

ANALYSIS OF AT&T WHOLESALE TRANSFER ACTIVITIES

SECTION AND ITEM NUMBER	VERIZON HOT CUT WORK ACTIVITY (From NRC Compliance Model, Tab 3, Column B)	AT&T “TRANSFER” ACTIVITY	AT&T’S EXPLANATION WHY THIS IS A WHOLESALE TRANSFER ACTIVITY	WHY THIS IS NOT AN ACTIVITY FOR WHICH AT&T MAY CHARGE VERIZON.
Section I, (TISOC), Step 1	Receive Local Service Request (LSR) from the CLEC and print, review, type and confirm the order request for new installation and/or account.	Receive Local Service Request (“LSR”) from the ILEC and Print, review, type and confirm the order request for new disconnect.	The New Service Provider initiates the porting process by submitting an LSR. AT&T accepts LSRs received via Web, Email, or FAX. This information must be manually transferred into another database for tracking and record keeping. An AT&T Provisioning Order is manually built to coordinate the customer transfer provisioning activities.	Verizon MA agrees that AT&T must input LSR data into its records system and acknowledge receipt of LSR with confirmation. This work, however, is part of the cost of doing business as a local exchange carrier. Verizon does not charge AT&T for such work on a Disconnect and Port Out Only order.
Section I, (TISOC), Step 2	Receive Local Service Request from the CLEC and print, review, type and confirm the order request for changes in existing account.	Receive Local Service Request from the ILEC and Print, review, type and confirm the order request for changes in existing account.	Process is the same as described in Section 1, Step 1.	See Step 1 above.
Section I, (TISOC), Step 3	Respond and/or change CLEC's pending Local Service Request.	Respond to and/or reject ILEC's pending Local Service Request.	AT&T manually verifies all information provided on the LSR. AT&T uses billing data, National Portability Administration Center (“NPAC”), original installation orders and sometimes the switch to verify LSR information. Failure to properly verify all information could result in any number of customer outage situations including porting telephone numbers (“TNs”) that belong to another customer or Service Provider Identification code (“SPID”). AT&T will send an LSRC within 48 hours of receiving the LSR. The LSRC is needed to coordinate the port schedule with the ILEC. Careful coordination is required between both carriers to prevent	Verizon MA verifies the SPID itself; there is no need for AT&T to re-verify it. Mere order confirmation is included in Steps 1 and 2, above. Verizon does not charge AT&T for such work on a Disconnect and Port Out Only order.  AT&T’s “careful coordination” is simply Verizon requesting a date to port and AT&T confirming it, per Step 1 above.  This is all the “coordination” that is needed for the seamless migration of service to Verizon MA.

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			problems with the customer's service, billing, and E911. AT&T also provides contact information so that the ILEC can call and speak to an AT&T Provisioning Agent for further clarification and/or coordination.	
Section II, (RCCC), Step 1	Access WFA/C to begin coordination process. (Screener)	Input LSR into AT&T's LSRC Data base to begin coordination process. (Screener)	For the ILEC's convenience, AT&T accepts LSRs from a variety of sources including web, email, and FAX. Because we allow multiple formats for LSRs, this information must be manually entered into a common database to process, track, and archive the information. This database is also used to respond to status inquiry telephone calls made by ILECs.	Already covered by Section I, Steps 1 and 2, above.
Section II, (RCCC), Step 2	Analyze order for work activity. (Screener)	Analyze order for work activity.	The order must be routed to the appropriate work center. This is based upon the type of order, UNE-L or Prime T1, and based upon the geographic region.	The only functions Verizon MA needs AT&T to do are: apply the 10 digit trigger; build the subscription request into NPAC to release the number; unlock the TN record(s) in the E911 database; and, delete the directory listing. Verizon MA agrees that AT&T must inform the appropriate staff to take these two actions. The "work activity" described by AT&T here, however, is its process to disconnect their service to the customer. This is in no way necessary to transfer service to Verizon MA and benefits only AT&T or its customer. It is a classic cost of AT&T's retail business.

