

**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. 03-138
Southwestern Bell Communications Services,)	
Inc. for Provision of In-Region, InterLATA)	
Services in Michigan)	

**SUPPLEMENTAL JOINT REPLY 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:

1. My name is Mark J. Cottrell. I am Executive Director – Long Distance Compliance – Operations Support Systems (“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 respond to CLEC allegations in this proceeding regarding SBC’s Change Management Process (“CMP”) and other miscellaneous issues as well as to update the record with respect to certain OSS-related matters. While this reply affidavit may not address all the issues to which SBC Midwest takes exception, the following addresses those issues where CLECs provided adequate information in their allegations. The fact that we have not addressed every detail of all opponents’ declarations does not mean that SBC believes the other parties’ claims have merit.

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 Jan. 16, 2003) (“Cottrell Affidavit”).

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. 4, 2003) (“Cottrell/Lawson Reply Affidavit”).

CHANGE MANAGEMENT

DOCUMENTATION

4. MCI complains that while the CMP once “worked relatively effectively,” it is “now functioning ineffectively at best.” Declaration of Sherry Lichtenberg ¶ 74, attached to Comments of MCI, Application by SBC Communications Inc., et al., for Authorization to Provide In-Region, InterLATA Services in Michigan, WC Docket No. 03-138 (FCC filed July 2, 2003) (“Lichtenberg Decl.”). For support, MCI points to SBC’s three most recent releases, which MCI claims required multiple sets of documentation changes. Id. ¶ 75. Contrary to MCI’s complaint, however, SBC’s documentation changes are both envisioned by the CMP and are issued in compliance with CMP guidelines.
5. First, in conjunction with CMP, some documentation changes may occur in production releases during the implementation process for a new release. Thus, when the Initial Requirements and Final Requirements Accessible Letters (“AL”) ³ were issued for Local Service Ordering Requirements (“LSOR”) version 6.00, the same ALs provided information on required corresponding documentation changes for LSOR versions 5.02 and 5.03. Indeed, all production versions of SBC documentation may be impacted by changes implemented as part of a quarterly release. For example, when the change that allows CLECs to utilize the Local Service Provider Authorization (“LSPAUTH”) field on the Local Service Request (“LSR”) (to accommodate line splitting arrangements with other parties) takes effect, this enhancement will be implemented in all LSOR production versions – not just the most recent version – which will require SBC documentation changes to all active LSOR versions.

³ Accessible Letters are SBC’s method of notifying CLECs of changes to SBC’s documentation.

6. Second, documentation changes may result from CLEC walkthroughs conducted by SBC to review all proposed documentation updates. For all proposed changes to requirements and corresponding documentation changes, a walkthrough is conducted, followed by an AL delivered to CLECs outlining the results of the walkthrough, including additional CLEC-proposed updates and answers to CLEC questions. Thus, after the walkthroughs of the Initial and Final Requirements, and any other coding change described below, a subsequent AL (or more) containing updates to the documentation for all applicable versions is distributed as a result of issues raised at the walkthrough.
7. Third, documentation updates can also occur in LSOR versions already in production as a result of changes to fix defects. Whenever CLECs are notified of CLEC-impacting changes via an AL pursuant to the Change Management Communication Plan (“CMCP”), a walkthrough occurs and new documentation may be distributed.
8. Finally, changes to documentation may also be required for other reasons. For example, post-release documentation changes may be made as a result of CLEC testing, SBC implementation weekend testing, CLEC questions, CLEC production issues, and further documentation validation performed by SBC. These changes are provided to CLECs within a few weeks of release implementation. Moreover, as with any document, there may be typographical errors. When dealing with technical documentation, where a misplaced space or character may affect the success of an LSR, immediate correction of these errors is critical. All changes to LSOR/LSPOR documentation follow CMP guidelines, including CLEC walkthroughs of the proposed changes.
9. Although SBC has complied with the CMP in issuing documentation changes, SBC has taken, and continues to take, numerous steps to improve the quality of SBC

documentation. For example, in January 2003, SBC reorganized its OSS Design and Support business team to consolidate the development of business rules and the writing of internal business requirements within two distinct teams. SBC has also taken an additional step to ensure its documentation is accurate by dedicating additional resources to the review and preparation of its 13-state LSOR/Local Service Pre-Ordering Requirements (“LSPOR”) documentation. In addition to organizational changes, SBC designed a new template to be utilized in the development of business requirements. This template was completely revamped to ensure that all variables necessary for a change request to be implemented were cared for and specifically, to ensure that LSOR/LSPOR-related requirements were appropriately updated.

SYSTEM DEFECTS

10. In addition, MCI alleges that SBC releases are “beset with system defects,” and that the “sheer volume of defects and documentation flaws is so significant” that MCI avoids moving to the latest version, preventing it “from taking advantage of the latest functionality.” Lichtenberg Decl. ¶¶ 75, 77. MCI is incorrect on both counts.
11. Although MCI complains generally about the number of defects for the version 5.02, 5.03 and 6.00 releases, it vaguely cites only one purported defect for the version 5.02 release with a “significant CLEC impact.” Despite careful review of the Enhanced Defect Report (“EDR”), SBC was unable to identify any open defect matching MCI’s description.⁴ Notably, MCI’s operational staff communicates with SBC on a more or less daily basis and, since MCI migrated to 5.02 on May 5 and 5.03 on June 21, SBC has not

⁴ According to MCI, this purported defect results in an extra service order being generated for end users “who move but want to retain their phone number.” See Lichtenberg Decl. ¶ 76. Given that the EDR lists defects by number and version, MCI could easily have provided that information in connection with its allegation if, in fact, there was such a defect on the report.

received any reports from MCI of critical defects that would have affected MCI's ability to migrate to a higher version or that would have prevented MCI from placing orders.

Additionally, SBC met with MCI operational contacts on July 10, 2003 and, upon SBC's inquiry, MCI responded that there were no major issues or defects affecting its operations in the Midwest region.

12. The high overall quality of SBC Midwest's releases can easily be seen in the successful implementation of LSOR version 6.00, effective June 16, 2003. As discussed in the Cottrell Affidavit in the initial Michigan proceeding, LSRs are processed by LASR and SBC Midwest's other downstream systems in the exact same manner, regardless of whether the LSR was sent by the CLEC using LEX or EDI.⁵ Because LEX is not versioned, all LEX users move to the highest LSOR version (in this case, 6.00) on the Monday following the release weekend. Thus, the overall impact of any defects in the LSOR version 6.00 release is best quantified by looking at the volume of orders placed over LEX. For the three weeks following the June release (June 14 – July 5), more than 45,000 unique PONs⁶ were submitted via LEX and processed on version 6.00 in the Midwest region, while more than 161,000 unique PONs were submitted throughout SBC's 13-state region. Notably, the LEX volumes processed in the Midwest during the three week period both before June release (and therefore processed on version 5.03) and after the June release are almost identical. The fact that CLECs are able to submit this volume of requests for local service demonstrates first, that any defects in the release are

⁵ See Cottrell Affidavit ¶ 149 & n.57.

⁶ "Unique PONs" do not include subsequent iterations of the original LSR. This means that if an LSR has two associated supplemental ("supp.") LSRs (for example, because the original and the first supp. were rejected), this request is counted only once rather than three times.

not CLEC-impacting to any significant effect and, second, that no defects associated with the latest release should prevent a CLEC from moving to LSOR version 6.00.⁷

13. In fact, one CLEC migrated to version 6.00 the week of June 16, and by the end of June, it had submitted more than 17,000 LSRs in the Midwest region. The overall commercial volumes for EDI and LEX transactions (see Attachments A and B) also more than sufficiently demonstrate that release defects are not inhibiting or preventing CLECs from submitting LSRs on any of the three current versions in the SBC Midwest region.
14. The limited nature of the defects associated with the version 6.00 release is further demonstrated by a review of the defects themselves. As of July 11, the EDR reflected approximately 44 open defects for the LSOR 6.00 release potentially impacting the SBC Midwest region. Of these, a total of 11 were assigned SBC's highest impact ratings (6 pre-ordering defects and 4 ordering defects were assigned Severity Level 2; one ordering defect was assigned Severity Level 1).
15. Two of the six pre-ordering defects were cancelled as opened in error, and two have been fixed. These four are reflected as "Closed" on SBC's external defect report. Root cause analysis associated with the remaining two Level 2 pre-ordering defects has shown one defect to be a problem with a feature value and the other to impact the information for only a single address.

⁷ SBC's versioning model provides CLECs with a great deal of flexibility in determining if and when to move to a release version. Many CLECs avoid moving to a newer version as long as possible, in order to save the associated time and development costs – opting instead to limit coding activity only to those releases/versions that will be available for the longest time. In fact, it has become a common practice for many CLECs is to move off the retiring version to the most current version in production a few months prior to the older version's retirement, making it unlikely that these CLECs would migrate to another, newer release only a few months later.

