/Lawson Reply Affidavit ¶ 32;
- B103 rejects – See id. ¶¶ 33-34;
- G408 rejects – See id. ¶¶ 29-30;
- H332 rejects – See id. ¶ 37;
- hunting information rejects – See id. ¶ 35;
- LS6327 and G318 rejects – See id. ¶ 36; and
- DACT rejects – See Ex Parte Letter from Geoffrey M. Klineberg, Kellogg, Huber, Hansen, Todd & Evans, P.L.L.C., to Marlene H. Dortch, FCC, WC Docket No. 03-16, Attach. B at 2-3 (Mar. 28, 2003).

22. In adopting the CMCP, which SBC now has implemented on a 13-state basis, SBC agreed to undertake a number of measures to respond specifically to CLEC concerns, including (1) use of an Exception Request Accessible Letter to provide CLECs with notice of new edits for existing business rules and for changes to EDI mapping and CORBA Interface Definition Language ("IDL"); (2) creation and posting on CLEC

²³ See Opinion and Order, In the Matter, on the Commission's Own Motion, to Consider SBC's, f/k/a Ameritech Michigan, Compliance with the Competitive Checklist in Section 271 of the Federal Telecommunications Act of 1996, Case No. U-12320, at 5 (Mar. 26, 2003) (Supp. App. C, Tab 9).

Online of the Enhanced Defect Report (“EDR”); (3) development and implementation of a training program for SBC personnel; and (4) development and documentation of rigorous methods and procedures for testing of system changes. These and other measures, which are specified in eight “action plans” contained in the CMCP, are in addition to the already existing notification and communication processes contained in the 13-state CMP.

23. The CMCP provided a schedule for completion of the eight actions plans, and required SBC to file with the MPSC quarterly reports – beginning on April 30, 2003 – updating the MPSC on SBC’s progress in complying with the CMCP. As required by the CMCP, SBC filed with the MPSC the first quarterly status report on April 30, 2003.²⁴ As detailed in the CMCP Status Report, SBC completed all “action plan” requirements scheduled for completion within the current reporting period in accordance with the terms of the plan.

Exception Request Accessible Letters

24. In response to CLEC concerns over inadequate notice of programming changes made on SBC’s side of the interface, sections 4(a) and 4(c) of the CMCP require SBC to notify the CLEC community of such “CLEC-impacting” programming changes. In this context, the term “CLEC-impacting” is defined as “any change made by SBC to the interface that would cause a CLEC’s previously accepted LSR to be rejected or a previously accepted pre-order transaction to fail.” CMCP, § 4. Specifically, SBC agreed to issue an Exception Request Accessible Letter (“AL”) before new edits are made to existing

²⁴ Change Management Communications Plan Status Report, In the Matter, on the Commission’s Own Motion, to Consider SBC’s, f/k/a Ameritech Michigan, Compliance with the Competitive Checklist in Section 271 of the Federal Telecommunications Act of 1996, Case No. U-12320 (MPSC filed Apr. 30, 2003) (Supp. App. C, Tab 12) (“CMCP Status Report”).

business rules for the pre-order and order interfaces. SBC also agreed to issue an AL before any change is made to EDI mapping or CORBA IDL structure. These ALs are designed to provide CLECs with sufficient notice of these programming changes to enable CLECs to plan accordingly. As detailed in the CMCP Status Report, SBC has implemented the necessary procedures and is issuing Exception Request Accessible Letters in compliance with CMCP requirements.

Enhanced Defect Report

25. Also adopted in response to CLEC concerns over insufficient notice of changes to SBC's side of the interface, section 4(b) of the CMCP requires SBC to notify the CLEC community via an Enhanced Defect Report ("EDR") when modifications to existing edits and/or table updates are required to correct an open defect in the pre-order and order interfaces. The EDR provides CLECs with numerous details on current defects, including:

- A list of all CLEC-impacting defects in the pre-order and order interfaces, including defects identified by SBC;
- Issues reported as potential defects, even before a determination has been made as to whether a defect exists;
- A target date for a maintenance release once a tentative date has been set for each defect;
- Information on closed defects, to remain posted for 90 days after closure; and
- Information on any repairs that were not implemented in the maintenance release for which they were targeted.

26. As scheduled under the CMCP, SBC implemented the EDR and posted it on the CLEC Online website on April 4, 2003, before the April 18 requirement date. The EDR has been updated daily since that time.²⁵
27. In addition to publishing the EDR on the CLEC Online website, SBC has also taken several steps to encourage CLECs to refer to the EDR for updates on defects. For example, on April 18, 2003, SBC published Accessible Letter CLECALLS03-059 (Supp. App. K, Tab 4), notifying CLECs that the EDR was posted to the CLEC Online, and detailing the specific enhancements included in the EDR. Another Accessible Letter (CLECALLS03-061) (Supp. App. K, Tab 4) was issued on April 21, 2003 to remind CLECs to check the EDR for defect status and information on maintenance releases; similar letters were published every Monday through the end of May. Finally, at CMP meetings, SBC updates CLECs on recent activity and progress of defect requests impacting the pre-order and order interfaces. The standing agenda for CMP meetings includes this item. For example, at both the May 8 and June 5 CMP meetings, a discussion on the EDR included SBC's explanation for the various fields provided on the EDR as well as discussion on CLEC comments and suggestions for enhancements.

Training for SBC Personnel

28. Section 4(g) of the CMCP requires SBC to develop and administer a training program to educate SBC's internal work groups concerning SBC's obligations under the CMCP.

²⁵ See Attachment A to the CMCP Status Report for a copy of the EDR as of April 29, 2003. The EDR is an enhancement to SBC's original Defect Report, which has been posted to the CLEC Online since April 15, 2002. Unlike the earlier version of the Defect Report, which listed only those defects reported by CLECs to OSS Support managers and/or the Mechanized Customer Production Support Center ("MCPSC"), the EDR also lists defects internally identified by SBC as potentially CLEC-impacting as well as those reported by CLECs to the LSC and/or IS Call Center. The total number of reported defects has increased accordingly.

29. Again, SBC met the CMCP timeline for completing this action plan. SBC developed an informative document entitled “SBC Change Management Process Communications Plan Training,” which addressed each of the topics listed in section 4(g) of the CMCP.

Among other things, this material:

- Provides criteria to assist SBC personnel in determining if a proposed change is CLEC-impacting;
- Introduces and explains the CMCP requirements for posting CLEC-impacting defects to the EDR;
- Provides an overview of the Exception Request Accessible Letter Process;
- Provides criteria to assist in determining whether an Exception Request AL is required;
- Stresses the importance of adhering to the 13-state CMP and the requirements of the CMCP when making changes to business rules and system requirements;
- Calls attention to the need to exercise care when implementing changes and fixes to the interface in order to ensure that proper evaluation is done on which of the three LSOG versions are subject to the change (including validation that the LSOR/LSPOR for all affected versions support the change); and
- Reinforces the need to use the proper outage notification process for situations where a system does not turn up as planned.

30. Moreover, between April 8 and April 18, 2003, SBC used this training document to conduct 20 training sessions for more than 1,000 SBC employees, including all employee groups required to receive that training under CMCP terms.

Defect Testing Improvements

31. Under section 4(f) of the CMCP, SBC agreed to implement improvements to its defect testing. To increase the accountability of all SBC staff and management that participate in the testing of fixes, the Industry Markets organization was required to review the IT testing process to ensure that thorough testing is performed. Moreover, to support the comprehensive, accurate and timely creation and maintenance of testing documentation, SBC agreed to implement an audit trail for any such changes.

32. As discussed in the April 30, 2003 CMCP Status Report, SBC has complied with the CMCP for this action plan. Specifically, SBC has established a core team in place with primary responsibility for:
- Working with the pre-order and order subject matter experts to determine whether a reported defect is CLEC impacting;
 - Ensuring that CLECs are properly notified (via Accessible Letter or the EDR) of any such defects;
 - Validating that thorough and complete internal testing of any proposed changes is planned and executed; and
 - Ensuring that appropriate documentation of the test plan and results is maintained.
33. SBC also has developed methods and procedures for this Team which, among other things, requires that:
- The team approve the test plan for any CLEC-impacting change prior to execution;
 - Verify that the expected result is received in testing;
 - Investigate any differences between the expected result and the actual result; and
 - Verify that positive and regression testing (if required) has occurred and is sufficient.

