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March 13, 2002

Ex Parte

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
445 12th Street, SW
TW-A325 - 12th Street Lobby
Washington, DC 20554

RECEIVED

MAR 13 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket No. 98-141: Extension of Target Date for Completion of the
Uniform and Enhanced OSS Plan of Record

Dear Mr. Caton:

Today, the attached letter regarding an extension of SBC's target date for completion of the Uniformed and Enhanced OSS Plan of Record was submitted to Ms. Dorothy Attwood. The letter responds to inquiries made by Mr. Anthony Dale in relation to the subject matter.

An original and one copy of this Ex Parte are being filed in the Office of the Secretary on March 13, 2002. Please include it in the public record of these proceedings as required under Section 1.1206(b)(2) of the Commission's rules.

Sincerely,

A handwritten signature in cursive script, appearing to read "Caryn D. Moir", is written over a faint, circular stamp or watermark.

Attachment

cc: Mr. Anthony Dale

Caryn D. Moir
Vice President
Federal Regulator

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March 13, 2002

Ms. Dorothy Attwood
Chief, Common Carrier Bureau
Federal Communications Commission
445 12th Street, S.W., Room 5-C450
Washington, D.C. 20554

**Re: Extension of Target Date for Completion of the Uniform and
Enhanced OSS Plan of Record; CC Docket No. 98-141**

Dear Ms. Attwood:

Anthony Dale has requested that SBC Communications Inc. (SBC) provide additional information regarding the circumstances leading to its request for a 32 day extension to the target date for completion of Phase 3 of SBC's Uniform and Enhanced (U&E) OSS Plan of Record (POR). Specifically, he has requested SBC to provide additional detail concerning the software problems identified by SBC, the potential risks that those problems posed and SBC's communications to its CLEC customers regarding those problems. In addition, he has asked for more information about negotiations, state regulatory decisions and arbitrations that established new and unanticipated OSS requirements and that consumed resources that would have been devoted to POR implementation. Finally, he has asked whether the modifications or delays associated with the protracted walkthroughs for the POR releases led to or exacerbated the software problems identified by SBC. This letter responds to Mr. Dale's request.

SBC's Identification of Problems and Risks During Testing

As part of implementing the order and preorder releases, SBC has successfully completed over 37,000 test cases for ordering in addition to over 30,000 test cases for preordering. Despite these many successes, SBC's joint tests with CLECs and internal testing identified several critical areas in which the release software was not performing as it was designed and intended to perform. These malfunctions could adversely affect CLEC operations, as well as SBC performance. Described here are five examples.

EDI Translation

The EDI interface did not correctly map incoming and outgoing data into the proper formats in all cases. On incoming orders, data were corrupted, missing or placed in incorrect fields on certain order scenarios. If left uncorrected, this could have caused invalid rejection of certain orders from CLECs or, where the order successfully passed through the interface, to communicate improper information to downstream systems or cause the order to fall out for manual handling.

On outgoing transmissions for a Customer Service Inquiry, the EDI interface did not always parse customer service record information per agreed-upon business rules. Once again, this could have lead to incorrect or rejected orders.

Flow Through

With the POR implementation, all Flow Through programs had to be modified in order to maintain existing Service Order Flow Through capability. In some instances, these programs were not working as designed, resulting in increased manual intervention to process CLEC orders. The reduction in Flow Through could have caused SBC to Miss Firm Order Confirmation intervals and provisioning due dates.

Service Representative Interface

The Service Representative interface, which intelligently assigns orders and allows SBC Service Representatives to access requests that require manual handling, was not correctly sending all expected order status indicators to the Service Representative. Because the Service Representative depends upon these indicators to understand the work they need to perform, this problem could have negatively impacted both order quality and processing timeliness.

Notifications

SBC found during testing that, in some situations, partial information was being returned on notifications. These incomplete notifications would have deprived CLECs of accurate and timely information necessary to process orders.

Company Identifier Derivation

SBC found that the new interfaces were not properly deriving the company identifiers (ACNA/CCNA information) on some orders passed to the SBC Directory organization. This could have lead to delays in transmitting directory information

SBC's Notification to the CLEC Community

Historically, SBC has found that many software errors typically can result from a few common causes. When it identified problems during internal and joint testing, SBC anticipated that it would be able to identify and correct these few problems and thus resolve many of the errors it had identified. Also, some successful joint testing, predominantly in SWBT, indicated that the problems might be limited in scope. As a result, SBC pressed forward with plans to deploy the release. However, following an extensive push during the weekend preceding the PB/NB/SWBT release, SBC determined that many of the errors it had identified had unique causes, and that each error would therefore have to be resolved individually. SBC then knew that it would be unable to correct a sufficient number of the errors by the planned deployment dates.