16. The four Level 2 ordering defects involve unique conditions, with potential impact to only very small volumes of orders. For three of these defects, the Local Service Center (“LSC”) captures and corrects the error prior to returning the notification to the CLEC – meaning that there is little, if any, CLEC impact as a result of the defect. The fourth ordering defect involves SBC’s failure to reject orders for a feature that is not allowed. SBC’s release documentation correctly advises CLECs that this order type is not allowed, which further limits the potential for CLEC impact.
17. The one Severity 1 ordering defect impacts CLECs submitting UNE-P and resale orders on version 6.00, with a same day due date and no field work required. Instead of providing the same day due date, SBC’s systems instead are returning a FOC for the standard interval applied to orders that require fieldwork. CLECs reporting this problem are advised to send a supplemental LSR requesting a due date change. This defect was opened on June 23, 2003; SBC is currently working through root cause analysis in order to resolve this defect as quickly as possible.
18. Notably, 23 of the 44 LSOR version 6.00 defects reported as of July 11 have already been corrected, cancelled or targeted for a fix date.
19. In addressing these defects, SBC has followed its normal processes. The defects are ranked and prioritized by severity, so that the defects with the greatest CLEC impact (i.e., those directly impacting multiple CLECs, or a significant number of orders, or heavily impacting only one or a few CLECs) are resolved as quickly as possible. In this regard, SBC works with its CLEC partners to identify the critical defects. For example, if a CLEC ordered complex services in the Midwest region that virtually no other CLEC ordered mechanically, even if total volumes for that order type were low, SBC would

consider that any defects for that order type could seriously impact that particular CLEC. SBC works every day to ensure the proper prioritization is given to all customer requests and issues.⁸

20. As discussed in our supplemental affidavit (“Cottrell/Lawson Supp. Aff.”) (Supp. App. A, Tab 3), in April of this year SBC implemented a new Enhanced Defect Report in compliance with the requirements of the CMCP.⁹ 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 new 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. Thus, while the total number of reported defects has increased accordingly, this increase does not reflect any actual increase in the number of release defects.¹⁰
21. Rather, the CMCP enhancements, including the EDR and the new Exception Request Accessible Letter notification process have enabled CLECs to assess the impact of a defect on their respective processes and has led to more open discussion concerning

⁸ This is the same process utilized for resolving defects from the version 5.02 and 5.03 releases. The June 30, 2003 EDR contained a total of 155 open defects for all three current releases (5.02, 5.03 and 6.00) with a potential impact in the SBC Midwest region. Of these, 51 have been resolved; 22 are in “production validation” status following the July 17 maintenance release (*i.e.*, the fix has been applied, but SBC is awaiting confirmation from the reporting CLEC that its problem has been resolved); 18 are targets for implementation in the maintenance release scheduled for August 1, 2003; 2 were incorrectly identified on the EDR as impacting the Midwest region; and 9 were identified as documentation issues that should not have been included on the EDR. The remaining 53 defects continue to be analyzed by SBC to identify the root cause and resolution.

⁹ See Cottrell/Lawson Supp. Aff. ¶¶ 25-27.

¹⁰ MCI complains that SBC’s EDR does not include defects that do not impact CLECs or defects that have been resolved. MCI further alleges that “SBC suddenly removed” the resolved defects from its website. Lichtenberg Decl. ¶ 76. The EDR reflects only potentially CLEC-impacting defects in compliance with CMCP requirements. Further, contrary to MCI’s contention, resolved defects are indeed available on the EDR. While it was true that on the old “Defect Report,” closed defects were removed daily, the new CMP process requires that closed defects be retained on the “Closed” tab of the EDR for 90 days after closure, and SBC has been in compliance with this requirement since the EDR was initiated in April 2003.

proposed defect fixes and their potential impacts. This, together with the CMCP enhancements to the defect testing process, have contributed substantially to the lack of CLEC impact resulting from maintenance releases in May, June and July of this year.¹¹

CLEC CHANGE REQUESTS

22. MCI also complains that CLECs no longer have a “real opportunity” to make change requests and that SBC fails to implement CLEC change requests (“CCRs”) in a “reasonable time frame” and fails to inform CLECs in a timely manner on the status of their requests. Lichtenberg Decl. ¶ 79. MCI specifically complains that 14 CCRs, submitted in 2002, have not yet been approved or rejected by SBC. *Id.* ¶¶ 79-80. MCI mischaracterizes the situation.
23. SBC accepts, prioritizes, and weights CCRs for implementation purposes in accordance with CMP requirements. Status on CCRs is provided at each monthly CMP meeting. Moreover, contrary to MCI’s suggestion, the fact that a particular CCR may not be designated as “Approved” on the CMP log does not mean that the request is not being discussed or investigated. For example, although the CLEC-initiated change request for versioning does not have an “Approved” status on the CMP log, numerous meetings have been held with CLECs to discuss the details of request and various options for

¹¹ 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.

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.

See Cottrell/Lawson Supp. Aff. ¶¶ 31-33.

implementation. In fact, SBC presented a proposal on versioning in response to this CCR at the July CMP meeting.

24. Further, SBC has implemented a substantial number of CLEC-initiated change requests (approximately 180 since 1998), including 31 CCRs that were initiated by MCI.

Moreover, CLEC-initiated change requests are not the only changes that provide benefit to the CLECs, nor are CCRs the only venue available to CLECs for seeking changes to SBC's interfaces. For example:

- CLECs and SBC agreed in the CMP to keep current with Ordering and Billing Forum ("OBF") enhancements. CLECs participating in OBF may request industry-standard enhancements for new LSOG versions – like LSOR version 6.00 implemented by SBC in the June release.
- SBC is implementing flow-through enhancements pursuant to a 24-month plan agreed-upon with the CLECs through collaborative discussions in the CMP.¹² Although initiated by SBC, the change requests for flow through in connection with this plan are a direct result of CLEC input.
- Similarly, the Uniform and Enhanced POR release in April 2002 implemented a 13-state OSS platform with extensive collaboration and input from the CLECs.

25. The CCR log distributed for the July 10, 2003 CMP meeting shows 90 open CCRs, 37 of which were opened prior to 2003, and only three of which are still in "Pending" status.¹³

At the July CMP meeting, six CCRs were "Not Approved," four were "Closed,"¹⁴ and four were put into "Monitor" status because they were committed to a release. The remaining 20 CCRs opened prior to 2003 have been approved, but are not yet committed to a release.

¹² See Cottrell Affidavit ¶ 171.

¹³ Status indicators for the CCR log are as follows: "Approved" = A CR has been submitted by Change Management for prioritization to an open release; "Pending" = not yet identified as an OSS issue or an OSS issue that can be implemented; "Deferred" = requires more data or more time in order to properly evaluate; "Not Approved" = not an OSS issue or not an OSS issue that can be implemented; "Monitor" = CR has been committed for a specific release; and "Closed" = CR has been satisfied and was closed with the concurrence of the originating CLEC.

¹⁴ The four "Closed" CCRs were so disposed only after SBC received confirmation from the originating CLEC.

26. MCI complains about a CCR it submitted in November 2002 to permit ordering on Sunday, and alleges that SBC's "only response to date has been that it is still looking at this request to determine feasibility."¹⁵ Id. ¶ 80. MCI's allegations are flatly incorrect. SBC's records indicate that this request was submitted by MCI on February 14, 2003. CLECs were informed that this request was accepted at the May 8, 2003 CMP meeting, which was attended by two representatives of MCI. An SBC Change Request (CR 030476) was issued on June 10, 2003 to allow for Sunday order processing hours for Midwest and SNET. The scope of this effort is large and involves a minimum of 28 ordering and backend systems requirements. This CCR also will require funding identification to provide for additional maintenance support as well some coding changes. Requirements, a Work Request¹⁶ and a Business Case will be drafted during 2003. A target date for implementation will be identified as funding and coding impacts are analyzed. Thus, contrary to MCI's allegation, SBC's handling of this change request is a prime example of how the CMP effectively addresses CLEC change requests.
27. MCI also provides an example of a CCR that AT&T requested in January 2003 asking that SBC provide Daily Usage Feeds ("DUF") by state, and claims that, while the change request was accepted, SBC continues to delay implementation.¹⁷ Id. ¶¶ 81-82. MCI neglects to mention, however, that because this change to SBC's legacy systems will force every CLEC to modify its systems to accept the split DUF, it has been a very contentious issue within the CLEC community – with many smaller CLECs opposing the change due to limited resources. Because of the high level of disagreement over whether

¹⁵ Attachment C contains the CCR log history for this change request.

¹⁶ A "Work Request" is an SBC internal document used to initiate internal changes to SBC.

¹⁷ Attachment D contains the CCR log history for this change request.

to adopt this change, SBC requested via Accessible Letter, CLECAM03-015 (January 21, 2003) (Supp. App. H, Tab 1) that the CLEC community provide input on whether the requested change to the DUF should be implemented. The result of this input was 12 to 11 NOT to split the DUF by state. SBC ultimately reconsidered and decided to proceed with splitting DUF, despite the CLEC vote, as it would bring more consistency across the SBC regions.¹⁸ A Work Request was submitted on May 15, 2003 to apply for this change. The next possible release date available for a change with this scope is August 2004, although that date is not confirmed. It is important to note that this change will directly impact each CLEC that receives DUF today, and implementation any sooner may over-burden the CLEC community by forcing modifications to their systems in a shorter time frame. Although MCI complains about the delay, CLECs will require ample time to prepare.

28. In addition, MCI notes that in 2001 it submitted a CCR to view posted service orders throughout the 13 SBC states, and complains that this CCR was not scheduled for the September 27, 2003 release.¹⁹ Id. ¶ 83. In fact a change request that provides for the implementation of Posted Order Status in the West region, has been committed for the December 13, 2003 release. Implementing this CCR has been a major effort that required the deployment of new databases, structures and associated hardware in the West region. The Midwest region and SNET efforts are still being scoped, as this will again require the development and deployment of basic infrastructure such as databases and associated

¹⁸ This change will bring the Midwest region in line with the other regions in which SBC already sends DUF in state-specific files separated by appropriate headers and trailers; therefore it is a costly but welcome change from SBC's perspective.

¹⁹ Currently, only CLECs serving end users in the Southwest region are able to view posted service orders by using the Order Status Inquiry function in Verigate (the same functionality provided in the application-to-application pre-order interfaces). Attachment E contains the CCR log history for this change request.

hardware prior to the deployment of the Posted Order Status application itself. This scoping includes the funding and prioritization required for an effort as large as this project. Once these processes are complete, a target release date can be assigned.

