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	)	D.T.E. 99-271

BELL ATLANTIC–MASSACHUSETTS
OSS AFFIDAVIT

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OSS AFFIDAVIT

1. My name is Stuart Miller. My Business Address is 1095 Avenue of the Americas, New York, New York. I am employed by Bell Atlantic as Vice President in the Operations Assurance and Administration Group of Network Services. Prior to January 2000, I was responsible for program management of the operations developments undertaken by Bell Atlantic in order to meet the requirements of the Telecommunications Act of 1996 ("Act") and various State and Federal Communications Commission ("FCC") Orders. I have testified on the topic of Bell Atlantic's Operations Support Systems ("OSS") before the New York Public Service Commission ("New York PSC") on various occasions since 1997. I earlier provided testimony in this proceeding on May 24, 1999 and August 27, 1999, and at the Technical Sessions held in late 1999.

2. My name is Marion C. Jordan. My business address is 1320 N. Court House Road, Arlington, Virginia. I am Vice President – CLEC System Support. My responsibilities include overseeing the Bell Atlantic local operating telephone companies' Change Management process and communications with CLECs, and overall project management for the implementation of CLEC requests concerning access to Bell Atlantic's OSS. I earlier provided testimony in this proceeding at the Technical Sessions held in late 1999.

3. I assumed my current responsibilities on September 1, 1999. From August 1996 until my recent appointment, I was Director – Systems Management Services in the Telecom Group Systems organization. In that position, I was responsible for directing the systems development work necessary to meet the requirements of the Act, and to enable CLECs to obtain access to Bell Atlantic's OSS. I joined Bell Atlantic in 1994. I was initially responsible for development activities for several retail systems.

4. Prior to joining Bell Atlantic, I was employed by MCI Telecommunications for over 10 years. At MCI, I held positions of increasing responsibility in areas of software requirements and implementation activities, marketing, and customer service.

5. My name is Marilyn DeVito. My Business Address is 1095 Avenue of the Americas, New York, New York. I am employed by Bell Atlantic as Director, Compliance Management, Program One. My responsibilities include overseeing systems initiatives for Bell Atlantic in order to meet the requirements of the Act. I assumed my current responsibilities in August 1997. I was a participant at the New York OSS collaborative.

6. In prior positions in NYNEX, I was responsible for project management of the information systems work related to Unbundled Network Element, Intralata Presubscription, and various other products as they relate to Information Systems. Over

the course of my career, I have held various management positions in retail customer care centers for business, residence and wholesale services.

7. My name is Sean J. Sullivan. My business address is 125 High Street, Boston, Massachusetts 02110. My current position is Director, TIS Systems and Methods, which includes responsibility for the development of business rules for the CLEC's use in developing their systems and submitting orders to Bell Atlantic.

8. Prior to assuming my current position, I spent two years as the project manager for the development and launch of Bell Atlantic's Resale program. I have a total of 15 years with Bell Atlantic, with considerable experience in Information Services and Operations. I earlier provided testimony in this proceeding at the Technical Sessions held in late 1999.

9. My name is David W. Swan Jr. My business address is 2980 Fairview Park Drive, Falls Church, Virginia. I am Vice President – Wholesale Support and Billing. My responsibilities include overseeing the Bell Atlantic customer contact centers that interact with Wholesale customers on billing issues, including collections, treatment and claims. I also oversee work activities that involve developing methods and procedures, business requirements, and systems specifications for various Wholesale systems, including access ordering and billing, Pre-subscribed Interexchange Carrier ("PIC") order processing, access customer gateways and UNE and Resale billing.

10. I assumed my current responsibilities in August 1997 at the time of the Bell Atlantic/NYNEX merger. Before the merger, I held a similar position with the pre-merger Bell Atlantic. From 1991 until 1994, I was Assistant Vice President in the Information Systems Organization. In that position, I was responsible for supervising application development and maintenance for Operations Support, Finance, and Billing

Systems. I joined Bell Atlantic in December 1966. I was initially responsible for development activities for various computer applications.

11. My name is Paul Haven. My business address is 13100 Columbia Pike, Silver Spring, Maryland. I am employed by Bell Atlantic as a Director in Program One – Network Services. In this position, I am responsible for Bell Atlantic's maintenance and repair systems utilized by CLECs.

12. I joined the Company in 1984 and have held various positions of increasing responsibility in information systems and network services. Prior to assuming my current position, I served as Director for Program Management in Network Systems

13. My name is Brian Barry. My business address is 125 High Street, Boston, Massachusetts. I am employed by Bell Atlantic as the Manager of Telecommunications Industry Services Operations Center ("TISOC") Customer Care. In this position, I manage a group of people that serve as the point of contact for service issues that CLECs or Resellers may have with the TISOCs or Resale Service Centers. In addition, my group is responsible for the clearance of post completion discrepancies ("PCDs") when these occur.

14. I joined the Company in 1979 and have held various positions of increasing responsibility in customer services and provisioning. Prior to assuming my current position, I served as the Manager of the Boston Resale Service Center.

15. My name is Thomas Sautto. My business address is 540 Broad Street, Newark, New Jersey, 07101. I am employed by Bell Atlantic as the Executive Director – Wholesale Customer Care Operations. In this position, I am responsible for managing a group of people that serve as the single point of contact for service issues that CLECs or Resellers may have with system interfaces or transactions, inquiries regarding the status of their

orders, and questions or help regarding how to submit orders. I am also responsible for a group of service managers that are in daily contact with the CLECs to ensure that their service is working satisfactorily.

16. I joined the Company in November 1969 and have held various positions of increasing responsibility in customer services (provisioning and maintenance), process reengineering, system support and various staff assignments. Prior to assuming my current position, I served as Director – Operations Assurance where I was responsible for regional support for all Bell Atlantic Customers Service Centers and the Customer Repari Service Center. These responsibilities included system support for all these centers' systems, methods and procedures and process support.

17. My name is R. Michael Toothman. My business address is 13100 Columbia Pike, Silver Spring, Maryland 20904. My title is Director – CLEC Communication. My responsibilities include Change Management and requirements for CLEC-initiated changes.

18. Prior to assuming my current position, I held a number of positions of increasing responsibility in the areas of system requirements/development, change management, and testing. I have been involved in telecommunications for 28 years.

19. The purpose of this Affidavit is to describe the access that Bell Atlantic provides to its OSS for pre-ordering, ordering and provisioning, maintenance and repair, and billing for CLECs in Massachusetts. In combination with the testimony already provided by Bell Atlantic witnesses in this proceeding and the comprehensive studies completed by KPMG in New York and ongoing in Massachusetts, we demonstrate that the access BA-MA provides to support interconnection arrangements, Resale and Unbundled Network

Elements ("UNEs") – including combinations of UNEs – satisfies the requirements of the Act as recently set forth by the FCC in the *FCC Approval Order*.[1]

20. This Affidavit also responds to the various OSS claims presented by CLECs at the Technical Sessions held last year. Importantly, the claims are largely identical to those that the CLECs presented to the New York PSC and the FCC in this same timeframe last year in opposing BA-NY's application for Section 271 approval. The FCC rejected these claims in finding that BA-NY's OSS met the requirements of the Act.

21. There are four Exhibits associated with this Affidavit, labeled A to D.

I. BACKGROUND

A. BA-MA's OSS Are In Commercial Operation Today

22. The OSS used by Bell Atlantic to support CLECs is in substantial commercial use today. Seventy-nine CLECs are using it in their commercial operations in Massachusetts. There are eight CLECs using application-to-application interfaces to obtain access to these OSS, while the others use the simple access provided by Bell Atlantic's Web-GUI interface. In the month of March 2000, alone, these OSS supported almost 500,000 pre-order transactions, and more than 500,000 ordering transactions in New England and New York. While many CLECs still call in their trouble reports, the electronic Repair Trouble Administration System ("RETAS") interface to BA-MA's maintenance and repair OSS supported 4,100 maintenance transactions per month for Massachusetts customers, with functionality that exceeds that available to BA-MA representatives. Finally, Bell Atlantic's New England Billing OSS generates more than 10,000 CLEC bills per month and more than 48 million call usage records per month.

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[1] *In the Matter of Bell Atlantic New York for Authorization Under Section 271 of the Communications Act To Provide Region, InterLATA Service in the State of New York*, CC Docket 99-295, Memorandum Opinion and Order, ("FCC Approval Order") FCC 99-404, rel. December 22, 1999.

23. BA-MA also has in place a full suite of CLEC support services. These include the TISOC service representatives who help CLECs with their orders and the Bell Atlantic System Support personnel who assist CLECs from their help desk positions. The support also includes an extensive library of publications from the CLEC Handbooks that provides simple and straightforward information on how to do business with BA-MA to detailed technical publications that speak directly to CLEC technical and systems personnel. BA-MA also introduces, operates and changes the access it offers CLECs for obtaining access to its OSS in accordance with a Change Management Process developed in collaboration with CLECs and lauded by the FCC. (*FCC Approval Order* ¶ 111)

24. Importantly, Bell Atlantic's interfaces and OSS used by the CLECs have also been subjected to expert third-party review by KPMG as they were employed by Bell Atlantic-New York ("BA-NY"). Based in part on that review, the FCC concluded that BA-NY provides CLECs with nondiscriminatory access to its OSS.

B. KPMG's Extensive Testing in New York

25. The New York PSC engaged KPMG in April 1998 to evaluate Bell Atlantic's OSS and the interfaces provided to CLECs in New York. Under guidance from the New York PSC, KPMG specifically designed its test to address all stages of a CLEC's relationship with BA-NY, including initial establishment of the relationship, performing daily operations, and maintaining the ongoing relationship. KPMG included each of the potential service delivery methods a CLEC might use – Resale, UNEs, and UNE combinations – in its review. Hewlett Packard Corporation ("HPC") built the interfaces used by KPMG based on documentation provided by BA-NY. The test focused specifically on the five OSS functional areas of pre-ordering, ordering and provisioning, maintenance and repair, and billing.

26. In addition to the systems tests, KPMG analyzed BA-NY's day-to-day operations and CLEC support and operational management practices, including policy development, development of methods and procedures, and procedural change management, to determine whether the processes functioned correctly and according to documentation and expectations.

27. KPMG's test was designed to be "representative of an entire CLEC marketplace, which was much broader than that likely to be experienced by any single CLEC in the near future." (KPMG Final Report at § II.A.6) Overall, KPMG examined 855 test points and concluded that BA-NY had satisfied the evaluation criteria on 850 of them – over 99%. BA-NY has now addressed the five remaining points as well. *See* Miller Supplemental Affidavit, August 27, 1999.

C. The KPMG Review In Massachusetts

28. The KPMG test in Massachusetts, like the New York test, is designed to be multi-faceted and provide end-to-end testing of the systems, interfaces, and processes that fall within the scope of the testing effort. All stages of the BA-MA–CLEC relationship are to be considered, including the establishment of relationships, the performance of daily operations and the maintenance of the ongoing relationship. Moreover, each of the service delivery methods are included in the scope of the test. KPMG considered many factors in constructing its Master Test Plan ("MTP"), including the systems and processes to be tested, the measurement points and respective evaluation criteria, and the conditions required in order to stage a successful, efficient and objective test.

29. A KPMG draft test plan was released for comment by the Department on September 13, 1999. CLECs provided substantial comment and, on November 19, 1999, the Department issued a Letter Order addressing concerns raised by the CLECs and adopting

a final MTP. As in New York, the MTP is divided into separate "domains" to organize and facilitate testing:

- Pre-Ordering, Ordering, and Provisioning ("POP")
- Maintenance and Repair ("M&R")
- Billing ("BLG")
- Relationship Management and Infrastructure ("RM&I")
- Performance Metrics Reporting ("PMR")

30. These tests are underway in Massachusetts and the Department has indicated that the KPMG results will be the subject of a separate Technical Session. Two things are abundantly clear at this time, however. First, the KPMG test is comprehensive in scope, especially since the underlying BA-MA OSS have largely already been tested successfully in New York. Second, because the KPMG test of BA-MA's OSS is a military style test, meaning "test until you pass," any issues raised by KPMG will be addressed. Thus, although BA-MA is already providing nondiscriminatory access today to its OSS, the testing will confirm that and further improve those systems.

II. PRE-ORDERING

A. Systems and Interfaces

31. The affidavit and testimony provided earlier by Mr. Miller and other BA-MA witnesses demonstrate that Bell Atlantic provides CLECs with the same pre-order systems and functionality in Massachusetts as it does in New York. The record also shows that BA-MA service representatives and CLEC employees obtain the same pre-ordering information from the same OSS. (Miller Aff. ¶ 23; Tr. 2046 – 64*)*

32. Whether a CLEC chooses to use EDI or the Web GUI, its pre-order transaction enters a BA-MA gateway system that provides security and automatically directs the transaction to the appropriate back-end OSS. By contrast, BA-MA representatives must log in

separately to each back-end OSS, must know which OSS contains the information they need, and must query the appropriate OSS individually. Accordingly, in these and other respects, BA-MA has provided CLECs pre-order functionality superior to that which BA-MA's own retail representatives have. A diagram of the pre-ordering process flow was provided in BA-MA's initial filing on May 24, 1999. (Miller Aff. ¶ 19)

33. In addition to the EDI and Web GUI interfaces, BA-MA has made a third alternative available – Common Object Request Broker Architecture ("CORBA"). Although to date only AT&T has used the CORBA pre-ordering interface and only for parsed Customer Service Record ("CSR") retrieval, Telephone Number ("TN") reservation and address validation, BA-MA provides each of the transactions specified for CORBA in both the Local Service Ordering Guidelines ("LSOG") versions 3 and 4 industry guidelines in addition to the parsed CSR. The CORBA interface is available to any CLEC that chooses to use it. In fact, other CLECs are currently in the process of testing the CORBA interface with Bell Atlantic.

