

**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 99-271**

**Respondent:** Stuart Miller  
**Title:** Vice President-Network

**REQUEST:** Department of Telecommunications and Energy, Set #3

**DATED:** October 29, 1999

**ITEM:** DTE 3-1 Please respond to arguments made by CLECs in their MTP comments that KPMG LLP's ("KPMG") test of BA-MA's operations support systems ("OSS") should include the testing of Local Service Ordering Guidelines Release 4, which Bell Atlantic Corporation ("Bell Atlantic") agreed to implement pursuant to the terms of the August 20, 1999 Settlement Agreement among AT&T Corp., MCI WorldCom, Inc., and Bell Atlantic.

**REPLY:** The purpose of the KPMG Massachusetts Evaluation is to test whether the systems and processes BA-MA has in place support competition in the local market. Because Bell Atlantic's OSSs are continually being updated to reflect changes to industry standards, there are two critical principles that must be recognized by the Department. The first is that the test must be conducted using the systems and standards that are in place when the test begins. The second is that the test must include an evaluation of the processes in place to manage changes to the systems. These principles will ensure that testing can be completed on time with specificity, and that BA-MA's ability to manage updates will be appropriately evaluated.

The LSOG2 based OSS are currently used by CLECs and will continue to be used for some time to provide access to the BA-MA OSSs. It is appropriate to test these systems as KPMG proposes in the Master Test Plan and to evaluate BA-MA's processes for implementing future changes, such as LSOG4, via the Change Management process.

Currently, LSOG4 is scheduled to enter production in Bell Atlantic in February 2000. The enhancements that have been agreed to between

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Bell Atlantic, AT&T and MCI are currently slated for deployment over the period of February 2000 through June 2000. Including a full test using LSOG 4 in Massachusetts would delay the start of the test until at least March 2000 and depending upon the extent of the enhancements required, could delay the start of the test until June 2000.

KPMG has recommended that the LSOG4 release be the foundation of the Change Management test identified in the Master Test Plan. This is consistent with the status of LSOG4 and would form the basis of an excellent review of BA-MA's Change Management procedures. This is also consistent with how releases of new applications have been incorporated in other trials. For instance, in New York, Bell Atlantic released Version 1.6 of the LSOG 2 business rules in May of 1998. This occurred after the transaction and volume portion of the trial was completed, and represented a fairly significant enhancement to the interface. The New York Public Service Commission and KPMG correctly decided to incorporate Version 1.6 into the trial by using it as the basis for testing Bell Atlantic's Change Management process.

Through the Change Management test, KPMG and the Department will gain the same knowledge and insight into the LSOG4 functions and features as would a CLEC. The Change Management test will allow KPMG and the Department to verify interfaces, verify Pre-Ordering and Ordering functions, and verify documentation in a manner that allows for an assessment of the introduction of the new release. KPMG will examine BA-MA's Change Management methodologies, practices, procedures and performance to determine whether it can successfully provide and manage the delivery of new releases to CLECs. If that process works, then migrating to LSOG 4 will also work.

Moreover, when BA-MA implements LSOG 4, it will continue to support the prior LSOG version for those CLECs who are not ready to cut over to the new release. Supporting the current and prior versions of the interface will mitigate any problems that CLECs may experience with LSOG 4 and will allow CLECs substantial time to convert to the new standard. Specifically with LSOG 2, this version of the industry standard interface will remain in production until the release of the version of LSOG following LSOG 4. This virtually assures the CLECs of continued LSOG 2 support at least through the year 2000.

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**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 99-271**

**Respondent:** Kenneth Garbarino

**Title:** Director

**REQUEST:** Department of Telecommunications and Energy, Set #3

**DATED:** October 29, 1999

**ITEM:** DTE 3-2 Please respond to all of the concerns and arguments raised in the CLEC MTP comments regarding the adequacy of the set of metrics contained in the BA-MA § 271 compliance filing, made with the Department on May 24, 1999, and the necessity of establishing an explicit set of performance metrics in the MTP prior to OSS testing to address "gaps" in BA-MA's compliance filing metrics.

