S T A T E O F M I C H I G A N

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

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In the matter, on the Commission's own motion, to consider Ameritech Michigan's compliance with the competitive checklist in Section 271 of the federal Telecommunications Act of 1996.	)	**Case No. U-12320**

JOINT AFFIDAVIT OF

WALTER W. WILLARD

AND

REBECCA L. WEBBER

ON BEHALF OF

AT&T COMMUNICATIONS OF MICHIGAN, INC. AND TCG DETROIT

November 15, 2002

1. My name is Walter W. Willard. I am making this joint affidavit on behalf of AT&T Communications of Michigan, Inc. I am the District Manager for OSS Local Services in AT&T's SBC Communications (SBC) 13-State Local Services and Access Management organization. In this position, I have responsibility for the business relationship with SBC to support AT&T's plans for local service market entry and for negotiations with SBC Ameritech, SBC Pacific Bell ("Pacific"), SBC Southwestern Bell ("SWBT"), and SBC Southern New England Telephone ("SNET") to facilitate such market entry. The matters I am personally focused on include Operations Support Systems ("OSS").

2. In that capacity, I am actively involved with various SBC Ameritech[1] teams that are responsible for working with AT&T as a local service provider. Among the teams or organizations at SBC Ameritech with which I, and members of my organization, have frequent – sometimes daily – contact are: SBC Ameritech's AT&T Account Team; OSS representatives; SBC Ameritech's Local Service Centers (Resale Local Service Center ("RLSC") and Facilities Local Service Center ("FLSC")); and Project teams implementing various system, operational and engineering changes at SBC Ameritech. Through SBC Ameritech's AT&T Account Team, I am also in frequent contact with policymakers at SBC Ameritech's parent corporation, SBC Corp. ("SBC"), regarding a multitude of local issues that bear on activities in our regions. I have similar responsibilities in California, Texas, Missouri, Oklahoma, Kansas and Arkansas with respect to SBC/Pacific Bell and SBC/Southwest Bell. In addition to these

[1] In this affidavit, in general, we will refer to the Ameritech Bell Operating Companies as SBC Ameritech and to the Bell Operating Company in Michigan as Ameritech Michigan or Ameritech.

responsibilities, I have represented AT&T as a primary member of the California OSS Third Party Test – Test Advisory Board.

3. I am a graduate of the University of San Francisco, where I received a Bachelor of Science degree in Business Administration. I also received a Master of Science degree in Telecommunications from Golden Gate University in San Francisco. I have been employed by AT&T since 1981. In the course of my employment at AT&T, I have held various positions in the Engineering, Operations, OSS Research and Development with AT&T Bell Laboratories, International, and Outsourcing areas. I have previously testified on behalf of AT&T in various regulatory proceedings, including the Section 271 proceedings conducted by State commissions in Missouri, Arkansas, Oklahoma, Kansas, California and Illinois. I have also presented testimony before the FCC in connection with Section 271 applications by SBC Southwestern Bell for California, Texas and Missouri. I have also testified on behalf of AT&T in Interconnection Agreement Arbitration proceedings before the Texas, Oklahoma and California Commissions.

4. My name is Rebecca L. Webber. I am making this joint affidavit on behalf of AT&T Communications of Michigan, Inc. In 1999, I became an OSS Manager for AT&T. In this position I have had responsibilities over OSS testing, interface and software releases, production support issues and escalations, ordering and provisioning issues. As part of my job responsibilities, I attend or participate in Change Management meetings, as well as CLEC User Forums.

5. I graduated from Villanova University with a Bachelor of Science Degree in Finance. Since graduating from college, I have been employed in the

telecommunications industry where I have held positions of increasing responsibility. Specifically, I began my career with MCI in 1994, where I held the positions of Service Support Representative, Account Support Coordinator, and Strategic National Service Representative. In these capacities, I routinely dealt with customer facing, provisioning, maintenance and repair, and billing related issues. In 1997, I began working with USN Communications, where I held the positions of Product Analyst and Business Assurance Manager. In this capacity my energies were focused on marketing, product management, billing and revenue assurance.