Other CMCP Measures

34. The CMCP also contains other measures to improve CLEC communication in addition to those mentioned above regarding CLEC-impacting changes. In each of these instances, SBC completed the requirements in accordance with the terms of the plan.
35. First, SBC agreed to provide CLECs with a list of SBC's third-party vendors and software versions used by OSS that could impact CLEC connectivity. As required under section 4(d) of the CMCP, this list was posted on the CLEC Online website on March 20, 2003. SBC will provide detailed information in an AL when SBC either changes a third-party vendor or moves to a newer version of third-party vendor software.

36. Second, SBC agreed under section 4(e) of the CMCP to continue to work with CLECs in the CLEC User Forum (“CUF”) on additional improvements to the CLEC Profile process. SBC has done so. Most recently, SBC added this issue to the agenda of the May 8, 2003 Midwest CUF meeting.
37. Finally, to ensure that SBC is meeting its action plan objectives, SBC also agreed to conduct reviews on a quarterly basis for at least one year, and to assess SBC’s compliance with the objectives of the CMCP actions plans. SBC created a Quality Assurance Review Program under section 4(h) of the CMCP, which uses the following objectives:
- a) **New Pre-Order and Order Edits for Existing Business Rules:** All new edits to existing business rules are accurately identified and approved; processes for identifying these edits and CLEC notification are documented and maintained; and accurate and timely CLEC notification is provided.
 - b) **Modifications to Existing Pre-Order and Order Edits for Existing Business Rules:** All modifications to existing edits for existing business rules required to correct an open defect are accurately identified and approved; accurate and timely notification is provided to CLECs; and the EDR is maintained according to plan requirements.
 - c) **EDI Mapping and CORBA IDL Changes.** All EDI mapping and CORBA IDL changes are planned, reviewed, tested, and authorized; CLECs are notified of these changes in a timely manner via an Exception Process AL.
 - d) **Third Party Information to be Provided by SBC to CLECs.** CLEC notification list of third party vendors and software versions used by SBC OSS that could impact CLEC connectivity is provided and updated with accurate and complete information; management reviews and approves list prior to on-line posting; and the ability to modify the list is restricted.
 - e) **CLEC Profile.** CLECs are able to continue to raise CLEC profile improvements at CLEC User Forum Meetings.
 - f) **Current Defect Testing.** Before system changes are implemented, CLEC-impacting defect fixes implemented outside of normal release cycles are tested and results are documented; testing is planned, documented, and authorized by SBC management; and testing results are reviewed and approved by SBC management prior to implementation.

- g) **Internal Training and Awareness Sessions.** Training documentation is accurate, includes all items required by the plan and was reviewed and approved by SBC management; and OSS Support and System Application teams are educated on the plan's actions as outlined in the training document.
38. As noted above, the CMCP was implemented for all 13 SBC states on or before April 21, 2003. The terms and conditions of the CMCP have been incorporated into the daily operations and management of SBC's OSS. SBC's implementation of and compliance with the CMCP addresses the issues raised by AT&T and other CLECs in the initial Michigan 271 application regarding the receipt of adequate notification of proposed changes by SBC to the pre-order or order interfaces that could have unintended impact on the CLECs. There have been no new complaints by CLECs (other than those raised in the initial Michigan 271 application – all of which previously have been addressed), that interface changes made by SBC outside the release schedule have caused a previously-accepted LSR to be rejected, or a previously accepted pre-order transaction to fail.

VERSIONING

39. During the initial Michigan 271 proceeding, AT&T complained that SBC's versioning model, which is based on Operating Company Number ("OCN") and requires that a CLEC operate on a single LSOR version, violates the non-discrimination requirements of the Act. AT&T asked that SBC implement versioning at the Trading Partner ID ("TPID") level, which, AT&T argued, would allow Covad to submit LSRs on AT&T's behalf using a different LSOR version than that used by AT&T.
40. SBC has already responded to these arguments at length. Specifically, SBC has explained (among other things) that its versioning model was implemented in compliance with CMP after extensive negotiation with CLECs; that the FCC has already found on numerous occasions that SBC's versioning is in compliance with all applicable section

251 and 271 legal requirements; that AT&T and Covad have viable alternatives available to solve this business problem on their own that do not require a wholesale revision to SBC's versioning model; and that this issue should be negotiated through the CMP rather than raised as a 271 compliance issue.

41. The versioning issue raised by AT&T was thoroughly discussed at the April 3, 2003 CMP meeting.²⁶ As the minutes to that meeting demonstrate, SBC suggested that the issue raised by AT&T would most effectively be addressed through an LSR-based agency arrangement, whereby the LSR would be modified in a manner that would allow a third party to submit orders on behalf of a CLEC, using a different LSOR version than that used by the CLEC. This proposal could be implemented without any changes to SBC's versioning model, and would directly address AT&T's concern by allowing Covad to submit orders on behalf of AT&T using a LSOR version not used by AT&T. Based on this discussion, all CLECs attending the meeting (including AT&T and WorldCom) agreed that the issue of third-party ordering should be addressed "outside of the versioning arena." Attachment B at 1.
42. During the May 8, 2003 CMP meeting, SBC and the CLECs agreed that a joint effort should be undertaken to ensure that any changes to the ordering process designed to facilitate CLEC third-party agency arrangements meets the needs of all participants. Those efforts currently are underway, and will be worked through special sessions and follow-up at CMP meetings as appropriate.
43. SBC and CLECs also continue to work together through the CMP to discuss possible changes to SBC's versioning model designed to address CLEC business needs other than

²⁶ The minutes of the April 3, 2003 CMP meeting are provided as Attachment B to this affidavit.

third-party agency arrangements. Specifically, SBC has suggested it would be willing to develop Purchase Order Number (“PON”) based versioning, if the CLECs were willing to agree that SBC would only be required to maintain two versions of software, rather than three. During the April 3 CMP meeting, CLECs indicated they might be willing to consider this option, if SBC, in turn, would be willing to reduce the number of releases from four to three per year. This item will continue to be worked through the CMP, as appropriate.

44. These facts further serve to demonstrate that the CMP is the appropriate forum for ensuring that the needs of all CLECs (as opposed to just one or two) and of SBC are considered in negotiating changes to SBC’s systems. SBC complies with both the letter and the spirit of its CMP obligations, and will continue to work with the CLECs to obtain resolution of this issue through the CMP.

POST TO BILL NOTIFICATIONS

45. The Post to Bill (“PTB”) notification advises the CLEC that service orders for a given LSR have posted to the billing database.²⁷ PTB notifications are generated by LASR, and are returned to the CLEC via the same interface used by the CLEC to send the LSR. Because the PTB is LSR-specific, LASR generates the PTB only after it receives notification that all service order(s) related to the LSR have posted to the billing system. For example, if a CLEC orders five UNE-P lines on a single LSR, the PTB notification

²⁷ See Cottrell/Lawson Reply Affidavit ¶ 124.

will be sent only after the service orders associated with all five UNE-P lines have posted to CABS.²⁸

46. Contrary to CLEC allegations, SBC did not “withhold” or “block” PTB notifications during the ACIS/CABS reconciliation process.²⁹ However, SBC did prevent new service order activity from posting to CABS during the course of the reconciliation.³⁰ PTB notifications were sent on a timely basis once these delayed service orders posted to CABS. As such, the PTB notifications worked as designed to provide notice to the CLECs of the actual posting date of the service orders in question.
47. SBC provided CLECs with notification of the ACIS/CABS reconciliation in Accessible Letter CLECAM02-509, dated November 21, 2002 (App. H, Tab 32). At the time this letter was sent, SBC’s primary concern was making sure the CLECs were informed as to the upcoming reconciliation. SBC did not recognize that failure to advise the CLECs of the need to prevent service orders from posting during the reconciliation process could

²⁸ As specified by the LSOR, the following information fields are transmitted to the CLEC on the PTB notification: the CLEC’s Purchase Order Number (**PON**); the LSR version identifier submitted by the CLEC (**VER**); the LASR response version used by SBC to send the PTB (**EC VER**); the date and time the PTB was sent (**D/T SENT**); the CLEC’s company code (**CC**); the response type (**RT** – in this case, a PTB); and the date by which all service orders for the LSR posted to the billing system (**PD**).