29. MCI also raises issues with SBC's CLEC User Forum ("CUF") and complains that the CUF has numerous open issues, 11 of which were opened in 2002 or before. Id. ¶ 84. As of July 9, 2003, there are eight open issues from 2002 or before on the latest log. Broad issues are being addressed here that cannot be resolved in a few months time. This same log shows that nine issues were closed in 2002 and nine have already been closed in 2003.
30. Finally, MCI alleges that SBC "often simply dismisses [CCRs] as unimportant," and provides as an example the CCR requesting "unreject" capability in current LSOR versions.²⁰ Id. ¶ 87. MCI's allegation that SBC dismisses CCRs as unimportant is completely untrue, and it misrepresents the facts surrounding SBC's handling of the "unreject" CCR. In fact, SBC takes each and every CLEC-initiated change request very seriously and the example MCI holds out is a case in point. The CCR log indicates that this CCR was opened on June 11, 2002. SBC's preliminary analysis indicated this functionality would require major rework for SBC. SBC requested that this CCR be given "Deferred" status to be revisited in April 2003, because SBC was in the midst of preparing for the Business Rules POR implemented in March 2003. However, in November 2002, another CLEC raised this issue and SBC agreed to follow up on the request.

²⁰ This capability was provided in the SBC Midwest region for LSOR version 4.02.

31. Before the December 2002 meeting, SBC's change management team met with SMEs, but reported that the SBC SMEs needed additional time to determine the scope for this project and changed the status for this CCR to "Pending." As seen in the CCR log history for this CCR,²¹ this issue was discussed in CMP meetings in February, March, May, and June. During this time, the CMP team, as CLEC advocates, continued to raise the issue within SBC. In each meeting, SBC reported that this CCR would not be approved, yet CLECs requested that the team continue to bring back additional information and status. In the July 2003 CMP meeting, SBC officially closed the CCR as "Not Approved."
32. Although this CCR was not successfully approved and scheduled for implementation, that certainly does not mean that the CMP did not work. Indeed, this example is a perfect illustration of how the CMP process works. Specifically, SBC's handling of this CCR is an example of how, even though this CCR was put into "Pending" status, SBC reopened it at the request of the CLECs. It is also an example of how, even though the CCR was denied by SBC SMEs, the CMP team kept the CCR open and continued to try to satisfy CLEC requests.
33. Clearly, not all change requests – whether they are submitted by CLECs or by SBC can be implemented, perhaps due to costs, or to the scope being too large for the benefits provided, or there simply may not be the support required for approval. Even SBC change requests fall by the wayside for these reasons. But for each change request, SBC follows a proven process set forth in the CMP and tries to improve that process whenever possible. SBC does not "dismiss" CCRs as "unimportant" as alleged by MCI. To the

²¹ See Attachment F.

contrary, the very example that MCI provides demonstrates that SBC followed the process and continually worked the issue on behalf of the CLECs.

CLEC ISSUES

AT&T (911 AND LINE SPLITTING)

34. AT&T describes an incident where one of its line splitting end users called 911 and was notified that the address displayed at the answering point was not the correct address, but was the address of the central office serving the end user. Declaration of Sarah DeYoung ¶¶ 9-11, attached to Comments of AT&T Corp., Application by SBC Communications Inc., et al., for Authorization to Provide In-Region, InterLATA Services in Michigan, WC Docket No. 03-138 (FCC filed July 2, 2003) (“DeYoung Decl.”). 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 service orders created for the provisioning of ULS-ST ports.²² SBC Midwest’s LSC M&P have 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.
35. This error occurred only on service orders for line-splitting that were manually handled by the LSC. SBC Midwest’s systems were and are correctly programmed to populate the end user’s location as the service address on line-splitting orders that flowed through to provisioning without need of manual handling. Additionally, SBC Midwest has

²² 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.

confirmed that no other M&P for stand-alone switch port products require use of the central office location as the service address.

36. After being notified of the problem with this line, investigating the root cause and implementing the process change identified above, SBC Midwest undertook a review of the embedded base of ULS-ST ports in the Midwest region. Of approximately 250 such ports reflected in the ACIS database for the Midwest region, approximately 50 contained the central office rather than the end-user location as the service address. SBC Midwest issued service orders to correct the customer service records for these accounts to reflect the end-user's location as the service address. SBC Midwest also confirmed that the 911 database was updated through this service order process to reflect these same address corrections. This process, which also involved a complete review of LSR reports in order to make sure that no account was missed, was completed in early July.
37. AT&T and MCI complain that CLEC partners in a line splitting arrangement must use the same version of EDI when they submit requests for line splitting. DeYoung Decl. ¶ 23; Lichtenberg Decl. ¶ 51. AT&T further claims that although SBC "might be willing" to consider system changes to allow CLEC partners to use different version of EDI, SBC has not provided details of such changes in writing. Moreover, according to AT&T, SBC offers no current, workable process to accommodate line splitting partners. DeYoung Decl. ¶ 24.
38. As discussed in the Cottrell/Lawson Supplemental affidavit, and thoroughly explained in SBC's July 7 Ex Parte, the CLECs (including AT&T and MCI) have agreed in the CMP that third-party ordering would best be handled through an LSR-based agency arrangement, which will utilize the OBF-defined Local Service Provider Authorization

("LSPAUTH") field and the Company Code ("CC") field on the LSR to denote which entity is placing the order and which entity is the account owner. 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. 03-138 (July 7, 2003) ("July 7 Ex Parte"). Barring any unforeseen developments, SBC has committed to implement the LSR Agency process in the quarterly release currently scheduled for March 13, 2004.

39. The LSR agency process requires extensive logic changes. The CC field is currently used today for both the owner of the account and the party submitting the request. After the change, if the LSPAUTH field is populated, all of the validations relating to the owner of the account need to use the LSPAUTH value and not that of the CC field. These changes need to be made in multiple applications across the four SBC regions.
40. In order to comply with all Change Management requirements, all release requirements for the quarterly release scheduled for March 13, 2004 must be completed by the end of July 2003, with final business requirements and a prioritized list of enhancements forwarded to SBC's Information Technology ("IT") organization by the middle of August. Systems design work to implement the release will be conducted by IT until the end of September. Based on that work, initial requirements will be distributed to the CLECs no later than October 13, 2003, with final requirements due no later than November 24, 2003. See CMP § 3.3 and subsections (Attachment N to the Cottrell Affidavit). Internal code development will continue until the end of December, at which time internal testing will begin. The code then will be released for CLEC testing in early February, at least 37 days prior to implementation. See CMP § 3.3.7.

TDS Metrocom

41. TDS Metrocom alleges that SBC's test environment "differs substantially" from its production environment and problems that do not appear during testing are experienced in the production environment when exactly the same ordering information is entered into the system. Affidavit of Rod Cox ¶ 34, attached to Comments of TDS Metrocom, Application by SBC Communications Inc., et al., for Authorization to Provide In-Region, InterLATA Services in Michigan, WC Docket No. 03-138 (FCC filed July 2, 2003) ("Cox Aff."). TDS Metrocom brought two issues to SBC's attention related to experiencing rejects when it moved to production on LSOR version 5.03 that it did not receive in the test environment. Upon investigation, SBC discovered that the LSC representative for the CLEC test environment failed to recognize that TDS Metrocom's LSRs should have been rejected. SBC has reinforced with the LSC representatives that the same tools, guides, and checks used in production also need to be used for CLEC testing.
42. TDS Metrocom complains about a cross boundary issue, where its customers reside in South Beloit, Illinois, but the central office serving these customers is located in Wisconsin. Cox Aff. ¶ 34. Because of the conflict between the Wisconsin central office circuit ID (or ECCKT) and the end user's Illinois location, SBC's systems were rejecting TDS Metrocom's orders for South Beloit.²³ SBC has addressed this issue by arranging for these orders to drop to the LSC for manual handling. Currently, TDS Metrocom must change the Wisconsin ECCKT for south Beloit end users to reflect an Illinois ending.

²³ This issue first appeared in April 2002 and SBC developed a work around for LSOR version 4.02. When TDS Metrocom migrated to LSOR version 5.03, the same problem reappeared and SBC developed a workaround for LSOR version 5.03.

This causes the LSR to drop to manual where the LSC corrects the circuit ID and the orders are provisioned appropriately. SBC is in the process of implementing a change so that TDS Metrocom will no longer be required to alter the circuit ID on these LSRs.

NALA

43. The National ALEC Association/Prepaid Communications Association (“NALA”) has complained that SBC’s imposition of a flat-rate monthly charge for OSS access in the Southwest region is inappropriate, and that SBC could assess a similar flat-rate charge in other states, including Michigan. Comments of National ALEC Association/Prepaid Communications Association, Application by SBC Communications Inc., et al., for Authorization to Provide In-Region, InterLATA Services in Michigan, WC Docket No. 03-138, at 7-8 (FCC filed July 2, 2003) (“NALA Comments”). NALA’s concerns are unfounded. First, access to OSS charges were approved as part of cost proceedings by the state public utility commissions in Texas, Missouri, Oklahoma, Kansas and Arkansas, and subsequently were incorporated into CLEC ICA agreements for those states. These charges were waived for 36 months as part of the SBC/Ameritech merger conditions, and were reinstated appropriately. However, in the Midwest region, the state commissions have not approved discrete rate elements for access to OSS. Accordingly, contrary to NALA’s assertions, SBC could not simply “assess” a separate charge for OSS access in any of the Midwest states. Should SBC seek the establishment of a separate rate for OSS access in the future, those efforts would be subject to normal procedures, including negotiations between the parties, cost docket proceeding before the appropriate state commissions, etc.

UPDATES

44. Although the following issues were not expressly raised by CLECs in their supplemental comments, SBC Midwest is providing these updates to the record:

POST TO BILL UPDATE

45. As discussed in the Cottrell/Lawson Supplemental Affidavit, ¶ 48, SBC provided CLECs in the Midwest region with Accessible Letter CLECAM03-028 (Apr. 7, 2003) (Supp. App. J, Tab 4), advising of two circumstances (discovered on March 26, 2003) that resulted in a failure to timely deliver Post to Bill (“PTB”) notifications.
46. As set out in that Accessible Letter, SBC implemented additional manual verification procedures designed to ensure that file transfer failures, such as the failure that occurred on January 28, 2003, were identified and corrected in a timely manner. Pursuant to this process, the team responsible for the applications that created the input file would send an e-mail notification to key team members responsible for the receiving application when the file had been transferred. Once the file was processed, an e-mail notification was sent to the originating application team members with a count of the total number of records processed. This record count was then compared to the original count for the input file to ensure that all records were processed. Any glitches or discrepancies could be investigated immediately, since all parties were manually monitoring the process.
47. As noted in the Accessible letter, this manual process was put in place pending enhancements to SBC Midwest’s automated monitoring process. Mechanized verification steps, designed to ensure the proper hand-off and receipt of the file, as well as the sequential processing of each file, have since been developed and implemented.

