

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Stuart Miller
Title: Vice President

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

- ITEM:** DTE-CoreComm 1-1
- A. What event triggers an electronic message from BA-MA to competitive local exchange carriers (“CLECs”), stating that a problem with the graphical user interface (“GUI”) has been reported and requesting that all CLECs who use the GUI ascertain whether it is working properly?
 - B. What is the protocol for determining to which CLECs such a message should be sent?
 - C. Is a single trouble report from a single CLEC sufficient to trigger such a message, or is some “filter” applied to ensure that CLECs do not receive a high volume of messages that turn out to be attributable to the isolated problems of one other GUI user?
 - D. Are such electronic messages also communicated to BA-MA personnel and, if so, to which personnel?
 - E. Do BA-MA personnel perform, in response to such electronic messages as may be sent to them, any diagnostic operations to evaluate the performance of the GUI? If so, what operations do they perform?
 - F. Are the diagnostic operations, if any, identified in E. above sufficient to identify any problems in the operation of the GUI?

- G. Has BA-MA received any complaints or comments from CLECs about excessive electronic messages regarding problems with the GUI? If so, please identify the CLECs that have made such complaints or comments, the substance of the complaint or comment, and any BA-MA response thereto.
- H. What is the approximate number of CLEC orders processed through the GUI, on an orders per day basis, for each of the past twelve months?
- I. How does the number identified in H. compare to the total number of orders processed by BA-MA from CLECs, on an orders per day basis, during the same period?

REPLY:

- A. BA-MA has published on the TIS Web Site <http://www.bell-atl.com/tis/>, under customer documentation, a paper called Type 1 Process Documentation. This document outlines all the rules surrounding the process for notification, communication and resolution of electronic communications. The document deals with notification concerning all of BA-MA's interfaces, such as WEB GUI and EDI. The procedure was posted on the Web Site in August 99 and is provided as attachment 1.
- B. The notices are sent to the standard BA-MA Industry Change Control list. BA-MA also pages CLECs who have provided us with pager numbers.
- C. A single trouble report does not necessarily trigger a message. As indicated in the documentation produced in response to A, above, industry notification will take place within one hour of issue identification. However, if during that first hour, BA-MA and the CLEC involved determine that the problem is isolated to a single CLEC, BA-MA and the CLEC will work to resolve the problem on a bilateral basis, and no industry-wide communication would be required.
- D. BA-MA personnel involved with the support and provisioning of wholesale services are notified electronically.

REPLY:
(cont'd)

- E. The process description provided in response to A, above describes the diagnostic operations used to evaluate the performance of the GUI.
- F. Yes.
- G. The process was implemented in August of 1999. Since that time, there have been no complaints or comments from CLECs. Prior to the implementation of this process, some CLECs expressed dissatisfaction with the methods and frequency of communications associated with interface issues.
- H. Please see Attachment 2 and Attachment 3 for daily order volumes submitted via the EDI interface and the Web GUI, respectively.
- I. Please see the Company's response to H above.

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REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

- ITEM:** DTE-CoreComm 1-2
- A. Are the employees BA-MA assigns to interact with and support CLECs subject to the same employee rotation policies as are other Bell Atlantic employees?
 - B. **NOT ADOPTED:** What accounts for the high level of turnover among these employees, which necessitates extra work and inconvenience for CLECs who need to do business with Bell Atlantic?
 - C. What are the criteria by which BA-MA employees are selected and assigned to interact with and support the provision of services to CLECs?
 - D. Is there a formal training program for such employees? If so, please provide a detailed description of such training program and produce any documents used in such training program.
 - E. Is there any functional separation within BA-MA between the employees who interact with and support the provision of services to CLECs and those who provide similar services to BA-MA's retail operations?
 - F. Are there internal BA-MA processes for comparing the performance of employees assigned to interact with and support the provision of services to CLECs to the performance of employees who provide similar services to BA-MA's retail operations? If yes, please describe those processes and produce any documents relating to the results of such comparisons over the past eighteen months.

