COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

D.T.E. 03-74

REQUEST: Department of Telecommunications and Energy Second Set of Information Requests to AT&T Communications of New England

DATE: September 29, 2003

DTE –Teleport- 2-1:

Please refer to the cost study attached to Teleport's response to DTE-TCG 1-2. For each task listed, indicate (1) whether Teleport performs the task when a customer disconnects service without migrating to another carrier, and (2) whether Teleport performs the task when the customer migrates their service to a carrier which does not assess a customer migration charge on Teleport. In other words, please provide two new cost studies, reflecting the tasks performed by Teleport when a customer cancels service without migrating, and the tasks performed by Teleport when a customer migrates to a carrier which does not assess a customer migration charge on Teleport, and compare with the cost study attached to Teleport's response to DTE-TCG-1-2.

RESPONSE:

Teleport Communications Boston ("AT&T") provides this response including Appendix 1 and Appendix 2 in response to DTE-Teleport-2-1. Within both appendices the first vertical column refers to the corresponding "Section and Item Number" of the *AT&T and Verizon Customer Transfer Functions*" spreadsheet, Appendix A to *Answer of AT&T Communications of New England, Inc., and Teleport Communications Boston* in this proceeding ("Appendix A").

Appendix 1: Includes a recitation and description of the *retail* tasks and functions that AT&T must complete in the instance that an AT&T customer terminates his/her service without migrating to another carrier.

Appendix 2: includes a recitation and description of *wholesale* tasks and functions that AT&T must perform in order to coordinate the transfer of an end user's service to another carrier. The tasks set forth under Appendix 2 are identical regardless of whether or not such other carrier assesses a customer migration charge on Teleport. AT&T does not assess a transfer charge on other carriers for performance of these functions, if such other carrier does not charge

AT&T for coordinating the transfer of a customer's service[1] ***to*** AT&T. This mutual compensation arrangement is analogous to the "bill and keep" convention for the exchange of voice traffic.

There are fundamental differences between the simple disconnection of a customer from the network, and the seamless transfer of a customer from one carrier to another without loss or degradation of service and without imposing logistical burdens on the customer for coordinating the transfer him or herself. When a customer's service is to be disconnected by AT&T as part of a migration, specific tasks must be accomplished to transfer the customer, the loop facility, and the customer's telephone number, in a coordinated manner. Without AT&T's coordination activities, the customer's service is at risk of being interrupted or degraded (as explained below), and a burden would be placed on the customer to ensure that one carrier's service and bills end at precisely the same time as the other carrier's service and bills begin.

The tasks required for a customer migration are far more resource dependant than for a simple disconnection, primarily because there is in integral requirement to synchronize all AT&T functions with those to be completed by Verizon. This requires resources devoted to tracking Verizon's order status, exchanging information regarding orderstatus with Verizon, and making adjustments to AT&T's schedule and plans for work and labor deployment. Successful customer migrations from AT&T to Verizon require constant and vigilant coordination, the extent of which is further described below.

Moreover, AT&T must coordinate closely with Verizon to insure not merely that appropriate actions are taken, but that they are taken at agreed-upon times and in the agreed-upon manner. Under the current arrangement, Verizon places an order with AT&T to undertake the actions necessary for the transfer of the customer's service. If coordination were not required to effect the customer's seamless transfer of service to Verizon, there would be no reason for Verizon to request that AT&T do anything. Similarly, there would be no need for Verizon to provide AT&T with extensive information regarding precisely when the service cutover is planned and, as often happens, there would be no need for Verizon to notify AT&T of changes that Verizon desires to make to the previously agreed upon schedule for the transfer. It could be left to Verizon and the customer to figure out and effect the termination of service from AT&T and the initiation of service to Verizon. This, however, would not effectuate a seamless customer service transfer to Verizon and, because the outcomes without coordination between the firms would be unacceptable, this is not, in fact, what is done.

[1] The transfer of a customer's service refers to the transfer of the customer record, the associated facility and telephone number as well as updates to appropriate databases used by carriers providing local service.

As set forth above, the wholesale functions required to be performed by AT&T accomplish three major aims- each of which being essential to the seamless transfer of a customer. First and foremost, AT&T coordinates with Verizon to ensure that the customer's service, especially the telephone number(s) are transferred to Verizon without service interruption or degradation. Second, even before Verizon places an order for a customer's service to be transferred, AT&T makes the customer service record available to Verizon so that Verizon does not need to burden the customer with the responsibility for informing Verizon of every detail regarding his or her current services. Like any winning carrier, Verizon does not want to ask the customer to identify the services to which the customer subscribes for fear of losing the customer or even of getting incorrect information from the customer. Third, AT&T coordinates with Verizon to relieve the customer and Verizon of ensuring that AT&T's billing to the customer ends on the same day that Verizon's billing to the customer begins.

AT&T coordinates with Verizon to ensure that Verizon executes the activities that it is required to perform prior to transfer of the customer's service. Conversely, to the extent that any such activities are not performed by Verizon, AT&T must monitor Verizon's activities so that AT&T is aware of such failures in order to notify its own internal personnel and systems which must adjust wok schedules and loads accordingly.