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Section II, (RCCC), Step 3	Eliminate roadblocks from the order. (Screener)	Eliminate roadblocks from the order. Discern Job elements.	All errors on the LSR are identified and detailed on the reject LSRC. AT&T takes the time to manually identify all errors in the order and to give direction on how these errors might best be resolved. Some of the most common reasons for reject include requesting to port TN which do not belong to the specified customer, providing an invalid customer name or address, and requesting to port TNs from a non-AT&T SPID code. The LSR is also manually analyzed for job elements. Job elements such as circuit facility type (UNE-L or T1), product type including Wholesale, and line type (Native AT&T or ported TNs).	This is a repeat of Section I, Step 3. Verizon MA does not ask AT&T to analyze the LSR for “job elements,” nor is that necessary for Verizon MA to provide service. AT&T’s “Job elements” analysis appears to be intended to reconfigure AT&T’s own network following the loss of their customer, and is a retail cost.
Section II, (RCCC), Step 4	Analyze order for related orders (CRO). (Screener)	Analyze order for related orders New order or Supplemental Order (“Supp”)	The order is manually analyzed as a new order, supplementary order or a related order. Verizon SPID #9104 sends a substantial number of their orders. These orders must be completely reanalyzed and reprocessed by AT&T. Additionally, the gaining carrier can request an expedited of the order. This is a time intensive process that requires manual coordination between multiple groups.	A hot cut requires Verizon MA to coordinate multiple work orders, but a winback does not generate multiple work orders for AT&T to coordinate. Verizon MA does not ask for or need AT&T to reprocess each order. Verizon MA agrees that if it cancels the order or changes the due date, AT&T must update its records, but Verizon MA does not charge AT&T for such work on a Disconnect and Port Out Only order.
Section II, (RCCC), Step 5	Assign order to Technician. (Screener)	Assign order to Technician.	An Access Service Request, ASR, is manually entered into AT&T provisioning systems for the coordinated date assigned to the transfer of service. AT&T returns an LSRC to the ILEC that includes the AT&T work order system (“ASR”) number and the ATT agent's name and contact number. If the order is determined to be a supplementary change order, the appropriate changes are manually made on the ASR and LSRC. This sharing of LSRC information with the ILEC is required to coordinate porting activities.	AT&T does not need to do any provisioning or coordination on Verizon’s winback requests. This item is simply reiteration of the work listed in Section I, Step 2 and Section II, Step 2.

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Section II, (RCCC), Step 6	Perform administrative checks.	Perform administrative checks.	AT&T runs quality checks on its service delivery tasks in order to insure compliance to industry commitments. These include quality checks of Local Service Request Confirmations, Access Service Request and on-time Firm Order Confirmation response time. Cycle time delays and errors on orders can cause customer outages.	AT&T may choose to monitor the quality of its service if it chooses, for management purposes, efficiency, etc., but Verizon MA does not ask AT&T to do so, nor is it necessary to enable AT&T to perform the four functions required of it to allow migration of the end user customer's service.
Section II, (RCCC), Step 7	Contact CPC to resolve design problems.	Access ALI and COLR database to determine circuit	Access the Access Line Inventory ("ALI") and Circuit Order Layout Record ("COLR") database to determine circuit. Access type will determine what additional orders will need to be processed. If order is T1 access an additional internal order will need to be issued to eliminate the T1 and retrieve the AT&T channel bank.	Determining the circuit would have been done in Section I, Step 3. The other actions described here are updating AT&T records and reconfiguring its network. These actions benefit AT&T only, do not benefit Verizon MA, and are not needed to migrate service to Verizon MA.
Section II, (RCCC), Step 10	Remove any facility roadblocks or problems.	Remove any facility roadblocks or problems.	Remove any facility roadblocks or problems.	Not applicable. AT&T does no facilities work on a winback. Therefore, there can be no facilities problems for AT&T to remove.
Section II, (RCCC), Step 13	Notify CLEC of order completion.	Notify ILEC of order completion.	Done via the LSR and LSRC	Not true. AT&T does not notify Verizon of any order completions.
Section II, (RCCC), Step 14	Update work activity in required systems.	Update work activity in required systems. ALI and COLR	Update work activity in required systems: ALI must be updated to show as availability of the loop, and COLR is updated to reflect that circuit is pending disconnect.  All AT&T systems must be updated as the order progression through the different system.  The ASR must be documented to reflect the activity of the order and status. This would include every time the order is touched, either in switch or network to reflect the activity.	This step has no bearing on the winback process. It is solely for AT&T's record keeping purposes.

