

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. No. 99-271

COMMENTS BY AT&T COMMUNICATIONS OF NEW ENGLAND, INC.,
REGARDING KPMG'S EXCEPTION NO. 3

KPMG Exception No. 3: KPMG observed inadequate system availability of the new release CLEC testing environment during LSOG 4.

Domain: Pre-Order, Order and Provisioning (POP)

KPMG Assessment: KPMG has concluded that CTE system availability is critical to both new entrant and new release testing.

Date of Exception: February 16, 2000

Date of BA Response: February 24 2000

Date of AT&T Comments: March 10, 2000

AT&T Comments:

AT&T concurs with KPMG's report concerning system availability during testing periods. There are real costs to AT&T associated with such system unavailability. Where AT&T or any other CLEC is prepared, on its end, with resources and systems ready to begin testing, such unavailability creates a domino effect in terms of delaying the completion of the CLEC's own systems to meet its release schedule and eventually a delay in its market entry.

The unavailability of systems experienced by KPMG in the simulated test environment is consistent with similar problems experienced by AT&T. AT&T is concerned that Bell Atlantic ("BA") has failed to acknowledge the seriousness of the nature of the delays identified in this Exception, particularly when it characterizes, for example, the problems associated with the ECXpert software as "sporadic in nature". In fact, the problem is greater and more widespread than BA's response suggests. It is very troubling that on the very same day – February 24, 2000 – that BA filed a response to this Exception that attempted to minimize its problems with ECXpert, BA was simultaneously announcing to the New York Public Service Commission that it could not get ECXpert to work properly and would be scrapping that software entirely.

It is imperative that Bell Atlantic provides full availability for systems when CLECs are testing new software releases. An important part of the process of BA rolling out new OSS software is to permit CLECs to test the software and to ensure that their own systems can work seamlessly with a Bell Atlantic interface release. CLECs incur real costs when Bell Atlantic's test systems are down, *i.e.* the time associated with holding up valuable system time and personnel who are

waiting for BA's test systems to be brought online. Like BA, CLECs are often subject to tight system schedules and as such BA's delay will affect the CLEC's own release schedule if the testing window is forfeited because of BA's delays.

In AT&T's experience, the test environment is available only during the hours of 9AM to 5PM, Monday through Friday. AT&T depends on BA's systems to be working during these hours so that testing can proceed as rapidly as possible. A CLEC may have numerous employees assigned to conduct interface testing with BA, the test team must be able to quickly identify problems with the release, design a fix for the problem and test the fix in the BA test environment. When a fix is deployed it may require several or all test cases to be tested, again, once the fix is in place. This is a painstaking process that is often jeopardized by the unavailability of BA test systems.

AT&T believes that the outages documented by KPMG in this Exception were of a significant enough concern throughout the CLEC community that they should have resulted in an industry notification by BA. The CLEC test environment is a critical component of BA's OSS complex and should be subject to the same outage notification as BA's production systems. If BA does not view the testing systems as a high priority, CLEC testing efforts will be subject to delays that may cause CLECs to be unprepared for a BA release. In the long run such unpreparedness will only bring the CLEC's production capability to a screeching halt. AT&T believes that CLECs must have dependable test systems that are available throughout the short test windows provided by BA.

KPMG must be able to measure BA's test system availability against some benchmark that is acceptable to participating CLECs, before considering this exception closed.