Specifically, automated “cycle counters” are associated with each input file. Each time a new iteration of the input file is created, the cycle counter is increased by one. Additional edits have been added to the application that processes these input files to require that files be processed in sequential order. If the application receives a file with a different cycle counter than the one it expects, processing halts and application support personnel are automatically paged by the Operating System (this paging occurs without human intervention). The “out of sequence” condition must be resolved before processing can continue, thus acting to ensure that input files are not missed.

48. The Cottrell/Lawson Supplemental Affidavit also provided information on a PTB failure that occurred May 14-22, 2003, as described in Accessible Letter CLECAM03-041 (June 5, 2003) (Supp. App. J, Tab 6). Id. ¶¶ 50-51. As noted in the letter, the problem occurred because not all the programming for a software patch implemented during the May 14 maintenance release was properly documented. Following this incident, the need for ensuring complete and accurate release documentation was re-emphasized to all employees involved in the implementation of this particular software patch, as well as all employees performing similar tasks.
49. The programming in this case was not properly documented because a change was agreed to on a verbal basis, and the procedures that require all code fixes to be documented in the System Requirements of the application were not followed. SBC is committed to maintaining complete and accurate System Specifications for its applications, to make sure that all aspects of a programming change are fully tested and evaluated for potential impacts to the CLECs and to SBC. Subsequent to this incident Industry Markets and IT personnel were made aware that processes had not been followed and that, as a result of

that failure, PTB notifications were not provided to CLECs. The procedure and its importance were re-emphasized to team members at all levels. The IT teams were reminded that they must declare all changes; ensure that the documentation reflects all changes that are being made; ensure that the System Testing team is aware of all changes as they plan and execute their test conditions; and ensure that potential CLEC impact is properly evaluated. The Industry Markets team was reminded that all changes must be documented in Business Requirements and must be fully evaluated before acceptance.

50. In order to further ensure proper PTB delivery to the CLECs, a manual daily report of the total data records processed has also been implemented. This report provides a cumulative view of the daily results from processing the records, including the number of PTB notifications sent and the number of requests that are waiting for additional service order completions before the PTB can be generated. This report is distributed daily to key members of the IT and Industry Markets teams, including the IT Executive Director responsible for the Notifications process. Each person is responsible for reviewing the report daily to identify any discrepancies, enabling identification and resolution of anomalies without delay.

MECHANIZED NOTIFICATIONS FOR ERRONEOUS COMPLETIONS

51. The implementation of a mechanized notification for erroneous completions would be worked through the CMP. Based on a review of CMP records, no CLEC has requested the implementation of such a mechanized notice. SBC has not investigated a different process, but a mechanized process potentially could be developed subject to CMP guidelines.

52. Notably, the volume of erroneous completions is small. As discussed in the Justin W. Brown Reply affidavit, during the 5 month period from September 2002 through January 2003, LSC records indicate only 111 instances of erroneous completions for all CLECs in all 5 SBC Midwest states. See Reply Affidavit of Justin W. Brown, attached to Reply Comments of SBC Communications, Application by SBC Communications Inc., et al., for Authorization to Provide In-Region, InterLATA Services in Michigan, WC Docket No. 03-16 (FCC filed Mar. 4, 2003) (Reply App., Tab 2).

PRE-ORDER INTERFACE OUTAGES

53. In its March 17, 2003 Ex Parte, SBC responded to an AT&T complaint related to CORBA outages. 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 (Mar. 17, 2003) (“March 17, 2003 Ex Parte”). Specifically AT&T claimed that it coded its side of the CORBA interface using the Interface Definition Language (“IDL”) promulgated by SBC for version 5.02 of that interface and that SBC assured AT&T that (with one exception related to the CSI Summary) the published IDL for version 5.03 was identical to those for version 5.02. See Joint Reply Declaration of Sarah DeYoung and Walter W. Willard ¶ 45, attached to Reply Comments of AT&T Corp., Application by SBC Communications Inc., et al., for Authorization to Provide In-Region, InterLATA Services in Michigan, WC Docket No. 03-16 (FCC filed Mar. 4, 2003). AT&T claimed that when it compared the two versions, however, it found numerous differences, and that these “unannounced [] changes” resulted in AT&T experiencing “marshalling errors” that lead to “more than 18 minutes of CORBA pre-order outages for AT&T each day.” Id.

¶ 48. In wrongly asserting that SBC is responsible for AT&T's outages, AT&T has distorted the facts.

54. In its ex parte, SBC explained that it had made no changes to the IDL specifications on its website and therefore AT&T's claim that "unannounced" SBC changes as the cause of AT&T's CORBA outages was not correct. See March 17, 2003 Ex Parte. Rather, any problems encountered as a result of the CORBA IDL resulted from AT&T using the wrong IDL specifications.
55. Since the March 17, 2003 Ex Parte was filed, SBC had determined that the IDL AT&T claimed to have been using was a pre-production version of 5.00 IDL that only was on the SBC website from December 13, 2001 until December 28, 2001. Internal SBC testing identified problems with that early version, and a corrected IDL was provided in an Accessible Letter (CLECALLS01-027), dated December 20, 2001 (App. K, Tab 7). After a December 27, 2001 CLEC walk through, the corrected IDL replaced the faulty version on the SBC website. This IDL was for version 5.00 of the CORBA pre-order interface, which notably did not go into production until April 2002. There were no changes required for version 5.01 or 5.02, and the only change for version 5.03 was the addition of the CSI summary function (also mentioned in the March 17, 2003 Ex Parte). Thus, the IDL version that was posted on SBC's website on December 28, 2001 will still work correctly today.
56. If indeed SBC had made a change, as AT&T alleges, it would have affected every CORBA Pre-order user. Because no CLEC other than AT&T has complained of a similar problem, it is clear that the issues raised by AT&T were not caused by SBC.

57. AT&T began testing CORBA version 5.02 in October 2002 and went into production in December 2002. Had AT&T used the IDL that was posted on the SBC website anytime after December 28, 2001 (nearly one year before it went into production on CORBA version 5.02), this problem would not have occurred.
58. The EDI pre-order issues raised by MCI were not necessarily caused by MCI. SBC noted in the March 17, 2003 Ex Parte that EDI pre-order time-outs and slow response times occurred on four days at approximately the same time of day. SBC discovered that one CLEC (not MCI) was improperly populating an entry in the wrong field, which caused the system to pull entire CSIs for every TN inquiry rather than basic information. This, in turn, caused the system slow down and once that CLEC was advised of its mistake and made appropriate adjustments to its process, no additional problems were detected. There were at least two additional issues discussed in this ex parte, and in one incident, SBC reconfigured its firewall, eliminating the problem. In the last issue, no problem was detected.
59. SBC records outage time for its interfaces, which then figure into the calculation of the performance measures.

WORKING SERVICE IN CONFLICT (“WSC”)

60. The Cottrell/Lawson Supplemental Affidavit confirmed that a mechanized jeopardy for WSC (scheduled for implementation in September), will be deployed for use in all 13 SBC states. Pending that implementation, the manual WSC notification process implemented in response to CLEC requests and in accordance with CUF guidelines, remains in effect.

61. Direct contact with the end users is necessary to resolve a WSC and, while CLECs may have suggested that SBC could contact the end-user on behalf of the CLEC for that purpose, there are numerous difficulties involved in implementing such a process. In addition to the practical difficulties described in SBC's March 17 Ex Parte,²⁴ interconnection agreements provide that "each Party will refer all questions regarding the other Party's services or products directly to the other Party at a telephone number specified by that Party." See, e.g., SBC 13-State Generic Interconnection Agreement, General Terms and Conditions, § 38.1 (App. B, Tab 11). Questions required to resolve a WSC (i.e., whether the service requested by the end-user is intended as an additional line), constitute questions regarding "the other Party's services or products" as described in this contract language.
62. Nor would contacting the end-user to resolve a WSC be equivalent to an end-user contact for maintenance and repair purposes. Resolution of a WSC is part of the ordering process. Any contact between SBC and the CLEC's end-user would occur before the transactions necessary to convert the end-user to the CLEC has occurred in SBC's systems. By contrast, maintenance and repair contacts by SBC service personnel occur only after the end user has been converted to service provided by the CLEC, and then only after express authorization by the CLEC via the trouble ticket request for repair.

CONCLUSION

63. 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

²⁴ See March 17, 2003 Ex Parte, Attachment A at 8-9.


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.

64. This concludes our affidavit.

STATE OF ILLINOIS)
)
COUNTY OF COOK)

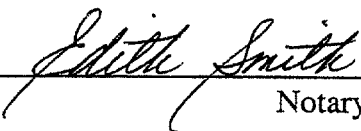
I declare under penalty of perjury that the foregoing is true and correct. Executed on

July 18, 2003.
(date)



MARK J. COTTRELL

Subscribed and sworn to before me this 18 day of July, 2003.



Notary Public

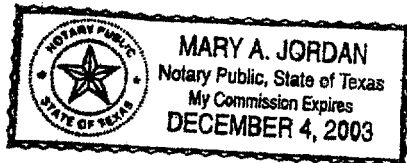


STATE OF TEXAS)
)
COUNTY OF DALLAS)

I declare under penalty of perjury that the foregoing is true and correct. Executed on
July 18, 2003
(date)

Beth Lawson
Beth Lawson

Subscribed and sworn to before me this 18 day of July, 2003.