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Section II, (RCCC), Step 19	Schedule required Bell Atlantic work teams.	Schedule required AT&T work teams.	Schedule city operations for equipment retrieval, Engineers to do translations and NPAC for TN porting	Equipment retrieval from AT&T’s customer is classic retail activity with no bearing on migrating the end user service. Verizon does not need AT&T to perform this work and it does not benefit Verizon. Translation work is ATT’s responsibility to cease service to its end user and render final bill. This is retail work activity. Verizon agrees that AT&T must release the number in NPAC.
Section II, (RCCC), Step 23	On DD, contact CLEC for final authorization to proceed.	Day before DD, contact ILEC for final authorization to proceed	Switch Engineer accesses switch, populating the 10-digit trigger in the switch. The 10-digit triggers enables intraswitch call origination and donor query calls to be routed to the CLEC’s switch even if the line is not disconnected from the switch. Another Engineer accesses NPAC to see if the ILEC has issued “creates” against the TN, if so AT&T concurs. The concurrence represents final notification.	Verizon MA does not receive go/no go calls from AT&T. Verizon agrees that populating the 10-digit trigger is required, but Verizon does not charge AT&T for such work on a Disconnect and Port Out Only order.
Section II, (RCCC), Step 24	Contact CLEC for final authorization.	Contact CLEC for final authorization. Duplicate entry (See step 23 above)	(See step 23 above)	Duplicate

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Section II, (RCCC), Step 25	Proceed with the HOT CUT conversion; notify all Bell Atlantic teams to proceed; advise CLEC when HOT CUT is complete.	Proceed with the Transfer; notify City Operations, Engineering and MACD teams to proceed; advise ILEC when Conversion is complete.	<p>On day of requested port (due date or “DD”), Prime change order (“P action C”), Engineer accesses NPAC and verifies if Verizon has activated the TNs.</p> <p><u>If activated:</u> then Translations are removed from the switch. NOTE: AT&amp;T does not automatically remove translations at 11:59 PM on the DD requested by Verizon.</p> <p>Otherwise, if Verizon has not activated the TN’s in NPAC, then this would result in an out of service customer.</p> <p><u>If not activated:</u> Then translations remain in the switch; translations and DD are placed in internal jeopardy status (for purpose of LEC late port jeopardy); AT&amp;T continues to check NPAC everyday for the next 6 business days. If Verizon does not activate requested TN’s in those 6 days, the DD and Translations are moved into internal jeopardy status that Verizon has not taken TNs, and thus order need to be cancelled. National Port Out pulls that jeopardy status and moves order into cancel status. If TN’s are activated in those 6 days then the steps mentioned above in the “if activated” procedures, are followed.</p>	Verizon MA does not require or request that AT&T verify that the activation has been performed or that translations have been removed. Verizon accepts responsibility to maintain customer service on the Due Date and on subsequent days.
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Section II, (RCCC), Step 26	Complete the order.	Complete the order.	AT&T’s internal Service Change Order request (“SOR”) for channel bank will be completed after to the closing of the change order for porting. AT&T will only go and retrieve equipment after the customer has successfully ported to a new carrier. The P Action C (Prime change order) is updated in ASR to reflect completed date. The Prime Disconnect (“P Action D”) is completed after the change order. This is the elimination of the DS1, which would continue to bill the end user if AT&T had not verified the service type prior to port. This includes removing all network cross connects.	Retrieval of its own equipment and updating its records are part of AT&T’s own disconnect process. None of this is relevant to the migration process.
Section II, (RCCC), Step 27	If CLEC postpones HOTCUT, contact TISOC for a DD Change and complete tracking form (Completion Sheet or HOT CUT checklist).	If ILEC postpones Conversion, Supp the original order	If the ILEC fails to port the TNs on the confirmed date, AT&T does not take the customer out of service by removing switch translations. Instead AT&T and other carriers grant the ILEC at least 48 hours to submit a supplementary order. If no Supp order is received the LSRC is canceled and the customer's service is protected. Manually checking NPAC to make sure that a port has successfully completed is labor intensive, but it is the only way to ensure that customers do not lose service because of the ILEC's missed port.	This step is a duplicate of Section II, Steps 4 and 25.  Steps 27-33 cover the process to address Supp LSRs or cancel LSRs. This should be one step.  Verizon MA does not charge AT&T for such work on a Disconnect and Port Out Only order.
Section II, (RCCC), Step 28	If CLEC is not ready, JEP/MFC will be placed in WFA/C & completion rescheduled when firm DD is received.	If ILEC is not ready, jeopardy status code will be placed in ‘status & completion’ field rescheduled when firm DD is received.	If ILEC is not ready, a jeopardy status code will be placed in ‘status and completion’ field, to be rescheduled when firm DD is received.	See step 27.