I. PURPOSE OF AFFIDAVIT

6. The purpose of our joint affidavit is to provide, in response to the Commission's request (in its September 16, 2002 order in this docket), AT&T's analysis of the BearingPoint findings (in its recent October 30, 2002 Report) regarding SBC Ameritech's provision of just, reasonable and nondiscriminatory access to its OSS in the state of Michigan. To provide this view, we will contrast AT&T's experiences, to date, with BearingPoint's findings and the data developed by that test, particularly in light of AT&T's entry into mass market residential services in Michigan using the unbundled network element ("UNE") Platform, also known as UNE-P. We have both been involved in the support of that entry, and in particular, we are part of the business-to-business team at AT&T that interfaces directly with SBC Ameritech regarding the availability and functionality of its OSS interfaces. We have both also participated as competitive local exchange carrier ("CLEC") representatives in the BearingPoint test, through the test interview processes, AT&T's provision of test facilities to BearingPoint, the weekly CLEC conference calls with BearingPoint and the state commission staffs monitoring test

activities, and in CLEC/BearingPoint "face-to-face" meetings that have been held over the past two years.

7. Our primary area of discussion will be the continued instability of SBC Ameritech's Change Management Processes, and the effect this instability has on AT&T's ability to efficiently use SBC Ameritech's OSS. While we will discuss this in greater detail below, our affidavit focuses on what has been and continues to be a major failure of SBC Ameritech's efforts to upgrade its OSS – SBC Ameritech has failed in significant ways to establish a "clearly organized and readily accessible" change management process and, even then, has demonstrated a pattern of noncompliance with the process that it has put in place.

8. The results of these failures are real; but – and this is significant – these failures are unlikely to have been discovered by the BearingPoint testing that has occurred. This is because the BearingPoint test of Change Management (which is essentially contained in the test section PPR1) has demonstrated "blind spots" that prevented Bearing Point from truly living the "life" of a CLEC vis-á-vis change management issues. The reality is that BearingPoint's PPR1 test was limited in scope and duration such that it did not begin to examine and record the possibility of the violations of SBC Ameritech change management processes that AT&T has experienced. Thus, our affidavit will provide the Commission additional facts to consider regarding whether SBC Ameritech has met this requirement of a Section 271 inquiry. (Mr. Connolly will provide in his own affidavit other additional information on this point as well.)

I. REQUIREMENTS FOR A CHANGE MANAGEMENT PROCESS

9. We understand that, as part of a Bell Operating Company's ("BOCs") application pursuant to Section 271, the Federal Communications Commission ("FCC") has required a BOC to establish that it has a working change management process or plan for its OSS. The FCC reviews the plan to determine whether the change management procedures afford an efficient competitor a meaningful opportunity to compete by providing sufficient access to the BOC's OSS.[2] From a practical standpoint, we believe one of the key elements that must be looked at was explained by the FCC in the following text (found at ¶ 102 of the *New York Order*):

> Competing carriers need information about and specifications for an incumbent's systems and interfaces in order to develop and modify their systems and procedures to access the incumbent's OSS functions.[3] Thus, in the *Ameritech Michigan Order*, the Commission determined that in order to provide nondiscriminatory access to OSS, a BOC must first demonstrate that it "has deployed the necessary systems and personnel to provide sufficient access to each of the necessary OSS functions and . . . is adequately assisting competing carriers to understand how to implement and use all of the OSS functions available to them."[4] By showing that it adequately assists competing carriers to use available OSS functions, a BOC provides evidence that it offers an efficient competitor a meaningful opportunity to compete.[5] As part of this demonstration, the Commission will give substantial consideration to the existence of an adequate change management process and evidence that the BOC has adhered to this process over time.

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[2] Memorandum Opinion and Order, *In the Matter of Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act To Provide In-Region, InterLATA Service in the State of New York*, CC 95-295, FCC 99-404, ¶¶ 82, 102 (rel. Dec. 22, 1999) ("*New York Order"*).

[3][footnote original to quote] *First BellSouth Louisiana Order*, 13 FCC Rcd at 6279 n.197; *BellSouth South Carolina Order*, 13 FCC Rcd at 625 n.467; *Ameritech Michigan Order*, 12 FCC Rcd at 20617 n. 334; *Local Competition Second Report and Order*, 11 FCC Rcd at 19742.