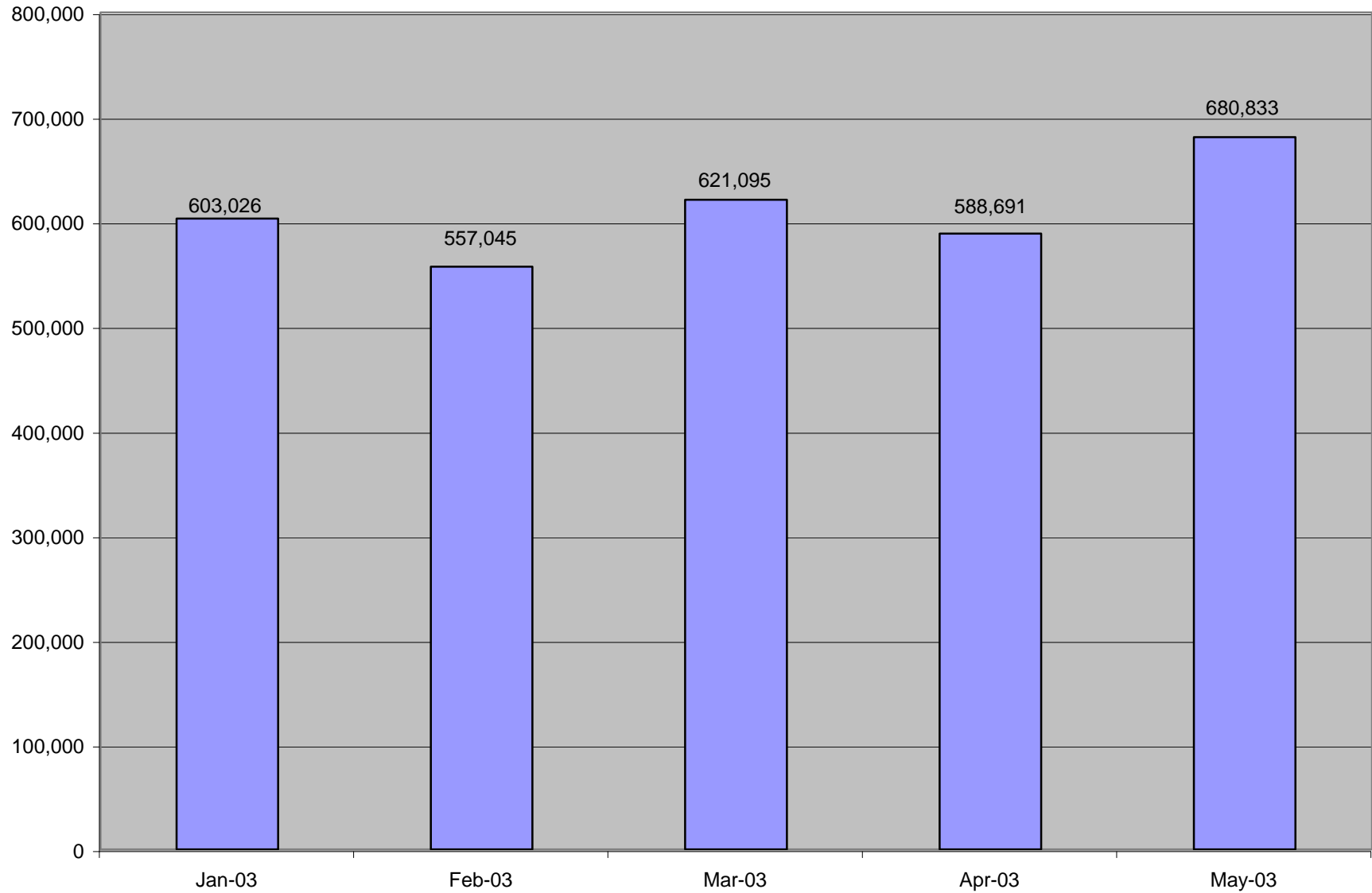
Mary A. Jordan
Notary Public

Cottrell/Lawson Supplemental Reply Affidavit – Attachment A

Midwest - EDI
Competitive Local Exchange Carrier (CLEC)
Service Order Activity

<u>Month-Year</u>	<u>Total</u>
Jan-03	603,026
Feb-03	557,045
Mar-03	621,095
Apr-03	588,691
May-03	680,833
Cumulative Total Jan 03 thru May 03	3,050,690

Midwest - EDI
Competitive Local Exchange Carrier (CLEC)
Service Order Activity

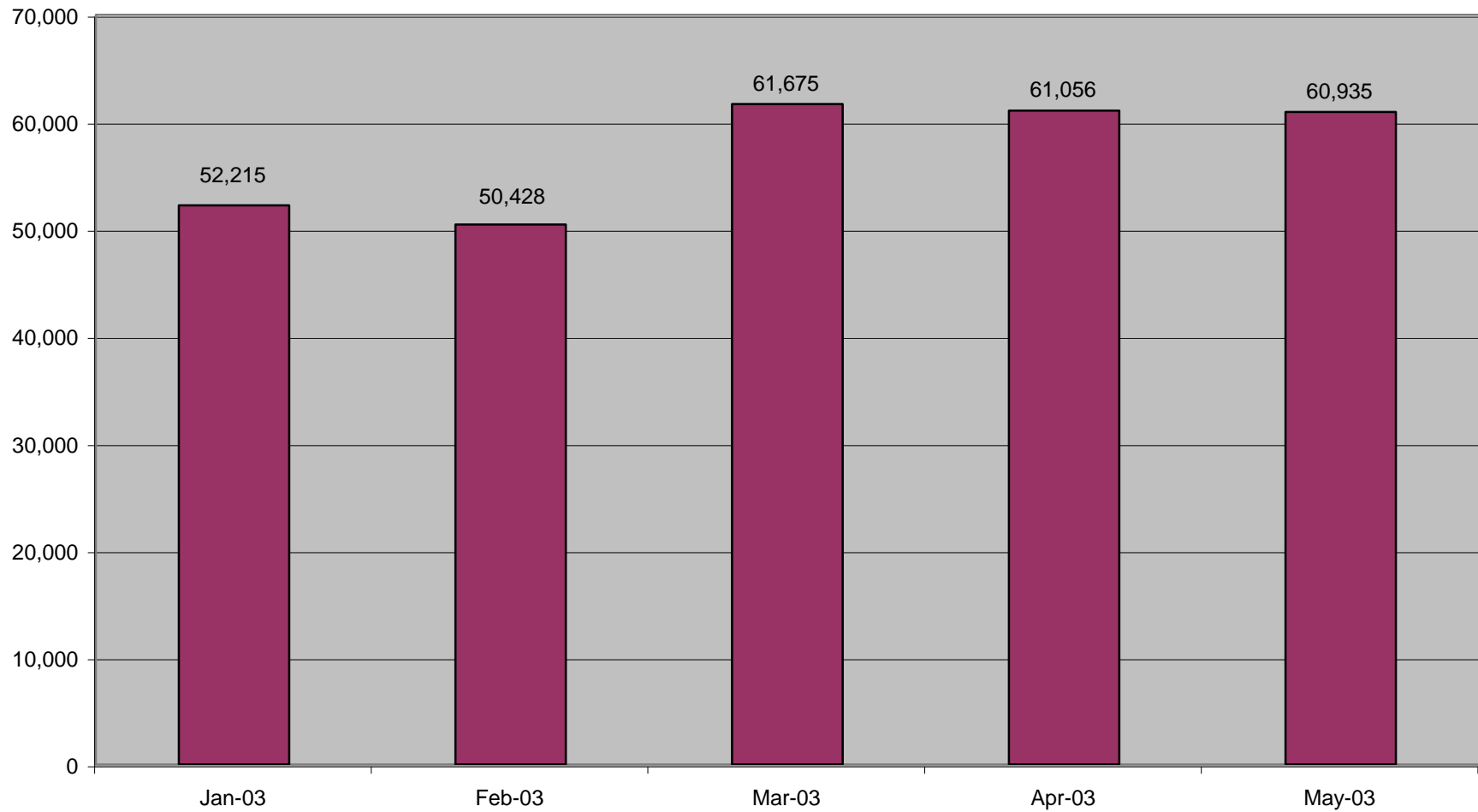


Cottrell/Lawson Supplemental Reply Affidavit – Attachment B

Midwest - LEX
Competitive Local Exchange Carrier (CLEC)
Service Order Activity

<u>Month/Year</u>	<u>Total</u>
Jan-03	52,215
Feb-03	50,428
Mar-03	61,675
Apr-03	61,056
May-03	60,935
Cumulative Total Jan 03 thru May 03	286,309

Midwest - LEX
Competitive Local Exchange Carrier (CLEC)
Service Order Activity



Cottrell/Lawson Supplemental Reply Affidavit – Attachment C

CCR History for Sunday Hours

CCR Tracking Number	Originating CLEC (Region)	CLEC Primary Contact Name	Interface Affecting	Status	Date Received
CCR 03-006 CR030476 (12/11/04)	WCOM	Terri McMillon	Ordering (EDI, LEX) All Regions	Pending Review in 7/2003	2/14/03

		M-F	Saturday	Sunday
EDI Ordering Gateway ^{3,6}	AIT, SWBT, PB/NB, SNET	00:00 - 01:00 05:00 - 23:59	00:00 - 01:00 05:00 - 23:59	00:00 - 01:00 05:00 - 23:59

SBC Order Processing Hours

³ AIT Order Processing hours are: M-F 06:00 - 23:00, Sat 07:00 - 19:00 CT, Sun none

SWBT Order Processing hours are: M-F 06:00 - 23:59, Sat 06:00 - 23:30, Sun 10:00 - 23:30 CT

PB/NB Order Processing hours are: M-F 06:00 - 23:00, Sat 06:00 - 19:00, Sun 10:00 - 18:00 PT

SNET Order Processing hours are: Mon - Sat 06:00 - 22:00 ET. Sun - None.

