

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

New England Telephone and Telegraph Company, d/b/a
Bell Atlantic-Massachusetts - Section 271 of the
Telecommunications Act of 1996 Compliance Filing

D.T.E. 99-271

**REPLY COMMENTS BY AT&T COMMUNICATIONS OF NEW ENGLAND, INC., IN
SUPPORT OF ITS MOTION TO ADJUST THE MASTER TEST PLAN AND TO
CLARIFY THE PROCEDURAL SCHEDULE**

AT&T Communications of New England, Inc., (“AT&T”) respectfully requests that the Department direct KPMG to conduct its pre-order and order Volume Performance Test on the so-called LSOG 4 OSSs. In addition, AT&T also respectfully requests that the Department provide for a period of OSS commercial availability of at least 90 days after KPMG completes its testing and issues its final report, as in the Pennsylvania 271 review process. AT&T submits these comments in response to the letter of opposition filed by Bell Atlantic-Massachusetts (“BA-MA”) on April 11, 2000.

Introduction and Summary.

The fact is that Bell Atlantic represents it has now made LSOG 4 OSSs available in the production environment for pre-ordering, ordering, and provisioning functions. These systems are available today, they are the systems that will be used by competitive local exchange carriers (“CLECs”) to enter the local exchange market in Massachusetts, and it is very important that they be the subject of volume production testing by KPMG. The LSOG 4 systems differ substantially from the LSOG 2 systems. For example, the LSOG 4 systems scrap DCAS – the Direct Customer Access System, which is one of the key OSSs in Bell Atlantic-North (“BA-North”), the old NYNEX territory – and for the first time replace it with a BA-South system

called “Request Manager”, and in addition they will include new functionality (such as fielded complex completions) that never existed in the LSOG 2 environment. Request Manager has never before been used or tested with the Bell Atlantic-North ordering systems, and is part of the BA-South family of OSSs that have failed KPMG volume testing twice in Pennsylvania.

It is irrelevant that the LSOG 4 changes to Bell Atlantic’s maintenance and repair systems will not be made until the June software release. KPMG’s volume production test will focus on the POP domain, and Bell Atlantic insists that the new and very different LSOG 4 systems for pre-order, order, and provisioning functions are available and in working order. KPMG volume production testing is an important part of the process of evaluating this claim.

In addition to volume testing of the LSOG 4 production environment, it is also very important that the Department provide for a 90-day commercial availability period after KPMG completes its work and files its final report. This 90-day period will be an opportunity, among other things, to gain the first commercial and CLEC experience with the new integration of the BA-South Request Manager system with the many BA-North OSSs. The fact that the BA-South OSSs using Request Manager have failed independent volume testing by KPMG underscores the importance of providing time for real-world experience with Request Manager in BA-North. Furthermore, Bell Atlantic has been and will continue to be making a myriad of other changes to its BA-North OSSs in response to KPMG findings, and in response to the substantial failure of the BA systems under early commercial volumes in New York. The requested commercial availability period will be an opportunity for the Department to be sure that all of these new systems appear to work as advertised. Thus, the commercial availability period will help the Department to ensure that the New York experience of unexpected Bell Atlantic systems failures is not repeated shortly after the completion of KPMG testing in Massachusetts.

Factual Background.

Uniform Interface Obligation and LSOG 4 Settlement Agreement

The Federal Communications Commission (the “FCC”), as Condition 2 on the Bell Atlantic/NYNEX merger, ordered Bell Atlantic to “provide uniform interfaces for use by carriers purchasing interconnection to obtain access to operations support systems.” *See* Memorandum and Order, *In the Applications of NYNEX Corp. Transferor, and Bell Atlantic Corp. Transferee, for Consent to Transfer Control of NYNEX Corp. and its Subsidiaries*, 12 F.C.C.R. 19985 (1997). On June 30, 1999, AT&T and MCI WorldCom filed a complaint with the FCC to enforce this uniform interface obligation.