[4] [footnote original to quote] *Ameritech Michigan Order*, 12 FCC Rcd at 20616; *Second BellSouth Louisiana Order*, 13 FCC Rcd at 20654.

[5] [footnote original to quote] *Second BellSouth Louisiana Order*, 13 FCC Rcd at 20655 (citing *Ameritech Michigan Order*, 12 FCC Rcd at 20619; *Local Competition First Report and Order*, 11 FCC Rcd at 15660; *Local Competition Second Reconsideration Order*, 11 FCC Rcd at 19742).

10. In other words, the FCC looks to determine if a BOC has deployed the necessary systems and personnel that allow a competitive carrier to efficiently understand and use the BOC's OSS. As part of that process, the FCC will evaluate whether the BOC has demonstrated a pattern of compliance with its change management plan.[6]

11. The BearingPoint Report[7] purports to evaluate this subject area and present findings to this Commission so that it can provide a consultation to the FCC regarding Ameritech's compliance with Section 271 of the federal Act. The report notes that the "objectives of this test are to determine the existence and functionality of procedures for developing, evaluating, and implementing change proposals" and focuses on "change management intervals, notifications, and tracking mechanisms."[8] As Mr. Connolly explains in his affidavit, the test (and its associated components – PPR 2 (Account Establishment), PPR 3 (CLEC Training, etc.) appear to capture data and experiences from only a short snapshot in time and, thus, do not adequately represent the full experience (or futility of that experience) of operating under SBC Ameritech's change management processes. Indeed, one of the major concerns regarding the

[6] Memorandum Opinion and Order, *In the Matter of Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., And BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Alabama, Kentucky, Mississippi, North Carolina, and South Carolina*, WC Docket No. 02-150, FCC 02-260, ¶ 180 (rel. Sept. 18, 2002). In this order, the FCC provides an outline of elements that also must be present before a BOC may successfully claim that its change management processes satisfy the standard. We discuss some of those elements below, but in general, we believe the touchstone remains the BOC's ability to "adequately assist" carriers in the use of the OSS over time.

[7] Unless we explain otherwise, we refer to the October 30, 2002 OSS Evaluation Project Report ("October 30 Bearing Point Report") submitted by BearingPoint in this case and found at the following URL: www.osstesting.com/Documents/MI%20Docs/OSS%20Evaluation%20Project%20Report%20103002.pdf.

[8] *Ibid*., p. 35.

BearingPoint approach is that there appears to be little opportunity for the Test CLEC[9] or test manager to experience and recognize the ongoing nature of Ameritech's change management deficiencies. To put it bluntly, BearingPoint's (and the Test CLEC's) approach do not reflect the true reality of CLEC experiences in this regard.

12. For example, so far as we are aware, the Test CLEC has submitted only one "CLEC Change Request" (also known as a "CCR") during the test thus far. The specifics of the CCR submitted by HP are not explained it its report. See October 29, 2002 Hewlett-Packard Report, page 6-7 of 6-12.[10] In the same time-frame, AT&T submitted five CCRs.

[9] When we refer to the Test CLEC, we are referring to that function within the test fulfilled by BearingPoint and its subcontractor, Hewlett-Packard ("HP"), whereby these companies simulated "real-world business situations." October 30, 2002 BearingPoint Report, p. 8.

[10] The October 29, 2002 Hewlett-Packard Report may be found at the following URL: www.osstesting.com/Documents/MI%20Docs/Michigan%20Report%20through%20083102%20v2.0%2020021029.pdf.

13. Other information confirms that HP – the "Test CLEC" – did not believe its inquiry into the change management was intended to be particularly broad. AT&T requested additional information from HP during the Technical Conferences convened in this case, regarding HP's examination of the methods and procedures employed by SBC Ameritech when it made changes to its legacy systems that affected CLEC OSS operations. HP's response was telling:

> HP reviewed Accessible Letters distributed by SBC Ameritech and completed an analysis of the AL to determine if there was an impact to the EDI gateway. Instances in which the Test CLEC was impacted by deviation by SBC Ameritech CM practices were captured in Observations and/or Exceptions.
>
> **It was not within HP's scope of work to capture SBC Ameritech adherence to published notification processes.**

HP Answer to AT&T Question No. 57 (emphasis added). In other words, HP did not even consider how SBC Ameritech's failure to give notice of a change in its systems affected a CLEC's ability to react to such a change. As we will explain below, this issue (SBC Ameritech's failure to give notice of a change) has become highly disruptive to AT&T's operations.