**REPLY:** In reviewing the comments of the CLECs on KPMG's Draft Master Test Plan (MTP), their comments concerning metrics can be grouped in the following categories:

- A. Arguments that the metrics provided in BA-MA's Section 271 filing are incomplete and, therefore, additional metrics must be determined prior to the start of any OSS test.
- B. Arguments that CLECs must be afforded due process rights and allowed to participate in metrics development as part of the MTP development.
- C. Arguments that the metrics adopted in New York should be required in Massachusetts. Several CLECs go further and propose additional metrics beyond those already required in New York.

The following addresses each of these areas.

**Response to Category A**

When the CLECs claim that a full set of metrics must be determined prior to the start of any OSS test, they fail to acknowledge two points. First, the metrics provided in BA-MA's Section 271 filing are a comprehensive set of measures that allows for a thorough evaluation of

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BA-MA's performance. Second, the commencement of a third-party test is not dependent on the establishment of a static set of measures.

The metrics included in BA-MA's filing consist of over 200 measures that were developed by the Department in the *Consolidated Arbitrations* after extensive review and cover end-to-end processes including Pre-ordering, Ordering, Provisioning, and Maintenance and Repair. Furthermore, the *Consolidated Arbitrations* measures were augmented in BA-MA's Section 271 filing with supplemental measures that provide additional data on other aspects of BA-MA's wholesale performance such as collocation, hot-cut performance, billing, and contact center support. BA-MA's supplemental measures were included to address the specific requirements of other third parties (e.g., Department of Justice). And, in determining the supplemental measures to include in the Section 271 filing, BA-MA utilized metrics and definitions that had already been determined in New York.

In their Draft MTP comments, several CLECs compare the final set of New York Carrier to Carrier (C2C) measures with the Massachusetts *Consolidated Arbitration* measures and point out "gaps" that are not covered by the Massachusetts plan. What the CLECs fail to acknowledge in their comments is that most of the "missing measures" are covered by the supplemental measures provided by BA-MA.

Moreover, CLEC comments that imply that Massachusetts is lacking performance measures and standards are simply incorrect. AT&T states, "OSS testing must be based on the actual performance standards with which BA must comply on a going forward basis." AT&T Comments at 41. MCIW states, "Until such time as performance measurements, standards, and benchmarks are finalized...the third party test cannot proceed." MCIW Comments at 8. In fact, the Department's Phase 3-E Order in the *Consolidated Arbitrations* established actual performance standards, and BA-MA has been reporting its performance in compliance with that Order for over a year. AT&T's and MCI's comments at most reveal their dissatisfaction with the comprehensive plan the Department adopted following a comprehensive examination in the *Consolidated Arbitrations*.

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It should also be noted that many of the allegedly “missing metrics” were considered by the Department in the *Consolidated Arbitrations* proceedings and rejected. For example the CLECs proposed additional levels of results disaggregation that were not adopted in the Phase 3-B Order. The Department denied reconsideration of this same issue in its Phase 3-C decision.

The CLECs also state that the third-party test cannot commence until a comprehensive and detailed set of metrics is developed. The CLECs ignore that the *Consolidated Arbitrations* metrics and supplemental measures provided by BA-MA in the Section 271 filing are a comprehensive set of metrics that KPMG will evaluate. KPMG will examine the processes by which BA-MA gathers the underlying data for the measures and reported results to validate the accuracy of those results. In essence, KPMG tests the ability of BA-MA systems to record the data, not the specific performance measures themselves. As noted in the MTP: “The objective of this test is to evaluate the capture, tracking, and reporting of metrics for pre-ordering, ordering, and provisioning and for maintenance and repair as required by regulatory bodies.” Draft Master Test Plan at 157. Therefore, the third party test will validate BA-MA’s ability to record and report performance in a satisfactory manner. Even if wholesale measurements change in the future, it is BA-MA’s ability to accurately record and report performance that is critical and will be evaluated by KPMG.