Hours of Operation for Ordering in Gray

Down time is in Blue

	SBC-West (PacBell)	SBC-Southwest (SWBT)	SBC-Midwest (AIT)	SNET
	Pacific	Central	Central	Eastern
Saturday	21:00	23:00*	23:00	0:00
Saturday	22:00	0:00	0:00	1:00
Saturday	23:00	1:00	1:00	2:00
Saturday	0:00	2:00	2:00	3:00
Saturday	1:00	3:00	3:00	4:00
Saturday	2:00	4:00	4:00	5:00
Saturday	3:00	5:00	5:00	6:00
Saturday	4:00	6:00	6:00	7:00

CCR History for Sunday Hours

CCR Tracking Number	Originating CLEC (Region)	CLEC Primary Contact Name	Interface Affecting	Status	Date Received
CCR 03-006 CR030476 (12/11/04)	WCOM	Terri McMillon	Ordering (EDI, LEX) All Regions	Pending Review in 7/2003	2/14/03

Saturday	5:00	7:00	7:00	8:00
Saturday	6:00	8:00	8:00	9:00
Saturday	7:00	9:00	9:00	10:00
Saturday	8:00	10:00	10:00	11:00
Saturday	9:00	11:00	11:00	12:00
Saturday	10:00	12:00	12:00	13:00
Saturday	11:00	13:00	13:00	14:00
Saturday	12:00	14:00	14:00	15:00
Saturday	13:00	15:00	15:00	16:00
Saturday	14:00	16:00	16:00	17:00
Saturday	15:00	17:00	17:00	18:00
Saturday	16:00	18:00	18:00	19:00
Saturday	17:00	19:00	19:00	20:00
Saturday	18:00	20:00	20:00	21:00
Saturday	19:00	21:00	21:00	22:00
Saturday	20:00	22:00	22:00	23:00
Sunday	21:00	23:00*	23:00	0:00
Sunday	22:00	0:00	0:00	1:00
Sunday	23:00	1:00	1:00	2:00
Sunday	0:00	2:00	2:00	3:00
Sunday	1:00	3:00	3:00	4:00
Sunday	2:00	4:00	4:00	5:00
Sunday	3:00	5:00	5:00	6:00
Sunday	4:00	6:00	6:00	7:00
Sunday	5:00	7:00	7:00	8:00
Sunday	6:00	8:00	8:00	9:00

CCR History for Sunday Hours

CCR Tracking Number	Originating CLEC (Region)	CLEC Primary Contact Name	Interface Affecting	Status	Date Received
CCR 03-006 CR030476 (12/11/04)	WCOM	Terri McMillon	Ordering (EDI, LEX) All Regions	Pending Review in 7/2003	2/14/03

Sunday	7:00	9:00	9:00	10:00
Sunday	8:00	10:00	10:00	11:00
Sunday	9:00	11:00	11:00	12:00
Sunday	10:00	12:00	12:00	13:00
Sunday	11:00	13:00	13:00	14:00
Sunday	12:00	14:00	14:00	15:00
Sunday	13:00	15:00	15:00	16:00
Sunday	14:00	16:00	16:00	17:00
Sunday	15:00	17:00	17:00	18:00
Sunday	16:00	18:00	18:00	19:00
Sunday	17:00	19:00	19:00	20:00
Sunday	18:00	20:00	20:00	21:00
Sunday	19:00	21:00	21:00	22:00
Sunday	20:00	22:00	22:00	23:00
Sunday	21:00	23:00*	23:00	0:00
Monday - Friday	22:00	0:00	0:00	1:00
Monday - Friday	23:00	1:00	1:00	2:00
Monday - Friday	0:00	2:00	2:00	3:00
Monday - Friday	1:00	3:00	3:00	4:00
Monday - Friday	2:00	4:00	4:00	5:00
Monday - Friday	3:00	5:00	5:00	6:00
Monday - Friday	4:00	6:00	6:00	7:00
Monday - Friday	5:00	7:00	7:00	8:00
Monday - Friday	6:00	8:00	8:00	9:00
Monday - Friday	7:00	9:00	9:00	10:00

CCR History for Sunday Hours

CCR Tracking Number	Originating CLEC (Region)	CLEC Primary Contact Name	Interface Affecting	Status	Date Received
CCR 03-006 CR030476 (12/11/04)	WCOM	Terri McMillon	Ordering (EDI, LEX) All Regions	Pending Review in 7/2003	2/14/03

Monday - Friday	8:00	10:00	10:00	11:00
Monday - Friday	9:00	11:00	11:00	12:00
Monday - Friday	10:00	12:00	12:00	13:00
Monday - Friday	11:00	13:00	13:00	14:00
Monday - Friday	12:00	14:00	14:00	15:00
Monday - Friday	13:00	15:00	15:00	16:00
Monday - Friday	14:00	16:00	16:00	17:00
Monday - Friday	15:00	17:00	17:00	18:00
Monday - Friday	16:00	18:00	18:00	19:00
Monday - Friday	17:00	19:00	19:00	20:00
Monday - Friday	18:00	20:00	20:00	21:00
Monday - Friday	19:00	21:00	21:00	22:00
Monday - Friday	20:00	22:00	22:00	23:00
Saturday	21:00	23:00	23:00	0:00

CLEC Verbatim Description: WCOM is requesting that SBC expand the ordering hours of availability in the West, Midwest and Connecticut regions to mirror the Southwest region ordering hours of availability. As you can see from the attached spreadsheet, hours vary, especially in the Midwest region where no ordering hours even exist on Sunday. This lack of consistency can cause system issues for CLECs doing business across the entire SBC footprint, which in turn will affect SBCs ordering systems and Local Service Centers.

SBC Response:
7/3/03 – Change Management has learned from the SME that CR030476 has been opened to satisfy this request and has a requested implementation date of 12/11/04. The business case is in progress and will provide hours of operation in both the Midwest and SNET regions on Sunday of 10:00 a.m. to 6:00 p.m. local time in each region. The SME agreed to join the next CMP call where he had additional information, but this is all he has at this time.

6/5/03 – The originator asked if the SME had already started the business case for this request. Change Management replied that he had, but did not know any further status. The originator would have preferred to have the SME on the call to talk about this request, so Change Management will ask him to join for the July call.

CCR History for Sunday Hours

CCR Tracking Number	Originating CLEC (Region)	CLEC Primary Contact Name	Interface Affecting	Status	Date Received
CCR 03-006 CR030476 (12/11/04)	WCOM	Terri McMillon	Ordering (EDI, LEX) All Regions	Pending Review in 7/2003	2/14/03
<p>5/15/03 – The SBC SME reported that he had investigated primarily the Sunday hours in the Midwest Region, but was looking at consistency over all regions. The hours in the Midwest region are doable, but costly. He will have to write a Business Case to gain approval for the funding and he is moving forward with that. The expected implementation date will be some time next year. He also mentioned that currently Saturday volumes are very low.</p>					
<p>5/2/03 – Change Management will provide status on this request at the May 8th meeting.</p>					
<p>2/20/03 – New CCR added to log.</p>					

Cottrell/Lawson Supplemental Reply Affidavit – Attachment D

CCR History for DUF Separation by State

CCR Tracking Number	Originating CLEC (Region)	CLEC Primary Contact Name	Interface Affecting	Status	Date Received
CCR 03-035	AT&T Midwest Region	Shannie Marin		Approved Review in 7/2003	11/8/02 Transferred from CUF on 5/1/03
<p>CLEC Verbatim Description: Ameritech system is not capable of separating the daily usage file by state and instead sends 1 file for all five states. AT&T is concerned that as customer volumes continue to grow the file will increase and processing errors will occur.</p> <p>CLEC Comments/Action Taken/Status/Resolution: AT&T has discussed with the account team since 7/01 and addressed during a CLEC June 2002 CLEC forum where Ameritech requested the issue be sent in on a form to the forum.</p> <p>CLEC Description of Extent of Impact on Business & CLEC Community: As customer volumes grow for CLECs processing problems may occur due to extremely large files for daily usage.</p>					
SBC Response:					
<p>7/3/03 – Change Management spoke with the SME and his team lead about their participation in the July meeting. Even though the timeframe given in the May meeting was not a satisfactory one for the CLECs, neither the SME nor his team lead has the power to change that. The date given is based on budgets and limited IT resources to do the necessary programming. Change Management will escalate this request if the originator wants it escalated, but all CLECs must realize that the IT resources are the same ones working on other requests by CLECs. As to the format or structure of the existing DUF file, SBC considers that to be proprietary information and so will neither confirm nor deny what one CLEC reportedly heard about that.</p>					
<p>6/6/03 – The CLECs expressed great concern over the projected date for implementing this request. One indicated that they thought the DUF file was actually made up of the five state files concatenated together and would not be that difficult to separate. The CLECs asked to have the SME join the July meeting to discuss. Change Management agreed to invite the SME.</p>					
<p>5/30/03 – Per the SME, the implementation of separating the DUF by state is currently targeted for 3Q04. The status will be changed to Approved and we will not review again until 1Q04.</p>					
<p>5/15/03 – The SME was not on the call to give an update, but Change Management reported that he is working on the solution for this request.</p>					
<p>5/1/03 – New CCR created for issue transferred from Midwest Region CUF at the April meeting.</p>					
<p>3/19/03 - CLEC User Forum: SBC stated that it did not have an implementation date yet. A target date is sometime early to mid-year next year. WorldCom expressed concern regarding the delay in implementing this change. WorldCom asked that SBC have someone available to work directly with WorldCom on this issue in the interim. SBC responded that it is currently working with CLECs directly. There was discussion on how this issue could be escalated. SBC responded that it would ensure that CLECs' concerns and sense of urgency are documented in the business case it submits for prioritization of this project. It was agreed to submit this issue as a CCR so it can be escalated in both CMP and CUF. ACTION ITEM: SBC will prepare a CCR on behalf of WorldCom to be tracked in CMP and provide the CCR number assigned to this request.</p>					
<p>Update - 3/14/03: Update to be provided at the March CUF meeting.</p>					

CCR History for DUF Separation by State

CCR Tracking Number	Originating CLEC (Region)	CLEC Primary Contact Name	Interface Affecting	Status	Date Received
CCR 03-035	AT&T Midwest Region	Shannie Marin		Approved Review in 7/2003	11/8/02 Transferred from CUF on 5/1/03

2/19/03 - CLEC User Forum:
 SBC reported that the result of CLECs votes was very close. There were 11 votes in favor and 12 against making the change. Due to the following additional considerations, SBC has decided to proceed with implementing the requested change to separate the DUF files by state.