34. CLEC Claims. MCI and AT&T complained earlier in the Technical Sessions that BA-NY had failed to provide a non-discriminatory application-to-application pre-ordering interface. MCI acknowledged that it began using EDI to retrieve CSRs in September 1999, and to perform address validation in November 1999, but claimed that other pre-ordering functions were only accessible through the Web GUI. (MCI Aff. ¶ 27)[2] Moreover, according to MCI, the EDI interface for the "parsed CSR" was unstable and did not cover all order types. (MCI Aff. ¶ 28-29) AT&T claimed that BA-NY's EDI pre-ordering interface could not be integrated with the ordering interface, and argued that

[2] References to MCI are to the Lichtenberg/Sivori Affidavit filed November 30, 1999, unless otherwise specified. References to AT&T are to the Crafton Affidavit filed November 30, 1999, presented by Mr. Carmody at the Technical Sessions on December 9, 1999.

the CORBA pre-ordering interface was frequently not available. (AT&T Aff. ¶ 27-31) AT&T and MCI made these same claims before the New York PSC and the FCC. They were simply wrong, and the lack of functionality about which they complained resulted primarily from the fact that at the time of their complaints, they had not finished their own interfaces. As a result, the New York PSC and the FCC both concluded that BA-NY provided nondiscriminatory access to pre-ordering OSS functions.

35. MCI's complaints about the lack of application-to-application pre-ordering functionality were surprising, since MCI was using EDI to retrieve both parsed and unparsed CSRs, and had completed EDI testing in October 1999, for address validation, TN reservation, TN assignment, the exchange and return of telephone numbers, due date availability, directory listing information by mid-November, 1999. The fact that MCI was not yet using all of these functions in production was the result of its own internal timing decisions and did not indicate a lack of functionality in BA-MA's interface.

36. MCI's complaints about the "parsed CSR" functionality BA-MA provides through the pre-ordering interface were equally without merit. CSR retrieval, whether parsed or unparsed, was not included in the pre-ordering guidelines issued by the Ordering and Billing Forum ("OBF") of the Alliance for Telecommunications Industry Solutions ("ATIS") until LSOG version 4, which BA-MA implemented on March 1, 2000. BA-MA nevertheless provided the functionality to retrieve non-complex CSRs over its pre-ordering interfaces from the beginning. When BA-MA implemented parsed CSR functionality for EDI in May 1999, it was ahead of the industry release.

37. AT&T claims that BA-MA's pre-ordering interface does not provide parity because responses obtained via CORBA cannot be fully integrated with the BA interface used to place orders. (AT&T Aff. ¶ 27) But AT&T has argued to the FCC that Bell Atlantic has

provided key functionality to allow CLECs to integrate their pre-ordering and ordering interfaces – parsed service address information – since August 1999, and that Bell Atlantic provides documentation of its parsing rules to CLECs upon request. Supplemental Declaration of Julie S. Chambers and Sarah DeYoung on behalf of AT&T Corp., attached to *Supplemental Comments of AT&T Corp. in Opposition to SBC's Section 271 Application for Texas*, CC Docket No. 00-65, filed April 26, 2000. In addition, BA-MA has assisted CLECs in their pre-ordering and ordering integration efforts through its active participation in collaborative sessions. For example, address components, community names and thoroughfare abbreviations have been made consistent throughout the Bell Atlantic footprint. In addition, field names for pre-order and order data elements have been synchronized to make it easier for a CLEC to integrate the pre-ordering data with its ordering data.

38. During the Technical Sessions, MCI explained how it has implemented the pre-population of certain ordering fields with information obtained through the pre-ordering process. (Tr. 3770) Moreover, in comments made on the Application by SBC for Authorization to provide In-Region, InterLATA Services in Texas, MCI stated that it had achieved pre-order/order integration in New York:

> In New York, in contrast, MCI WorldCom had successfully integrated Bell Atlantic's EDI pre-order interface with key order functionality and KPMG had evaluated CLECs' ability to do so for all pre-order functionality.[3]

[3] CC Docket No. 00-4, Joint Declaration of Terri McMillon and John Sivori on behalf of MCI WorldCom, attached to Comments, ¶ 50, filed January 31, 2000.

39. Finally, Covad mistakenly claimed that after obtaining the NXX/NPA through the address validation function, it has to use its own data sources to obtain the serving central office. (Covad Aff. ¶ 44)[4] Covad's claim is without merit. The address validation transaction returns the local serving office NPA/NXX of the end-user customer, as well as the common language location identification ("CLLI") of the switch serving that location. The Bell Atlantic business rules, provided to CLECs, explain in detail how to obtain this information. (Miller Aff. May 24, 1999, Exhibit Book 1, Tab 1)

B. System Performance & Volumes

40. Pre-ordering transactions are processed through a common system used throughout the New England and New York region. During 1999, Bell Atlantic received and processed more than 2.6 million pre-order transactions from CLECs in the region. That is nearly double the volume processed during 1998. In the first quarter of 2000, Bell Atlantic has already received and processed more than 1.2 million pre-ordering transactions from CLECs, more than double the volume processed during the same quarter last year.

41. Bell Atlantic reports pre-ordering response times and interface availability in Massachusetts using the same measurements and data collection processes used by Bell Atlantic in New York. As shown in the Measurements Affidavit, response times for pre-order transactions with direct retail equivalents bettered the "retail plus four seconds" standard established in the New York Carrier-to-Carrier ("C2C") collaborative. (Measurements Aff. Exhibit B1) In addition, for the parsed CSR transaction which has no retail analogue, BA-MA's performance has bettered C2C standard levels. These results are even better than those that the FCC found sufficient in New York to demonstrate that Bell Atlantic provided nondiscriminatory access to pre-ordering OSS

[4] References to Covad are to the Cutcher, Clancy, Moscaritolo, Szafraniec Affidavit filed on November 30,

functions. Further, excellent results have also been recorded for the Web-GUI and CORBA pre-order interfaces. (Measurements Aff.)

42. BA-MA and CLECs have access to the same pre-ordering information from the same underlying pre-ordering OSS. The underlying OSS are periodically taken out of service for routine maintenance, and during these periods they are equally unavailable to CLECs and to BA-MA representatives. The scheduled out-of-service hours for each OSS are listed in Volume II of the CLEC/Resale Handbooks (provided as Exhibit 3 in BA-MA's initial filing on May 24, 1999 and is also available on the Wholesale website). Similarly, if a particular OSS experiences an unexpected problem, it is equally unavailable to BA-MA employees and to CLEC employees. Only a difference in interface availability would affect BA-MA and the CLECs differently. BA-MA notifies CLECs if there is an interface outage, or if there is an unscheduled outage or maintenance for the underlying OSS.

43. BA-MA reports the availability of the interfaces provided to CLECs during both "prime time" (6:00 a.m. to 12 midnight Eastern time, Monday through Saturday) and "non-prime time" (12:01 a.m. to 5:59 a.m. Eastern time, Monday through Saturday; all day Sunday and holidays). As shown in the Measurements Affidavit, the interfaces were available more than 99% of the time they were scheduled to be available during prime time and non-prime time in the first two months of 2000, except for a 98.57% availability during non-prime time for the EDI interface in February. (Measurements Aff. Exhibit B1) During the last six months of 1999, interface availability was similarly strong with over 99% availability for 27 of 36 measurements with many others close to 99% and only one less than 97% (non-prime time EDI). (*Id.*)

1999.

44. CLEC Claims. Z-Tel claimed that between October 24, 1999 and November 30, 1999, the Web-GUI was down for approximately 60 hours. (Z-Tel (Davis) Aff. ¶ 27) The complaints raised by Z-Tel related to the introduction of the Phase III GUI that was launched in October 1999. As with many new applications, the launching of the Phase III Web GUI, did experience some start-up problems. Throughout the process of de-bugging the Phase III Web GUI, Bell Atlantic provided continuous access to the Phase II GUI so that CLECs would continue to be able to process transactions until the Phase III GUI functioned properly.

45. AT&T claimed in its November 30, 1999, comments that the CORBA pre-ordering interface was frequently not available. (AT&T Aff. ¶ 29) AT&T then went on to identify a series of times for which the CORBA interface was not available and claimed that CLEC system access is not as responsive as pre-ordering systems used by Bell Atlantic representatives. (AT&T Aff. ¶ 29-31) However, BA-MA began reporting on CORBA interface availability in January 2000. Since that time, CORBA has been available *24 hours a day/7 days a week* more than 99% of the time. Further, prime time availability of CORBA has consistently exceeded the C2C standard of 99.5%. (Measurements Aff. Exhibit B1)

46. Bell Atlantic's pre-order systems and interfaces in New York and New England are now handling more almost 500,000 transactions a month, nearly double the levels Bell Atlantic was handling at the time of the FCC's review of BA-NY's Section 271 application. The response time data addressed above attest to the ability of these systems to be scaled to meet growing demand. Moreover, as in New York, KPMG is testing the scalability of Bell Atlantic's interfaces and systems to meet future volume.

47. Specifically, KPMG will conduct a volume test over a four-day period based upon KPMG's estimate of a future level of pre-ordering and ordering transactions that may be presented to Bell Atlantic's OSS. (MTP IV-2) The volume test will be based on projected volumes that KPMG estimates will be presented to Bell Atlantic's OSS in September 2000. The Department is also requiring that KPMG evaluate Bell Atlantic's ability to add capacity to its systems and scale its processes to meet demand into the future. (MTP IV-8) Thus, the test will not only confirm that Bell Atlantic's OSS can *currently* handle additional commercial volumes that may develop over a reasonable time period but will also demonstrate that those systems can be scaled to accommodate demand into the future.

C. Connectivity & Security

48. BA-MA currently offers CLECs several options for connecting with BA-MA's EDI interface: Direct connection (Dedicated); Value Added Networks ("VANs"); public network (Internet) connectivity; and Interactive Agent connectivity using Secure Socket Layer 3 ("SSL3") technology. Detailed specifications along with the benefits associated with each of these options are provided in Volume II of the CLEC/Resale Handbooks. The Handbooks themselves can also be found on Bell Atlantic's web site (http://www.bell-atl.com/wholesale).

49. Z-Tel claimed in its comments filed in November that the Secure ID system of obtaining access to the Web GUI is inefficient and costly. (Z-Tel (Davis) Aff. ¶ 18-21) Z-Tel further claimed at the Technical Sessions in December that CLECs faced an unworkable situation in using the GUI because only the representative who created an order could edit it and only the representative who opened a trouble ticket could check its status. This claim was outdated even at the time it was made. One enhancement achieved by the

implementation of GUI III was the elimination of the Secure ID cards and the institution of passwords. This enhancement allows CLECs to administer access to the GUI for their own users. CLECs may now obtain access to the Web GUI via the Internet using a URL address and password. The CLEC designates one or more Administrators who administer passwords for users within the company. Z-Tel was provided with passwords on September 20, 1999.

III. ORDERING

A. Ordering Systems and Interfaces

50. As earlier explained by Mr. Miller and other Bell Atlantic witnesses, the ordering systems used in Massachusetts are the same as those used by BA-NY. (Tr. 2152-2184) Further, in approving BA-NY's Section 271 application, the FCC found that Bell Atlantic provided nondiscriminatory access to these systems in keeping with the Act's requirements. Specifically, BA-MA provides CLECs a choice of two interfaces for submitting Resale and UNE orders – EDI and the Web GUI. Currently eight carriers are using EDI in Massachusetts, and 71 are using the Web GUI.

51. BA-MA currently provides the industry standard EDI issues 8 and 10 (with LSOG version 2 and version 4 formats, respectively) for ordering. The EDI interface allows CLECs to order both UNEs – including combinations of UNEs such as the platform – and resold services. Mr. Miller also indicated that, for ordering certain arrangements like interconnection trunks that resemble access-type services in some respects, BA-MA provides Connect:Direct (formerly called Network Data Mover or NDM). (Miller Affidavit, May 24, 1999, ¶ 11) In addition, certain Access Service Requests ("ASRs") can be submitted using the Web GUI. Connect:Direct is a well-established industry standard protocol for exchanging information within and between telecommunications

carriers, and has traditionally been used by Bell Atlantic to receive ASRs from Interexchange Carriers ("IXCs"). CLECs may order interconnection trunks and other access-type services by submitting an ASR over Connect:Direct or by faxing their orders.

52. During the first quarter of 2000, Bell Atlantic processed over 1 million LSRs in New England and New York, including more than 100,000 LSRs in Massachusetts. KPMG will test BA-MA's ability to process normal, peak and stress order volumes. (MTP IV-2) That test, together with the commercial volume of orders that BA-MA already is handling, will confirm that BA-MA provides nondiscriminatory order processing to CLECs operating in Massachusetts.

B. OSS Order Flow-through/Order Reject Rates

53. Flow-through is the process by which electronically submitted CLEC orders flow-through and are entered into the Service Order Processor ("SOP") without manual assistance by Bell Atlantic. Bell Atlantic has designed a number of order types to flow-through. However, actual order flow-through is dependent on several factors. First, the order as submitted must contain all appropriate information for the type of request. Thus, if an order fails to contain a valid due date or provides a listed address in an incorrect format, it will be rejected by the system front-end edits. In some cases, the reject is sent back to the CLEC while in others, it is sent to the TISOC for manual processing. Second, the order must pass all parameters designed for establishing the order in SOP. For example, after an LSR for a migration from retail passes the initial up-front edits, the request is reviewed against the customer service record ("CSR"). If the existence of optional calling plans or contractual agreements are found, then the order may be rejected back to the CLEC or forwarded to Bell Atlantic's TISOC for review.

54. Orders requiring manual handling by the TISOC are automatically directed by the system to the appropriate work group based on order type. There, the TISOC representative processes any orders that are not designed to flow-through or that fail to flow-through as the result of an error. Importantly, the TISOC representative also reviews those orders and if a discrepancy is uncovered that requires input from the CLEC, the representative sends a query to the CLEC for clarification.

55. AT&T argued at the Technical Sessions, as it did before the FCC in connection with BA-NY's Section 271 application, that a very high level of order flow-through was a necessary prerequisite to Section 271 approval. (AT&T Aff. ¶ 35; Tr. 3757-58) This argument was rejected by the FCC, which declared that order flow-through rates are only a factor to be considered in the processing of orders, but not an independent checklist criterion.

56. Although the FCC has said that order flow-through is not an independent requirement of the Act, Bell Atlantic continually seeks to improve order flow-though rates. These efforts have resulted in the flow-through rate for UNE loop orders in Massachusetts improving from 23.15% to 36.51% and for Resale orders improving from 41.01% to 49.25% for the period October 1999 to February 2000. (Measurements Aff. Exhibit B1) In order to provide the greatest efficiencies for both CLECs and the TISOC, Bell Atlantic first concentrated on the types of orders that were expected to produce the highest volumes, specifically UNE-platform orders in New York. Accordingly, while the BA-NY flow-through rates of 53.3% for Resale orders approximate those of BA-MA, the current UNE flow-through rates in New York of 70.12% are substantially higher, because of the high proportion of UNE platform orders. As UNE-platform orders increase in Massachusetts, the BA-MA flow-through rate will also rise.