The CLECs argue that the Department should adopt the New York C2C measures at a minimum before the test can begin. As mentioned above, the CLECs frequently draw comparisons to New York and the C2C measures in an attempt to show the thoroughness of the process in NY. Their attempts, however, are misleading. When the New York third party test began, the collaborative process in New York that produced the C2C measures was just beginning. The set of C2C measures that existed at the starting point for the New York KPMG test was very different from the C2C measures now included in the plan. This is in contrast to the Massachusetts process which now has a comprehensive set of metrics that have already been adjudicated by the Department. Many of the measures that the CLECs use to illustrate “gaps” are actually still under development in New York and have not yet been reported. Moreover, the measures added to the C2C metrics were the result of the regulatory process, not the third party test.

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The development of a measurement plan and the third party test are not dependent and sequential. They were not so in New York and should not be in Massachusetts. The measures provided in BA-MA's Section 271 filing provide a solid basis for conducting the third party test. If the third party test indicates weak process areas additional measures may be recommended by KPMG or required by the Department. The CLECs, too, realize this. AT&T asserts: "In particular, the Department must allow for the possibility that performance standards will need to be augmented and revised based on further information gleaned through the OSS testing process." AT&T comments at 47.

**Response to Category B**

AT&T argues that because of its procedural rights, the Department should allow it to participate in the development of performance standards as part of the MTP development. Other CLECs make similar requests regarding their participation in measurement development, although they do not assert the same "due process" claim made by AT&T. This is a red herring. The Department does not have to litigate performance measures in an adjudicatory proceeding to evaluate BA-MA's Section 271 compliance. AT&T has received the adjudication to which it was entitled in the *Consolidated Arbitrations* where the Department's Performance Standards Plan was determined for inclusion in the AT&T/BA-MA Interconnection Agreement.

**Response to Category C**

Several CLECs use comparisons between the *Consolidated Arbitrations* measures and the New York C2C measures to highlight "gaps" in the Massachusetts measurement plan. AT&T and MCIW include detailed attachments with their Draft MTP comments that compare the two plans measure by measure. The conclusions that the CLECs draw, however, from these comparisons are misleading. When considered together, the *Consolidated Arbitrations* metrics and supplemental metrics included in BA-MA's Section 271 filing provide a complete and comprehensive view of BA-MA's wholesale performance.

In response to ATT 1-7, BA-MA provided a metric by metric comparison of the New York measurement plan and the metrics provided in BA-MA's Section 271 application. Unlike the various "analyses" provided by the CLECs in their comments, BA-MA's summary included the supplemental measures that were provided in

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the 271 filing. In examining the analysis provided in ATT 1-7, it is clear that when the metrics are compared side by side, the alleged “gaps” disappear. Much of the detail is provided in ATT 1-7, but following are a few illustrations of the disappearing gaps:

- Supplemental measures:
  - The CLECs claim that greater disaggregation is needed for pre-ordering response time. BA-MA provided this as measures PO-1-01 through PO-1-05.
  - MediaOne requested that LNP measures be included. BA-MA provided this as measure PR-4-07
  - Contact Center Response was provided as measures PO-3-01 and PO-3-03.
  - Other supplemental measures include billing, collocation, trunk blockage, etc.
- Many of the “gaps” that the CLECs portray are actually due to measures that are still under development and have not yet been reported in NY. There are over 100 measures in the C2C plan that are still under development.
- In some cases, the NY plan simply includes a greater amount of disaggregation for certain measures than the Massachusetts plan. There is no gap in these instances, just a difference in the level of detail. For example BA-MA reported OSS Interface Availability – Prime Time (PO-2-02) and OSS Interface Availability – Non-Prime Time (PO-2-03). The New York plan also includes OSS Interface Availability – Total, which is simply the compilation of the Prime Time and Non-Prime Time metrics that have been provided. There is no standard for the Total metric reported in New York. In addition it is significant to note that in some cases the Department has required greater disaggregation than NY and BA-MA has provided it.
- Average Offered Interval is required in New York but not in Massachusetts. The CLECs claim this is a gap but they are incorrect. Performance on all of the Average Offered Interval metrics is a function of the mix of orders placed by each individual carrier and not on any activity performed by BA-MA.