On Tuesday, February 19, SBC invoked the emergency provisions of its 13 state Change Management Process and notified the Change Management Points of Contact (CLEC contacts) of an emergency conference call to discuss the status of the release. Over the next few days, SBC hosted two calls. On the calls, SBC described the situation and indicated that, while it could move forward, it did not recommend doing so because it feared a negative impact on CLEC operations. SBC also responded to a number of CLECs' questions about the logistics of any delay (including how much time was needed to fix the problems, when would testing windows be available, and how would information be communicated). In addition, SBC proposed alternative release dates. The CLECs did not express a consistent opinion regarding the alternate dates; some (including WorldCom, AT&T and Birch) supported SBC's proposed dates, while other sought, additional time beyond SBC's proposed extension. Ultimately, the parties reached concurrence on SBC's proposed dates. SBC further agreed to slip the

retirement dates of other interfaces proportionately with the delay in the POR releases. SBC confirmed all this in a subsequent Accessible Letter.

Additional OSS Requirements, Other Than POR

At the same time SBC was implementing the POR, it was required to resource and develop various other OSS enhancements. Many of these OSS enhancements were necessary to address the ongoing operational needs of both SBC as well as CLECs. Others were the result of negotiations, regulatory decisions and arbitrations including the following, which were implemented during the last half of 2001. The Illinois House Bill 2900 required SBC to implement various product enhancements including the provisioning of Optional Calling Plans.

SBC managed the following OSS changes due to various Commission requirements:

- Implemented an option for CLECs to order cooperative acceptance testing in AIT.
- Implemented electronic ordering capability for LEC Protection in AIT.
- Developed flow through capability for Loop with Number Portability for the conversion of basic services as a result of the AIT 24 Month Flow Through Plan which will be implemented in April 2002.

System Requirement Changes During the POR Walkthrough Process Delayed Coding and Identification of Errors through Internal and Joint Testing

The POR that will be implemented shortly is the result of a long but fruitful negotiation process between SBC and the CLEC community. However, the POR has required software, hardware and other changes to a large set of systems. The changes that SBC has made affected all aspects of systems design and development work, from process flows to data requirements to implementation walkthroughs. Any change in the EDI interface or LSR requirements, for example, can have a ripple effect through multiple systems, affecting each of them and their business rules. Thus, in order to maintain synchronization between systems, each change must be reviewed from the perspective of each system. Consequently, SBC and its CLEC partners extended the POR walkthroughs several months beyond schedule (ending in November 2001 instead of June 2001).

During the walkthroughs, SBC made many changes to its POR documentation either at CLECs' requests or with their concurrence. For example, SBC agreed to make data characteristic changes to the LSR field, RPON/NOR, changing the number of occurrences of the RPON/NOR field from 20 to 99. In turn, this impacted the LASR database and ultimately the EDI mapping and interface specifications.

In addition, most changes to the LSR business rules also impacted SBC's Flow Through capabilities thus requiring further changes to these downstream processes. Because SBC had to maintain synchronization between its pre-ordering and ordering interfaces, it had to review any change to LSR ordering (no matter how insignificant) to determine whether the change would require a corresponding change to its pre-ordering requirements. This caused delays in coding and testing.

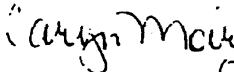
The development of SBC's Service Representative interface was also impacted by these kinds of changes. For example, final decisions on how to handle the processing of "Lite Address Validation" were jointly concluded with the CLECs during the 3rd quarter of 2001, which resulted in final design extending into the 4th quarter of 2001. By this time, development of the Service Representative Interface was already under way and

changes had to be made to develop a proactive notification to the Service Representative of any CLEC requesting Lite Address Validation. This caused additional *development and delayed testing of the Interface.*

These are just a few examples of the changes that resulted from the walkthrough process. Taken individually, they would not be considered significant, but when the volume of issues (over 800) is taken into account, consideration must be given. The critical point is that, because the walkthroughs continued into November 2001, SBC could not finalize its software business requirements until several months past schedule and was still coding into the first quarter of 2002, when it normally would be completing internal testing. In turn, this *delayed identification and resolution of software or documentation problems that normally occur during both internal testing and joint testing with the CLECs.*

Please let me know if you have further questions.

Sincerely,


(Caryn Moir)

Caryn Moir

cc Anthony Dale