57. Bell Atlantic pursues several paths to achieve additional flow-through. First, Bell Atlantic analyzes the error messages (system generated responses that identify and define LSR errors) generated when orders fail to flow-through. Error messages are reviewed to determine where system changes may have the greatest potential impact on flow-through, and where documentation additions or revisions, or CLEC education are needed.

58. Bell Atlantic formalized this process as a result of studies completed in September and October of last year. These studies analyzed various factors that prevented both UNE and resale orders from flowing though, focusing on those areas where the most fallout was occurring. The results of these studies led to several specific action steps. First, Bell Atlantic committed to make fifteen specific system changes in three phases within the Change Management process. Bell Atlantic has already addressed ten of these changes and another two changes will be implemented by the end of the year. An additional change is under development. In keeping with Bell Atlantic's practice of coordinating proposed system changes with CLECs via Change Management, however, the remaining two changes will not be implemented at this time based on CLEC feedback.

59. Second, Bell Atlantic established a rigorous ongoing order review process. This has led to the identification of additional opportunities for increasing flow-through, such as enabling those platform orders that were designated as essential lines or loop orders that included certain college dormitory information to flow-through.

60. Third, in each process/study, Bell Atlantic identified CLEC performance issues that limited order flow-through, leading to improvements such as the identification in the business rules of the specific manner by which the CLEC could determine the correct due date. In addition, Bell Atlantic has scheduled special workshops to address many CLEC performance issues, as discussed below.

61. The system enhancements Bell Atlantic has made have already shown benefits. In December 1999, for example, Bell Atlantic added the capability for UNE-P orders with additional listings to flow-through. This reduced the number of orders falling out from as many as 121 for the month of November in Massachusetts to zero following the release in December. At the same time, Bell Atlantic enabled orders for Ringmate Service to flow-through. This reduced the number of orders rejected to CLECs for Ringmate in New York from a high of 9,338 in October of 1999 to a level of approximately 140 in February 2000. These same system enhancements will have a positive impact on flow-through in Massachusetts. Indeed, one of the UNE-P CLECs in Massachusetts is already achieving an order flow-through rate above 80% this year.

62. Bell Atlantic also enhanced processes to enable flow-through for additional UNE loop orders. For example, UNE loop migration requests where the customer has existing hunting features now flow-through under most circumstances. The number of these orders that failed to flow-through in Massachusetts was reduced by 97%, from a high of 135 in December to a low of 3 in February 2000. Bell Atlantic's review efforts have also focused on UNE loop xDSL orders and system development has been initiated to flow-through ADSL requests. This system enhancement, which is currently scheduled for June 2000, will enable the flow-through of a substantial number of orders in Massachusetts.

63. Bell Atlantic has also increased flow-through capability for Resale services. For example, a single system improvement made in the treatment of the telephone number that the CLECs provide on the LSR, where Bell Atlantic now accepts the telephone number with or without hyphens, has reduced manual processing for these orders from 1,214 messages in December 1999 to 33 in January 2000, in Massachusetts. As a result

of these and other changes, some Resale CLECs in Massachusetts are achieving flow-through levels of 80% and more in 2000.

64. The success of these CLECs show that the system capabilities are in place to enable Massachusetts CLECs to achieve a significant level of order flow-through. Both order flow-through rates and order reject rates are driven in part by CLEC errors in the submitted LSRs. Whether due to increased employee training and motivation or due to their enhanced internal systems and procedures, some CLECs achieve and sustain high order flow-through rates while others do not. For example, while some Resale CLECs have consistently enjoyed order flow-though rates above 80% this year, another has rates that are consistently in the 30% range. Not surprisingly, the top flow-through Resellers also experience order reject rates as low as 15%, while the low order flow-through carrier experiences order reject rates above 75%. (Indeed, it is largely the percentage participation of these individual carriers in the marketplace that causes the monthly C2C averages to vary.) Similarly, certain UNE and LNP carriers consistently achieve better order flow-through rates *and* lower order reject rates then their counterparts.

65. To assist CLECs in increasing the quality of their order preparation, Bell Atlantic began conducting monthly CLEC education workshops in November 1999. The monthly workshops began by focusing on issues observed in the higher-volume New York orders, but apply in Massachusetts as well.

66. The topics for the first workshop were based on the CLEC error report, particularly focusing on four of the top error types that are rejected to the CLECs. Later workshops have continued to review the error reports, but also include coverage of the areas that CLECs have indicated are of particular interest. These topics have ranged from Ringmate service ordering examples, a loop qualification transaction overview, and

specific loop and number portability ordering scenarios. Feedback has shown that participants value the Wholesale Flow-Through Workshops and have seen continuous improvement since initiation of this educational forum. For the past six sessions the number of attendees has ranged from 38-49 people, representing 21 CLECs. The educational packages developed for these sessions are sent out to all CLECS based on the Bell Atlantic Change Management distribution list one week prior to the session.

67. Finally, to help CLECs perform their own analyses of the causes that prevent the flow-through of their orders, Bell Atlantic has developed a complete inventory of flow-through errors by individual CLEC and by mode-of-entry. This diagnostic tool was made available to CLECs via the New York C2C subcommittee meeting. The objective is to help CLECs manage their ordering processes more effectively and reduce ordering errors, both of which will ultimately increase their flow-through rates. Bell Atlantic will continue to work cooperatively with the CLECs to help them improve their ordering performance. Enhancements made in New York will be equally applicable in Massachusetts.

C. Ordering Notices

68. As explained in the Measurements Affidavit, the C2C standards have set an objective benchmark for returning order confirmations or rejections for mechanized flow-through orders, whether Resale or UNE, of 2 hours; a benchmark for order confirmations or rejections for manually-handled orders for Resale or UNE POTS with fewer than 10 lines of 24 hours; and for Resale or UNE POTS with 10 lines or more of 72 hours. The C2C results from January through March 2000 show that BA-MA performance on flow-through orders was consistently above the 95% level. (Measurements Aff. Exhibit B1)

69. There are four work centers responsible for receiving and processing Massachusetts wholesale orders that require BA-MA manual assistance: the Boston Resale Center, the Boston Platform Center, the Boston Digital Subscriber Loop ("DSL") Center, and the UNE Loop/Hotcut Center. The centers currently employ 431 full time representatives to process orders. In addition, two outsourcing companies, the ITC Group and Lexus , have been hired to handle overflow of simple Resale, UNE platform, and UNE Loop orders when volumes exceed the centers' capacity. Between these two companies, BA-MA has access to an additional 142 trained personnel to process orders.

70. BA-MA has demonstrated that it is able to staff its centers with enough representatives to handle the orders that require manual processing. In the past, CLECs have expressed concern with BA-MA's ability to provide Local Service Request Confirmations ("LSRCs") and rejections for orders that required manual processing in a timely fashion. Between November 1999 and March 2000, BA-MA increased its staffing over 81%. As a result of this force augmentation, BA-MA has substantially improved its confirmation and reject response times over the past several months. It is now providing LSRCs and order rejects at or near the C2C benchmark of 95% almost across the whole spectrum of order types with the exception of ASRs that are faxed or mailed which represent minimum volumes. (Measurements Aff. Exhibit B1)

71. Currently, 573 representatives are handling wholesale volumes and additional representatives can easily be added. Bell Atlantic plans to add 20 representatives to the wholesale centers in this month. These representatives will be placed into the particular centers based on the workload requirements of the centers. In addition, the DSL Center will add more than 20 new service representatives to its staff in May 2000 and an additional 38 representatives in June 2000.

72. Covad claimed that "TISOC availability is inconsistent and unreliable." (Covad Aff. ¶ 44) However, a review of BA-MA's UNE Center Availability - Order metric shows that for every month from July 1999 through March 2000, BA-MA exceeded its target of answering 80% of calls with in 30 seconds. (Measurements Aff. Exhibit B1) Similarly, the UNE Center Availability – Repair metric has exceeded the target of 80% of calls within 30 seconds for five out of the past six months. (Measurements Aff. Exhibit B1; *see* also Checklist Aff.)

73. Covad also claimed that BA-MA's service representatives are not trained in DSL. (Covad Aff. ¶ 48) Prior to July 1999, DSL services were handled in the UNE Loop/Hotcut Center. These orders were handled by six representatives who were trained to process DSL orders. In order to better serve the growing demand for DSL services, Bell Atlantic opened a new center dedicated to DSL services in July 1999, with 15 service representatives. Within two months, the center had 30 representatives and currently, the center employs 66 representatives. All of the representatives in the DSL Center have been trained on DSL services. As stated above, an additional 58 service representatives will be added to the center by the end of June 2000.

74. When the DSL Center first opened, data CLECs ("DLECs") were instructed to contact specific representatives at their direct lines. The DLECs were also provided with a list of telephone numbers for all of the supervisors and managers in the center so that they could always reach a DSL Center employee. In addition, the DLECs were provided with a general telephone number for the DSL Center. This reach number was answered by a dedicated wholesale service representative to ensure that the center was accessible during its hours of operation.

75. In January 2000, the DSL Center installed an "800" number to provide DLECs with a single reach number to enhance accessibility. Further, in March 2000, Bell Atlantic reorganized the reporting structure of the wholesale centers. Bell Atlantic created a new District Manager position, with responsibility solely for the DSL Centers in the Bell Atlantic region. This new organizational structure will provide more focused attention to the needs of the DLECs.

76. In short, Bell Atlantic has substantially enhanced the TISOC staffing levels, as discussed at the Technical Sessions. (Tr. 1755-1758) Further, Bell Atlantic has made organizational changes to enhance its ability to provide effective service to CLECs.

D. Missing Notifiers

77. Various CLECs have expressed concerns regarding missing notifiers including acknowledgements, confirmations and completion notices based on their experience in New York. (MCI Aff. ¶ 58; AT&T Aff. ¶ 108-111) The issues BA-NY encountered in processing orders from CLECs in New York dealt principally with the return of system notifiers that inform wholesale customers using the EDI ordering interface of the status of their orders. These notifiers include acknowledgements,[5] confirmations,[6] and completion notices.[7] In most cases, when the CLECs reported a missing notifier, Bell Atlantic had

[5] Acknowledgements are sent to wholesale customers to confirm receipt of an EDI order. Sometimes when a wholesale customer does not receive an acknowledgement in the expected time frame, it is because Bell Atlantic has no record of having received the order. This may occur because of a problem in the wholesale customer's system that is supposed to send the order to Bell Atlantic, or in the connection between the two systems, or in Bell Atlantic's system.

[6] Confirmations inform wholesale customers that a particular order is ready for provisioning and the date on which it will be provisioned. Reject notices and queries provide feedback to the CLEC that the order does not meet the requirements for a correct order, or that clarifying information is needed.

[7] Work completion notices inform the CLEC that the order has been provisioned. Billing completion notices indicate that the billing records changes associated with a provisioned order have been completed.

actually received and processed the order, but the CLEC had not received the notifier. In fewer than 3% of the cases, Bell Atlantic had no record of receiving the order, and asked the CLEC to resubmit the order. The OSS issues associated with returning status notices in New York affected Massachusetts to a much smaller extent because, currently, most orders processed in Massachusetts are originated through the Web GUI, which was not impacted by these EDI issues. In Massachusetts, only about 5% of all orders submitted are transmitted via the EDI interface. Therefore, the order impact in Massachusetts is estimated to have been far less than one-half of one percent.

78. The issues associated with these missing notifiers commanded and received the full attention of Bell Atlantic. Teams of Bell Atlantic information technology and systems employees worked around the clock for several weeks to identify and resolve the problem. In addition, Bell Atlantic discontinued the volume testing with KPMG in Massachusetts, New Jersey and Pennsylvania, and re-deployed personnel working on those tests to assist with this effort.

79. A dedicated team was established to address and resolve trouble tickets submitted by CLECs for missing notifiers. The team developed new tools to search for the notifiers and to resend them electronically whenever possible. Bell Atlantic took a series of steps to implement a long-term solution, and implemented several processes and improvements in the short term to ensure that CLECs were able to continue their successful mass marketing efforts. Bell Atlantic also developed and put in place new monitoring and diagnostic tools to enhance its ability to track CLEC orders.

80. Through these efforts, Bell Atlantic determined that the cause of the missing notifiers was a software component of the EDI order processing system. This software, ECXpert, was supplied by a third party vendor. The software did not always return the status notifier to

the CLEC as the order was processed. The software also sometimes failed to pass the order to the downstream systems for further processing.

81. To address these issues, Bell Atlantic first implemented interim steps to monitor and process CLEC orders that did not progress normally through ECXpert. A similar process was established to detect any outbound files containing confirmations, rejections or queries, or completion notices that had left DCAS but had failed to progress normally through ECXpert, and therefore were not sent to CLECs.

82. Second, Bell Atlantic instituted other processes to provide verification that files sent to Bell Atlantic by the CLECs were received and that files sent out from Bell Atlantic were received by the CLECs. Specifically, Bell Atlantic implemented a process in which it provided daily information confirming receipt of files from CLECs. This process enabled CLECs to verify that Bell Atlantic had received all of the files sent by them. In addition, Bell Atlantic provided daily reports of all files containing notices delivered to CLECs to enable them to verify that they received all of the confirmations or rejections and completion notices sent by Bell Atlantic.

83. Simultaneously, Bell Atlantic pursued two paths to develop a solution to the cause of the ECXpert problem. First, in early February, Bell Atlantic added additional hardware for the ECXpert boxes, which introduced a load-balancing feature and more than doubled capacity. This arrangement eliminates the need for CLECs to move their traffic from one server to another when a server goes down. It also distributes the traffic over any number of servers to balance the load and prevent overloading a single server. Shortly thereafter, Bell Atlantic implemented further significant hardware additions coincident with the implementation of LSOG 2 February release. These included two new SUN E6500 servers to replace the old ECXpert platforms and additional hardware to migrate AT&T

to the new Netlink software described below. Bell Atlantic migrated all other CLEC traffic to the new servers using Network Address Translation, which did not require the CLECs to make any changes to their IP addresses.