²⁹ In its March 19, 2003 Ex Parte letter, AT&T claimed that SBC had violated CMP by “intentionally blocking” PTB notifications (which AT&T refers to as Billing Completion Notifications “BCNs”) from being “transmitted over the mechanized interface” during the ACIS/CABS reconciliation process in January 2003. AT&T contended that “withholding these BCNs” was an operational change covered by CMP Section 3.1.1, and that SBC was required to provide notification to the CLECs under CMP guidelines. See Ex Parte Letter from Richard Young, Sidley, Austin, Brown, & Wood, to Marlene Dortch, FCC, WC Docket No. 03-16 (Mar. 19, 2003).

³⁰ The ACIS/CABS reconciliation process was executed during the week of January 20, 2003. For that five-day period, all new UNE-P service orders in the Midwest region were held after posting to ACIS, and were not processed for posting to CABS. See Brown/Cottrell/Flynn Affidavit for a discussion of the current UNE-P billing flow in the SBC Midwest region, and for further detail on the ACIS/CABS reconciliation. On Monday, January 27, SBC began to process the service orders that were held from January 20-24 (service orders for January 27 were held while the prior week’s orders were processed). On January 28, service orders for both January 27 and 28 were processed and, by January 29, billing service order processing was current for all states but Michigan (due to the higher order volume in that state). SBC continued to hold current day service order activity for Michigan, while processing the prior day’s billing service orders, until January 30. By January 31, billing service order processing was current in all five Midwest states.

have an operational impact on AT&T, or other CLECs that choose not to send change order activity until they have received a PTB notification. While holding the service orders in question was not a change to existing functionality that impacted the CLEC interface, and therefore did not fall within the notification provisions of the CMP, SBC acknowledges that the November 21, 2002 Accessible Letter could have included notification to the CLECs that new service order activity would not post to CABS during the reconciliation process.

48. To address this issue, SBC has undertaken to notify CLECs promptly if and when SBC detects any issue or problem that may impact delivery of PTB notifications.³¹ For example, on April 7, 2003, SBC provided CLECs in the Midwest region with Accessible Letter CLEAMS03-028 (Supp. App. J, Tab 4), advising of two circumstances (discovered on March 26, 2003) that resulted in a failure to timely deliver PTB notifications. This AL provides detail on the cause of each of the instances in question, as well as an approximate number of impacted PTBs. Additionally, as noted in the AL, impacted CLECs were contacted individually with specific details.
49. In its supplemental comments filed on April 9, 2003, AT&T questioned whether the two PTB failures referenced in the April 7 Accessible Letter were related to the ACIS/CABS reconciliation. See AT&T Supplemental Comments, WC Docket No. 03-16, at 9-10 (Apr. 9, 2003). There is no relationship between the reconciliation and these PTB issues. The first instance described in the April 7 Accessible Letter was a one-time event in

³¹ These pro-active steps also are intended to address AT&T's complaint during the initial Michigan 271 application that SBC failed to provide appropriate notice to CLECs when it determined a problem existed with PTB delivery in early December 2002, but did not advise the CLECs of the problem until January 29, 2003 – after it had determined the root cause of the problem, and implemented the necessary system fix. See Cottrell/Lawson Reply Affidavit ¶¶ 124-129; Accessible Letter CLEAMS03-008 (Jan. 29, 2003) (Supp. App. J, Tab 1).

which a single file of posted service orders was not transferred appropriately for PTB processing. Specifically, SBC was in the process of updating its automated scheduling software at the time the January 28, 2003 file of posted service order activity was due to be transferred to LASR, preventing the transfer from occurring mechanically. A manual effort to transfer and load the file did not complete successfully and, as a result, the file was not processed for PTB creation and delivery. The failure to process this file of service order activity was not in any way related to the ACIS/CABS reconciliation. The second instance resulted from a failure to capture posted service orders for some broadband types for PTB processing, and also was not caused or impacted by the ACIS/CABS reconciliation. As described in the April 7 Accessible Letter, processes have been put in place designed to make sure that similar problems do not occur in the future.

50. On May 23, 2003 and June 5, 2003, respectively, SBC issued Accessible Letters CLECAM03-037 (Supp. App. J, Tab 5) and CLECAM03-041 (Supp. App. J, Tab 6), providing Midwest CLECs with details concerning a PTB notification failure that occurred in the May 14-22, 2003 time frame, primarily impacting UNE-P orders. As set out in the June 5 letter, this PTB notification outage resulted from SBC's failure to properly document and test a software patch that was intended only to eliminate invalid "mismatch" errors appearing on internal reports. Internal testing is based on documentation for the software change. Because not all possible mismatch scenarios impacted by the patch were documented, they were not tested internally. As a result, an error in the patch was not detected prior to implementation, causing PTB notifications for UNE-P orders not to be sent for the days in question.

51. Approximately 107,500 PTB notifications (all but approximately 30 of which were for UNE-P orders) were impacted. SBC removed the software patch on May 22, once the problem was confirmed. PTB notifications have been generated and sent appropriately since that time. The delayed notifications were sent to the CLECs by close of business on May 23; SBC's OSS Customer Support team contacted impacted CLECs individually to provide CLEC-specific volumes of affected PTB notifications.
52. SBC takes its obligation with regard to timely and accurate delivery of PTB notifications very seriously, and regrets the inconvenience caused by the failure in question. The importance of following procedures for software development and testing has been reinforced for all employees involved in this particular incident, as well as for all employees performing similar tasks. In addition, SBC has developed a new process for daily review of LASR reports indicating the number and types of PTB notifications generated the previous day. This review will allow SBC to more quickly identify and address any problems causing PTB notifications not to be sent.

EDI TRANSLATOR UPGRADE

53. On April 10, 2003, SBC issued Accessible Letter CLECALLS03-052 (Supp. App. K, Tab 4), notifying CLECs that SBC's translator for EDI Ordering was to be upgraded from version 6.0 to version 6.1 of Sterling Commerce's Gentran: Basic for MVS with Realtime.³² This software upgrade allowed SBC to accommodate CLEC requests to keep the same Trading Partner ID ("TPID") after migrating to a newer LSOG release. Prior to the upgrade (and effective with the Uniform and Enhanced Plan of Record

³² The EDI translator converts CLEC data in the standard X12 format to SBC's internal format, and the reverse. Because Sterling Commerce's Gentran product, which is used for the EDI translator, does not involve CLEC connectivity, it was not reported on the list for third-party vendors maintained by SBC pursuant to CMCP § 4(d).

implementation for the SBC Midwest region in April 2002), the SBC EDI translator determined which LSOG format to use on outbound messages by a CLEC's TPID – which meant that a CLEC was required to obtain a new TPID each time it moved to a newer LSOG version.

54. The AL advised the CLECs that the upgrade would be applied in the CLEC test environment two weeks prior to the production environment upgrades. More than 30 CLECs submitted test transactions during that two-week period, all of which were processed by an EDI translator that had been upgraded to the Gentran version 6.1 software. No problems were detected during the testing period.
55. As scheduled, SBC implemented the upgrade in the SNET production environment on April 29, 2003. Again, no problems were detected. However, when the production upgrade was subsequently applied to the SBC West region on April 30, a problem appeared, whereby some notifications were sent without a date populated as required. Specifically, in LSOR 5.02 and 5.03 versions, no data was populated in the date time (“DTM”) stamp segment for some EDI 855 and 865 transactions.³³ Line loss notifications were not affected. SBC initially concluded that the problem was related to a power issue caused by a lightning strike. A manual reset of the translator was applied on April 30, 2003, which appeared to clear the problem.
56. SBC then proceeded to implement the EDI translator upgrade in the Midwest region effective May 1, 2003. With this upgrade, the same problem appeared in the Midwest and SNET regions, and reappeared in the West region. Recognizing that the manual reset

³³ EDI 855 and 865 transactions include all notifications to the CLECs (e.g., FOCs, SOCs, PTBs, etc.) other than line loss notices, which are EDI 836 transactions.

did not address the root cause of the problem, SBC and its vendor intensified their investigation of the software provided by the vendor for the EDI translator upgrade.

57. The DTM problem was found to reside in a flaw in the third-party vendor software. Specifically, a separate image of the EDI translator is maintained for each SBC region, but the images are grouped into two operating environments to most efficiently handle transaction volumes. The CLEC test environment is grouped with the West and Southwest regions into one operating environment, while the SBC Midwest and SNET regions are grouped into another operating environment. Upon investigation, it was discovered that that the DTM problem appeared only when multiple “images” of the upgraded EDI translator were applied to the same operating environment, and each of those images then attempted to access the same EDI “map name” (i.e., the software instructions for translating SBC’s internal format to X12 format for delivery of the notification to the CLEC). In other words, the DTM problem would arise only if two regions residing within the same operating environment used the EDI translator.
58. Thus, when only the CLEC Test environment and SNET were upgraded, no problem was detected – because they reside in different operating environments.³⁴ However, when the West region was upgraded, there were two upgraded EDI translators (West region and the CLEC test) in the same operating environment, accessing the same EDI map name, which triggered the problem. Similarly, when the Midwest region was upgraded, there were two upgraded translators (SNET and Midwest) operating in the same environment, accessing the same EDI map name, triggering the same problem.