- OBF guidelines indicate that the files should be split by state
- The change would be consistent across all SBC's regions

CLECs expressed concern regarding the voting process and having SBC make a decision contrary to the majority vote. SBC responded that the suggestion of a vote was made in an attempt to resolve conflicting opinions by CLECs on this request. SBC stated that at the time the voting suggestion was made, it did not take into account the other considerations. Amerivoice stated that implementing this change should not impact the priorities of the other CLEC requested projects already scheduled for implementation. SBC responded that the prioritization and implementation of the CCRs are handled by a different organization than billing, so implementing this change will not impact other CCRs.

ACTION ITEM: SBC will provide an update as to the target date for implementation at the March CUF meeting.

Update - 1/21/03:
 Accessible Letter CLECAM03-015 was distributed 1/21/03. Update to be provided at the 2/19 CUF meeting.

1/15/03 - CLEC User Forum:
 Some CLECs expressed concern that implementing this change would cause them undue hardship, while others had opposing opinions and were anxious for this change to be made. It was pointed out that implementing this change would make it consistent with the other SBC states. SBC suggested sending an Accessible Letter early next week advising the CLEC community of the proposed change and soliciting input whether CLECs would or would not support the change. The decision to go forward with implementing the change will be based on the majority vote. A question was raised whether it would be possible for SBC to provide both options to CLECs. SBC responded that it would have to re-verify whether it could support both options and hopes to get an answer to include in the Accessible Letter to be distributed.

ACTION ITEM: SBC will send an Accessible Letter describing the proposed change and ask for CLEC feedback.

ACTION ITEM: SBC will re-verify whether it could provide CLECs the option of receiving the DUF file as one file or five files, separated by state.

Update - 1/6/03:
 Several CLECs responded that separating the DUF files by OCN does not meet their needs, therefore, a request was made to the billing group to separate the DUF files by state. The earliest target date for implementation is August 2003.

CCR History for DUF Separation by State

CCR Tracking Number	Originating CLEC (Region)	CLEC Primary Contact Name	Interface Affecting	Status	Date Received
CCR 03-035	AT&T Midwest Region	Shannie Marin		Approved Review in 7/2003	11/8/02 Transferred from CUF on 5/1/03
<p>12/11/02 - CLEC User Forum: SBC stated that its internal billing group proposed to provide the DUF files separated by OCN rather than by state as was requested. That would be consistent with how the DUF files are separated for all of the other regions. Separating by OCN would be like separating by state because there is one UNE OCN per state. The DUF files are provided for UNE, it does not apply to retail. SBC is awaiting a response from AT&T to find out if this is acceptable. ACTION ITEM: CLECs will provide feedback by 12/17 whether having the DUF files separated by OCN (rather than by state) will meet their needs.</p>					

Cottrell/Lawson Supplemental Reply Affidavit – Attachment E

CCR History for Posted Service Order Information

CCR Tracking Number	Originating CLEC (Region)	CLEC Primary Contact Name	Interface Affecting	Status	Date Received
CCR 00-025 CR020085 Prioritized for 6/14/03	WCOM WorldCom Southwest region	Roseann Kendall	Order Status (Ordering) 2-State, Midwest region, SNET	Pending (See CCR01-050 below) No Review	7/28/00 11/01/00
<p>CLEC Verbatim Description: Currently, per the Toolbar, Order Status USERS GUIDE, the circuit id and PON search types can only be used for pending orders. WCOM is requesting that this search criteria be expanded to include posted orders as well. Until this search can be expanded, the CLECs only other choice to pull posted orders is via the "C" order, but since the "C" order numbers are re-assigned quickly this method of pulling posted orders is not a reliable tool either. The verbatim was changed to add the request to query posted " (C) orders by PON.</p>					
<p>SBC Response/Update: 8/1/02 – The originator replied that the search for posted orders exists today only in SWBT for intervals longer than 7 days. SWBT keeps posted orders available for 3 calendar years. The documentation for Service Order Status in Verigate states that for PB/NB, orders which have posted within the last 48 hours are available. In AIT, posted orders are available for 7 days after posting. In SNET, they are available for 72 hours after posting. Per confirmation from the originator, the request should be as stated above. The status will change back to Pending and it will be moved to the 13-State CCR Log and associated with CCR01 -050 submitted by WCOM. Since the CR was opened using this request, all future updates will be posted to that CCR.</p>					
<p>6/7/02 – Change Management will get with the originator concerning the closure of this request.</p>					
<p>2/9/01 – This will be put into Deferred status until April 2002.</p>					
<p>SBC Response/Update: 8/31/00 – No response available at this time, will provide status by 9/15/00. 9/6/00 – SWBT CMP Meeting: WorldCom and Progressive Concepts stated that they go to posted order database by TN, but they still cannot pull up the order. They receive a message stating that they do not have authorization. SBC stated that there appears to be a problem with the logic, because CLECs should be able to pull up their orders. SBC stated that by 9/13, it would provide CLECs documentation outlining its plans to: 1) provide regular updates on the progress being made; 2) planned target dates for milestones; and 3) the short-term and long-term plans. 12/6/00 – SWBT CMP Meeting: WorldCom pointed out that the 10/24, 11/1, and 12/3 updates are incorrect. These updates are related to a different CCR and should be removed. After clarification, it was agreed that SBC would address the request as it was originally submitted and provide information on the order of magnitude and timeline. 1/10/01 – There is a CR990812 asking to be able to pull posted service orders by circuit ID. Will not be considered until at least April 2002 when we have a uniform interface. There has been another request submitted to request pulling posted service orders by PON. This will be considered at the same time as the CR 990812. 2/6/01 – No further update.</p>					

CCR History for Posted Service Order Information

CCR Tracking Number	Originating CLEC (Region)	CLEC Primary Contact Name	Interface Affecting	Status	Date Received
CCR 01-050 CR020085 (12/13/03) CR020904 CR020905 (3/13/04)	WCOM 2-State	Roseann Kendall	Ordering (Order Status) 2-State, Midwest region, SNET	Approved No Review (Prioritized for 6/14/03)	11/9/01
<p>CLEC Verbatim Description: REQUEST TO ADD "POSTED INQUIRY" FUNCTIONALITY IN ENHANCED VERIGATE/ORDER STATUS FOR PACIFIC BELL, NEVADA BELL AND AMERITECH REGIONS.</p> <p>Currently the Enhanced VeriGate system's Order Status functionality, planned for implementation 2/23/02, provides a "posted inquiry" functionality only for the SBC SWBT region. This "posted inquiry" functionality, available for the SBC SWBT region, makes it possible for the CLEC to view posted (completed) service order data. Using the "posted inquiry" functionality, CLECs can view posted service orders from the past three years as well as for the current year. WCOM is requesting that this "posted inquiry" functionality, as available in the SBC SWBT region, be provided for the PacBell, NevBell, and SBC AIT regions.</p> <p>This CCR is being submitted with a High/Critical priority level. It is critical that CLECs have access to view and analyze the actions completed by SBC for its own service orders. WCOM's experience has proven that access to this service order information is needed to effectively manage issues that arise after the order has been completed. Without access to the service order data, the CLEC's ability to handle its end customer's issues is extremely limited.</p> <p>Further, without access to this information, the CLEC must manually contact and involved SBC representatives to request and retrieve information on completed service orders. If the CLECs had access to such information, the need to contact SBC representatives for resolving questions about completed orders would be minimized. Thus the electronic availability of posted (completed) service orders would benefit SBC as well as the CLEC.</p>					
SBC Response:					
<i>7/3/03 – Change Management has learned that CR020085, for the 2-State region only, has been committed for the 12/13/03 release. The other 2 CRs, CR020904 and CR020905, are hopeful for the 3/13/04 release.</i>					
<i>3/28/03 – Change Management has learned that CR020085 was not committed for the 9/27/03 release. The request date has been rolled forward to 12/13/03. Change Management is working closely with the Business Process SME to ensure that this CR will get committed for the December '03 release.</i>					
<i>3/12/03 – The CR020085 for the 2-State region is on the request list sent to IT for the 9/27/03 release. The Commit List for that release should be coming back from IT no later than the end of next week.</i>					
<i>11/27/02 – No further update.</i>					
<i>11/1/02 – The CR020085 above has been de-scoped to just PB/NB, since the regions will be deploying SPORT at different times. It is still carrying a requested date of 6/14/03. The CR for AIT region is CR020904 and the one for SNET region is CR020905.</i>					

