

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

**Investigation by the Department of Telecommunications and Energy upon its own motion pursuant to Section 271 of the Telecommunications Act of 1996 into the Compliance Filing of New England Telephone and Telegraph d/b/a Bell Atlantic-Massachusetts as part of its application to the Federal Communications Commission for entry into the in-region interLATA (long distance) telephone market.** :  
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**WORLDCOM, INC.'S PROPOSED DISCOVERY REQUESTS  
FOR BELL ATLANTIC-MASSACHUSETTS**

In accordance with the Department's June 9, 2000, Memorandum promulgating a revised schedule for participants, WorldCom, Inc., hereby propounds discovery requests to enable it to respond to the Supplemental Comments and affidavits filed May 26, 2000 by Bell Atlantic-Massachusetts ("BA-MA") in the above-captioned proceeding.

**Discovery Requests and Explanations**

1. (a) **Provide a complete flow diagram of BA-MA's front-end and back-end systems.**
- (b) **Describe in detail any differences between the systems used in Massachusetts and the systems used in New York, including:**
  - (1) **whether any systems are used in New York but not in Massachusetts or vice versa (e.g. Livewire is used in New York but not in MA);**
  - (2) **any differences in functionality of systems between New York and Massachusetts (even if the same system is used); and**
  - (3) **any differences in how the systems operate.**

**Please include systems differences with respect to pre-order, order, provisioning, maintenance and repair, and billing.**

- (c) **Provide a similar description of differences between Bell Atlantic's back-end systems in Massachusetts and Pennsylvania.**

EXPLANATION: WorldCom has extensive experience with Bell Atlantic's OSS in New York. WorldCom is participating in the OSS test in Pennsylvania. WorldCom needs to understand the similarities and differences between Bell Atlantic's OSS in Massachusetts and these other states in order to assess the extent to which WorldCom can rely on its experience in order to evaluate the readiness of Bell Atlantic's OSS and ultimately decide whether it is sufficiently reliable to launch ubiquitous residential service. This is particularly so since Bell Atlantic claims its OSS is ready and relies largely on evidence from New York in doing so. But Bell Atlantic also makes statements such as "many of the billing OSS are the same as those in New York." (Supplemental Comments at 150.)

**2. To the extent BA-MA is aware:**

- (a) **Provide a detailed description of KPMG's test of LSOG 4/EDI 10 (hereinafter referred to simply as LSOG 4). Compare the scope of this test to KPMG's test of LSOG 2, including a description of everything that is being tested in LSOG 2 that is not being tested for LSOG 4.**
- (b) **Provide a similar description of any internal testing of LSOG 4 that Bell Atlantic has conducted or is planning to conduct in MA. For Massachusetts systems or elsewhere, provide a description, broken down by week, of the success rate of integration testing of LSOG 4.**
- (c) **For each change BA-MA has made in response to a KPMG exception report or observation, state whether BA-MA has made the same change in LSOG 4. If not, explain why such a change was not needed or, if it was needed, explain why BA-MA did not implement the change.**

EXPLANATION: Bell Atlantic discusses many recent improvements it has made or is making to its OSS. Many of these are likely to be improvements only to LSOG 4/EDI 10 (hereinafter

referred to simply as LSOG 4), not LSOG 2. Bell Atlantic is likely to rely in part on LSOG 4 in seeking section 271 approval. Moreover, if WorldCom launches residential service in Massachusetts, it will do so using Bell Atlantic's LSOG 4/EDI 10 interface (hereinafter referred to simply as LSOG 4). WorldCom needs assurance that this interface is operationally ready.

3. (a) **Quantify the number of:**
- (1) **UNE-P orders BA-MA has filled in Massachusetts;**
  - (2) **UNE-P orders for residential service in Massachusetts;**
  - (3) **UNE-P migrations in Massachusetts;**
  - (4) **UNE-P new installs in Massachusetts;**
  - (5) **CLECs currently using BA-MA's UNE-P offering; and**
  - (6) **CLECs that have more than 20 UNE-P lines.**

**For each, provide the same data broken down by month.**

- (b) **Provide the flow-through rate on UNE-P orders broken down by month.**
- (c) **Provide the flow-through rate broken down by CLECs by month and the number of orders these CLECs are placing. (Bell Atlantic claims that some CLECs are able to achieve high flow through rates. OSS Affidavit ¶¶ 56, 64)**
- (d) **List the primary causes for UNE-P orders falling out for manual intervention in Massachusetts. Describe all situations in which a BA-MA representative will correct problems on an order rather than rejecting the order to the CLEC. (BA-MA claims that problems on CLEC orders are responsible for low flow through because BA-MA must correct these errors. OSS Aff. ¶ 54).**
- (c) **Provide the reject rate for orders submitted via UNE-P. Provide the reject rate broken down by CLEC by month. (Bell Atlantic claims that some CLECs are able to achieve low reject rates. OSS Aff. ¶ 64)**

EXPLANATION: Because successful commercial experience is the best gauge of operational readiness and WorldCom has not been able to obtain such experience itself as a result of the high prices in Massachusetts, WorldCom asks that Bell Atlantic provide additional data on UNE-P service in Massachusetts (which is the basis on which WorldCom would provide residential service).

4. (a) **Explain whether all of the changes implemented to address Bell Atlantic's problems in New York with missing ACKs, FOCs, and NOCs also been implemented with respect to Massachusetts. (BA-MA states generally that improved software and hardware is available in Massachusetts. Supplemental Comments at 145.)**
- (b) **Describe all situations for which Bell Atlantic was at least partially to blame for "connectivity problems" that led to missing notifiers in New York or elsewhere and whether such problems have been fixed for Massachusetts. (BA-MA suggests in its filing that CLECs were largely to blame for connectivity problems. Supplemental Comments at 144.)**

EXPLANATION: As the Department is well aware, WorldCom experienced substantial problems in New York when Bell Atlantic misplaced orders at various points in its internal process. WorldCom needs assurance that these problems will not be duplicated in Massachusetts.