³⁴ This is the reason why no problem was detected during CLEC testing. To SBC’s knowledge, this problem was not detected by the vendor’s quality assurance process or in other production locations known to the vendor. Going forward, SBC will work with the vendor to test this scenario internally prior to implementation of similar upgrades.

59. On May 1, SBC provided a broadcast notification to CLECs in the Midwest, West, and SNET regions, advising them of the DTM problem impacting outbound notifications.³⁵ Broadcast notifications are sent to CLECs via email when a trouble report (opened either by a CLEC or SBC) is determined to be a severe problem causing CLECs difficulty accessing or receiving data from SBC's OSS.³⁶ Shortly after noon Central time on the same day, a restoral notification was issued, advising CLECs that the problem had been resolved. At the time of that notification, all transactions were processing correctly; however, later that day and into the next, there were brief recurrences of the problem. Automation had been put in place to detect missing DTM information, and when the condition reoccurred, it was quickly corrected.
60. SBC's third-party vendor provided software programming that was implemented the night of May 2, 2003, which permanently resolved the problem.³⁷ Overall, approximately 20 CLECs using LSOR versions 5.02 and 5.03 in the SBC Midwest region

³⁵ A broadcast notification also was provided to CLECs in the SBC West region on April 30, 2003, when the DTM problem first manifested.

³⁶ Information on the outage notification process, which is SBC's standard procedure for providing immediate notification to CLECs of OSS issues, can be found on the CLEC Online website at <https://clec.sbc.com/clec>.

³⁷ The Gentran upgrade for the Southwest region, scheduled for May 2 was postponed until the permanent solution was applied. Because CLECs did not have to program or prepare in any way for the upgrade, CLECs were not notified of the postponement; Accessible Letter CLECSS03-047, issued May 6, 2003, (Supp. App. L, Tab 23) advised CLECs the upgrade was rescheduled the evening of May 6, 2003. A successful Gentran upgrade for the Southwest region occurred on May 6 – with no recurrence of the problems that had affected the other regions.

received about 9,300 incomplete notifications on May 1.³⁸ All such impacted notifications were re-flowed by 12:30 A.M. on May 3, 2003.³⁹

61. SBC OSS CLEC Support managers contacted all impacted CLECs using LSOR 5.02 and 5.03 on May 2, either by email, phone, or both, to inform them of the final resolution of the issue, the timing of the re-flow for the corrected notifications, and to provide responses to any questions.⁴⁰ CLECs that could not be contacted directly on May 2 were contacted directly on Monday, May 5. CLECs using LSOR 4.02 were contacted May 7, after SBC confirmed impacts to these CLECs.
62. On May 12, 2003, SBC issued Accessible Letter CLECALLS03-075 (Supp. App. K, Tab 5), notifying CLECs that the final step of the upgrade – activating the functionality (referred to as “relationship mode” functionality) that allows CLECs to change LSOG versions without need to change TPID – was scheduled for implementation in the Midwest region on May 18, 2003. As specified in the Accessible Letter, activation of the relationship mode was accomplished with an internal configuration setting that did not involve a software coding change.

³⁸ Approximately 10 CLECs using LSOR version 4.02 received approximately 1,250 SOC notifications without SBC-generated service order number(s) provided in the “REF” segment. The CLEC PON was passed on to the SOC correctly. The failure to include the SBC service order number(s) may or may not impact the CLEC, depending on whether the CLEC uses this field. SBC corrected the impacted version 4.02 SOC notifications and re-flowed them to the CLECs on May 5.

³⁹ AT&T questioned why SBC did not back out the software upgrade of the EDI translator pending a fix, rather than allowing incorrect notifications to be sent to the CLECs. Although SBC evaluated that option, it was determined that this was not a practical solution. Backing out the upgrade would have involved halting all EDI order transactions, the vast majority of which (estimated at roughly 90%) were not impacted in any way by the DTM issue. Instead, SBC followed existing procedures for providing notification to the CLECs of an existing problem, and then proceeded to address the problem in a timely manner.

⁴⁰ SBC followed up with any CLECs it was unable to contact directly on May 2 and this incident was discussed with CLECs during the May 8 CMP meeting, where general and root cause questions were answered, including written questions that were submitted by AT&T.

63. When the relationship mode feature was activated for the for the Midwest region on May 18, SBC inadvertently failed to configure the EDI translator for all possible LSOR versions of line loss notices (“LLNs”). As a result, approximately 120 EDI LLNs on CLEC-to-CLEC migrations, where the losing carrier was using LSOR version 4.02, were incorrectly sent in version 5.03.⁴¹ This problem was corrected at approximately 3:00 CDT on May 20. All seven impacted CLECs were notified individually by the OSS CLEC Support Team; corrected LLNs were sent upon CLEC request.⁴²

MISCELLANEOUS LINE-SPLITTING ISSUES

64. In May 2003, AT&T notified SBC of an issue that arose from a line-splitting conversion order issued in Michigan. According to AT&T, it enlisted a “friendly” customer to test the line-splitting process in the SBC Midwest region. In one of those test cases, AT&T issued orders to convert a customer from a line sharing arrangement to line-splitting. In a typical line-splitting conversion, a CLEC purchases separate unbundled network elements (“UNEs”) (xDSL capable loop and unbundled local switching – shared transport or “ULS-ST” port) from SBC 13-state and then combines those UNEs with its own (or a partnering CLEC’s) splitter located in the CLEC’s or the partnering CLEC’s collocation arrangement. [AT&T reported](#) that on May 18, the test customer dialed 911 but when the Emergency Response personnel arrived, they advised the customer that the address displayed at the Public Safety Answering Point (“PSAP”) was the address for SBC’s central office from which the end user’s ULS-ST port originated.

⁴¹ In this instance, only the GS segment, which identifies the EDI version, was affected. Information in the notification itself was not impacted.

⁴² [See](#) Accessible Letter CLECAM03-035 (May 21, 2003) (Supp. App. J, Tab 5).

65. A 911 Operator is instructed to confirm with the calling party that the address displayed on the PSAP terminal is the actual location of the emergency. If the displayed address is incorrect the 911 Operator then proceeds to question the calling party as to the actual physical location of the emergency. PSAP personnel follow established procedures to report 911 Database errors to their respective 911 database provider. This process ensures the integrity of the 911 database and was followed in this instance, as the error was reported to SBC Midwest and subsequently corrected by SBC Midwest's database vendor on May 19, 2003.
66. Upon investigation of this incident, SBC Midwest determined that the LSC methods and procedures ("M&P") instructed LSC service representatives to populate the central office location as the service address on orders for ULS-ST ports.⁴³ SBC Midwest's LSC M&P for the ULS-ST port has been updated to reflect that the service address field should always be populated with the end user service address on all ULS-ST ports; this updated documentation has been provided to all appropriate service representatives.

⁴³ Population of the central office location as the service address was intended to ensure that, if maintenance for this circuit were required, SBC Midwest technicians would be dispatched to the central office – not the end user's address.

CONCLUSION

67. 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), we hereby affirm that we have (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 our training and review and understanding of the Guidelines; and (4) complied with the requirements of the SBC Compliance Guidelines.
68. This concludes our affidavit.

STATE OF ILLINOIS

)

COUNTY OF COOK

)

)

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

JUNE 16, 2003.
(date)



MARK J. COTTRELL

Subscribed and sworn to before me this 16 day of June, 2003.



Notary Public



STATE OF Texas)

COUNTY OF Dallas)

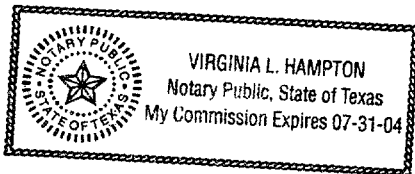
I declare under penalty of perjury that the foregoing is true and correct. Executed on

June 16th, 2003
(date)

Beth Lawson

Beth Lawson

Subscribed and sworn to before me this 16th day of June, 2003.