CCR History for Posted Service Order Information

CCR Tracking Number	Originating CLEC (Region)	CLEC Primary Contact Name	Interface Affecting	Status	Date Received
CCR 01-050 CR020085 (12/13/03) CR020904 CR020905 (3/13/04)	WCOM 2-State	Roseann Kendall	Ordering (Order Status) 2-State, Midwest region, SNET	Approved No Review (Prioritized for 6/14/03)	11/9/01
<p>9/27/02 – The SME has written the Business Requirements for this request. SBC IT has also been working on this. Requires establishing a database for each region for service orders. The SME, his director and the Director-Change Management have been advised that the CLECs want this escalated. As stated before, this is a very large project. The CR currently has a “Requested Date” of 6/14/03. Status will be changed to Approved.</p>					
<p>9/12/02 – The originator asked if there was any implementation timeframe available for this CCR. Change Management replied that there was not. The originator asked that this be escalated. Change Management agreed. (Talked to Dennis Schuessler – he said that his team is working on the business requirements for this and IT already had it on their “To Do” list. Will require establishing a database in the other regions like what is in SWBT. I will send email to Dennis and his boss advising that the CLECs want this escalated.)</p>					
<p>8/1/02 – No further update at this time.</p>					
<p>7/11/02 – Change Management is working with the SMEs to identify and quantify the LSC benefits.</p>					
<p>5/23/02 – Change Management has gone back to the SMEs for progress on this since POR. An internal meeting was held on 5/23/02 where Change Management learned that this may be a large enough effort to require a Business Case for hardware additions, etc. Change Management will contact the LSC SMEs on quantification of this CR. The Business SME will begin to work with IT to determine what would be required for implementation.</p>					
<p>3/29/02 – A question was asked on the SBC PB/SBC NB CMP call if the status of this request should be Approved since a CR has been input into the database for it. Change Management responded that normally one would expect that to be true. However, the SMEs asked that the CR be input so they could accurately look at this from the CLEC standpoint. The SMEs hope to be able to do this, but are not certain they can.</p>					
<p>3/7/02 – The 10/19/02 release date has been changed to 11/9/02.</p>					
<p>2/22/02 – Change Management has input CR020085 to request these changes. It currently carries a “Requested” implementation date of 10/19/02.</p>					
<p>1/31/02 – The originator has responded that they cannot get the information they need from any other source. Change Management will input a CR requesting the Posted Order Status functionality in SBC AIT, SBC PB, SBC NB and SBC SNET.</p>					
<p>1/25/02 – Change Management has emailed the originator asking if WCOM has found an alternate source for the information they need.</p>					
<p>1/10/02 – No further update at this time.</p>					
<p>12/11/01 – Change Management has learned that the SBC SWBT is the only region with a database of posted orders. The other regions retain their posted orders between 2 and 7 days after posting. The originator has indicated that they are exploring other means of getting the information they need. If that effort fails, then Change Management will input a CR for this request, but it will take a huge effort to accomplish this. That CR will have to follow the normal prioritization process for a future release. SBC suggests leaving in Pending status for now.</p>					
<p>11/19/01 – New CCR added to the log.</p>					

Cottrell/Lawson Joint Supplemental Reply Affidavit – Attachment F

CCR History for Unreject Functionality

CCR Tracking Number	Originating CLEC (Region)	CLEC Primary Contact Name	Interface Affecting	Status	Date Received
CCRAM 02-011	Choice One Midwest Region	Linda Peterman	Ordering (LEX, EDI) Midwest Region	Not Approved 7/10/03 Review in 7/2003	6/11/02
<p>CLEC Verbatim Description: Choice One, supported by multiple other CLECs, requests that functionality be added to LSOG5 (and above) to provide SBC with the capability of unrejecting Invalid System Rejects. Since CLECs must currently resolve such issues via resubmission of the effected orders manually, the impact to production, and therefore the CLEC's bottom line, is potentially enormous. In addition, ownership for resolution of these types of rejects should be on SBC, rather than on the CLEC.</p> <p>This functionality existed in prior LSOG versions and was omitted from LSOG5 with the stated premise that SBC would direct its efforts toward expeditiously resolving the related defect as opposed to "fixing" specific order issues. The reality is that the CLEC Community has not seen the promised speed to resolution.</p> <p>In addition, Performance Measure data is currently being (from the CLECs' perspective) adversely impacted. Invalid System Rejects are being "counted" as CLEC errors. This certainly brings the validity of Performance Measure Data into question.</p>					
<p>SBC Response/Update:</p> <p>7/3/03 – Change Management did receive the information from the CLEC on the DSL mailbox but was not able to access it. The LDMI representative indicated that the orders themselves were not sent to this mailbox, just the notification that orders had been created, the order numbers, etc. so the associated work group could do the work they needed to. This would more appropriately be addressed under the CCR02-088.</p> <p>Based on the outcome of all the research into this request, SBC still feels that its resources are better spent fixing rejects than re-programming systems to provide the unreject capability. SBC has explained the pitfalls of granting the unreject capability to service reps and the database errors that can result from its improper use. Change Management will show it as Not Approved in the July meeting.</p> <p>6/5/03 – Change Management reported that there is no workaround for the email issue. The CLECs asked again if the edits could be suspended or lifted. SBC had responded once before that they could not be because of the bad data that it would allow through and that SBC felt it was a much better use of its time to fix the rejects. Change Management asked if the number of invalid rejects was decreasing. The CLECs did not answer. They just said they wanted the edits lifted until the rejects are fixed. One of the CLECs asked if SBC could set up an "Invalid Reject Mailbox" to accept the emails like it had set up internally for Retail on DSL. A CLEC offered to send the address of this DSL mailbox to Change Management. Change Management agreed to follow up on this.</p> <p>5/15/03 – Change Management reminded everyone on the call of the discussion held during the CMP meeting on 5/8 concerning the excessive cost associated with utilizing email for a workaround here. The costs were for making SBC's systems capable of taking email and making it look like an LSR. Change Management agreed to check into whether there was a workaround for email. This will be discussed in the June meeting.</p> <p>5/2/03 – Updated will be provided at the May meeting.</p> <p>3/21/03 – See discussion documented in the action item log.</p>					

CCR History for Unreject Functionality

CCR Tracking Number	Originating CLEC (Region)	CLEC Primary Contact Name	Interface Affecting	Status	Date Received
CCRAM 02-011	Choice One Midwest Region	Linda Peterman	Ordering (LEX, EDI) Midwest Region	Not Approved 7/10/03 Review in 7/2003	6/11/02
<p>2/21/03 – This topic was discussed on the action item log. Please refer to Action Item #1 from 12/5/02 for the details of that discussion. 2/20/03 CMP Meeting - SBC stated that its track record for Version 5 is better and its track record for closing DRs is better with 5. In order to justify the expense of making a system modification, SBC has developed a report for invalid system rejects in 5. The LSC representatives have been trained to identify and capture this data. A DSS report will be produced and the results will be shared with CLECs over the next few CMP meetings. There was discussion regarding how the information would be tracked, whether a supp would be sent through manually, whether it would be sent with comments in the REMARKS field, and if it would be sent to a special fax number. AT&T expressed two concerns. The first, AT&T stated that SBC needs to re-assess its decision to get rid of the process to unreject rejects in the Midwest region and not implementing this capability in SBC's other regions. AT&T stated that yesterday, it had 1,000 orders fall into this category. The alternative is to accept the rejected orders and process manually, which is not an efficient way to operate. The second concern raised by AT&T relates to how this situation is captured in the performance measures. SBC responded that AT&T's second concern has been escalated to Glen Sirles and it will be addressed outside of CMP. SBC stated that with respect to AT&T's first concern, that SBC prefers to fix the edit than to develop the capability to unreject. SBC will have to check on the details of the type of information that would be captured. ChoiceOne and CoreComm stated that this was not resolved in the six-month performance measure review. They were told by regulatory in the Midwest region that SBC was manually accounting for these. ChoiceOne stated that it was told by SBC that it was not aware of a mechanical way to capture the data, and it was originally escalated to the officer level. ChoiceOne stated that it is still SBC's error, but CLECs are having to do manual work to correct the problem. TalkAmerica asked if the information would be shown by CLECs so they can validate the information internally. AT&T stated that it would be helpful. SBC responded that it would most likely provide the information by CLECs if SBC creates a DSS. DCS asked how information on any work around would be captured. SBC responded that it would have to find out. SBC suggested that once the first report is produced, it can be reviewed and discussed. WorldCom stated that it sent a spreadsheet to its OSS Support Manager if the information would be helpful. WorldCom stated that it does not have a way to handle it manually.</p>					
<p>12/6/02 – Change Management reported that the SBC SMEs had met once on this but needed additional time to determine how large a project this would be. The SMEs will provide a response in the January meeting. Status will be changed to Pending.</p>					
<p>11/27/02 – This will be addressed at the December 5th meeting.</p>					
<p>11/7/02 – Barb Scheiderer from CoreComm asked several questions about this request. She asked when was the first notification made to the CLECs of this process change. Change Management responded that it was made in the first Change Management meeting prior to the April 20, 2002 POR release in Ameritech. She inquired how this was determined to be "best practice" from among all the SBC regions. Change Management replied that this capability never existed in any of the other regions and this was discussed in the Collaboratives and identified there as something that would not be carried past POR. She asked if there were any PMs that were affected. Change Management replied that they were unsure because PMs are not a part of this forum. CLECs felt that PMs 5 and 9 were affected. CoreComm wants back the ability to unreject auto-auto invalid rejects. Change Management has brought this request to the attention of Glen Sirles, VP-OSS. He has indicated that this would be such a massive effort that no other work could be done in a future release if this were taken on. CoreComm asked to be able to do email rather than faxes as the workaround to not being able to unreject. Change Management reported that Glen supports this completely. SBC must make some internal changes first, but is already looking at getting that done.</p>					

CCR History for Unreject Functionality

CCR Tracking Number	Originating CLEC (Region)	CLEC Primary Contact Name	Interface Affecting	Status	Date Received
CCRAM 02-011	Choice One Midwest Region	Linda Peterman	Ordering (LEX, EDI) Midwest Region	Not Approved 7/10/03 Review in 7/2003	6/11/02
<p>7/11/02 – Change Management reported that the Collaboratives focused on unrejecting manual rejects, and this process is in place in all regions. SBC is concerned about how universal a problem this is. Any changes made to SBC systems could adversely impact some CLECs' own systems. It is major rework for SBC. The originator disagreed with Change Management's statements that unrejecting was discussed only for manual rejects in the Collaboratives. Change Management stated that this request would be deferred until April 2003 and SBC would begin looking at it again at that time.</p>					
<p>6/20/02 – Four CLECs said in the meeting that the DRs were not getting fixed fast enough and that they still struggled daily with the fallout caused by the invalid system rejects. Change Management replied that the real solution to this problem is to fix the DRs faster, not diverting resources to re-code the unreject capability.</p>					
<p>6/13/02 – Change Management is investigating this request.</p>					
<p>6/11/02 – New CCR added to the log.</p>					