84. Third, Bell Atlantic replaced the ECXpert software with internally developed software that addresses the key deficiencies of the ECXpert product, which were sporadic failure to generate notices, extensive logging activities that degraded performance, and inability to trace records. CLEC migration to the new software solution began on February 23rd and was completed on March 31, 2000. In total, after the CLECs completed the cutover to Netlink, they now operate on three separate complexes, each with several times the capacity of the original ordering hardware. Exhibit A, Page 1 depicts the implementation of the new hardware and software. The overall capital commitment for the hardware upgrades that Bell Atlantic deployed to address these issues, including additional equipment planned through the second quarter, is more than $45 million. Most importantly, the interface availability has averaged over 99% since the transition to the new hardware.

85. Some missing acknowledgements also appeared to be related to connectivity issues. As indicated in Mr. Miller's May 24, 1999 Affidavit, CLECs connect to Bell Atlantic using a variety of arrangements. These include VAN-to-VAN, direct FTP ("File Transfer Protocol"), FTP via the Internet, and SSL3. (Exhibit A, Page 2) In addition, CLECs have multiple systems on their side of the interface that processes these orders. Addressing the end-to-end processing and connectivity issues requires joint work by Bell Atlantic and the CLECs, because Bell Atlantic cannot track a file sent from a CLEC but never received by Bell Atlantic. Working with CLECs in the first few months of this year, Bell Atlantic identified and corrected several connectivity issues. A number of

these situations involved CLEC errors and required action by the CLECs, such as correcting passwords, routing traffic to the proper server, or fixing problems with a CLEC VAN or FTP connection. In other cases, the CLEC's receiving server or firewall connection was not operating properly, and files sent by Bell Atlantic to the CLEC were not received by their systems which process the orders. In one instance, a CLEC destroyed directories containing Bell Atlantic notifiers on their own production system. They called on Bell Atlantic for help and Bell Atlantic was able to use its Trouble Ticket Resolution process to restore their lost files.

86. The replacement of ECXpert and the additional hardware have resolved the system issue that created the missing notifier problem. On March 9, 2000, Bell Atlantic entered into a Consent Decree with the FCC (FCC Order 00-92, released March 9, 2000) which among other things, established metrics to "ensure that Bell Atlantic is providing such nondiscriminatory access." The measurement results, provided in Exhibit B, were tracked and filed with the FCC on a weekly basis for the period March 11 through April 28, 2000. These metrics clearly indicate the exceptional reliability and performance of the upgraded EDI interface. The results were as follows:

% Order Confirmations/ rejects sent within 3 business days:	99.3%
% SOP to Bill Completion within 3 business days:	98.9%
% Order Confirmation Timeliness:	96.5%

87. Bell Atlantic systems are handling significant and growing levels of CLEC transactions. Bell Atlantic is now receiving and processing an average of almost 16,000 Local Service Requests every day from CLECs.

E. Order Accuracy

88. The C2C reports contain several measures associated with the accuracy of BA-MA's order processing. These metrics ("% Accuracy – Orders", "% Accuracy – Opportunities", and "% Accuracy – LSRC") are explained in the accompanying Measurements Affidavit. The order accuracy measurements are developed by the members of Bell Atlantic's "Quality Management Team" who audit a random sample of orders and compare up to twelve specified field identifiers in the BA-MA service order with corresponding information in the orders placed by the CLECs. Bell Atlantic then reports the percent of orders or fields that match completely.

89. As currently scored, this measurement does not present an accurate picture of Bell Atlantic's performance because the metric counts all differences between the original CLEC order and the information entered into Bell Atlantic's service order processor as an "error." As described in the Measurements Affidavit, these mismatches can occur for a variety of reasons. For example, if a wholesale representative makes a correction to an error found on a CLEC's order, the correction, even though it is beneficial to the CLEC (because it may be necessary to process the order), causes a mismatch which is treated as if it was an error. In fact, the Wholesale representative has saved the "rejected" order from being returned to the CLEC and thus avoiding a potential delay. In order to correct this flaw, the review team has been working closely with the TISOC staff to ensure that all mismatches are truly errors and have modified the review procedures as appropriate. These revisions will be reflected beginning with the March 2000 metrics reports.

90. Bell Atlantic's Wholesale Customer Care group has identified two issues associated with service order accuracy that impact the application date field. The first issue involves orders, which require manual processing and cannot be entered into the Direct Order Entry ("DOE") system. The Wholesale Customer Care group determined that some Bell

Atlantic Wholesale service representatives were entering the application date to reflect the date they were preparing the order rather than the date on which the Resale or Platform Center received a complete and accurate order from the CLEC.[8] A revised Method and Procedure has been prepared to correct this application date issue. It instructs the service representative to use the application date of receipt of an error free LSR. The revised Method and Procedure was released in May 2000.

91. The second involves the New England Resale Center and the Platform Center. In those centers, the service representatives enter orders into the Direct Order Entry system ("DOE"), whenever possible. The DOE system automatically populates the application date and will not permit a service representative to change that date.[9] The measurement scoring team had been treating these application dates as errors even though the service representative has no choice but to use the automatically populated application date. Beginning with the March 2000 metric reports, Bell Atlantic is no longer counting these application dates as errors.

92. During its review of the reported results, the Wholesale Customer Care group also identified two incorrect practices. In the Platform Center, for orders requiring dispatch, the representatives were using the available SMARTS Clock date at the time they were preparing the order rather than checking to see what the available SMARTS Clock date was at the time an error free LSR was received in the center. This practice affected the

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8 For example, if a complete and accurate order was received on April 18th but the service representative did not prepare the order until the 19th, the representative was using an application date of April 19th rather than April 18th. However, the representative was using the customer requested due date, as long as that due date was valid at the time an error free LSR was received and the due date had not yet passed.

9 For example, if a complete and accurate order requiring manual processing came into the Center on April 18th, but was not entered into DOE until the 19th, DOE would automatically populate the application date field with April 19.

customer's due date for a small percentage of platform orders.[10] After discovering this situation, Bell Atlantic issued a revised Method and Procedure, instructing the representatives to use the available SMARTS Clock date at the time a complete and accurate order is received. The updated Method and Procedure went into effect in May 2000. In addition, the representatives will be taught how to validate what the available SMARTS Clock date was at the time the order was received. The review of the Method and Procedure and the training on the SMARTS Clock is scheduled to be completed no later than May 31, 2000.

93. The Wholesale Customer Care group also found that the due dates used in the UNE Loop/Hotcut Center for these type of orders were being calculated from the LSRC date, rather than from the date of receipt of an error free LSR. This practice, which affected a small portion of loop orders, was corrected via the updated Method and Procedure in May 2000.

94. Similarly, in investigating the "% Accuracy – LSRC" metric, the Wholesale Customer Care group determined that the New England Resale Center was creating a number of LSRCs that did not carry the Account Telephone Number. An investigation into this issue revealed that some representatives were unaware that they needed to populate the Account Telephone Number field on the LSRC manually when preparing manual orders. The representatives had mistakenly assumed that this field was automatically populated. It should be noted that this misconception did not affect the CLEC's receipt of the LSRC. The New England Resale representatives were trained on the correct procedure in January 2000. In addition, Bell Atlantic provided guidance on the correct procedures to

[10] Platform orders requiring dispatch account for less than 10% of all platform orders and only those orders that were prepared after the SMARTS clock had changed were affected.

the outsourcing group working on Resale orders. A follow-up review in March indicated that most of the representatives were following the correct procedures, so that individual retraining could be conducted in April where the oversight was still observed.

F. Jeopardy And Completion Notices

95. Jeopardy Notices. BA-MA provides Open Query System ("OQS") reports for both provisioning and maintenance to the CLECs. BA-MA posts OQS reports three times each day. As a result, any status information transmitted by the BA-MA technician during the day to the WFA system is available with the next update. BA-MA retains the reports for approximately 30 days so that CLECs can go back to check on earlier reports if desired.

96. The OQS reports BA-MA provides to CLECs were agreed to in negotiations during the collaborative proceedings in New York. BA-MA does not routinely provide jeopardy notices or OQS reports to its own customer service representatives. If a retail representative needs to answer a question from an end user, that representative must first check the status of the order in SOP or WFA. In most cases, this provides sufficient information for the representative to answer a customer question. If the representative needs additional information, he or she must call the relevant dispatch center. If a CLEC needs additional information beyond that available through the OQS reports, it can check the order status in SOP or the installation status (from WFA) through the pre-ordering interfaces. If further information is needed, the CLEC can call the TISOC or RCMC (for provisioning or maintenance, respectively). These support centers can call the dispatch foreman, if needed. Therefore, the CLEC has access to the same status information as BA-MA retail representatives do.

97. Some CLECs argued at the Technical Sessions, as they did before the FCC concerning BA-NY's Section 271 application, that Bell Atlantic should be required to actively provide them with electronic jeopardy notices. (MCI Aff. ¶ 62; AT&T Aff. ¶ 42*)* The FCC rejected these claims and pointed out that Bell Atlantic in New York – as in Massachusetts – provides electronic access to jeopardy notices contained in OQS reports and gives CLECs the opportunity to check on the status of an order in its Work Force Administration ("WFA") system or in the SOP system through pre-order interfaces, or by calling a dispatch center. (*FCC Approval Order* ¶ 184) The FCC concluded that the order status and jeopardy information system created by Bell Atlantic for wholesale orders is nondiscriminatory in accordance with the Act. (*FCC Approval Order* ¶ 185)

98. Completion Notices. Once an order is completed, BA-MA provides a completion notice to the CLEC over the same interface used to submit the order. In addition, in some cases, depending on the type of service, carriers are notified by telephone. As explained in the Measurements Affidavit, the C2C Guidelines provide that BA-MA will return 95% of order completion notices by noon of the day following order completion in the billing system. Since July of 1999, BA-MA has far exceeded this standard, returning more than 99% of UNE and Resale order completion notices within the required time frame. (Measurements Aff. Exhibit B1)

99. In August 1999, BA-MA began providing CLECs with an additional completion notice that is sent over the same interface used to submit the order upon completion of the actual provisioning of an order (prior to completion in the billing system). Moreover, CLECs also can use the pre-ordering interfaces to obtain the status of a pending order, and can thus determine whether provisioning has been completed on an order as soon as that information is posted in the SOP, just as a BA-MA representative can for retail orders.

CLECs therefore are provided with timely information concerning the status of their orders.

100. KPMG's test in Massachusetts will include a review of the completion notification process. (MTP IV-2) BA-MA expects that the results of that test will confirm BA-MA's ability to provide completion notifications.

IV. PROVISIONING

101. As discussed in the accompanying Checklist Affidavit, the provisioning systems and processes used for most CLEC orders are the same as those used for BA-MA retail provisioning. This includes all Resale, UNE-P, and new UNE loop orders other than data loops. For UNE-loop conversions ("hot cuts"), which involve physically disconnecting an end user's loop from the BA-MA switch and connecting it to the CLEC's transmission equipment, a specific coordination process has been developed between the CLEC and BA-MA to minimize the disruption of the customer's service. Similarly, a specific process has been developed to deliver data loops. These are also described in the Checklist Affidavit. (Checklist Aff.) However, the same OSS are used to support these processes.

102. CLEC Claims. Various CLEC claims related to provisioning notices were discussed earlier in the section on Ordering OSS. The only other OSS provisioning-related claim was made by MCI. Specifically, MCI noted that BA-NY had on occasion changed the "reserved" telephone numbers of new customers of MCI's residential local telephone service during installation. In response to Record Request No. 277, MCI provided a list of 84 such instances, which occurred in New York during the period from December 23, 1999 through February 21, 2000. Bell Atlantic has investigated the PONs provided by MCI. These PONs were associated with MCI orders placed between mid-November

1999 through mid-January 2000 and represented approximately one half of one percent of the total number of orders that MCI placed during this period where a new telephone number was required.

103. Bell Atlantic acknowledges that there are occasions where a telephone number reserved during the pre-ordering process turns out to be a working telephone number and, therefore, must be changed to a spare telephone number. This anomaly occurs due to an occasional error in the telephone number inventory database used for both wholesale and retail numbers. This situation can happen for a variety of reasons, including human error. However, as demonstrated by the extremely low percentage for which the problem occurred, it is rare. Moreover, a retail customer is just as likely to be impacted by this situation as a wholesale customer. For that reason, no telephone number – whether retail or wholesale – is guaranteed until the telephone number is installed and working. MCI is aware of this fact. (Indeed, in the retail environment, Bell Atlantic informs its end user customers that they should not print business cards, stationary, etc. before the telephone number is in and working.)

104. KPMG will test the provisioning process in Massachusetts to confirm that the provisioning environment supporting CLEC orders is on parity with internal BA provisioning. In addition, KPMG's evaluation will address products and situations that require coordinated provisioning to minimize customer disruption. KPMG's test will confirm the completeness and consistency of the provisioning process. (MTP IV-3, IV-7 and IV-8)

v. MAINTENANCE AND TROUBLE REPORTING

A. Systems and Interfaces

105. BA-MA provides CLECs with a Web GUI interface for obtaining access to BA-MA's maintenance and repair OSS, via a platform called Repair Trouble Administration System ("RETAS"). Approximately 250 CLECs in the Bell Atlantic region use the Web GUI. CLECs are able to perform the following maintenance and repair tasks or functions: (i) Test (for both POTS lines and Special Services at DS0 and lower); (ii) Create Trouble Ticket; (iii) obtain Trouble Status; (iv) Modify Trouble Ticket; (v) Request Cancellation of Trouble Ticket; (vi) Request Trouble Report History; and (vii) Trouble Ticket Service Recovery. These are the same maintenance and repair tasks or functions available to BA-MA representatives.

106. The Web GUI allows CLECs to perform these functions for Resale dial tone line services, UNE P, and – except for the Test function – for UNE loops (since BA-MA does not provide the switching for a customer served by a UNE loop, the mechanized loop test – MLT – will not work with a UNE loop). A CLEC uses the Web GUI to create the transaction in RETAS, which automatically directs the transaction to the appropriate back-end OSS. A diagram of the maintenance and repair process flow was provided in BA-MA's initial filing on May 24, 1999. (Miller Aff. ¶ 43)

B. System Functionality

107. When a CLEC representative gets a trouble report on a Resale or UNE-P service and determines after discussion with the customer that the problem may be in the BA-MA network, he or she creates a mechanized line test request using the Web GUI. BA-MA's loop maintenance operating system then electronically tests the line and provides the results to the CLEC. For stand-alone UNE loops, BA-MA's loop maintenance operating

system is unable to perform the line test, because the loop is not connected to the BA-MA switch. In such cases, the CLEC that provides the switching for the customer's service must conduct the line test.