Virginia L. Hampton
Notary Public

Cottrell/Lawson Supplemental Affidavit – Attachment A

*Ameritech OSS Test Observation Process
Additional Information Document*

Observation Report: 656	State Applicability: Michigan
Author: BearingPoint	Role: Test Manager
Release Date: September 26, 2002	Additional Information: October 30, 2002

Additional Information:

On September 24, 2002, SBC Ameritech provided a response to Observation Report 656. In the response SBC Ameritech stated:

“SBC Ameritech has reviewed the data supplied in Observation 656 and notes that half (50.05%) of the cumulative repair time is associated with a single ticket with an MTTR of 236.38 hours. Absent this one ticket, the Test CLEC would have experienced an overall MTTR of 6.94 hours instead of 13.5 hours and would have been very comparable to the retail MTTR results reported by KPMG [Consulting].

Outlying cases with abnormally high MTTR times are 1) not indicative of real world CLEC experiences and 2) certainly do not happen with the frequency reflected in KPMG[Consulting]'s results (1 in 35 cases). In a real world experience, a CLEC experiencing an abnormally high repair time would be constantly escalating this ticket through the SBC Ameritech organizations until the matter was resolved to their satisfaction. Such an escalation did not occur with this ticket. Secondly, tickets with abnormally high intervals are relatively few and far between and certainly do not have the dramatic impact on results as does this single case in KPMG [Consulting]'s sample.

In order to properly address the frequency of such high MTTR cases in a commercial environment, SBC Ameritech asks that KPMG [Consulting] perform a statistical permutation test in order to align and modify their results accordingly.”

In addition, SBC Ameritech requests that KPMG [Consulting] provide details regarding the construction of their retail equivalent number. Specifically, SBC Ameritech requests details on source of data, months of data used, and products used.

BearingPoint acknowledges SBC Ameritech’s comments above regarding the 236.38-hour trouble ticket. BearingPoint cannot comment on whether its experience is indicative of a real world CLEC experience, except to state that the objective of the test is to mimic this experience as closely as possible. BearingPoint agrees that a real world CLEC probably would continually escalate the ticket through the SBC Ameritech organizations until the matter was resolved. However, testing the SBC Ameritech escalation process is not within the scope of this particular test.

BearingPoint did not calculate permutation tests previously because the retail results have not yet been validated. However, per SBC Ameritech’s request, BearingPoint subsequently conducted permutation tests on the retail data provided by SBC Ameritech. The results of these tests, as in the case of the original test, are failures. The results of the permutation tests are as follows:

Mean Permutation Results:

Product Type	BearingPoint Avg.	BearingPoint Count	SBC AIT Avg.	SBC AIT Count	P-Value
DS1	2.81	24	5.4	627	0.9925
PL VG	51.80	5	7.6	1,154	0.0025
ISDN –BRI	18.71	5	8.7	168	0.0990
Total	12.4	34	6.3	1,949	0.0047

Ameritech OSS Test Observation Process Additional Information Document

Median Permutation Results:

Product Type	BearingPoint Median	BearingPoint Count	SBC AIT Median.	SBC AIT Count	P-Value
DS1	2.55	24	3.52	627	0.8333
PL VG	7.88	5	3.75	1,154	0.1252
ISDN –BRI	20.10	5	3.48	168	0.0170

Totals were not provided for the median permutation tests as this type of test is not intended to be performed across different product sets.

Based on the results of the permutation tests, BearingPoint acknowledges that the MTTR failure for Special Services is being driven by the results experienced on the PL VG and the ISDN-BRI test circuits. However, considering these products are included in the scope of the test per the MTP, BearingPoint does not feel it is appropriate to change the conclusions drawn in this observation.

On October 15, 2002, SBC Ameritech provided an additional response to Observation Report 656. In the response SBC Ameritech stated:

“SBC Ameritech has conducted additional research on several of the Test troubles with abnormal repair intervals. This results of this additional research, as detailed below, indicates that the actual time spent repairing these circuits is less than that reported in this observation.....

.....In summary, the Test CLEC behavior was not normal for special service circuits trouble reporting. Special Service circuits normally require interaction and joint testing between SBC Ameritech and a CLEC. Given that these special service troubles remained open for an abnormal length of time awaiting input from the CLEC, SBC Ameritech requests that BearingPoint adjust the time intervals for these cited items to reflect SBC Ameritech’s efforts to restore the reported troubles without any of the required assistance from the Test CLEC.

With the proposed adjustments, the total cumulative duration time would be reduced from 472.32 hours to 211.54¹, and the total average duration time to 6.044 hours.

In conclusion, when adjusting for the above facts and also considering BearingPoint’s experience in other OSS tests it has conducted as noted in the Draft Report, in which BearingPoint cited for this same test point in other jurisdictions i.e. BellSouth, Verizon, and Qwest, the Mean Time to Restore retail average ranged from a low 9.3 hours to a high of 24.2 during the BearingPoint test period (page 968, footnote 228) SBC Ameritech believes it has clearly demonstrated that SBC Ameritech provides both retail and wholesale service at a level higher than the industry standard.”

BearingPoint conducted a review of the three circuits identified in SBC Ameritech’s most recent response. The findings for each of the circuits can be found below.

Item #1 (Circuit 8002 T1ZF 1 ANARMIAKH06 – ANARMIMNDC0)

- ◆ When reviewing the WFAC: Circuit History (OSSCHI) provided by SBC Ameritech, BearingPoint found that the trouble ticket was received (RECD) on 07/29/02 18:11, restored (RST) on 08/08/02 14:34, and closed (CLD) on 08/08/02 14:34. BearingPoint evaluates each circuit according to its duration time, which is defined for Specials as the amount of time elapsed from the receipt of the ticket to the restoration of the ticket minus no access or delayed maintenance time.

According to the OSSCHI, the total duration time for this circuit is 236 hours 11 minutes (236.18 hours). That duration time represents the receipt to clear duration of 236 hours 23 minutes minus the 12 minutes of recorded NA CTR time. In Observation Report 656, BearingPoint indicates that the

¹ Item #1 would be reduced to 16.7 hours; Item #14 would be reduced to 9.7 hours; Item #35 would be reduced to 22.2 hours

Ameritech OSS Test Observation Process Additional Information Document

circuit in question had a duration time of 236.38 hours, which represents the time elapsed between receipt of the ticket to the time the ticket was restored. BearingPoint inadvertently failed to remove the 12 minutes of no access time. The Observation Report will be updated and the appropriate duration time of 236.18 hours will be used.

SBC Ameritech states that the CLEC was advised of the test status on three separate occasions.

1. The WFAC: Circuit History (OSSCHI) indicates that on 07/30/02 1842 the following message was recorded:

07/30/02 1842 JED RMK FIX /STAT/JESSICA CALLED FOR STATUS – TOLD HER TESTER IS UP ON TKT NOW – SHE WILL CALL BACK IN 1 HOUR

BearingPoint does not believe that the Test CLEC was ever notified of a trouble clearance. All of the contacts with the Test CLEC appeared to be status calls.

2. The OSSCHI indicates that on 07/31/02 1110 the following message was recorded:

VAR RMK FIX /STAT/JESSICA TRANSFER TO ACD 4 MORE STAT....

BearingPoint does not believe that the Test CLEC was ever notified of a trouble clearance. All of the contacts with the Test CLEC appeared to be status calls.

3. The OSSCHI indicates that on 08/01/02 0940 the following message was recorded:

SCW RMK FIX /STAT/XTRANSFER TO TECH'S Q FOR TECH ASST

BearingPoint does not believe that this event described involved that Test CLEC. It appears that the event described took place between two SBC Ameritech employees.

- ◆ At no point on 08/01/02 does the OSSCHI indicate that test and repair activity was conducted. There is no record of any activity for this trouble ticket between 08/01/02 0940 and 08/08/02 1434. On 08/08/02 1434 the following message was recorded in the OSSCHI:

EVC RST FIX AMERITECHGE/MT /000 08/08/02 14:34
GD043469
TEST ASSIST
CUSTOMER ADVISED

It appears that the trouble was restored (RST) at this time. It also appears that this was the first instance that the CLEC was advised. Therefore, BearingPoint believes it would be inappropriate to exclude the time between 08/01/02 and 08/08/02. There is no evidence that SBC Ameritech was waiting for a response from the CLEC. The trouble was not restored until 08/08/02 14:34, which is two days following BearingPoint's Data Request (#3076) for this and many other trouble histories.

