Attachment 1 to Reply Testimony of AT&T Panel Members, December 19, 2003

SECTION AND ITEM NUMBER FROM VERIZON MA's "HOT CUT" COST STUDY	AT&T WHOLESALE TRANSFER ACTIVITY DESCRIPTION (AS COMAPRED TO SIMILAR ACTIVITY DESCRIPTION FROM VERIZON MA'S "HOT CUT" COST STUDY)	EXPLANATION OF AT&T WHOLESALE TRANSFER ACTIVITY	REASON AT&T BILLS FOR THIS WORK ACTIVITY AND THE CONSEQUENCE TO VERIZON AND/OR THE END USER OF NOT PERFORMING THIS ACTION.	COST STUDY MINUTES
Section 1, (TISOC), Step 1	Receive Local Service Request ("LSR") from the ILEC. Print, review, type and confirm the order request for customer transfer.	The ILEC initiates the customer transfer process by submitting an LSR. AT&T accepts LSRs from other carriers via a Web form tool, email, or FAX. Note: Verizon only uses fax or email as the transmission vehicle for its LSRs.	The LSR that AT&T receives from Verizon must be manually sorted, saved and distributed internally for processing. Without doing this preliminary work the downstream AT&T provisioning work force would not be aware of the transfer and therefore would not do all the work necessary (e.g. set the 10-digit trigger, release the telephone number (TN) in NPAC, etc.) for the seamless transfer of this customer over to Verizon.	4 minutes
Section 1, (TISOC), Step 3	Respond to and/or reject ILEC's Local Service Request.	AT&T manually verifies all information provided on the LSR. AT&T uses various available sources such as; billing data, National Portability	In cases where AT&T finds an error on the LSR it must reject the order back to Verizon and sometimes coordinate with Verizon to get the order corrected and reissued	7 minutes

		National Portability Administration Center ("NPAC"), original installation orders for the customer account and sometimes the switch translations to verify LSR information. AT&T will send an LSRC (confirmation) to ILEC within 48 hours of receiving the LSR. The LSRC is needed to confirm to the ILEC that its order was received and is being worked in accordance to the instructions supplied on the order by the ILEC. 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.	reissued. Failure to properly verify all information on the order received from Verizon could result in any number of customer outage situations including porting TNs that belong to another customer or Service Provider Identification code ("SPID"). In cases where AT&T does not find an error in the order it must manually create and send a confirmation message to Verizon. Without receipt of these reject or confirmation messages Verizon has no way of knowing where its customer transfer order with AT&T stands (or if AT&T even received its order). AT&T must also respond to the status phone calls it receives from Verizon. The purpose of these calls includes; requests for expedites, requests for status on a particular order and requests for information to correct ordering errors. The consequence of AT&T not taking these calls to assist Verizon is that Verizon would have to truly go it alone to implement these customer transfers at the risk of service continuity to the customer. Because Verizon requests AT&T's assistance, AT&T assumes that Verizon	

			either cannot implement the transfer without AT&T's assistance or does not want to bear the cost or consequence of doing so.	
Section II, (RCCC), Step 1	Input LSR into AT&T's LSRC Data base to begin customer transfer process.	Because AT&T allows multiple input LSR transmission vehicles (web form tool, FAX or email), the information contained on the LSR must be manually entered into a common database to be processed, tracked, and archived. This database is also used to respond to status inquiry telephone calls made by ILECs.	To trigger AT&T's internal processes an AT&T service order must be created manually from the confirmed LSR received from Verizon. Without manually creating this internal service order the downstream AT&T provisioning work force would not be aware of the transfer and therefore would not do all the work necessary (e.g. set the 10-digit trigger, release the telephone number (TN) in NPAC, etc.) for the seamless transfer of this customer over to Verizon. Creating this manual service order also serves as a tool to allow AT&T to track the order to its completion and respond to Verizon inquires regarding the status of the order.	4 minutes
Section II, (RCCC), Step 2	Analyze order for work activity.	The order must be routed to the appropriate work center. This is based upon the type of order, e.g. POTS or Prime T1 customer, and based upon the geographic region.	In addition to routing the order to the appropriate work centers based on the type of facility involved (e.g. voice grade analog loops vs. DS1 loop), AT&T must insure via a manual investigation that there are no pending orders on the account. Should a migration to another	2 minutes