REPLY:

- A. Yes.
- B. NOT ADOPTED
- C. BA-MA employees are selected and assigned to interact with and support the provision of services to CLECs in the same manner as they are assigned to other departments within the Company. Where possible, the Company's Upgrade and Transfer Plan is utilized to fill positions in the Wholesale Department. Otherwise, the vacancies are filled utilizing the Company's Employment Office for new hires. New hires are screened, tested and interviewed for Wholesale Services positions in the same manner as is used to hire new employees for Retail Services positions.
- D. Yes, employees assigned to interact with and support the provision of services to CLECs receive 4-5 weeks of formal training. This training is similar to the training received by retail service representatives, but is focused on wholesale products and services.

Bell Atlantic considers the training documentation proprietary and competitively sensitive. It will be made available to the extent provided for in a mutually agreeable non-disclosure agreement.

Due to the voluminous nature of the training documentation, the Company has provided a copy only to the Department (attached). A copy will be made available for inspection by others, subject to an appropriate non-disclosure agreement at the Company's offices at 125 High Street, Boston Massachusetts, at a mutually agreeable time.

- E. Employees assigned to support the provision of services to CLECs are functionally separated in that they work in the Telecommunications Industry Services Operations Centers (TISOC), which are dedicated to wholesale customers. Retail Service Representatives, dedicated to the support of retail services, are prevented, through systems security controls, from accessing the records of wholesale customers.

REPLY: DTE-CoreComm 1-2 (cont'd) F. There are no internal BA-MA processes for comparing the performance of employees assigned to interact with and support the provision of services to CLECs to the performance of employees who provide similar services to BA-MA's retail operations. However, both groups receive similar training as well as performance standards. In addition, many of the employees assigned to interact with and support the provision of services to CLECs have previous experience in performing those same functions associated with BA-MA's retail operations.

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D.T.E. 99-271

Respondent: Stuart Miller

Title: Vice-President

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-CoreComm 1-4

- A. What criteria does BA-MA employ in choosing the CLECs that will be included in beta tests of any new arrangements or services that BA-MA provides to CLECs in order to fulfill any of the obligations reflected in the fourteen point checklist in Section 271 of the Act?
- B. What procedures does BA-MA have to ensure that it addresses the concerns and perspectives of smaller CLECs?
- C. To what extent do BA-MA processes for interacting with and supporting the provision of services to CLECs take into account the relative sizes of the various CLECs doing business in Massachusetts?

REPLY:

- A. Any CLEC may participate in the test of any new arrangement. Each request by a CLEC to participate is handled on a case-by-case basis to ensure that the needs of both the CLEC and BA-MA are met. To date, all requests for such testing have been accommodated.
- B. BA-MA procedures are designed to accommodate the needs of all CLECs, both large and small. For example, all CLECs are assigned an Account Manager at Bell Atlantic, all CLECs may participate in the Change Management process, all CLECs have access to the documentation needed to do business with Bell Atlantic, all CLECs have access to Bell Atlantic's Help Desks and operations centers and all CLECs are supported through the process of either developing their own EDI interface or utilizing the Bell Atlantic Web GUI as their interface.
- C. Please see B above.

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D.T.E. 99-271

Respondent: Paula Brown

Title: Vice President – Regulatory

REQUEST: Department of Telecommunications and Energy, Set #1

DATED: September 24, 1999

ITEM: DTE-CoreComm 1-7

- A. Will BA-MA file a tariff with the DTE for the provision of the UNE platform (“UNE-P”)?
- B. If yes, when will such a filing be made?
- C. If no, why not?
- D. If no, what arrangements, if any, will BA-MA make to provide UNE-P to CLECs who request it?
- E. Are there any reasons that BA-MA cannot make UNE-P available to CLECs who request it? If so, please describe in detail what those reasons are.
- F. Is BA-MA willing to work with CLECs and the Department to overcome the obstacles to making UNE-P available that were identified in E.?

REPLY: (A-F) BA-MA does not currently have plans to file a tariff for UNE-P. Notwithstanding this, BA-MA offers UNE-P through contract in compliance with the Department’s Phase 4-J Order in the *Consolidated Arbitrations*, dated March 19, 1999. In addition, BA-MA understands from a recent FCC news release that the FCC may have limited the situations in which incumbent LECs must offer unbundled local switching. Given that UNE-P involves the combination of unbundled local switching and the local loop, the FCC’s decision may impact UNE-P provisioning requirements. The FCC, however, has not issued the official order that adopts this decision. BA-MA will comply with any final order from the FCC or court of competent jurisdiction regarding the issue of UNE-P.