Item #14 (Circuit 517-841-7577 8001 T1ZF JCSNMIMBH00 – JCSNMIMNDC0)

- ◆ Based upon BearingPoint's response to Exception Report 115 issued on October 7, 2002, this trouble has been removed from the test base.

Item #35 (Circuit 586-677-5285 IBZD 884316 MB)

*Ameritech OSS Test Observation Process
Additional Information Document*

- ◆ BearingPoint indicated that the trouble was reported on 07/25/02 03:01. SBC Ameritech correctly points-out what BearingPoint intended was to indicate that the trouble was reported on 07/25/02 15:01. BearingPoint has adjusted the MTTR to account for the 12 hours that were removed from this ticket's duration time.

BearingPoint has removed Item#14 from the test base (Circuit 517-841-7577 8001 T1ZF JCSNMIMBH00 – JCSNMIMNDC0). Additionally, BearingPoint made the necessary 12-minute adjustment to Item #1 (Circuit 8002 T1ZF 1 ANARMIAKH06 – ANARMIMNDC0) and 12 hour adjustment to Item #35 (Circuit 586-677-5285 IBZD 884316 MB). The updated MTTR is 12.4 hours. SBC Ameritech still does not meet the retail MTTR standard of 6.6 hours.

Cottrell/Lawson Supplemental Affidavit – Attachment B

**All Regions
Change Management Process Meeting
225 West Randolph, Room 1602, Chicago, Illinois
Thursday, April 3, 2003 ~ 9:30 AM – 1:45 PM CST**

Final Minutes

Welcome and Introductions

SBC opened the meeting by welcoming all participants to the Change Management Process (CMP) meeting. A list of attendees is included as Attachment 1 and the Agenda is included as Attachment 2 to these minutes.

Versioning Discussion (Reference Action Item #9 – 01/16/03 and CCR Numbers 02-007 and 03-010)

SBC distributed and reviewed the "SBC Versioning – Pre-Order and Ordering OSS Interface Talking Points" document, which is included as Attachment 3 to these minutes. The following is a summary of the discussion points:

- SBC reviewed the topics discussed at the previous versioning meeting.
- WorldCom stated that the fifth bullet regarding the establishment of business arrangements for data services should be expanded to include third party, third party vendors, and service bureau providers. SBC asked if there is a distinction between POTS vs. data services or network arrangements, and where a third party is different. AT&T stated that it is not a network arrangement but described it as a product ordering arrangement. There was discussion regarding the various scenarios such as different people ordering different products using different OCNs, or one company doing one sort of business or one segment of business acting on behalf of another company, or doing line-splitting internally across the EDI platform.
- There was discussion regarding SBC's proposed solution related to establishing business arrangements for data services/line splitting. SBC suggested that the third-party business arrangement used by some CLECs for line splitting would be most effectively addressed through an LSR-based agency agreement. An LSR solution would not require changes to versioning and is not impacted by the method used for versioning. All CLECs at the meeting agreed that the third-party issue should be addressed outside of the versioning arena. AT&T asked how long this solution would take to implement. SBC responded that it does not know because it has not gotten to the level of detail to make that determination. Based on the current release schedule, the earliest date for consideration would be the first quarter of 2004. SBC requested CLECs to submit feedback via the CMP mailbox on this proposal and provide information on other partnership/agency scenarios that exists in the CLEC community. CLECs agreed to provide information/feedback by April 17th.
 - ACTION ITEM:** CLECs will provide information on other partnership/agency scenarios that exists in the CLEC community by April 17th.
 - ACTION ITEM:** CLECs will send feedback on SBC's proposed solution related to establishing business arrangements for data services/line splitting by April 17th.
- NightFire raised a concern that it discussed at last month's CMP meeting regarding SBC's policy that on release weekend, it converts all pipeline orders in the retiring version to the next highest version, regardless of whether the CLEC is moving to that version or the version above the next highest. NightFire would like SBC to convert all the pipeline orders to the version as specified by the CLEC.
 - ACTION ITEM:** SBC will look into NightFire's request.
- CLECs commented that the remaining information provided in the document is the same as the proposals discussed at the last meeting. There was discussion that the number of versions SBC is now proposing to maintain is two, rather than the three from the previous discussion. CLECs stated that if SBC supports two versions, that would require CLECs to

update to a new version more frequently if SBC remains on four releases a year. ASI stated that it would like to see the Final Requirements earlier in the process if SBC moves to fewer versions. SBC stated that it would like some concession from CLECs to recoup its expenses if it is going to spend the necessary resources to change its current version strategy. ChoiceOne asked what the reason is for SBC having quarterly releases. WorldCom stated that CLECs may consider some movement if there were fewer releases, such as three instead of the current four releases a year. SBC responded that currently, the CMP guidelines state that SBC will not implement releases sooner than 90 days apart. Some of the drivers of having four releases a year are:

- Keeping up-to-date on the LSOG version – SBC is an active participant in the industry and it is SBC's desire to keep current
- Implementing enhancements requested by CLECs
- Implementing internal process improvements, such as flow-through
- Resolve workload issues in the service centers
- System level upgrade for vendor software, for example having to upgrade an operating environment

WorldCom stated that if SBC went to only three releases a year, it would occur every 120 days as opposed to the current 90-day cycle so there would only be a 30-day difference. TalkAmerica stated that it would give SBC more time to implement releases and it would help both SBC and CLECs by not having to change so often. SBC responded that it understands the points CLECs are making and that it is a good alternative from the CLECs' perspective. SBC stated that it would discuss this suggestion internally. WorldCom asked how long it would take to find out SBC's position on the suggestion of going with three releases because it would be helpful in its internal discussions around SBC's proposal of the versioning strategy.

ACTION ITEM: SBC will provide a response to CLECs on its position of moving to three releases a year by April 17th.

- TalkAmerica suggested that SBC eliminate dot releases all together and maintain two LSOG versions. SBC clarified that based on TalkAmerica's suggestion, that SBC would currently have version 3.00 and 5.00 and in June, it would have 5.00 and 6.00. SBC's current proposal is to maintain the two most recent versions, for example, version 5.02 and 5.03. The current proposal may include two LSOGs or two dots of an LSOG. WorldCom stated that SBC continues to make changes to old versions and that is not what was envisioned with the current versioning strategy. WorldCom stated that currently, CLECs have the ability to by-pass one upgrade, however, if the proposal is implemented, it would eliminate that option. DCA stated that having to flash cut may or may not be a problem depending on the size of a release. DCA stated that SBC should ensure that its internal groups understand the CLEC testing impacts with maintaining two versions. ChoiceOne stated that with the two version scenario, CLECs would be required to change every three to six months.
- There was discussion regarding the requirement that CLECs select a single EDI version, LEX GUI or FAX as a single option to receive loss notifications. SBC stated that the line loss notification is triggered by a request from the winning CLEC, but is independent of any LSR activity of the losing CLEC. SBC explained that CLECs advise SBC in what version they would like to receive their loss notifications and SBC updates an internal election table. The system goes to that table and sends the notification based on what each CLEC has selected. Currently, the line loss notification is based on the version that is determined by LASR using the company code table. AT&T reminded SBC that the CLEC profile process needs to be improved if the profile is to be used to determine how a CLEC receives its loss notifications.
- There was discussion regarding a concern raised by WorldCom at last month's meeting related to a third party/partner CLEC accidentally sending in an EDI order with the wrong (higher) version (see Action Item #2 – 3/20/03). The first order that is submitted to SBC would cause the tables to be automatically updated and that would require all subsequent orders to be sent in the higher version. WorldCom would like some sort of edit that would check a table and reject the order if the CLEC has not sent in a form. SBC responded that this automatic update of the version was implemented at the CLECs'

request. CLECs originally wanted to move to a different version without having to advise SBC. SBC stated that it could remove the automatic update feature if CLECs agreed. CLECs at the meeting agreed to have SBC remove the automatic version update process. WorldCom stated that it would submit a CCR requesting SBC to remove this automatic version update feature.

- SBC will add versioning discussion to the May CMP meeting agenda.

Flow-Through Discussion

Covad stated that it cannot determine if the IDSL product type is flow-through eligible using the Flow-Through and Exceptions matrices. The XDSL product types are defined in some of the regional matrices, but it is not in the other regional matrices. SBC responded that it thought the "X" referenced the different types of DSL products. Covad stated that in some regions, the flow-through types of DSL are listed.

ACTION ITEM: SBC will find out if the IDSL product types are flow-through capable and where it is documented.