			carrier be pending on the same TN (or TNs) AT&T would have to reject the request back to the second carrier that issued the LSR. Without this pending order check the customer's number(s) may be ported to a carrier other than the one that the customer really wanted to be his local service provider.	
Section II, (RCCC), Step 4	Analyze order for related orders or Supplemental Orders ("Supp")	The order is manually analyzed to determine if it is an original order, a supplementary order or contains related orders. Supplemental orders must be completely reanalyzed and reprocessed by AT&T. Additionally, the ILEC can request an expedited of an order. This is a time and labor intensive process that requires manual coordination between multiple AT&T work groups on behalf of the ILEC's expedited due date request.	Because of the volume of duplicate orders and Supplemental orders AT&T receives from Verizon, AT&T must analyze every order it receives to make sure AT&T is working off of the latest information from Verizon. Orders that are supplemented must be manually processed just as the original orders were processed to insure that AT&T's downstream provisioning groups are working with the most current due dates and information. Additionally, for continuity of customer service AT&T must make sure that it does not process an order that was later cancelled by Verizon via a Supp.	1 minute

Section II, (RCCC), Step 5	Assign order to Technician.	An Access Service Request, ASR, is manually entered into AT&T's internal provisioning systems to generate an internal service order to accomplish the transfer of service. AT&T informs the ILEC of the internal service order number and the ATT agent's name and contact number. If the order is determined to be a supplemental change order, the appropriate changes are manually made on the ASR and LSRC.	When AT&T creates its internal service order via manually creating an Access Service request in AT&T's provisioning system, AT&T returns information to Verizon about this ASR for order tracking purposes. The information AT&T supplies Verizon includes the order number of the ASR and the AT&T contact name and phone number should Verizon have to contact AT&T regarding the specific order. Without this information Verizon would not be able to reference the specific internal AT&T service order number when calling with inquiries or transfer problems. This information also reduces Verizon's conversion costs by providing a specific contact for Verizon to call on any order issues that may arise.	4 minutes
Section II, (RCCC), Step 6	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.	Because of the manually intensive nature of AT&T's customer transfer process these internal quality checks are absolutely necessary to insure that all the necessary internal orders have been created and all the required fields on these orders are filled in. Consequently, an order or update (Supp) may be missed)	1 minute

Section II, (RCCC), Step 14	Update work activity in required internal provisioning systems.	The order must be accurately documented to reflect all activity on the order and the current status of the order. This includes updates for every time the order is touched, either in the switch, NPAC or the network to reflect the activity. Any modifications received at the request of the ILEC must also be documented on the order.	At this stage of AT&T's process AT&T manually inputs "conversational" updates to the work order for continuity of work among AT&T personnel. These updates are also used to apprise Verizon of the order status should AT&T receive an order inquiry, escalation or expedite request. AT&T also needs to update its systems based on subsequent requests from the ILEC, such as a due date change, to insure that AT&T's work activities are coordinated with those of Verizon. This is particularly critical for DS1 customer transfers which, in addition to the number port, also typically involve an AT&T field visit to the customer's premises, a trip that is costly for AT&T and potentially disruptive for the customer. Without being apprised of Verizon initiate due date changes AT&T would be making erroneous customer visits with a potential of impact to the customer's service. Note: As the vast majority of Verizon's customer transfer activity with AT&T involves a DS1 customer this coordination is of the utmost importance.	7 minutes

Section II, (RCCC), Step 23	On due date verify that the NPAC number port create message has been submitted by ILEC.	On the day prior to the due date AT&T populates the 10-digit trigger in the switch for the customers that are scheduled to be transferred the next day. The 10-digit trigger enables intra-switch calls to be routed to the appropriate switch pre and post the number port. On the due date AT&T accesses NPAC to determine if the ILEC has issued "creates" against the TN. If so AT&T issues a concurrence message to NPAC. The concurrence represents final notification to the ILEC.	If 10-digit trigger is not populated the customer would not be able to receive any "intra-switch" calls originating from AT&T's switch after Verizon ports the number. On occasions when Verizon is late issuing its create message to NPAC, Verizon will not be able to port the number without AT&T issuing its concur message to NPAC. These steps are performed and coordinated with Verizon's interface with NPAC to insure for a seamless transfer of the customer's service to Verizon.	7 minutes* * for number ports where Verizon misses the original due date 2 minutes are added to AT&T's work time to monitor NPAC for activity on the TN
Section II, (RCCC), Step 25	Proceed with the Transfer	AT&T monitors the NPAC activity on the due date to insure that the ILEC activates the number port. If AT&T finds that the number port has been activated then the customer's translations are removed from the AT&T switch. NOTE: For continuity of service purposes AT&T does not	To ensure for the continuity of the customer's service AT&T will monitor the customer's number(s) in NPAC on the due date and for 6 days beyond the due date in cases where the number was not ported by Verizon. When Verizon ports the number AT&T removes the 10 digit trigger and the translations from its switch. If the number is not ported on the	0 minutes[1]