108. Once the CLEC representative determines where the problem is located, he or she can create a trouble ticket request using the Web GUI. BA-MA processes the request, returns a trouble ticket number to the CLEC and gives an appointment interval. If the trouble ticket is a switch feature type of trouble, RETAS will attempt to perform an automatic feature fix, by updating the switch translations if they do not match the billing records. CLEC representatives can also check the status of a trouble ticket using the Web GUI, modify or close out a pending trouble ticket, request the history of the three most recently reported trouble tickets on a line, or request an extended history which provides up to four and a half years of trouble history on a line. The CLEC may also request implementation of temporary service recovery alternatives (call forwarding, make line busy) to reroute service to another properly functioning end user line, for an open trouble ticket on a POTS line which is in a pending "dispatch-out" status.

109. A CLEC using the Web GUI benefits from more automatic functionality than is available to a BA-MA representative, who must perform functions manually. For example, a CLEC mechanized line test is conducted using the same OSS that BA-MA service representatives use. When a BA-MA representative conducts a mechanized loop test, he or she must determine the circuit type, geographic region and destination, and then manually submit the test to the correct back-end system. For CLECs, however, RETAS automatically makes these determinations and submits the test to the correct system. Similarly, when the test results are returned, the BA-MA representative must interpret the highly technical results himself or herself. Results for CLEC tests, however, are

automatically analyzed by the system and returned with a recommendation (for example, whether to dispatch a technician).

110. In its review of BA-NY's OSS and interfaces, KPMG found that the functionality available to CLECs through the Web GUI and RETAS was on a par with that available to BA-NY's retail representatives, with one qualification – retail representatives had access to extended trouble history for the line which was unavailable to CLECs. (KPMG NY Final Report at § V.C, V47-55) In June 1999, BA-NY implemented an Extended Trouble History Feature in RETAS that provides CLECs the same functionality available to BA-NY's retail representatives for historical trouble data. The same functionality is also available to CLECs doing business in Massachusetts. KPMG's testing in Massachusetts will address all aspects of maintenance and repair including RETAS, processes, documentation, work center support, network surveillance and capacity management. (MTP Section V)

111. Covad claimed in its comments filed in November that it was unable to open trouble tickets on new loops for 24 hours. (Covad Aff. ¶ 47) Covad's claim was outdated when it was made. BA-MA implemented a function in RETAS that gives CLECs the ability to enter a trouble ticket immediately after a service order is completed. This function enables RETAS to check the SOP to validate the presence of a recently completed service order. When it finds the recently completed service order, RETAS validates the account identification and allows the CLEC to create a trouble ticket. As a result, CLECs can now enter a trouble ticket electronically sooner than retail representatives can. KPMG will test this new function and confirm that it is available and working as designed. (MTP Section V)

C. Volumes and Performance

112. During the second half of 1999, CLECs used the interfaces serving BA-MA to perform an average of over 55,000 maintenance transactions per month, with a peak of nearly 65,000 transactions in the normally busy month of September 1999. In 1999, RETAS was not capable of measuring transactions by state. However, since January 2000, when that capability was implemented, CLECs have used the interfaces serving BA-MA to perform an average of over 4,100 maintenance transactions per month, for Massachusetts customers alone.

113. AT&T claimed that parity has not been achieved in the area of response times for creating trouble tickets and cited the average response time results for August and September 1999. (AT&T Aff. ¶ 57) In fact, system response times varied in 1999 both above and below the C2C standards. The deviations from standards were investigated and addressed by Bell Atlantic during 1999 and into early 2000. In several instances, the "comparable" transactions were found to include non-comparable transactions. These measurement distortions have now been remedied. In others, operational improvements were required and made.

114. First, until August 1999, wholesale "create trouble ticket" transaction response times included transactions that electronically initiated an automatic feature fix when the CLEC entered a trouble report related to a switch feature problem. When this occurs, RETAS compares the billing system records with the switch, "fixes" the problem electronically, and informs the CLEC in real-time. "Create" transactions that initiate an automatic feature fix, generally run much longer than other "create" transactions. Since response times for the "feature fix" function are not included in the "create" response times for BA-MA retail, beginning in August 1999, response times for wholesale "creates" that

initiate the “feature fix” function are also excluded from the “create” function wholesale measurements.

115. Second, until December 1999, wholesale transaction response time metrics included the time interval required to check the system to ensure that the CLEC accessing the circuit information actually owns the circuit. No such activity exists for BA-MA retail. In addition, the trouble create transaction response time metrics also included the time interval required to return the trouble ticket number to the CLEC. This capability is also not available to BA-MA retail. Therefore, beginning December 1999, these activities are no longer included in the response time metric calculations for these transactions.

116. In addition, Bell Atlantic had earlier determined that retail transaction measurements were including response times for "unsuccessful" or "error" transactions. Therefore, in mid-January the wholesale transaction measurements also began including response times for these types of transactions, which often have a shorter average response time.

117. In other cases an operational solution was required. For example, in February 2000, Bell Atlantic implemented system enhancements that increased the efficiency of the software that processes Maintenance and Repair transactions. This resulted in improved response times. Specifically, certain reference data, which had been accessed frequently from disk, were moved into core memory.

118. Finally, during 1999, there were outage incidents affecting RETAS that resulted in single day problems skewing the metrics for the entire month. For example, one day in September 1999 caused the month’s "create" response time metric to increase by approximately 45%, and three problem days in August 1999 increased that month’s "create" response time metric by about 40%. Due to system incidents on these "problem" days, the response time for a small number of transactions were so inflated that they

affected the metric for the entire month. When such incidents occur, Bell Atlantic has investigated, determined the cause, and implemented a fix and/or a mechanism to minimize the impact of a similar future incident. The result has been that the number of such incidents has decreased. Accordingly, the number of "problem" days are significantly reduced, and response time performance has shown consistent improvement.

119. As a result of all these actions, both to measure and provide comparable service, each of the Create Trouble, Status Trouble, Modify Trouble, Request Cancellation of Trouble and Test Trouble functions have shown results at or better – and frequently far better – than the established C2C standard. Even with respect to the other function, Trouble Report History, Bell Atlantic has determined an approach to address this transaction that it will implement by the end of this month.

120. During the New York KPMG test, BA-NY demonstrated that it can handle approximately 500 transactions per hour, or 4,000 transactions in an 8-hour day, with acceptable response time performance. (NY KPMG Final Report at § IV.V.B, V35-35) This is still significantly more than the volume of transactions now being handled throughout the region. It is clear, therefore, that BA-NY's OSS and interfaces have ample capacity to handle CLEC transactions. The same interface is utilized in Massachusetts and KPMG is in the process of completing a capacity management analysis here as well. Specifically, KPMG is testing BA-MA's maintenance and repair systems, operational environment, and business processes and their associated scalability to meet future demand. (MTP Section V)

D. Application-to-Application Interfaces and Electronic Bonding

121. Bell Atlantic has also responded to specific requests by individual CLECs for an application-to-application interface for maintenance and repair. Electronic bonding,

which is the standard for maintenance and trouble reporting for exchange access services, offers some transactions similar to those used for local service, but does not offer the equivalent functionality available in RETAS. Moreover, it is expensive to implement, and, therefore, tends to be used only by the largest carriers.

122. A standard for one local repair and maintenance function over electronic bonding – mechanized loop testing for local POTS services – was approved by the industry as of March 1999. The industry has adopted the exchange access standards for four other functions, but a number of other functions needed for local service maintenance and repair – functions BA-MA provides to its own representatives and to CLECs through the Web GUI – are lacking in the standards for electronic bonding for repair and maintenance. Moreover, as with electronic bonding for access services, it is unlikely that electronic bonding for local services will be economically feasible for more than a few very large carriers.

123. Despite its high cost and limited functionality due to lack of industry standards, BA-MA has implemented electronic bonding with MCI and is ready to begin joint testing with AT&T. In addition, BA-MA is working with Sprint to implement electronic bonding and expects to complete that effort during the second half of 2000. BA-MA is willing to work with other CLECs interested in deploying an electronic bonding platform.

VI. BILLING

A. Systems and Interfaces

124. The billing systems BA-MA uses to accumulate and provide CLECs with usage billing information, including access records, are the same billing systems BA-MA uses for retail and interexchange carriers. Additional functionality was added to the existing

systems to accommodate the billing of new usage rate elements, non-recurring and recurring charges to CLECs, and to produce the wholesale bill.

125. Retail and wholesale call usage is recorded at the central office switches, as appropriate. BA-MA and CLEC usage data for each switch are captured at the same time, on the same tape and delivered to the data center in the same way. Call records are sent electronically to BA-MA's data processing centers, where the Automated Message Accounting system ("AMA") performs a number of checks to ensure that the switches are sending data appropriately and in the proper format. AMA identifies CLEC switch usage and sends usage details to the Carrier Access Billing system ("CABS") and the Message Processing System ("MPS"). MPS then rates the usage (if appropriate) and creates Exchange Message Interface ("EMI") records for rated and unrated usage. EMI record creation is completed before BA-MA's retail usage is posted to the retail accounts. Each CLEC requesting Daily Usage File ("DUF") service receives an EMI file on business days with all the usage recorded for each of its end user customers. CLECs can choose whether to receive these daily usage files over Connect:Direct or on tape. A diagram of the billing process flow was provided in BA-MA's initial filing on May 24, 1999. (Miller Aff. ¶ 53)

126. Usage information is also used in creating the wholesale bill. The wholesale bill is sent to the CLEC on paper (UNEs only), over Connect:Direct, on tape, or on CD-ROM at the CLEC's choice. Resellers receive up to two monthly bills, one for each of the two summary billing periods in the month. Charges for ancillary services are billed separately to the Resellers' administrative accounts in the first billing period of each month.

127. Billing for most UNEs is handled through the CABS application. Recurring, non-recurring and usage charges for unbundled platform services, interoffice transmission

facilities, collocation, DS-1 loops (and higher), and SS7 are billed directly in CABS. Charges for UNE 2-wire and 4-wire loops are generated by CRIS. UNE wholesale bills are sent to CLECs once a month.

B. Volumes and Performance

128. Currently, Bell Atlantic produces more than 1,500 wholesale CRIS bills and more than 300 wholesale CABS bills per month in New England. Bell Atlantic produced more than 445 million EMI records in New England in 1999. To date in 2000, Bell Atlantic has been creating more than 48 million EMI records per month in New England, a 30% increase over 1999 volumes.

129. The C2C standard for the provision of usage data is 95% within 4 business days. Bell Atlantic in New England has exceeded this standard every month since July 1999. (Measurements Aff. Exhibit B1) The C2C standard for bill timeliness is 98% within 10 business days. Bill Timeliness is currently reported with an interim metric. The calculations are done manually for both New England and New York. New England bills are rendered on a regional basis making it difficult, for manually created metrics, to provide state-specific results.[11] Bell Atlantic expects to complete the development work to mechanize this metric in May, which will allow BA-MA to report on the timeliness of all carrier bills on a Massachusetts-specific basis.

130. Results for New England exceeded the standard for Carrier Bill Timeliness every month in 1999. The results from July through December were as follows:

[11] During 1999 the metric results provided in the Massachusetts C2C Reports represented a combined New England/New York result. The 1999 reports have now been recalculated to include only the New England results. (Revised C2C Reports, filed April 26, 2000)

MONTH…..	RESULT…..
July	100%
August	100%
September	100%
October	100%
November	99.08%
December	99.82%

The results in January and February 2000 – 62.5% and 30.11% respectively – did not meet the target due to a production problem in the CABS billing system in January, when the allowable size of an internal table for Billing Telephone Numbers ("BTNs") was exceeded. This failure prevented the proper storage of data for the creation of the Bill Data Tapes for BTNs above the table limit and required Bell Atlantic to re-send certain January bills. The February bills were held until the corrections to the table were completed. Bell Atlantic adjusted the table size, which will correct the problem going forward. Both January and February bills were rerun by March 7, 2000. The March results showed significant improvement with 100% of bills issued on time.

131. BA-MA also provides accurate usage records to CLECs. As part of the DUF-process, a CLEC may return usage records if the records sent to it contain an incomplete record, an invalid field, a misdirected record, a duplicate record, damaged information, or an unreadable record. The process calls for the CLEC to call the Bell Atlantic System Support help desk (BASS) and provide information about the record problem. The BASS help desk then logs the reported problem, provides the CLEC with a ticket number, and forwards the report to the Wholesale Technical Support Group ("WTSG"). WTSG contacts the CLEC and requests that the original record (unaltered) with the appropriate Return Reason Code added in accordance with EMI standards, be sent via E-mail to WTSG.

132. Upon receipt of the returned usage, WTSG investigates the CLEC's claim and notifies the CLECs of its findings. If investigation shows the claim is valid (*e.g.*, record incomplete or field invalid), WTSG works with the CLEC to correct the record. If investigation shows the record was misdirected or a duplicate, WTSG advises the Network Interconnection Markets manager to initiate the claims and adjustments process. If investigation shows the claim is invalid, WTSG notifies the CLEC. If the CLEC disagrees with WTSG's conclusion, it can escalate the issue to the WTSG manager, who will attempt to resolve it. Throughout the process, the existing trouble ticket is updated to reflect the progress of the investigation. When the investigation is complete and the CLEC is satisfied, the trouble ticket is closed. Bell Atlantic sends on average 12 million daily usage records to CLECs every week in New England. Fewer than 1% of usage record are requested as "resends" each week.