Action Item Log

SBC distributed and reviewed the Action Item Log, which was updated and is included as Attachment 4 to these minutes. Discussion and updates are noted on the log. SBC stated that since the last meeting was only two weeks ago, it did not have the time to work on the majority of the action items. In addition, one of the CMP team members has been called for jury duty, so the action items assigned to that individual have not been worked.

CLEC Change Request Log

SBC stated that the person responsible for the CCR process has been called for jury duty so the review of the log will be postponed until the May meeting. The Pager & Phone Company discussed its new CCR regarding a modification to WEBLEX to allow batch suspend and restoral orders so CLECs can "upload" or submit a list of numbers to be typed with identical information from a pre-defined template with the only change being the telephone number and PON. The Pager & Phone Company said that this process would create and submit those orders via the WEBLEX process from that point. TalkAmerica presented a new CCR, which requests that a CLEC be allowed to reuse a TN that it has just disconnected. Currently this type of request has to be done manually. TalkAmerica stated that it is a timing issue that CLECs cannot get back an old TN. TalkAmerica said that the request is to have the ability to get back an existing TN because it cannot reserve that TN. Nor will the system allow them to send a request without a TN.

Change Request Prioritization Process

Birch stated that it thinks the actual process is working well.

Round Table Discussion

Retail Order with Hunting Does Not Flow Through (DMR Communications):

DMR Communications stated that if a UNE/P order REQTYP M has hunting on a SBC retail account, and it is migrating the customer without hunting, the order falls out in LEX and the CLEC is charged a semi mechanized rate. SBC responded that the flow through process examines the existing account structure and the LSR. DMR asked if this process could be changed. SBC responded that DMR should submit a CCR to be prioritized and analyzed for size and scope to determine whether this change request would be implemented.

TN Reservation Error on DID Number Block (TalkAmerica):

TalkAmerica expressed concern regarding a situation where a TN reservation was processed but later discovered that the TN was already in use. When TalkAmerica first raised this issue to find out how this could happen, TalkAmerica was advised by its OSS Support Management team that it was a human error. SBC clarified that all telephone numbers being used within the DID block needs to be recorded in the backend systems. In this situation, the particular TN was not recorded so it appeared as though that number was available. Since this was an isolated case, TalkAmerica's account manager agreed to verify that this was the actual

situation that caused the problem. Birch stated that it has been working with its operations team on a DID number block system issue occurring in the same COs. Navigator Telecommunications stated that it had a problem with DID blocks and had worked with its Account Manager to resolve. Navigator stated that it had created separate BANS for its DID blocks and this eliminated the problems.

Status of Conference Bridge Decision (WorldCom):

WorldCom asked the status of the conference bridge situation. SBC responded that it is still reviewing this situation and has not yet made a decision. SBC stated that the toll free conference bridge will be available until mid-year, so there is still time before having to make alternate plans. WorldCom expressed concern that having to pay for the calls will affect the process. Allegiance stated that individuals from the same company could bridge others on the line so it would pay for only one port/call. Forte Communications stated that at five cents a minute, \$3.00 per hour, that a call such as today's would cost under \$20.00 and it believes the cost is insignificant for the CLECs. SBC stated that the issue is whether SBC should bear the cost of all CLECs to call into the meetings or can each CLEC bear the cost for their participation. Easton Telecom raised the question whether providing a toll free conference bridge for these meetings was a compliance issue. SBC responded that it was not a compliance obligation to provide a toll free conference bridge. RCN commented that CLECs pay for the testing meetings with SBC. The Pager & Phone Company suggested that the agenda be divided in such a way that CLECs would know when to call into that portion of the meeting in which they are interested. SBC responded that it tries to arrange the agenda topics in order as much as possible. SBC stated that it would provide prior notice of its decision on this topic.

CMP Meeting Rotation Schedule (NightFire):

NightFire asked whether SBC was planning to hold the All Regions CMP and CUF meetings in California. SBC responded no, that it plans to hold the meetings only in Dallas and Chicago. Allegiance stated that there were so few people attending the meetings in person in California, that it was decided not to hold the meetings in California.

Submit Changes to Business Rules (Birch):

Birch asked how it would request a change to LSOR or the business rules. SBC responded that CLECs should submit a CCR.

Effectiveness of Change Management Process

Covad stated that the CCR process with Qwest is very well defined. Once a CCR is submitted to Qwest, it calls the CLEC to clarify the request and review what products are impacted. A project manager is assigned and within six days Qwest schedules a meeting with the originating CLEC. Covad stated that Qwest's new process has really made a difference. SBC responded that its process is similar. If there are any questions regarding the CCR, SBC contacts the originating CLEC for clarification. There is an internal change request written that is submitted to the LRB and to the appropriate subject matter expert for analysis. SBC's process acknowledges receipt of the CCR within 48 hours.

Future Meeting Logistics

The next meeting will be held on Thursday, May 8th beginning at 9:30 AM CST, at the same location.

Meeting adjourned at 1:45 PM.

Attachments from Change Management Process Meeting April 3, 2003

Attachment 1 – Attendees List



"04 03 AR CMP
Attendees.doc"

Attachment 2 – Final Agenda



"04 03 AR CMP Final
Agenda.doc"

Attachment 3 – SBC Versioning – Pre-Order and Ordering OSS Interface Talking Points



"Versioning
Discussion Points 4-3"

Attachment 4 – Action Item Log



"AR CMP Action Item
Log 04 04 03 Min.doc"

All Regions
Change Management Process Meeting
April 3, 2003 ~ 9:30 AM to 1:45 PM CST
225 West Randolph, Room 1602, Chicago, Illinois

Attendees List

Via Phon e	Attendee	CLEC or Company Name	Email Address	Phone
x	Almas, Bennie	NightFire	balmas@nightfire.com	510-500-1192
x	Baker, Sandy	SBC Communications		
	Berard, John	Covad Communications	jberard@covad.com	720-208-2109
x	Britton-Davis, Doug	Westel, Inc.	doug.britton@westel.net	512-480-5580
	Brooks, Tracey	TalkAmerica	tbrooks@talk.com	312-729-1283
x	Bryan, Janice	SBC Communications		
x	Carroll, Norene	Birch Telecom, Inc.	ncarroll@birch.com	816-300-7357
x	Coleman, Eon	Allegiance		
x	Connolly, Matt	Birch Telecom, Inc.	mconnolly@birch.com	816-300-1626
x	Corse, Ed	RCN	ed.corse@rcn.net	312-955-2492
x	DeDolph, Linda	SBC Communications		
x	Gause, Marsha	SBC Communications		
x	Hardy, Eva	SBC Communications		
x	Harless, Michelle	American Management Systems	michelle.harless@ams.com	303-215-3544
x	Hassan, Stacy	Birch Telecom, Inc.	shassan@birch.com	
x	Herrera, Elsa	SBC Communications		
x	Honigfort, Tom	SBC Communications		
	Horton, NaOra	SBC Communications		
x	Isaacs, Kim	Eschelon Telcom	kdisaacs@eschelon.com	612-436-6038
x	Johnson, Diana	NOS Communications, Inc.	djohnson@sitehelp.org	702-547-8816
x	Kendall, Roseann	WorldCom	roseann.kendall@wcom.com	972-656-1355
	King, Kathy	SBC Communications		
	Laughlin, Justin	Z-Tel Communications	jlaughlin@z-tel.com	813-233-4712
x	Le Doux, Kenrick	Navigator Telecommunications	ken@navtel.com	501-954-4024
x	Lee, David	DMR Communications	dave@dmrcom.net	

All Regions
Change Management Process Meeting
April 3, 2003 ~ 9:30 AM to 1:45 PM CST
225 West Randolph, Room 1602, Chicago, Illinois