In summary, the performance measures provided by BA-MA in its Section 271 filing provide a comprehensive base on which to perform the third party test. The claims espoused by the CLECs in their comments are based on misleading comparisons between the

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*Consolidated Arbitrations* measures and the NY C2C plan. The only “gaps” are due to the CLECs’ failure to acknowledge that the supplemental measures provide most of the information they are requesting, over 100 measures are still under development in the NY plan, and that many issues have already been considered and decided in the *Consolidated Arbitrations*.

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**NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY**

**COMMONWEALTH OF MASSACHUSETTS**

**D.T.E. 99-271**

**Respondent:** Paula Brown  
**Title:** Vice President-Regulatory  
**Respondent:** Stuart Miller  
**Title:** Vice President-Network

**REQUEST:** Department of Telecommunications and Energy, Set #3

**DATED:** October 29, 1999

**ITEM:** DTE 3-3 Please respond to the argument that commercially available terms and Conditions for the provisioning of UNE-P must be established prior to KMPG's OSS testing to ensure that this test will provide an accurate representation of what is currently available to CLECs in Massachusetts, as opposed to a hypothetical UNE-P offering.

**REPLY:** On March 19, 1999, the Department issued its Phase 4-J Order in the *Consolidated Arbitrations*. In its Order, the Department stated:

“Bell Atlantic shall make existing combined UNEs, including the UNE platform, available to all CLECs in their combined form<sup>1</sup>. In addition, the interconnection agreements do not provide for a fee for maintaining an existing combination of UNEs (i.e., a “glue charge”), and accordingly no such fee shall be assessed<sup>2</sup>.”

BA-MA has complied with the Department’s Phase 4-J Order and is now providing the UNE platform to CLECs when ordered as a migration from an existing service.

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<sup>1</sup> “Bell Atlantic shall not disassemble or make unavailable to CLECs already-combined UNEs where doing so would thwart the intent of this directive. For example, if a customer served by a Bell Atlantic UNE platform discontinues service, Bell Atlantic may not disassemble or make unavailable that UNE platform for use by another customer taking service from that CLEC or another CLEC.”

<sup>2</sup> “Unless otherwise determined, the price for a particular set of pre-combined UNEs would be the sum of the prices for the individual UNEs which make up the combination.”

**REPLY DTE 3-3  
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On May 21, 1999, the Department issued its Phase 4-K Order in the *Consolidated Arbitrations*. In that Order, the Department stated:

“Again, we suggest that Bell Atlantic consider providing combinations of previously uncombined UNEs, perhaps with a glue charge applicable only to combinations of previously uncombined UNEs.”

On June 18, 1999, BA-MA filed its proposal in compliance with the Phase 4K Order. In its filing, BA-MA offered voluntarily to provide CLECs with the UNE-P, where the Loop and Local Switching UNEs are not already combined, for the provision of residential and business POTS service and residential and business Basic Rate Interface ISDN service under the following terms and conditions:

- BA-MA-combined UNE-P arrangements will be available for residence service in all central offices and for business service only in central offices where no collocation arrangements exist.
- BA-MA-combined UNE-P arrangements will be provided with a “Glue Fee:
- BA-MA-combined UNE-P arrangements will be offered until 2003.

The Department has not yet issued its Order in response to BA-MA’s proposal. Moreover, BA-MA is currently in the process of reviewing the FCC’s UNE Remand decision. Upon completion of its review, BA-MA will make modifications, as necessary, to its UNE-P proposal.

As a result of the Department’s Phase 4-J Order, commercially available terms and conditions exist for the provisioning of UNE-P where the loop and switching element are already combined. KPMG can complete its testing of the product as it exists in the marketplace. In the case of an UNE-P where the elements are not already combined, BA-MA has proposed certain restrictions that have not yet been acted upon by the Department. However, BA-MA has made the necessary changes to its systems to allow KPMG to test the process of providing a new UNE-P without any restrictions. For instance, KPMG can today, issue a Local Service Request for new service at any business or residential location within Massachusetts, using UNE-P as the vehicle for providing that service. The systems that KPMG will test are the

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same systems that CLECs will use to submit UNE-P orders. There is no difference. Therefore, KPMG can, in fact, perform the necessary tests to verify BA-MA's ability to handle the pre-ordering, ordering, provisioning, billing and maintenance of UNE Platforms in Massachusetts.