14. The change request process provides a means for CLECs to request changes to SBC Ameritech's OSS and LSOR business rules. CLECs may recommend interface changes for future consideration by submitting a CLEC Change Request Form to SBC and the CLEC's Account Manager. These changes may include new functionality or changes to existing functionality.[11]

[11] As Mr. Connolly discusses in his affidavit, the BearingPoint Test and the Technical Conferences convened from October 14-18, 2002, revealed that there are processes at work regarding CCRs that are not

15. The CCR process is important to CLEC's because it is the only avenue by which CLECs can identify and request SBC/Ameritech OSS systems changes or enhancements that will improve the existing system functionality, improve support for ordering, provisioning, maintenance and repair processes or enable new products and services to be ordered. Through the CCR process, SBC Ameritech and the CLECs are able to collaborate on potential solutions, discuss the relative merits of a CCR with all parties and work together on setting a priority for each CCR. In theory, the CCR process is the vehicle by which CLECs can request SBC/Ameritech to make OSS changes that meet the needs of providers in a competitive marketplace and to request that SBC provide the capabilities needed to support emerging competitive services that utilize unbundled portions of the incumbents network.

16. At this point, however, we do not believe that the BearingPoint Test or HP's "Test CLEC" activities have "drilled down" sufficiently to determine the efficiency of the CCR process. CCRs remain a cumbersome vehicle – they may take as long as 6-9 months before SBC Ameritech's response or review is complete – and even then are subject to almost unilateral rejection by the company. The possibility that there are internal SBC Ameritech priorities that are being taken into account and maybe even given preferential treatment (by, for example, this mysterious LSR Review Board that we

"mapped" into the current Change Management Process, and to which CLECs in general have no understanding of or visibility into. For example, as a result of the BearingPoint Report and the Technical Conferences, AT&T learned for the first time that there is a LSR Review Board that operates internally within SBC Ameritech that reviews and prioritizes CLEC CCRs affecting LSRs. Tr. 5320. The fact that there is a undisclosed deliberative body within SBC Ameritech making decisions regarding the order, priority, and viability of CCRs is simply antithetical to the open change management process that was negotiated and agreed to by all parties.

now know is in operation) should give the Commission ample grounds to direct BearingPoint to return to this portion of the test and investigate further.

II. CHANGE MANAGEMENT IS A CRITICAL PART OF OSS FUNCTIONALITY

17. In our affidavit, we will point out information that suggests that SBC Ameritech has not deployed the necessary systems and personnel such that it can claim that it has a stable and robust change management processes. In fact, we have observed or experienced instances where SBC Ameritech has either violated outright its change management protocols or, and this is a pervasive problem, has simply claimed that the rules do not apply.

18. Change Management is a process that involves giving notice of "changes" and providing affected parties (Ameritech, CLECs etc.) sufficient time to "manage" to that change. For example, the time lines in the Ameritech Change Management Process were set up with the intent that if a CLEC actually received the final requirements for an LSOG release 110-130 days prior to the release as expected, the CLEC could actually complete all of the work that it needs to do in order to be prepared to use that new release by SBC Ameritech's new release date.

19. This process can be defeated if the BOC fails to abide by the actual notice requirements and time intervals. It can also be rendered ineffectual if the BOC consistently skirts the edges of the requirements, or, does not operate within the "spirit" of the change management rules and constantly identifies – but does not give proper notification of -- "changes" in its OSS. By submitting constant updates/changes to

requirements that are supposedly final, a BOC compresses the timelines so that CLECs do not have the time needed to properly code to the requirements. Additionally, frequent changes create re-work for CLECs as earlier requirements and coding must be re-inspected and validated against the new changes. Further, SBC/Ameritech requirements, exceptions, and document updates often create confusion, since there is no one definitive document of requirements. Rather, there are multiple Accessible Letters that must be accounted for and correlated. As we will describe below, this is SBC Ameritech's *modus operandi* and it has a chilling effect on CLEC operations. Ameritech's ever-changing "release" process creates a lack confidence on the part of CLECs, including AT&T, such that we are more likely to remain "tied to" releases, and thus we are denied the alleged benefits of the new release until such time as evidence demonstrating the reliability of the new release is provided.