133. KPMG is in the process of testing the accuracy of both the usage files and the wholesale bill, and BA-MA expects that the test will confirm that both are accurate. In addition, Bell Atlantic has begun to implement a performance metric for bill accuracy pursuant to the New York PSC's February C2C Order (*See* Measurements Aff.) This measure is intended to allow the regulatory authorities and CLECs to monitor the accuracy of the wholesale bill. This approximated measure is currently being reported using an interim, manually calculated method based on corporate financial revenue and adjustment data that considers all processed adjustments and total billed revenues. This manual method of calculating bill accuracy does not isolate adjustments that are solely due to billing errors as specified in the C2C Guidelines and as a result, it does not yet reflect the accuracy of the wholesale bill. Although certain insights can be gleaned from the Bill Accuracy Metric as it is reported today, it is not yet an accurate tool to use to monitor the

wholesale bill because it includes adjustments that are warranted as well as those that may be considered billing errors.

134. As indicated in the Measurements Affidavit, the percentage of billing dollars adjusted for BA-MA retail and CLECs from October 1999 to February 2000, has generally ranged from 1.25% to 2.5%. (Measurements Aff. Exhibit B1) However, in January 2000, 6.61% of retail total billed dollars and 7.61% of wholesale total billed dollars were adjusted. This was the result of settling a three and a half-year billing dispute, for wholesale and retail services, between Bell Atlantic and a single CLEC, and was, therefore, a one-time anomaly.

C. Billing Format

135. BA-MA provides CLECs' bills in the Bill Data Tape format defined by Telecordia's Technical Review Group as specified in Billing Output Specification ("BOS"). Daily Usage is sent to the CLECs in accordance with the EMI format established through the Ordering and Billing Forums of the Alliance for Telecommunications Industry Solutions (ATIS). The litany of AT&T and MCI complaints presented at the Technical Sessions are the same as those they made before the New York PSC and the FCC in that same time frame. The FCC concluded that BA-NY provides nondiscriminatory access to its billing functions.

136. First, AT&T complained that BA-NY did not provide accurate and complete billing information to CLECs on a consistent and reliable basis. In particular, AT&T complained that BA-NY had not provided nondiscriminatory access to local usage data or to access usage data. (AT&T Aff. ¶ 58) AT&T's complaints are related to its experience in New York, not Massachusetts and, in any event, AT&T admitted that the specific issues it raised have already been resolved. (AT&T Aff. ¶ 59-62)

137. Second, AT&T claimed that in New York, BA-NY had not consistently provide it with the local usage data that AT&T needed to bill its end users. (AT&T Aff. ¶ 59) Contrary to AT&T's assertions, BA-NY changed the dataset names in its local usage files at AT&T's request and after multiple joint conference calls on the subject and, in fact, expedited AT&T's request faster than BA-NY's initial timeframe because of the importance of this change to AT&T. AT&T itself failed to make appropriate changes to its systems to accommodate BA-NY's modified billing system and, therefore, was at first unable to receive local usage files. After consulting with BA-NY on the problem, AT&T modified its systems and could again receive local usage files.

138. Next, AT&T claimed that in New York, it could not process the local usage files. (AT&T Aff. ¶ 60-61) This is another complaint that has been resolved. After BA-NY inadvertently omitted a new header and trailer format from its August 1999 OSS release, BA-NY and AT&T worked together to resolve this problem. BA-NY included the new format in its October release – and AT&T agreed to a workaround for the interim period. In any event, the headers and trailers used before BA-NY implemented the October release were the same as those that AT&T – as well as the rest of the industry – consistently used to bill customers. Moreover, BA-NY offered to resend any data AT&T could not read.

139. Finally, AT&T claimed that in New York, BA-NY was deficient in providing access usage data, and pointed to an August test of UNE P in support of its claim. (AT&T Aff. ¶ 66) AT&T was the only CLEC making this claim. Moreover, AT&T conceded that it

is now receiving access usage files that are adequate. (Crafton/Connolly FCC Decl. ¶ 186)[12]

140. As with local usage data, the facts demonstrate that AT&T and BA-NY have worked together to solve AT&T's concerns. The Exchange Message Interface records that are at issue here contain many fields, and BA-NY has consistently supplied sufficient fields for CLECs to bill for access. AT&T claimed, however, that BA-NY did not consistently supply call duration, "from" numbers, "to" numbers, and jurisdictional indicators in New York which prevented AT&T from billing long distance carriers for access. (AT&T Aff. ¶ 66)

141. AT&T's claim is misleading and inaccurate. First, there are different ways to measure call duration, and BA-NY and BA-MA are currently providing access minutes, which are sufficient for AT&T to bill its customers. Nevertheless, BA-NY and BA-MA also provide conversation time as of November 20, 1999. Second, the population of "from" and "to" numbers on the EMI records depends on the direction of the calls. Calls originating from a UNE platform have the "from" number populated on the EMI record.

142. The only time BA-NY or BA-MA does not provide a "to" number on an access record is when operator services passes the call. This is because Bell Atlantic is not aware of the "to" number. For instance, if a customer dials the operator to connect a long distance call from Massachusetts to California, BA-MA connects the customer to the long distance operator to complete the call. At that point, an access record is created but it will not include the "to" number because BA-MA does not have the "to" number. This is true whether a BA-MA retail customer or a CLEC's customer originated the call. If it were a

[12] AT&T noted in an affidavit submitted to the FCC in the BA-NY Section 271 proceeding that it had received access usage files that were adequate.

BA-MA retail customer that originated the call, BA-MA would bill originating access to the long distance carrier based on that carrier's Percent Interstate Usage report as per BA-MA's Access Tariff, DTE MA. No. 15. AT&T can perform its billing in a similar manner. The population of the "from" number on calls terminating to a UNE platform depends on the call transport technology of the company delivering the calls to the BA-NY or BA-MA network. If the "from" is provided, BA-NY and BA-MA will record and provide the "from" number in the EMI record. If the "from" number is not provided to BA-MA then BA-MA is not able to provide it on the EMI records. In addition, in this instance BA-NY and BA-MA record the "to" number and include it on the EMI record.

143. BA-MA agrees that it has not always provided jurisdictional indicators (which indicate whether the call is interLATA or intraLATA) to CLECs because this information is not always recorded at the switch. However, CLECs can bill for access without this information by using NPA-NXX tables. AT&T has the same information to determine jurisdiction as does BA-MA, and is the only CLEC claiming it needs an additional indicator or that it cannot bill its customer because it does not get it. Nevertheless, BA-MA agreed to provide AT&T and the other CLECs with jurisdictional indicators. Bell Atlantic implemented the necessary billing system changes in the February 2000 OSS release.

144. For its part, MCI complained that BA-NY commingled meet point billing access records, UNE-P access records and UNE-P end user records without using the proper headers and trailers. (MCI Aff. ¶ 64) MCI's complaints are outdated. Prior to October 1999, BA-NY did commingle access records and end user UNE-P records; however, BA-NY did so in accordance with the EMI standards then in effect. Then, upon finalization of the EMI standards for the headers and trailers referred to by MCI, BA-NY and BA-MA

implemented the new EMI standards in October 1999, thus rendering MCI's complaint moot.

145. MCI also complained that BA-NY failed to provide a complete list of USOCs and that BA-NY refused to provide MCI with access to BILLViewer technology. The essence of MCI's complaint is unclear. Bell Atlantic bills generated by both CABS and CRIS (BDT Format) include a listing of the USOCs that appear on the bill at the end of every bill. In addition, a USOC Descriptions and Rate Database is available on the Bell Atlantic Web site at www.bellatlantic.com/wholesale under the Customer Documentation/Supplementary Documentation section. With respect to BILLViewer technology, MCI has requested the use of "Simple View," a bill viewer technology utilized in the Bell Atlantic South states. However, at the present time, that system is simply not available in the North.

146. As is clear from the discussion above, AT&T and MCI have made no specific claims regarding billing data in Massachusetts, and their claims with respect to New York are outdated and without merit.

D. Billing Adjustments

147. BA-MA provides the CLECs with a process for handling billing adjustments or billing claims. The process is the same for CLECs doing business in both New England and New York. CLEC billing claims are faxed to the TISOC utilizing the claim form provided in the CLEC handbook. The Bell Atlantic service representative enters the claim information into the Claims Adjudication Record Management and Adjustment ("CARMA") system or the CABS Dispute System and contacts the CLEC to acknowledge receipt of the claim and to discuss any additional information needed. If the claim is not closed as a result of this discussion, the CLEC is given a commitment

date and the claim is investigated. Upon completion of the investigation, the CLEC is notified and, if warranted, an adjustment is made to the CLEC's bill.

148. MCI reiterated at the Technical Sessions claims it had made about BA-NY in the Section 271 review process for New York. Specifically, MCI complained that BA-NY had not reconciled erroneous billing for interim local number portability in New York. This issue has been resolved. MCI filed a claim for overbilling in both flat rated (initial) and additional paths for provisioning and usage. As a result of an agreement reached between MCI and Bell Atlantic, MCI will receive a credit on its May INP summary bill. In addition, Bell Atlantic completed a system change in April that will ensure correct INP billing for MCI going forward.

149. Finally, MCI claimed that BA-NY had demonstrated an unwillingness to take steps to respond to billing issues from MCI absent external regulatory pressure. (MCI Aff. ¶ 66) This is simply not true. MCI presented no information concerning BA-NY's lack of cooperation.

150. Moreover, Bell Atlantic's Billing Collection Operation Center works cooperatively with CLECs to resolve billing issues and disputes. Depending on the nature of the problem, some billing disputes can require extensive and time-consuming investigation. Others can be dealt with quite readily. For example, during the first quarter of 2000, MCI submitted 128 billing claims in New England. Ninety-seven were closed within 20 days, nineteen were closed within 30 days, eleven were closed within 58 days and one remained open as of April 24, 2000.

151. KPMG is performing an extensive test of the billing process in Massachusetts to include carrier billing, daily usage files, billing documentation, billing workcenter support and

capacity management. (MTP Section VI) BA-MA expects that the test will confirm that it provides nondiscriminatory access to its billing functions.

VII. CLEC SYSTEM SUPPORT

152. On September 1, 1999, Bell Atlantic created a Vice President-led department (CLEC System Support) dedicated to supporting the full life cycle of system changes on behalf of CLEC users. This support addresses the interfaces through which the CLECs obtain access to the preorder, order/provisioning, billing, and trouble/maintenance OSS. The life cycle includes the creation and prioritization of system changes, documentation of requirements, system development, change notification and documentation, and testing. The CLEC Systems Support department is staffed with director-led groups that handle Change Management, CLEC Testing and Common Interface implementation

A. Change Management

153. Bell Atlantic and the CLECs have jointly developed a region-wide Change Management Process for managing the life cycle of system changes. This process is designed to accommodate changes requested by CLECs, changes requested by Bell Atlantic, emergency changes and changes required by standards bodies or regulatory authorities. A copy of the Change Management Process document was provided with BA-MA's May 24, 1999 filing as Exhibit 6, Book 5, Tab 13.

154. The Change Management organization within the CLEC Systems Support department provides industry notifications for items that are important to the industry. This organization receives requests from CLECs for systems changes and works with CLECs to define requirements and prioritize system changes. The Change Management organization provides notice of upcoming system changes and oversees the publication of the documentation of system changes through the business rules, technical guides, and

other documentation, as required. It also sponsors workshops on topics that are important to the industry, such as help desk processes, CLEC-to-CLEC migrations and others.

155. Bell Atlantic implements a number of CLEC-impacting software releases each year. With each new planned release, Bell Atlantic produces draft detailed business rules and technical specifications describing those changes. These draft specifications are shared by electronic mail with over 500 individual CLEC users that participate in the Change Management Process. In its November filing, MCI claimed that BA-NY did not give CLECs a meaningful opportunity to provide input on new releases. (MCI Aff. ¶ 77) Bell Atlantic and the CLECs recently agreed to extend the time for publishing these draft business rules from 66 days before implementation into production to 73 days before the changes are implemented. This allows more time for formal CLEC comments on the draft business rules and allows Bell Atlantic to address the CLEC comments in the final business rules and technical specifications published 45 days before implementation.

156. In the case of changes in industry standards or guidelines, Bell Atlantic and the CLECs jointly develop a schedule for distribution of draft specifications and/or business rules, receipt of CLEC comments on the documentation, and distribution of final documentation. This schedule provides additional opportunity for CLEC comment and input on draft specifications.

157. Once the specifications are final, implementation and internal verification of the new software commences. CLECs then have the ability to test with their own systems, as discussed below. As the CLECs review and test the implemented change, they communicate any problems they may encounter to Bell Atlantic. Bell Atlantic investigates and determines the appropriate resolution of any issues. Following the test period, the new software is made available for production transactions.

158. Bell Atlantic supports two industry standard versions of each interface – the current version and the latest prior version. This provides CLECs with an extended period of time to comply with new industry standards and guidelines. For instance, although LSOG 4 was implemented March 1, 2000, all CLECs may continue to use LSOG 2 for ordering and LSOG 3 for pre-ordering. LSOG 2 and LSOG 3 represent prior versions of the respective business rules. CLECs will be able to migrate to LSOG 4 as they become ready.

159. AT&T complained that Bell Atlantic only allowed 10 days for review of the LSOG 4 documentation. (AT&T Aff. ¶ 78) AT&T neglected to mention that there were multiple cycles for review of draft specifications and that the documentation timeline was revised based on CLEC input. That is, Bell Atlantic issued the original timeline on May 19, 1999. It included three draft review cycles for the business rules (the first on May 28, 1999, approximately 266 days prior to implementation, and the last on August 13, 1999, approximately 185 days prior to implementation). There were also two draft cycles for EDI specifications (the first on September 3, 1999, and the last on December 14, 1999). Then, Bell Atlantic added an additional review cycle in response to a request from the CLECs. In addition, Bell Atlantic entered into collaborative discussions with AT&T and other CLECs to increase the uniformity of the business rules across the region. That effort produced agreement on a number of changes to add to the LSOG 4 February release. These changes were updated in the documentation and sent to the CLECs for review on October 25, 1999. AT&T, therefore, had ample opportunity to review and comment on LSOG 4 documentation.

160. BA-MA uses the same measurements for the Change Management process in Massachusetts as those used in New York and commended by the FCC in the *FCC*

Approval Order. (*FCC Approval Order* ¶ 113-118) The specific measurements are described in the Measurements Affidavit, and the operating results are attached as Exhibit B1 to that document. These measurements show that Bell Atlantic has continued to adhere to the Change Management Process. The "Timeliness of Change Management Notice" metric requires Bell Atlantic to meet the established dates for publication of draft and final business rules and technical specifications without any subsequent material changes. Bell Atlantic has met that requirement for the first 3 months of this year for all publications, with the sole exception of the final issuance of the EDI technical specifications for LSOG 4. However, since no CLEC planned to use EDI for LSOG 4 in production immediately, this did not have a significant impact on the CLECs.