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Section II, (RCCC), Step 29	If CLEC contacts RCCC to change DD: notify frame to stop work.	If ILEC contacts AT&T to change DD: supp is initiated.	Upon receipt of the supplementary request, AT&T will update the ASR order and the LSRC to reflect the new porting information.	See step 27.
Section II, (RCCC), Step 30	If CLEC contacts RCCC to change DD: enter JEP/MFC in WFA/C & reschedule upon receipt of firm DD change.	If ILEC contacts AT&T to change DD: reschedule upon receipt of firm DD change	If ILEC contacts AT&T to change DD: reschedule upon receipt of firm DD change.	See Step 27.
Section II, (RCCC), Step 31	On DD at end of tour, complete order in WFA/C.	If ILEC contacts AT&T to change DD: reschedule upon receipt of firm DD change	If ILEC contacts AT&T to change DD: reschedule upon receipt of firm DD change	See step 27.
Section II, (RCCC), Step 32	If a CLEC postpones the order via a telephone call to the RCCC, enter JEP/MFC in WFA/C pending DD change.	If a ILEC postpones the order via a telephone call to AT&T, enter Supp and jeopardy status code order pending DD change.	If a ILEC postpones the order via a telephone call to AT&T, enter Supp and jeopardy status code order pending DD change.	See step 27.
Section II, (RCCC), Step 33	Notify all work teams in Bell Atlantic about any postponement, DD change or cancellation.	Notify all work teams in AT&T about any postponement, DD change or cancellation.	Upon receipt of the supplementary request, AT&T updates the ASR order and the work teams are immediately updated with the new information.	See step 27.
Section IV, (RCMAC), Step 4	Under RCCC direction, re-establish LNP service due to premature final disconnect of ported TN(s). Customer change of due date (only for LNP).	Under Provisioning directions, AT&T reestablish LNP service due to premature final disconnect of ported TN(s). Customer change of due date (only for LNP)	Because of the process mention in Section II, Step 24 AT&T does not create premature final disconnects, AT&T verifies that the TNs are accepted by the new provider and does not have an automatic pull of translations	AT&T's entries are self-contradictory. If AT&T does not create premature final disconnects, there is no need to correct such errors. Pulling translations is simply AT&T disconnecting its own service to make its port available for re-use. This is not necessary to migrate the customer service to Verizon MA.



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Section IV, (RCMAC), Step 7	Research and refer to the RCCC those translation packets held in MARCH for which no coordination call was received.	Research and refer to the Provisioning Center those translation packets held but not transferred and for which no coordination call was received.	Research and refer to the Provisioning Center those translation packets held but not transferred and for which no coordination call was received.	AT&T just cancels them.
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