5. (a) **Describe the process flow for each UNE-P LSR that BA-MA receives. In particular, state whether each UNE-P LSR is divided into multiple orders in Bell Atlantic's back-end systems. If so, describe what happens to each individual order and how Bell Atlantic ensures they remain coordinated.**
- (b) **Describe the process Bell Atlantic uses to update its Line Information Database (LIDB), what information is contained in that database, and how Bell Atlantic knows that the database is being updated correctly on CLEC orders.**

EXPLANATION: WorldCom's recent experience ordering UNE-P in Texas has provided additional understanding of potential barriers to successful provision of UNE-P service. The above questions are to determine whether such barriers exist in Massachusetts.

6. **BA-MA should explain whether it has implemented fielded complex completion notices in June, 2000.**

EXPLANATION: BA-MA states on page 43 of its Supplemental Comments that it plans to implement fielded complex completion notices in June.

7. **BA-MA should state when it plans to implement the ExpressTrak billing system for Massachusetts and describe your plans for the roll out. BA-MA should also discuss the success or failure of any testing or experience with ExpressTrak to date whether in Massachusetts or elsewhere.**

EXPLANATION: WorldCom is aware that BA-MA intends to implement a new billing system – Express Trak – across its region and needs the above requested information to determine the impact of this system on possible entry.

8. **Quantify the largest number of orders for unbundled loops (new or hot cut) in Massachusetts that the TISOC has handled in a day, a week, and a month. Provide the same information for New York orders.**

EXPLANATION: BA-MA asserts that its TISOC is prepared to handle commercial volumes of unbundled loop orders. (Checklist Aff. ¶ 163-64; Supplemental Comments at 55 ). WorldCom wishes to ascertain to what extent this claim has been tested by actual commercial volumes in Massachusetts, and to compare the volumes thus far handled in Massachusetts to the volumes at issue in New York, since Bell Atlantic relies heavily on the similarities between New York and Massachusetts in support of its application.

9. (a) **Indicate whether Bell Atlantic has any GR-303 installed today in its network in Massachusetts, and if so, what percentage of BA-MA's Massachusetts customers are served by GR-303.**
- (b) **If Bell Atlantic has no GR-303 installed in its network in Massachusetts today, indicate when it plans, if at all, to begin installing GR-303 into its network in the state.**
- (c) **Provide projections for the amount of GR-303 which will be a part of the BA-MA network in Massachusetts by the end of 2000, 2001, 2002, and 2005.**

EXPLANATION: BA-MA directly responded to WorldCom's contentions on regarding IDLC and GR-303 on pages 77-78 of its Supplemental Comments and paragraphs 227-245 of the Checklist Affidavit. However, BA-MA never denies in its supplemental comments and affidavits that it

is technically feasible to unbundle IDLC loops if the IDLC contains the GR-303 integrated interface. Rather, BA-MA simply states that as its network exists today, it is not technically feasible to unbundle IDLC loops. Presumably, this is because its network contains no GR-303. WorldCom seeks to verify this explanation and, if it is so, to find out when BA-MA plans to install GR-303 in Massachusetts and how much.

10. (a) **Quantify orders for the Switch Subplatform, broken out by month. Indicate how many CLECs are responsible for these orders.**
- (b) **Quantify orders for unbundled subloops, broken out by month. Indicate how many CLECs are responsible for these orders. Explain which performance metrics cover BA-MA's performance in providing unbundled subloops.**
- (c) **Quantify requests for Line Sharing, broken out by month. Indicate how many CLECs are responsible for these orders. Explain which performance metrics cover BA-MA's performance in providing line sharing.**
- (d) **Quantify the number of orders that BA-MA has received and provisioned for dark fiber, broken out by month. Explain which performance metrics capture BA-MA's performance in providing dark fiber.**

EXPLANATION: BA-MA suggests compliance with the requirements of section 271 by relying on its facial offering of a number of UNEs and UNE combinations. WorldCom wishes to know to what extent CLECs are in fact receiving service under these offerings, and whether current performance measures adequately capture performance for these services. This will permit the parties to identify gaps in the current proposals for anti-backsliding remedies plans, as well as to determine whether BA-MA's current performance is adequate.

11. (a) **State the percentage of CLEC-requested loop qualifications that required use of manual methods?**
- (b) **Describe the process and frequency of updating the mechanized pre-qualification database.**

- (c) **What process does BA-MA representatives follow if the mechanized pre-qualification database indicates that a loop is not DSL qualified?**
- (d) **What enhancements have been made to the mechanized pre-qualification database as a result of the New York DSL collaborative?**
- (e) **Does BA-MA have a timeline for providing a mechanized method to obtain loop make-up information?**

EXPLANATION: On May 5, 2000, BA-MA for the first time proposed methods and procedures for pre-qualifying and qualifying loops for DSL service and, therefore, this is WorldCom's first opportunity to ask BA-MA questions about these procedures.

- 12. Describe all orders BA-MA expected/designated to flow through that did not flow through during testing. State what caused these orders to fallout.**

EXPLANATION: In the past, Bell Atlantic's list of orders that will not flow through has proven incomplete.

- 13. Document the internal BA Quality Assurance process used for the CLEC Flash and Change Control procedure.**

EXPLANATION: WorldCom's New York experience leads us to believe that this is a problem.