20. The failures of a change management process are palpable to a CLEC like AT&T. CLECs expend significant capital (both financial and human) on the development of the interfaces that connect to SBC Ameritech's OSS. In each instance that SBC Ameritech inappropriately varies or violates an established rule or requirement (and thus violates its change management process), the CLEC is left with very few favorable options. The CLEC can "fight the system" – i.e., it can assert its right under change management escalation processes. But these processes, while designed to proceed in an expedited manner, do not provide either prompt or retroactive relief.

21. More likely, when faced with a possible violation of the change management process the CLEC will attempt to negotiate a "work around" for the OSS fault. Like the first alternative mentioned above, this result also provides incomplete

relief. While the CLEC may obtain a means to "put out the fire" and sustain some level of service to its customers, the costs are usually high. First, the costs a CLEC has incurred in "coding"[12] to a standard that is not correct have been wasted. Then there is the cost of new coding and potentially new testing to implement a systems solution, or the CLEC is burdened with the costs as building an inefficient work-around process that depends on human intervention and manual or semi-manual activities.

22. Second, there is the chilling effect that we mentioned above. If a CLEC believes that the current interface design is unstable (*i.e.,* constantly changing) it will not have confidence in future release generations of the interface. In more specific terms, AT&T delayed its progression to Ameritech's LSOG 4 release because of concerns that developed while using the prior release. AT&T has delayed moving to the next generation – LSOG 5 (now LSOG 5.2) – because of similar concerns. As we explain in the next section of this affidavit, AT&T's experience with LSOG 4 has been anything but reassuring.

III. SBC AMERITECH VIOLATED ITS CHANGE MANAGEMENT PROCESS IN CONNECTION WITH ITS LSOG 4 RELEASE

23. The remainder of this affidavit will give details of AT&T's past and present experiences – and misadventures – with SBC Ameritech's OSS as it primarily relates to the failure of its Change Management Processes.[13] We will begin by discussing

[12] When we refer to "coding," we mean the development of the software and associated electronics necessary to implement – either on an electronically bonded basis or through the use of some other type of communications protocol (i.e., the internet) – an OSS function. This activity starts with the understanding (by the CLEC) of the requirements necessary to transmit/translate information into the BOC's OSS, and then proceeds with the creation, testing, and implementation of the necessary electronic connections to that OSS and software communication for transmitting information (order, preorder, billing etc.) successfully.

[13] We say "primarily" because, as we continue this discussion, we will identify areas of concern with the functionality and performance of the OSS. It is our belief that the majority of these issues arise because of

our experiences transitioning to LSOG 4, and then discuss generally our concerns with our upcoming transition to LSOG 5.

A. AT&T Experienced Major Problems Transitioning to LSOG 4 That Were Exacerbated By SBC Ameritech's Failure To Follow Its Change Management Process

24. Although it may seem like "ancient history," particularly to those of us who have worked on these issues for several years now, for the Commission to have the full context, we feel it is important to begin our discussion with a description of several major "upgrades" to SBC Ameritech's OSS that have occurred since 1997. For some two and one-half years prior to its merger with SBC in October of 1999, and in fact until March 2001, Ameritech's OSS were virtually frozen in time. They were quite literally the same interfaces with virtually the same functionality that was in place in August of 1997 when the FCC rejected its 271 application for Michigan -- in part for failure to provide adequate OSS. Ameritech's work on this old interface dates to 1996, before the industry standards-setting body, ATIS,[14] had adopted standards for pre-ordering and ordering. Subsequent generations of the so-called LSOG industry-standards have come and gone. LSOG Version 3 standards were adopted by the industry in May 1998, and LSOG 4 conventions became the industry standard in June of 1999.[15] Yet up until March

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SBC Ameritech's inoperative change management processes – but some of the issues (such as Line Loss Notifiers) are simply critical faults in the systems and manual processes that SBC Ameritech uses to provide its OSS. At the end of this affidavit, will summarize these deficiencies as best we are able.