Bell Atlantic entered into a Settlement Agreement to resolve this issue on August 20, 1999. Bell Atlantic once again committed itself “to implement uniform, application-to-application interfaces across its current thirteen state region and the District of Columbia that provide access to Bell Atlantic’s Operations Support Systems (“OSS”) supporting the functions of pre-ordering, ordering, provisioning, repair and maintenance, and billing for resold services and unbundled network elements.” *See* Uniform Interfaces Settlement Agreement, ¶ 2.1. Bell Atlantic specifically committed itself to a February 2000 release of new OSS interfaces which comply with the LSOG 4 standard for pre-ordering, ordering, and provisioning (“POP”) functions. *Id.* ¶¶ 6.1-6.2. A subsequent June 2000 release was also required, in which Bell Atlantic must provide LSOG 4 interfaces for maintenance and repair functions, and was to incorporate any refinements to the POP interfaces that the parties defined during collaborative sessions in the Fall of 1999. *Id.* ¶¶ 6.1-6.3. In practice, however, Bell Atlantic has represented – in an ongoing arbitration over this Uniform Interface settlement – that the additional POP refinements were included in the February 2000 release, and will not have to wait for June (see below).

Failure of BA-South OSSs, Including Request Manager, in KPMG Volume Testing

The “Request Manager” system is part of the BA-South OSSs that twice have failed volume testing by KPMG in Pennsylvania. According to KPMG’s Exception Report No. 7 in the Pennsylvania OSS test process, volume testing was first begun on November 15, 1999. KPMG reported that “[d]ue to serious system performance problems observed, November 15 volume testing was suspended prior to completion.” KPMG states that “[a]dditional volume testing was conducted on several days in December 1999,” and that “on December 14 and December 20-21, during several hours of testing[,] numerous ordering transactions failed to receive the expected local service confirmations (LSCs).” To date, so far as AT&T has been able to determine, Bell Atlantic has not diagnosed the sources of its BA-South systems problems in Pennsylvania, and has still not reported that the Request Manager and the other BA-South OSSs are ready for further volume testing.

Reply Comments.

I. ENTIRELY NEW LSOG 4 SYSTEMS HAVE BEEN RELEASED FOR PRE-ORDER, ORDER, AND PROVISIONING FUNCTIONS, AND SHOULD BE THE SUBJECT OF KPMG VOLUME PRODUCTION TESTING.

Bell Atlantic has represented elsewhere that its LSOG 4 software has been available in the production environment since March 1, 2000, for pre-order, order, and provisioning functions, and that CLECs have already begun to use it. AT&T’s request that the new LSOG 4 systems be subjected to volume production testing by KPMG is not a gratuitous effort to “delay” this proceeding, as BA-MA tries to suggest. Rather, it is an effort to ensure that full testing is done on the very OSSs that Bell Atlantic insists are available and working, that Bell Atlantic is obligated to provide, and that CLECs will be using to enter the market in Massachusetts.

A. The LSOG 4 Systems Are Not Mere “Updates,” But In Fact Differ Substantially From the LSOG 2 Systems.

If the Department were to permit KPMG to perform its volume production testing only in the LSOG 2 environment, the Department would likely not have enough information to evaluate the efficacy of the new LSOG 4 systems. The Department will not be able to extrapolate from LSOG 2 testing results, no matter how much subjective evaluation of future change control capabilities is attempted.

The POP systems in LSOG 4 are substantially different from those in LSOG 2, as Bell Atlantic acknowledges. As Bell Atlantic recently stated in a brief to arbitrators in the Uniform Interface proceedings, “[t]he LSOG 4 release was the largest coordinated release Bell Atlantic had ever attempted for wholesale systems, and it affected an unprecedented number of systems.” Uniform Interface Arbitration, *Post-Hearing Brief of Bell Atlantic Corporation* at 5, 4/3/2000.¹ Bell Atlantic says that this “monstrous task” involved substantial changes to “more than 30 computer systems.” *Id.* at 29.