161. Scheduling System Changes. Bell Atlantic has recognized the importance of setting priorities to deal with system changes. Working with the CLECs, Bell Atlantic introduced a process where CLEC-impacting Bell Atlantic-initiated changes and CLEC-initiated changes are assigned priorities based on agreed criteria. Once prioritized, these projects are scheduled for implementation using the priority of the change as a key-determining factor. For example, last fall, Bell Atlantic and a number of CLECs conducted a collaborative to address their highest priority – uniform business rules for LSOG 4. Bell Atlantic agreed to make many changes in the LSOG 4 business rules. Seventeen such changes were made with the March 1st release of LSOG 4 and twenty-two additional requested changes will be made by July 1, 2000.

162. MCI claimed that until very recently Bell Atlantic-initiated changes were given priority over CLEC-initiated changes as a matter of course. (MCI Aff. ¶ 77) MCI has offered a very skewed perspective. The majority of Bell Atlantic-initiated changes were made to benefit the CLECs. During the past two years, Bell Atlantic has implemented numerous

software capabilities to support CLEC access to the OSS functions. Although only a few of these were specifically requested by CLECs, many were highlighted by KPMG or the New York PSC as extremely important for supporting a wide range of possible CLEC transactions at commercial volumes. The CLECs also benefit from Bell Atlantic-initiated system changes that increase flow-through and enhance GUI capabilities.

163. In the *FCC Approval Order at ¶ 108,* the FCC favorably commented on the dispute resolution mechanism that Bell Atlantic and the CLECs negotiated as part of the Change Management escalation process. The process allows for a CLEC to escalate to the Change Management Director and then to the Bell Atlantic Vice President, as necessary, to resolve issues in connection with Change Management. If the issue is still not resolved, either party may take the issue to the state regulatory body. For instance, through the escalation process, CLECs requested that Bell Atlantic not retire Web GUI Phase II until all issues and concerns with the Phase III GUI had been addressed and CLEC training completed. Three times Bell Atlantic agreed to defer the retirement of the Phase II GUI until all issues were resolved.

164. Communications With CLECs. Bell Atlantic has also adopted a strong bias towards communicating promptly and completely with CLECs. The clearest need for such communications is when there is a need to inform CLECs of urgent circumstances or emergency system changes. The processes and procedures applicable to these communications have been developed jointly with the CLECs.

165. First, early last year, some CLECs expressed concerns about the frequency of the FLASH announcements (now "Type 1" bulletins) and questioned whether Bell Atlantic used these to communicate changes that were not true emergencies. In response to these criticisms, Bell Atlantic scheduled two workshops with the CLECs in May. Based on the

feedback received, Bell Atlantic agreed to process modifications, including adding a pager notification of emergency changes to ensure that key contacts at each CLEC received notice in a timely fashion. Bell Atlantic also created a revised notification process, which was distributed to CLECs on June 30, 1999, which created "bulletins" for notices of emergency software changes and systems outages.

166. After a July 7, 1999 session with CLECs to review the modified process, Bell Atlantic circulated an update on August 11, 1999. Two CLECs then participated in a two-week "beta test" of the new process, and the process was implemented for all CLECs at the end of August with the understanding that there would be another evaluation after a month. The new process for Type 1 notifications was discussed at a meeting on October 15, 1999, as well as at subsequent monthly Change Management meetings. After receiving additional CLEC comments in December, a final meeting was held in January 2000, and the proposed final notification guidelines were published on February 29th. (Exhibit C) In sum, the content, format and conditions under which Bulletins will be issued, and pager call-outs will be made, were thoroughly discussed with the CLECs and agreed on jointly with the CLECs.

167. Second, in the event of an emergency outage, Bell Atlantic has adopted a procedure to conduct a conference call for CLECs whenever there is an announcement of an immediate software change. This conference call enables Bell Atlantic to provide as much information as possible to CLECs, thereby facilitating their implementation of any required modifications at the same time as Bell Atlantic. This conference call procedure is used regularly and has been well received by the CLECs. No CLEC has indicated on these calls that notification of system changes or documentation updates should have been delayed.

168. AT&T claimed that Type 1 Bulletins often involve routine changes that that do not create a risk of system outage or of "putting a CLEC out of business." (AT&T Aff. ¶ 74) AT&T is simply wrong. Bell Atlantic has used the Type 1 Bulletins to communicate information about software defects, including situations where the existing documentation contains incorrect information on how to format an order. It is important that Bell Atlantic communicate this information as soon as possible to prevent possible problems to CLECs who are developing interfaces or submitting orders based on the documentation. If Bell Atlantic waited until the next release to provide this information, the CLECs building interfaces could be required to redo some of that effort, and CLECs with existing interfaces might continue to submit incorrect orders and other transactions. Bell Atlantic's policy has been to correct these errors (documentation and/or software) and provide notification to the CLECs as quickly as possible after the defect has been identified, either by a CLEC or by Bell Atlantic.

169. KPMG concluded in its New York review that Bell Atlantic had not inappropriately classified any Type 1 notices. (NY 271 Tr. 3496 (July 28, 1999) This trend has continued. Exhibit D, attached, contains a list of all the Type 1 changes initiated during the first quarter of 2000. All either resulted from a CLEC reported trouble or from the identification by KPMG or Bell Atlantic of a software or documentation defect, exactly the type of situation that should be communicated in a Type 1 release. KPMG will perform a similar evaluation of the Bell Atlantic Change Management Process in Massachusetts

170. MCI claimed that BA-NY did not monitor the interfaces adequately so that it could provide immediate notice of outages in New York. (MCI Aff. ¶ 84) MCI cited Bell Atlantic's August 1999 performance on the "Change Notification" Metric PO-4-01 as

evidence for this claim. However, emergency outages are not included in this metric. Instead, BA-NY's performance on the two items that PO-4-01 actually does measure demonstrates that Bell Atlantic was providing adequate notice. First, this metric measures timeliness of notice that a system will not be available when it otherwise is scheduled to be operating. On its Web site, Bell Atlantic publishes the hours systems are available for CLECs to use for each type of transaction. On the first of each month, Bell Atlantic publishes on the Web site a three-month rolling forecast of any changes to that availability schedule. If after the first of the month a planned system outage becomes known for that month, Bell Atlantic must notify CLECs prior to the time that the system is unavailable through a System Availability Bulletin. There were eight periods of system unavailability in January, three in February, and six in March. In all instances CLECs were notified on time. (Measurements Aff. Exhibit B1) Second, the metric includes notifications for Type 1 Bulletins. Of the 78 Type 1 notifications made in January through March 2000, Bell Atlantic failed to notify CLECs beforehand only one time. (*Id*.)

B. Testing Process

171. Bell Atlantic also assists CLECs in testing the interaction of the systems and interfaces they have developed with Bell Atlantic's interfaces and OSS as part of managing the OSS life cycle. Specifically, Bell Atlantic has developed CLEC application-to-application test procedures and a totally separate test environment (CLEC Test Environment) that mirrors the actual production environment. Beginning in November, 1999, five CLECs have used the CLEC Test Environment in Massachusetts and an additional five have tested in New York which also qualifies them to submit requests in Massachusetts. CLECs can use the procedures and test environment to certify their software for entry into the local

services market (new entrant testing) or to verify that new types of orders previously unused are entered and processed appropriately. CLECS can also use the testing environment and procedures to validate the continuity of interface capability and/or new functionality when Bell Atlantic introduces new software releases (new release testing).

172. Bell Atlantic's current test environment was developed in response to KPMG feedback during the New York test, as well as CLEC comments and input. The procedures have been used for CLEC testing since May 1999. These procedures have several key aspects. First, Bell Atlantic has established a software-testing environment that mirrors the production software environment. Second, Bell Atlantic has established a formal set of test transactions – the "test deck" – which is a cross-section of the most frequent types of pre-order and order transactions. Test decks have been created in five Bell Atlantic jurisdictions including Massachusetts. The test deck is intended to demonstrate for each release that the test environment is ready and, subsequently, that the software release has been successfully migrated to the production environment. The test deck is executed in both the test environment and in production to demonstrate the functional match of these environments. Bell Atlantic publishes full documentation of the test deck, including expected results and results actually obtained when executed. Bell Atlantic solicits and incorporates feedback from CLECs on the test deck and works with CLECs to identify additions or modifications to the test deck as appropriate for each new release. In addition, CLECs are not limited to the test deck, but can test other scenarios to satisfy their unique market or ordering patterns. Third, the procedures provide for a "protected period" in the test environment to ensure a stable environment for CLEC testing before a new release is implemented in production. Finally, the procedures set out time frames and processes for CLEC testing, for their notification to Bell Atlantic of problems

encountered, for the implementation of software "bug" fixes by Bell Atlantic and for re-testing by CLECs.

173. Bell Atlantic provides dedicated test coordinators to work with CLECs on both new entrant and new release testing. The test coordinator assists the CLEC in the development of a test plan uniquely suited to the business the CLEC operates and the functionality it intends to use. The test coordinator oversees the execution of the test and validates results with the CLEC.

174. As a further enhancement to these procedures, Bell Atlantic established a physically separate test environment for CLECs in Massachusetts in October 1999. The separate test environment allowed for an expansion of the test period for CLECs to four weeks, with extended daily hours. As a result, there are more opportunities for "bugs" to be detected and to be fixed by both sides, CLECs and Bell Atlantic.

175. Implementation of a new standard set of business rules was planned for the February release (LSOG 4). Along with the changes resulting from the Fall 1999 uniform business rules collaborative and other changes, this was the largest release Bell Atlantic had ever implemented for wholesale services. This was also the first time the separate CLEC Test Environment was used in connection with new release testing outside of New York. Therefore, it resulted in over 400 separate test deck scenarios. The combination of these factors resulted in the February release not going as planned. Essentially, it proved difficult to validate all the different test deck scenarios on a timely basis. Now that the test decks have been established and used to test a release, subsequent releases will not experience the problems and delays associated with the February release.

176. KPMG is performing an extensive test in connection with BA-MA's Quality Assurance testing environment. (MTP VII-1 and VII-2) KPMG, acting as a CLEC, has utilized the

test environment during the February Release and will perform further testing during the June Release. BA-MA expects that the test results will confirm BA-MA's ability to provide CLECs with a stable test environment.

177. Finally, MCI argued in Massachusetts as it did before the New York PSC and FCC that CLECs should be allowed to delay a new release. (MCI Aff. ¶ 78) This was properly not required by the FCC. Indeed, the FCC noted that Bell Atlantic must accommodate a variety of CLEC interests with any given change release. (*FCC Approval Order* ¶ 125) Moreover, it would be inappropriate for the CLECs to control whether a release can be implemented because of the extensive nature of some changes to Bell Atlantic's internal systems. A release will impact many Bell Atlantic systems and contain changes that impact all areas of the business. Many business processes and future changes rely on the timely implementation of a release. However, Bell Atlantic has historically listened to CLEC requests to delay implementation of a release when appropriate and will continue to do so in the future.

178. Bell Atlantic has procedures in place that enable CLECs to validate that a release has been adequately tested. Under these circumstances, and given Bell Atlantic's demonstrated responsiveness to CLEC feedback concerning release scheduling, there is no need for CLECs to have the ability to delay a release.

VIII. TRAINING AND ASSISTANCE FOR CLECS

A. Handbooks and Documentation

179. As indicated in the May 24, 1999, affidavit of Stuart Miller, BA-MA provides CLECs with extensive documentation to assist them in doing business with Bell Atlantic. (Miller Aff. ¶ 59) This documentation includes detailed CLEC Handbooks, which are provided on CD-ROM, advising CLECs, whether Resale or facilities-based, how to communicate

effectively with Bell Atlantic's OSS and personnel. These documents and others (such as the Web GUI User Guide) are available on the web site and can be downloaded to a user's PC. In addition, Bell Atlantic provides CLECs with extensive technical specification documentation enabling CLECs to program their systems for the use of EDI, including the *Bell Atlantic Pre-Order EDI Guide, Bell Atlantic North Pre-Order Documentation, Bell Atlantic North Ordering Documentation* and *Bell Atlantic North Order EDI Guide.* Further, Bell Atlantic provides CLECs with associated training on the use of the Web-GUI system for pre-order, ordering, and maintenance and repair transactions. Also, Bell Atlantic conducts monthly flow-through workshops that provide information on how to improve order quality, reduce rejects and queries, and improve overall flow-through rates.

180. BA-MA uses the same CLEC Handbooks, system documentation and training materials/sessions as are used by Bell Atlantic in New York. The FCC concluded that BA-NY provided the documentation and support necessary to give competing carriers nondiscriminatory access to its OSS. Perhaps more importantly, this documentation and training underlies the active competitive environment that has seen Bell Atlantic-North process over 500,000 CLEC orders in March 2000 alone, proving that CLECs can and do successfully use Bell Atlantic documentation and interfaces.

181. Bell Atlantic updates the complete CLEC Handbook annually, but provides specific updates to various sections as required throughout the year. Z-Tel stated at the Technical Sessions that it was difficult for CLECs to keep current with these changes and AT&T complained that Bell Atlantic-North had not provided for "automatic" updates as it had in Bell Atlantic-South. (Tr. 3693 (Z-Tel); AT&T Aff. ¶ 87) Again, these claims are

outdated. In September 1999, Bell Atlantic provided CLECs with the capability easily to update their CD-ROM version(s) of the handbook via the Bell Atlantic web site.

182. Similarly, Bell Atlantic's system documentation is updated as necessary to respond to CLEC needs. Although MCI complained that the documentation is changed too frequently, Bell Atlantic must respond to industry needs that are both broad in scope and dynamic in nature. New and revised documentation needs arise for many reasons. For example, these needs can be driven by a CLEC's feedback based upon its reported operational uncertainty or experience. Documentation may be changed in these circumstances so that all CLECs in Bell Atlantic can benefit from this valuable feedback. As a supplier to all of these CLECs, not only MCI, Bell Atlantic remains committed to communicating all changes, regardless of the size or impact, to CLECs in a timely fashion. The jointly negotiated Change Management Process, in place since May 1998, ensures the timely notification of interface changes to all CLECs. Announcements and Bulletins are distributed electronically and monthly meetings are held to keep all CLECs informed of system changes.