AT&T must expend resources to ensure that AT&T does not terminate its service to the customer until Verizon actually starts its service to the customer, but does promptly terminate its service when Verizon initiates its service for the customer. For example, Verizon will often cancel a request to migrate a customer, or supplement the request in order to postpone the date of the transfer. If AT&T were not keeping track of Verizon's customer service transfer orders, AT&T would end up terminating the customer's service on the date that Verizon had originally requested the transfer to take place, which would leave the customer without service.

Indeed, the work necessary to minimize the risk of customer service interruption (a risk that arises solely because the customer's service is being transferred to another carrier rather than being terminated outright) can best be seen in the context of one of the procedures that AT&T uses. When Verizon notifies AT&T that it intends to take a particular customer, it provides a date for doing so. AT&T begins the work necessary to terminate the service (*i.e.*, stop providing dial tone to the customer) *on the specific date requested by Verizon*. Twenty-four hours prior to the specific transfer date requested by Verizon, AT&T puts a "ten digit trigger" on the number. This allows Verizon to take the number at anytime during the next 24 hours without service interruption, by activating the number at the number portability administration center (NPAC) at a time of Verizon's choosing.[2] Thus, keeping track of Verizon's orders and knowing when to place

[2] If Verizon has activated the number at NPAC, incoming calls that do not originate from the AT&T switch on which the ported number was resident will be routed to the Verizon switch. In the

the ten-digit trigger avoids service disruption. But there is more. AT&T also ensures that the 911 and Directory Assistance/Directory Listings (DA/DL) databases are updated, indicating that AT&T is no longer the customer's pre-subscribed local carrier.

Moreover, unlike Verizon, AT&T does not automatically take down translations from its switch (network) and make updates to the appropriate databases for the number that Verizon had requested to be ported at 11:59 PM on the specific date requested.[3] Unless a loss alert is received from Verizon, AT&T does not do so, because Verizon does not always activate the number at NPAC during the day of the requested port (*i.e.*, the 24 hours following AT&T's placement of the ten digit trigger). If AT&T were to take down its translations prior to Verizon activating the number at NPAC, the customer would again be left without service. As a result, AT&T monitors the NPAC database and does not take down its translations until after it confirms that Verizon has activated the number.[4] Indeed, AT&T has received Verizon orders to transfer the customer's service for which Verizon never activated the number or took the customer.

The attached Appendix A was designed to describe wholesale functions related to the transfer of a customer's service between telecommunications carriers. AT&T has nevertheless tried to identify those activities that would be involved if the retail customer were to request complete termination of service. There is not always a perfect match. Some functions are performed in the simple disconnect-of-service that are not performed in the transfer of a customer's service. In such instances, the Appendix A spreadsheet that was designed to show the functions performed in the transfer of customer service to Verizon does not show certain disconnect functions. Appendix 1 identifies those instances. For those item numbers on Appendix A where there is a perfect match, *i.e.*, where the wholesale function depicted is identical to the retail task that would be required in a simple disconnect, we have color-coded the task in green on the Appendix A spreadsheet. For those items where the wholesale function depicted on the Appendix A spreadsheet is similar, but not identical to, the retail task that would be required in a simple disconnect, we have color coded the task in blue. In these instances, the simple disconnect activities are fewer and less complicated than the analogous wholesale functions. Finally, to ensure that there is no misunderstanding, we

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absence of a ten-digit trigger, all calls originating from the same AT&T switch where the ported number had resided would not be completed, because they would not receive the appropriate routing to NPAC. Rather, they would be directed to the port on the AT&T switch where the number previously resided. Because, after Verizon performs the hot cut, that port is no longer connected to the customer's premises, the calls would not be completed. The ten-digit trigger essentially alerts any incoming calls to the number to be ported, which originated on the same switch, to check the NPAC database.

[3] To "take down the translations from its switch" has the effect of terminating dial tone to the customer.

[4] Section 2, items 23 and 25 describe the tasks involved in this coordination work.

have color-coded in yellow those DS1 wholesale disconnect functions that *were not included* in AT&T's customer transfer rate charged to Verizon.[5] As to such functions, it is irrelevant whether they would have to be undertaken in a simple disconnect situation.

As indicated previously, accompanying the Appendix A spreadsheet, Appendix 1 to this response provides a table that describes in a step-by-step fashion the activities undertaken to perform a simple disconnect. It is cross referenced to the Appendix A spreadsheet, and it explains in more detail the relationship between the retail (disconnect) and wholesale (transfer) functions performed by AT&T with respect to each referenced step.

Similarly, Appendix 2 to this response provides a table that describes in a step-by-step fashion the activities undertaken to perform a coordinated transfer of a customer's service *that are not* required *in the case of a simple termination*. In some instances, a step will appear on Appendix 2 that also appears on Appendix 1. In such cases, although a task of that step's description is required for a simple disconnect, a more complicated task of that description is required for a coordinated transfer.

[5] Unlike the wholesale functions highlighted in yellow, all of the wholesale functions depicted in the spreadsheet that are included in the AT&T customer transfer rate charged to Verizon are identified with an "X" that appears in the column(s) to the far right of the relevant wholesale function description.