Bell Atlantic’s decision to replace DCAS with BA-South’s Request Manager in LSOG 4 underscores how different the new LSOG 4 systems are from the LSOG 2 OSSs. Bell Atlantic has announced that with LSOG 4 it is replacing DCAS, an important part of BA-North’s OSSs, with a product used in BA-South called “Request Manager.” DCAS – the Direct Customer Access System – is the key part of Bell Atlantic-North’s current “gateway systems,” and under LSOG 2 performs order validation, determines whether an order is a candidate for flow-through processing, and routes each order to the proper systems destination for further processing. *See*

¹ AT&T would be happy to provide the Department with a copy of this 47-page brief upon request. Not surprisingly, AT&T does not agree with all of the assertions made by Bell Atlantic in this brief. For present purposes, however, the Department should be aware of Bell Atlantic’s insistence that its LSOG 4 systems are available and indeed in use in the production environment.

Tr. 11/22/99 at 2054 (Stuart Miller). Request Manager is being substituted to perform the same functions in the LSOG 4 systems.

Given that the Request Manager system has already been the subject of failed volume testing in Pennsylvania, it is likely that failures will occur in the real world without the safeguard of rigorous, formal volume testing of the LSOG 4 production environment by KPMG. This testing is important, as it will help ensure that CLECs in Massachusetts are not subjected to the kinds of Bell Atlantic systems failures that have plagued CLECs in New York. The LSOG 4 systems also include for the first time functionality, such as fielded complex completions, that does not and will not even exist in the LSOG 2 environment. KPMG volume production testing of LSOG 4 is needed to ensure that these entirely new and substantially revised systems work as they must.

B. Bell Atlantic Insists that LSOG 4 Has Been Fully Implemented for Pre-Order, Order, and Provisioning Functions.

AT&T notes in its motion (at page 1) that “Bell Atlantic has now made LSOG 4 OSSs available in the production environment for pre-ordering, ordering, and provisioning functions.” BA-MA does not challenge this point, but instead tries to obfuscate the matter by stating that “the implementation of the LSOG 4 features and functionality that AT&T has requested will not be completed until Bell Atlantic’s June 2000 software release” (see BA-MA’s Letter of Opposition, at 2). Technically, this is true, but only in a manner not relevant to the issues raised by AT&T’s motion. The Uniform Interfaces Settlement Agreement required Bell Atlantic to rollout LSOG 4 systems for pre-order, order, and provisioning functions by March 1, 2000, but does not require that maintenance and repair systems be made uniform under LSOG 4 standards until July 1, 2000. For the purposes of AT&T’s motion, however, what matters is Bell Atlantic’s insistence that the LSOG 4 pre-order, order, and provisioning systems have been made available.

Bell Atlantic has so represented in the brief it filed less than two weeks ago, on April 3, 2000, with the arbitrators in the Uniform Interface proceedings. According to Bell Atlantic:

LSOG 4 – *with all the promised uniformity* – was up and running in production and ready for the CLECs to use by March 1. In fact, a number of CLECs are already using it. Since March 1, CLECs have submitted over **3000** Local Service Requests (“LSRs”) – for actual customers – using the February LSOG 4 release. These CLECs are therefore already enjoying the benefits of the unprecedented level of uniformity provided by LSOG 4. This fact alone – that other CLECs are actually using LSOG 4 to do business with real customers – belies AT&T’s and MCIW’s claim that LSOG 4 is not implemented.

Uniform Interface Arbitration, *Post-Hearing Brief of Bell Atlantic Corporation* at 7, 4/3/2000 (emphasis in original). Bell Atlantic says that its LSOG 4 systems are “in production and working,” that they were “placed ... in production by March 1, 2000,” and that “the CLECs are using it.” *Id.* at 1-2. Indeed, Bell Atlantic goes so far as to assert that its February LSOG 4 release is unaffected by the systems problems experienced by CLECs in New York. *Id.* at 2, 33-36. In Bell Atlantic’s words, “there is no link between the ECXpert system problems and the LSOG 4 implementation requirements set forth in the Settlement Agreement.” *Id.* at 32.