183. AT&T claimed that the technical documentation contained errors in version after version, and that Bell Atlantic did not fix these errors. (AT&T Aff. ¶ 82) AT&T presented these same arguments in the same timeframe to the New York PSC and the FCC. Moreover, Bell Atlantic has continued to improve its documentation quality. For example, the trend for documentation corrections for ordering shows that the errors identified have been corrected, and that few remain open. For Version 1.6 (June 1999 release), there were 52 ordering business rules documentation changes made due to KPMG identified errors. For Version 1.7 (August 1999 release), there were 13 KPMG identified errors. In Version

1.7.1 (September 1999), Bell Atlantic had to correct only 4 errors. The February 2000 release had just one KPMG identified error.

184. AT&T also complained that there were mismatches between Bell Atlantic business rules and EDI specifications. (AT&T Aff. ¶ 88) When AT&T raised this same issue in New York, Bell Atlantic explained that the limited number of such mismatches were caused in part by differences between the industry groups which published Ordering and EDI standards. For example, a large number of the document "mismatches" that AT&T raised earlier arose from the fact that Bell Atlantic established its EDI ordering specifications in accordance with the industry standard ANSI X.12 specifications (the technical standards document). These ANSI specifications differed in some respects from the OBF business rules (Local Service Order Guidelines or "LSOG"). Importantly, these "mismatches" were of far less consequence than AT&T's claim suggests, since all parties know that from a practical perspective the EDI standards control and these EDI standards require specific qualifying data elements.

185. In any event, many of the AT&T "mismatch" claims were already stale when they were raised in this proceeding. Bell Atlantic documented and explained the differences in industry naming conventions in its Version 1.7 (August 1999) or Version 1.7.1 (September 1999) releases.

186. In order to provide additional assistance to CLECs, Bell Atlantic developed the Integrated Documentation Application ("IDA"). IDA uses the LSOG Industry Standard Guidelines as its baseline, and candles the Bell Atlantic Business Rules against those guidelines. In addition, IDA enforces consistency in naming conventions between the Business Rule form/field combinations and the Interface Specification, whether it is EDI or CORBA in the case of pre-order. Change logs are automatically generated by the

application so that the CLEC is made aware of *each* change that is made to a new version of the Business rules and or Interface Specification and the logs record, where appropriate, the Change request associated with the log entry.

187. In order to respond to the CLEC request to more easily associate the Business rule directly to the Interface Specification rather than work with two separate documents (the Rule and the Spec), IDA produces a document that combines the Business Rule with the Specification in a side-by-side format in a single document. This further simplifies the CLECs' task of programming their systems to communicate with Bell Atlantic. Bell Atlantic believes it is the first in the industry to produce such a document.

188. Finally, AT&T itself has argued to the FCC that Bell Atlantic publishes accurate and comprehensive EDI specifications. Declaration of Nancy Dalton and Sarah DeYoung on behalf of AT&T Corp., ¶82, attached to *Comments of AT&T Corp., in Opposition to Southwestern Bell Telephone Company's Section 271 Application for Texas*, CC Docket No. 00-4, filed January 31, 2000.[13] Together with the fact that KPMG and CLECs have successfully built their own side of the interface using Bell Atlantic's documentation and that, as described above, Bell Atlantic's documentation has become more accurate, this demonstrates that AT&T's claims about Bell Atlantic's documentation are without merit. In addition, KPMG and HPC have utilized Bell Atlantic documentation during the Massachusetts KPMG test. BA-MA expects that this will confirm the quality of BA-MA's documentation.

[13] "Unlike Bell Atlantic, SWBT has failed to publish accurate and comprehensive, SWBT-specific EDI interface documentation. While Bell Atlantic (and other BOCs) publish customized EDI specifications, SWBT does not." *Id*.

B. Training/Reference Guides

189. As discussed above, Bell Atlantic provides CLECs with extensive training opportunities to assist them in doing business with BA-MA. The courses and curriculum, along with integrated training techniques, provide CLEC employees with the training and skills needed to master the complexities of telecommunications as well as to communicate effectively with Bell Atlantic. For example, the Resale training provides a complete and comprehensive skills-based knowledge of the products and services that are available for Resale. Similarly, as discussed above, Bell Atlantic conducts monthly workshops aimed at educating CLECs on ways to improve order quality and order flow-through. Each of these workshops carefully note the appropriate documentation for the CLEC representatives. Additionally, the Bell Atlantic "Business Rule" teams work directly with the training teams to ensure that course materials are consistent with system releases and documentation changes. Overall, the training program enables CLECs to interact effectively with Bell Atlantic.

190. To achieve this training goal, Bell Atlantic has divided the training curriculum into distinct modules as follows:

- Basic (Non-Complex) Products and Services
- Directory Listings Training
- Complex Products
- RETAS for Resellers (Repair Trouble Administration System)
- RETAS for CLECs (Repair Trouble Administration System)
- BA - NORTH Unbundled Network Elements (UNE) Training for CLECs
- BA - SOUTH Unbundled Network Elements (UNE) Training for CLECs
- Additional Training Offerings (will be developed for CLEC upon request)

The "hands-on" classroom environment allows students to learn and practice exactly what they need to know in order to interact with Bell Atlantic as appropriate to provision service to their end-users. Bell Atlantic training also includes post-training support to students for 30 calendar days after the class.

191. In addition, Bell Atlantic will "suitcase" the standard training curriculum to CLEC sites upon request when the schedule permits. CLECs have the option of selecting various individual modules from the standard training curriculum that can be delivered at their locations. Bell Atlantic will also consider CLEC requests to develop and deliver customized courses that are not in the standard curriculum upon request. For example, these requests may cover related subject areas like customer contact skills.

192. In 1999, Bell Atlantic trained 1,278 CLEC students. Similarly, CLECs have sent more than 300 representatives through Bell Atlantic training in the first quarter of 2000. Bell Atlantic has already conducted 4 "suitcased" courses this year, and has 3 more in the planning cycle. In addition, Bell Atlantic conducted free GUI Training sessions during the first part of this year in conjunction with the LSOG 4 release. Finally, it is significant that Bell Atlantic routinely asks for feedback at the end of each course or training session and that the vast majority of feedback has been very positive.

193. In short, Bell Atlantic has provided CLECs with the handbooks, documentation and training that provide them with a meaningful opportunity to compete in Massachusetts, just as it does in New York.

C. Help Desk Support

194. The Bell Atlantic Systems Support ("BASS") help desk serves CLECs and Resellers operating throughout the 14-state Bell Atlantic region. It was established to provide a single point of contact for all CLEC reports of systems issues (system outages,

passwords, software application problems, *etc.*), to provide timely notification to the CLEC of such events, and to ensure that any problems are resolved as quickly as possible. The BASS Help Desk answers incoming calls from the CLECs regarding the Bell Atlantic Web GUI or the Bell Atlantic OSS interfaces to CLEC provided applications. Information about the BASS Help Desk can be found in both the Resale and CLEC Handbook Series, Volume II, Section 5.3.

195. There are 20 service agents and six managers staffing the BASS Help Desk. The Help Desk utilizes an automated call distributor ("ACD") to distribute calls to the first available service agent. The ACD produces reports on call volumes and distribution by time-of-day. As call volumes increase, additional service agents are hired.

196. The service agents receive extensive on-the-job training. Each service agent is provided with a job guide, which describes the actions that should be taken in a particular type of situation and the appropriate contact list for that situation. New service agents are paired with experienced agents until they are fully trained. A manager is on the floor at all times to answer any questions that the service agent may have. In addition, the skill sets and performance of the call agents are evaluated regularly, and reinforcement is provided as needed.

197. Bell Atlantic is committed to providing the CLECs with excellent support from the BASS Help Desk and has adapted its operations as necessary. In support of the notification process, a Paging and Notification Control Desk was established in July 1999 to ensure timely notifications of system outages to all identified CLEC contacts. The procedures implemented for call handling, notification, escalation, and resolution conform to ISO 9002 standards. Further, based upon its own analysis and input from the CLECs, the

BASS Help Desk hours of operation were recently expanded to 24 hours a day, 7 days a week.

198. MCI has pointed to KPMG's Final Report in New York in which KPMG was "not satisfied" with Bell Atlantic's documentation in terms of contact lists and help desk telephone numbers. (MCI Aff. ¶ 95) This issue has was discussed by Stuart Miller in his August 27, 1999 affidavit in this proceeding. As stated by Mr. Miller:

> Bell Atlantic provides extensive information regarding the Help Desks in Volume II, Section 5.3 of both the CLEC and Resale Handbook Series. The handbooks provide a thorough roadmap to the Help Desk and Assistance Information process. Bell Atlantic updates and will continue to update, as appropriate, the Handbooks to reflect the most current Help Desk information. (¶ 8)

In fact, the Handbooks were updated in May 2000 to reflect the fact that the BASS Help Desk is open 24 hours a day, 7 days a week and to provide a contact list, including names and telephone numbers, for the Bell Atlantic BASS Help Desk.

199. The BASS Help Desk communicates information to CLECs regarding system outages, slow response times, or Type 1 Severity 1 change requests through the Bell Atlantic CLEC Change Management Notification processes. A review of BA-MA's Average Notification of Interface Outage metric through February 2000 reveals that Bell Atlantic has notified CLECs of interface outages in less than 20 minutes in three out of the five reported months. Thereafter, the Help Desk keeps CLECs apprised of the status of restoration efforts, and subsequently advises them when the outage condition has been cleared.

200. As stated previously, the BASS Help Desk was designed to answer incoming calls from CLECs regarding the Bell Atlantic Web GUI or the Bell Atlantic OSS interfaces. MCI claimed that Help Desk representatives often lack the necessary expertise to answer

questions or respond to problems. (MCI Aff. ¶ 96) MCI does not take into account that the help desk agents are not an isolated resource within Bell Atlantic. Instead, BASS help desk call agents have been provided with tools and training to enable them to retrieve and analyze information from the various systems to resolve problems. Depending on the nature of the call, the service agent may be able to resolve the issue on line. For example, if a CLEC representative was asking how to log on, the Bell Atlantic service agent could provide immediate assistance. If the problem appears to be systems-related, the Bell Atlantic service agent tries to recreate the problem in order to determine if the problem is actually in the Bell Atlantic system. If it is determined that there is a Bell Atlantic systems issue, the service agent will contact the appropriate Bell Atlantic subject matter experts ("SMEs") and set up a conference call, known as a technical bridge, to resolve the issue. For example, if a service agent received a call regarding a problem with the Web GUI, the agent would notify the technical staff responsible for the Web GUI and establish a technical bridge to discuss and resolve the problem.

201. As described in BA-MA's response to Record Request No. 120, the Help Desk opens a trouble ticket each time a CLEC calls to make an inquiry or to report an issue, regardless of the reason. Tickets are opened in order to document and track issues, as well as to refer issues to the appropriate groups within Bell Atlantic. Separate trouble tickets are opened for each CLEC that calls to report the same system trouble; *e.g.*, Web GUI is down. For instance, Bell Atlantic experienced a Web GUI connectivity issue on March 10, 2000, which resulted in the BASS Help Desk agents opening 43 separate trouble tickets, one for each CLEC that called to report the connectivity issue.

202. Approximately 170 different CLECs/Resellers called the BASS Help Desk in March. Only 22% of those contacts were related to systems outages or slow response times. Of

the remaining 78%, more than 13% of the tickets were related to PONS (questions, status, inquiries, *etc.*), 18% were related to pre-order and service order activity (CLEC received an error message during pre-ordering or ordering transaction, awaiting acknowledgements, *etc.*), 20% were related to customer logon issues (required assistance logging on, forgot password, *etc.*), 12% sought answers to informational questions ("how do I" or "where do I" – type questions), 7% were related to a search inquiry (CLECs seeking assistance using the Search feature, BASS Help Desk assisting CLECs to "undelete" service orders that the CLEC inadvertently deleted), and the remaining 7% related to various miscellaneous causes (*e.g.*, billing inquiries, systems administration, *etc.*)

203. This review indicates that, although the contacts made to the Help Desk are tracked as "trouble tickets," a great many of these contacts might be more appropriately considered customer service. As discussed above, Bell Atlantic provides extensive training and documentation that would enable CLECs to eliminate many of the "how to" calls.

204. MCI claimed that Bell Atlantic does not perform root cause analysis after trouble tickets have been addressed. (MCI Aff. ¶ 98) Bell Atlantic does analyze trouble tickets to determine the root cause of the problem. In November 1999, a new management tool was implemented at the Help Desk and this was subsequently enhanced in February 2000. The tool provides a mechanism to categorize all trouble tickets, thereby increasing Bell Atlantic's ability to analyze the nature and cause of the trouble tickets. When the service agent is entering the trouble ticket, they also enter a category that allows Bell Atlantic to track trouble tickets by category. This will assist Bell Atlantic in analyzing problems and in developing and implementing new processes to fix them.

205. Finally, Bell Atlantic has established additional "help desks" which have been designed to provide more specific assistance to CLECs when technical issues are involved. These Help Desks include the Bell Atlantic Web GUI Business Help Desk (supporting Bell Atlantic-North) and the Bell Atlantic RETAS Help Desk. The Bell Atlantic Web GUI Business Help Desk provides assistance regarding application questions and supports users (who have been trained on the GUI System) in their efforts to enter request and orders into the Web GUI System. The Bell Atlantic Web GUI Business Help Desk can be reached Monday through Friday, 7:00 a.m. to 12:00 a.m. The Bell Atlantic RETAS Help Desk handles all questions related to Trouble Administration Requests Responses and Maintenance. The RETAS Help Desk can be reached 24 hours per day, 7 days a week. Information pertaining to the Bell Atlantic Web GUI Business Help Desk and the Bell Atlantic RETAS Help Desk can be found in both the Resale and CLEC Handbook Series, Volume II, Section 5.3. The CLECs always have the option of contacting the BASS Help Desk and, if appropriate, the BASS Help Desk will refer the call to the Bell Atlantic Web GUI Business Help Desk or the Bell Atlantic RETAS Help Desk. All of these resources are available to assist CLECs in their use of the Bell Atlantic OSS.

206. This concludes our Affidavit.