If the Department orders modifications to the new UNE-P offering at a later date, BA-MA will comply. As a result, the only system change would be the inclusion of restrictions that would merely prevent a CLEC from ordering an UNE-P under the restricted circumstances. While systems modifications were in process, BA-MA would notify the CLECs of the UNE-P restrictions and the CLECs would submit their Local Service Requests accordingly. For example, if the Department agreed with BA-MA that UNE-P arrangements would not be available for business service in central offices where CLECs were collocated, then BA-MA would provide CLECs with a list of central offices that contained a collocation arrangement and CLECs would not order UNE-P in those central offices. This would have no impact on the results of the KPMG test since CLECs will only order UNE-P in offices where it is available, and therefore, from a CLEC ordering perspective, the results of the KPMG test are no different than what a CLEC will experience in a commercial environment.

KPMG will perform an extensive evaluation of BA-MA's OSS systems, interfaces and processes that enable CLECs to compete with BA-MA for customers' local telephone service. The test will include the pre-ordering, ordering, provisioning, maintenance and repair and billing of a variety of BA-MA unbundled elements and resold services, as well as relationship management, documentation, testing environment, capacity planning and other critical processes. It is impossible to test every possible transaction type in a test of this magnitude. Instead, the tester would include a broad spectrum of the transaction types, which, upon completion of the test and analysis of the results, would allow the tester to form conclusions on system readiness. To that end, it is not necessary to test additional restrictions that may or may not be applied to the provisioning of a UNE Platform once the Department has issued its Order. If the KPMG test finds that the systems perform satisfactorily and that the Company's Change Management practice is satisfactory, then it is reasonable to assume that further changes to systems can also be implemented in a satisfactory manner, regardless of whether that change is to

**REPLY DTE 3-3**  
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accommodate restrictions associated with UNE-P or any other change associated with any product or unbundled element.

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**D.T.E. 99-271**

**Respondent:** Stuart Miller

**Title:** Vice President-Network

**REQUEST:** Department of Telecommunications and Energy, Set #3

**DATED:** October 29, 1999

**ITEM:** DTE 3-4 Please explain whether and how the "flow-through" tests envisioned in the MTP will capture the degree to which the list of orders that are represented to CLECs (and KPMG) as "flow-through" (i.e. Level 5) provides parity with the nature of order flow-through for BA-MA's retail operations. Also, please address the argument that any flow-through evaluation by KPMG should examine and report results for each category of orders (including UNE-P, UNE-L, number portability, and directory listings).

**REPLY:** The KPMG Evaluation is designed to test whether BA-MA has met its requirement to provide non-discriminatory access to its operational support systems. One of these standards is to provide wholesale order flow-through at parity with retail. Flow-through for retail orders is defined as orders that do not require manual entry into the Service Order Processor (SOP).<sup>3</sup> Flow-through for CLEC orders is defined as Local Service Requests received electronically through the ordering interface that do not require manual entry into the SOP. KPMG's Evaluation will test BA-MA's ability to provide flow-through capability for the order types that are designed to flow-through, if CLECs fill out their orders for those services and products correctly. BA-MA can conduct a detailed comparison of flow-through for the wholesale order types used in KPMG's test and the closest comparable retail order types. For purposes of making the comparison, retail

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<sup>3</sup> Flow-through for retail is actually a misnomer, since every retail order must be typed by a BA-MA representative in order to ultimately get the order into the SOP.

**REPLY DTE 3-4  
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orders that can be entered by a BA-MA representative using the Direct Order Entry (DOE) front-end system would be defined as flow-through orders. DOE is an interface to the service order processor that simplifies order entry for BA-MA retail representatives. Orders that BA-MA representatives must manually enter into the service order processor would be considered "non-flow-through" or manual orders.