Furthermore, Bell Atlantic has represented that all agreed upon refinements to its POP interfaces were included in the February 2000 release of the LSOG 4 systems, and were not held back for June. *Id.* at 5.

The Department has recognized the importance of ensuring that “the current BA-MA pre-order and order interfaces ... should be subjected to normal, high, and stress transaction testing as the foundation for a complete evaluation of the Pre-Ordering, Ordering, and Provisioning (“POP”) domain.” Letter Order of 11/19/99 at 4. Because of Bell Atlantic’s own delays, LSOG 4 is now the current Bell Atlantic pre-order and order interface. Therefore, it is the LSOG 4 systems that should be the object of KPMG’s volume testing in the production environment.

II. THE SECTION 271 EVALUATION SCHEDULE SHOULD INCLUDE AT LEAST 90 DAYS OF COMMERCIAL AVAILABILITY AFTER KPMG COMPLETES ITS TESTING AND ISSUES ITS FINAL REPORT.

In opposing AT&T's request for a defined minimum commercial availability period, Bell Atlantic tries to distinguish the 271 review process in Massachusetts from the procedures established for the similar process in Pennsylvania. Bell Atlantic writes that "AT&T knows well that the Bell Atlantic systems that serve Massachusetts, New York and the other /Bell Atlantic-North' States are operationally distinct from the OSS serving Pennsylvania." *Bell Atlantic's Opposition* at 2. According to Bell Atlantic, a commercial availability period is needed in Pennsylvania because the BA-South systems have not been subjected to any "'real world' actual experience." *Id.* BA-MA asserts that this is not true of the BA-North systems. *Id.*

But this claim that BA-North's systems are entirely different from those of BA-South is no longer true in the LSOG 4 environment. As explained above, Bell Atlantic has announced that with LSOG 4 it is replacing DCAS, an important part of BA-North's OSSs, with a product used in BA-South call "Request Manager." Request Manager has already been part of failed volume testing in Pennsylvania, and will need thorough testing by KPMG as well as a commercial test period to ensure that this system is ready for real-world use. The fact is that the large majority of customer orders in Massachusetts will use the new LSOG 4 systems, including Request Manager from BA-South, and these customers deserve the careful review that the combination of KPMG volume testing of the LSOG 4 production environment and the follow-on commercial availability period will provide.

Furthermore, even the LSOG 2 production environment is very different today than it was just a few weeks ago. Bell Atlantic was forced to scrap its ECXpert systems with brand-new software it calls "Netlink," in an effort to fix the substantial and discriminatory problems experienced by CLECs trying to order UNEs from Bell Atlantic in New York. It is disingenuous

for BA-MA to assert that the BA-North systems have been undergoing months of commercial experience, when that experience was on old and broken systems that have now been replaced or reconfigured.

AT&T has made the modest proposal that the Department schedule the same commercial availability period that has been adopted by the Pennsylvania Public Utility Commission. Bell Atlantic's stated reasons for opposing this suggestions have no merit.

Conclusion.

For the reasons stated above and in its Motion, AT&T respectfully requests that the Department:

(1) revise the Master Test Plan, to direct KPMG to conduct its production environment Volume Performance Test on Bell Atlantic's newly released LSOG 4 pre-order, order, and provisioning systems; and

(2) specify that the Department will not conclude its Section 271 review, and will not bring to an end its evidentiary hearings on disputed factual issues, until completing an OSS commercial availability period of at least 90 days, starting immediately after the filing of KPMG's final report.

Respectfully submitted,

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Dated: April ___, 2000.

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the above document to be served upon
the attorney of record for each other party on April ___, 2000.