[1] The work time for this step that is unique to a customer transfer has been accounted for in other work steps shown on this document. Though AT&T does not currently include the time needed to remove the customer translations from its switch because this is work that is not unique to a customer transfer Verizon does not afford the CLECs the same courtesy. Per Verizon's Massachusetts Compliance Filing for a "Two Wire Hot Cut Initial" Verizon charges the CLECs 5.5 minutes of work time to perform the same task (see Verizon's Massachusetts Compliance Filing, D.T.E. 01-20, "Two Wire Hot Cut Initial", RCMAC – line 3.

		automatically remove translations at 11:59 PM on the DD requested by the ILEC. If AT&T followed this process and the number port was not activated then the customer would taken out of service. If AT&T finds that the ILEC did not activate the number port in NPAC then the customer's translations remain active in the AT&T switch maintaining continuity of service for the customer. The service order for this customer transfer is placed in a jeopardy status. AT&T continues to check all orders with a jeopardy status in NPAC everyday for the next 6 business days. If the ILEC does not activate the requested TN's within those 6 days, the order is cancelled. If the TN's are activated by the ILEC within the 6 days then the steps mentioned above in the "if activated" procedures, are followed.	due date AT&T will insert a jeopardy code on the order. This jeopardy code is an indication to the AT&T provisioning team that it needs to monitor this account in NPAC for the next 6 business days to determine whether Verizon ports the number. This is done in lieu of Verizon's practice of removing its translations at the end of the day the number port was due without performing any checks to make sure that the winning carrier successfully ported the number. This activity is a quality of service check performed by AT&T as a result of AT&T's experience with the relatively low percentage of number ports that actually get performed on the original due date. If AT&T finds that after 6 business days the number still has not been ported, AT&T's provisioning center will be instructed to create an internal cancel of the order. This cancellation instructs AT&T's downstream provisioning teams that they should no longer proceed with any work activity on this order to transfer the customer. If AT&T were not to perform this step, and were to remove its translations before the number is ported, then the customer	

			would be entirely without service if Verizon had not transferred the customer's loop back to its switch.	
Section II, (RCCC), Step 26	Complete the order.	Once AT&T has determined that the number has been ported AT&T will manually update the order to change its status to "active". An active status on these orders is an indication to the downstream process that the customer's number has been successfully ported. It then triggers AT&T to unlock the E911 database so that it can be updated by the ILEC.	If this step is not performed Verizon will not be able to update the E911 database to reflect that it is now the customer's local service provider and to make changes to the customer's information in the data base should such changes be required. Additionally, this step allows AT&T to discontinue its billing to the customer thereby eliminating any double billing issues for the customer to resolve. If AT&T were not to perform this step, the customer's transfer to Verizon would be more burdensome on the customer, requiring the customer to become involved in resolving the double billing situation.	1 minute
Section II, (RCCC), Step 32	ILEC postpones or expedites the order via a telephone call to AT&T.	If ILEC postpones the order via a telephone call AT&T will place the order in a jeopardy status until it receives a Supp from the ILEC to reschedule the due date or to cancel the original order. All	Calls from Verizon to delay or expedite a pending order create additional work for AT&T to make sure that its work activities are coordinated with the revised requested date.	0 minutes*** ***though AT&T receives such calls from

		reschedules and cancels must be manually processed by AT&T If ILEC calls to expedite a customer transfer AT&T must realign its work force to accomplish the work tasks necessary to meet the requested date.		Verizon which create additional work for AT&T, a special study would be required to determine the work time impact of these calls.