Once KPMG has identified the universe of wholesale order types, it intends to include in the flow-through test, a retail analog of each order type can be developed to determine if a comparable retail order would flow-through. An analysis such as this would demonstrate the degree of flow-through parity between wholesale and retail.

A similar analysis was performed in New York. Using the volume weightings assigned for the KPMG test, BA-NY calculated the percentage of CLEC orders designed to flow-through and the percentage of the retail analogs designed to "flow-through." For service orders designed to "flow-through" in retail, 89% of comparable resale orders were designed to flow-through and 95.7% of UNE-platform orders were designed to flow-through. In addition, 92% of other UNE orders were designed to flow-through. Conversely, comparing total retail volumes that flow-through with total wholesale volumes that flow-through is not a valid comparison because it is distorted by the mix of orders, *i.e.*, the proportion of order types requested by CLECs vs. those requested by retail.

The order types not designed for flow-through in both retail and wholesale are mainly complex order types such as Centrex, ISDN, private line, foreign exchange and ADSL/HDSL. Other orders that do not flow-through are as a result of order entry errors made by the CLECs or system conditions occurring in BA-MA systems.

However, in an effort to ensure that the wholesale market achieves optimal benefits from flow-through functionality, Bell Atlantic has put a process in place to centrally monitor flow-through performance and look for continuous process improvements. Flow-through studies, performed on an ongoing basis, continually search for changes that would further enhance the flow-through process and thus, the flow-through rates. Initial studies have resulted in a series of recommendations for enhancements to flow-through.

**REPLY DTE 3-4  
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The attached joint affidavit of Stuart Miller, Sean J. Sullivan and Arthur Zanfani, filed in Case 97-C-0271 in New York, address specific improvement plans in New York which apply equally to Massachusetts.

The proposed enhancements contained in the affidavit have been reviewed with CLECs at a change control meeting and on a follow-up conference call. Based on that review, several of the stated changes from Phase I, the October 30<sup>th</sup> changes, have been implemented. In addition, Bell Atlantic has scheduled a seminar with the CLECs to review the common mistakes and recommend preventive action. Based on feedback from this session, additional seminars will be scheduled.

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**D.T.E. 99-271**

**Respondent:** Stuart Miller

**Title:** Vice President-Network

**REQUEST:** Department of Telecommunications and Energy, Set #3

**DATED:** October 29, 1999

**ITEM:** DTE 3-5 Please respond to the concerns and arguments raised in the CLEC MTP comments regarding the need for "normal, high and stress volume" testing in a third-party OSS evaluation. Also, please explain how the Massachusetts KPMG OSS test will satisfy the Federal Communications Commission's ("FCC") representation, as outlined in Common Carrier Bureau Chief Lawrence E. Strickling's September 27, 1999, letter to US West, that normal, high and stress volume testing are key elements of a third-party OSS test, which will assist the FCC in determining whether a Bell operating company's OSS is operationally ready and capable of handling ever-increasing volumes of Transactions.

**REPLY:** Third party testing of the Wholesale environment, at normal, peak and stress levels, is an established method to demonstrate competency in systems capacity. BA-MA is committed to maintaining the system capacity necessary to support its wholesale customers.

The volumes that were processed during the stress test in New York included not only the forecasted volumes for New York, but also the forecasted volumes for Massachusetts, Vermont, New Hampshire, Maine, Connecticut, and Rhode Island. The stress volumes run under the New York test embodied end of year 1999 volumes for all of the New England states and New York based on the Company's latest forecast produced in December 1998. Actual volumes of orders experienced to date in 1999 indicate that the Company forecast was conservative. As a result, the stress test performed in New York

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utilized order volumes that are expected to occur around August 2000. Since the systems that would be stress-tested in Massachusetts are the same as those that have already been stress tested in New York, there is no need to re-do such a test in Massachusetts. KPMG found no discrepancies during its stress test of the systems in the New York trial and because the systems are the same, would find no difference in a Massachusetts trial.

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