Attendees List

Via Phone	Attendee	CLEC or Company Name	Email Address	Phone
x	Lee, Myra	ASI	mf4932@txmail.sbc.com	210-246-8226
x	Mastracchio, Eileen	SBC Communications		
	McAllister, Marianne	Allegiance Telecom, Inc	marianne.mcallister@allegiancetelecom.com	469-259-4437
x	McCluskey, James	Accenture	james.f.mccluskey@accenture.com	612-277-4632
x	McFarland, JD	SBC Communications		
x	McMillon, Terri	WorldCom	terri.mcmillon@wcom.com	972-729-5271
x	Mendoza, Lori	Allegiance Telecom	lori.mendoza@allegiancetelecom.com	425-888-8585
x	Micou, Bill	AT&T	bmicou@att.com	908-580-9511
x	Moore, Donna	SBC Communications		
x	Moore, Steve	Sprint Communications Company LP	steve.moore@mail.sprint.com	913-534-2730
	Norvell, Tom	DCA Services	tnorvell@dcaweb.net	312-980-5253
	Peterman, Linda	Choice One Communications	lpeterman@choiceonecom.com	616-988-7139
x	Poulton, Lois	Easton Telecom Services	lpoulton@eastontelecom.com	330-659-6700
x	Schmick, Dale	The Pager & Phone Company	dale@thepagerco.com	816-483-3301
x	Scipio, Michael	SBC Communications		
x	Smallwood, Linda	SBC Communications		
x	Smith, Kevin	Verizon Avenue	kevin.f.smith@verizon.com	703-375-4779
x	Steed, Debbie	Telcordia Technologies	dsteed@telcordia.com	573-885-3846
x	Taff, Steve	Allegiance	steve.taff@allegiancetelecom.com	469-259-2525
x	Tate, Linda	SBC Communications		
	Truhn, Janine	Talk America	jtruhn@talk.com	312-596-8033
x	Wagner, Mel	Birch Telecom, Inc.	mwagner@birch.com	816-300-3800

**All Regions
Change Management Process Meeting
April 3, 2003 ~ 9:30 AM to 1:45 PM CST
225 West Randolph, Room 1602, Chicago, Illinois**

Attendees List

Via Phon e	Attendee	CLEC or Company Name	Email Address	Phone
	Waterloo, Tom	Forte Communications	tomw@fortep hones.com	847-733-8907
	Webb, Pat	WorldCom	pat.a.webb@wcom.com	312-260-3547
x	Wierzbicki, Tess	SBC Communications		
x	Willard, Walt	AT&T	wwillard@att.com	415-333-7650
	Zink, Gail	Globalcom Inc. USA	gzink@global-com.com	312-893-0159

All Regions Change Management Meeting

Date: Thursday, April 3, 2003 ~ **Time:** 9:30 AM - 5:00 PM CST

Location: 225 West Randolph, Room 1602, Chicago, Illinois

Bridge No.: 800-215-4958 ~ **Access Code:** 925-823-5861#

Final Agenda

TOPIC
◆ Welcome and Introductions
◆ Versioning Discussion – 9:45 AM
◆ Flow-Through Discussion
◆ Action Item Log
◆ CLEC Change Request Log
◆ Change Request Prioritization Process
◆ Round Table Discussion
◆ Effectiveness of Change Management Process
◆ Future Meeting Logistics

April 3rd, 2003

SBC Versioning - Pre-Ordering and Ordering OSS Interface
Talking Points

At the end of 2002, SBC and CLECs discussed OSS versioning for the SBC interfaces of EDI Order and EDI/CORBA Pre-Order. CLECs presented SBC with several key items surrounding the current SBC versioning strategy. As discussed during those meetings, both parties were to have given this issue more thought and come prepared to further discuss in the first half of 2003. From previous discussions, SBC captured the following discussion topics:

- CLECs ability to be on more than one version simultaneously
 - Version by OCN/Company code or by Trading Partner ID
 - Version by Request Type and OCN
 - Version by Trading Partner ID, Request Type and OCN
 - Version by PON
- CLECs' desire for SBC to convert all CLEC data when moving to a new version
- CLECs' desire not to have to flash cut to a new version
- SBCs' desire to simplify the operating environment created by versioning
- CLECs' desire to establish Business Arrangements for Data Services

Note: As discussed previously, not all of the issues are compatible and some are actually in conflict with one another.

Based upon CLEC input, SBC believes that the issue referenced in bullet 5 above, has now become of primary importance. SBC does not believe, however, that this issue is best resolved within the context of a versioning discussion. In order to best address this concern, SBC would discuss an LSR based agency arrangement that would facilitate business partnerships between CLEC partners on the line splitting process. This solution would not require changes to versioning and is not impacted by versioning. It would utilize the OBF defined field LSP Authorization (LSPAUTH) on the LSR to denote which entity is placing the order and which entity is the account owner. The LSPAUTH field would contain the Company Code (CC) for the existing owner of the account. The Company Code field (CC) field would be populated with the Company Code of the entity originating the LSR. The LSPAUTH would be validated against SBC's records to ensure the value matched the CC on the current account. The billing would continue to be under the CC contained in the LSPAUTH field. Confirmations, Completions and Post to Bills would be returned to the originator of the request, or the OCN in the CC field.

Versioning Discussion Points

To the extent CLECs want versioning for other business related purposes, such as bullets 1-4 above, SBC has captured the following for discussion purposes.

- Versioning for EDI Ordering would be controlled at the PON level instead of the CC level. All activity related to a PON remains in the same version. All notifications would be returned in the same version as the originating PON, and

April 3rd, 2003

- supplemental orders must be in the same version as the original (unless the originating order is from a retired version.) PON has been selected because versioning by PON essentially relaxes the versioning logic while not diminishing the significance of the CC value within the LASR logic. Versioning by TPID on the other hand, would require replacement of the existing logic with a new controlling mechanism that LASR currently does not recognize and process today.
- SBC would maintain 2 versions of software. These 2 versions would be the most recent LSOR/LSPOR versions. Thus, the 2 versions may include 2 LSOGs or 2 Dots of a single LSOG, depending on what the most recent versions are.
 - CLECs would be able to use multiple versions simultaneously.
 - Provided the CLEC converts over a weekend when SBC is implementing an OSS release, SBC would convert active pipeline data in the retiring version to the version specified by the CLEC. CLECs would be required to notify SBC of their specified version at least **45** days prior to release weekend. In the event that SBC is not notified, all active pipeline orders in the retiring version would be converted to the lowest (or oldest) valid LSOR version that remains in production. Supplements for converted requests would be submitted in this new version.
 - CLECs would elect a single EDI version, the LEX GUI or FAX as a single option to receive Loss Notifications. It would be necessary for CLECs using EDI to update this option as versions retire.
 - For EDI Ordering, the version would be indicated by the GSID (GS03 data element). The version indicated by the GSID must match the version indicated in the RVER entry on the LSR. All orders within a GS envelope must be in the same version.
 - Changes to the TPID (ISA06 data element) would not be necessary between versions. As documented in the SBC Interconnection Procedures document, SBC would continue to support 3 TPID/IP/PORT combinations.

SBC would be allowed additional flexibility to add flow-through enhancements to prior/existing versions of software. SBC may, at its discretion, implement additional flow-through in prior versions to realize operational efficiencies in processing CLEC requests.

The CLEC testing window would remain unchanged. CLECs would be allowed access to the test environment for EDI ordering, EDI/CORBA Pre-Ordering and LEX GUI testing 37 days prior to an OSS LSOR/LSPOR release.

EDI and CORBA Pre-order already allow CLECs to be on multiple versions simultaneously. Supported versions for Pre-order would match supported versions for Order.

It should be noted that the following points apply to any versioning discussion.

- Applies to EDI Ordering, EDI Pre-Order, and CORBA Pre-Order only.
- The Pre-Ordering GUI (Verigate) would continue to not be versioned, and would always reflect the highest version of the Local Service Pre-Ordering Requirements (LSPOR).

Attachment 3

April 3rd, 2003

- The Ordering GUI (LEX) would continue to not be versioned, and would always reflect the highest version of the Local Service Ordering Requirements (LSOR).
- Since LEX would not be versioned, SBC would continue to perform conversions over release weekends, as is standard practice today.
- Manual Forms utilized by CLECs would follow the same guidelines as the GUIs. As such, they would not be versioned.
- After LSOR releases, all new LEX or Manual Forms requests would originate in the highest LSOR version.

If an agreement can be reached between SBC and the CLECs, SBC anticipates that 9-12 months would be required to develop a systems solution. This 9-12 month timeline is dependent upon when SBC can begin the project and would be weighed against other planning and CMP commitments. For illustration purposes, a potential rollout schedule follows.

April 3rd, 2003

TENTATIVE ROLLOUT SCHEDULE

Quarter 1:

06.01
06.00
05.03
05.02 - Retiring Version

Quarter 2:

06.02
06.01
06.00 – Retiring Version
05.03 - Retiring Version

Quarter 3:

06.03
06.02
06.01 - Retiring Version

Quarter 4:

07.00
06.03
06.02 - Retiring Version

Quarter 5:

07.01
07.00
06.03 - Retiring Version