[14] Alliance for Telecommunications Industry Solutions is the organization that publishes industry standards, guidelines and operating procedures used by interexchange and local carriers to support interoperability of the carriers. Its key committees whose work establishes the standards for pre-ordering and ordering are the Ordering and Billing Forum ("OBF") and the Telecommunications Industry Forum ("TCIF"), and the standards are known as the Local Service Ordering Guides ("LSOG") and the EDI LSOG Mechanization Specification ("ELMS").

[15] The industry standards serve three purposes: (1) they define what transactions types can be exchanged and what those transactions mean (i.e., the business function they are to accomplish); (2) they specify what

2001, Ameritech's pre-ordering/ordering interfaces were pre-LSOG 2 versions and thus they lagged full two versions behind the then-current industry standards – the standards that other RBOCs, like Southwestern Bell Telephone Company, had continually upgraded towards as new standards were released.

25. It was against this background that the FCC and the state commissions in Illinois and Ohio reviewed the SBC/Ameritech merger application. It is not surprising, therefore, that during their review, these commissions found that Ameritech's OSS lagged behind the industry and needed a jumpstart.[16] In arguing for approval of the merger, SBC committed that, if the merger were approved, it would move expeditiously to update Ameritech's systems to industry standard. In fact, as a condition of approval of the merger, the Illinois and Ohio commissions ordered Ameritech to update its OSS and engage in state OSS collaboratives, beginning in November of 1999, to discuss those updates with the CLECs.[17] Those OSS collaboratives soon spread to the other Ameritech states, including Michigan.

26. SBC Ameritech, in the state collaborative meetings, eventually accepted many of the CLEC OSS proposals for increased functionality and improved process and

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data elements are necessary to accomplish the transactions; and (3) they establish what the characteristics of the data elements should be (e.g., number of characters in a field, whether the field is to contain alphabetic or numeric characters, and whether the field is required, optional or conditional). When an RBOC's specifications are said to be "compliant with the standard," it means that all three characteristics have been achieved.

[16] See *Joint Application for Approval of the Reorganization of Illinois Bell Telephone d/b/a Ameritech Illinois, and the Reorganization of Ameritech Illinois Metro, Inc. in Accordance With Section 7-204 of the Public Utilities Act and For All Other Appropriate Relief*, Illinois Commerce Commission Docket No. 98-0555, September 23, 1999 Order, at 257-259; *In the Matter of the Joint Application of SBC Communications Inc., SBC Delaware Inc., Ameritech Corporation, and Ameritech Ohio for Consent and Approval of a Change of Control*, Public Utilities Commission of Ohio Case No. 98-1082-TP-AMT, April 8, 1999 Opinion and Order, at 10-17.

[17] Ibid.

procedures. That agreement was put to writing and called the Plan of Record (or "POR") and filed with the Illinois Commission in Docket No. 00-0592. Other OSS upgrades were developed in the so-called "A-AA" process, primarily in collaboratives sponsored by the Public Service Commission of Wisconsin. The Michigan Master Test Plan, as approved by this Commission, requires that these A-AA enhancements must be fully tested by BearingPoint in Michigan.[18]

27. As we describe below, there is reason to question whether SBC Ameritech has fully implemented these improvements. While SBC Ameritech has claimed to have had its LSOG 4 release available in March 2001, that release was riddled with so many document and system deficiencies that it was impossible for any carrier to actually use it until months afterward, and many of those system problems linger today.

28. Our discussion of the many problems we have observed with SBC Ameritech's release of major OSS versions starts with the March 2001 release of LSOG 4. To put it bluntly, SBC Ameritech's March 2001 LSOG 4 was mired in documentation errors and deviated greatly from the stated change management timeframes, all of which made it virtually impossible for CLECs to be in a position to use it at the time it was

[18] See Master Test Plan v. 3.0, Part III, § F at p. 21 (April 2, 2002) (found at www.osstesting.com/Documents/MI%20Docs/MPSC%20MTP%20Ver%203 _0.pdf). The MTP states:

> The test will not be considered complete until Ameritech has implemented a series of modifications and enhancements to its OSS (as described in the table below and in Appendix F), and those modifications and enhancements have been tested. These modifications and enhancements have been negotiated between Ameritech and CLECs in collaborative work sessions conducted under the auspices of several state regulatory agencies and at the Federal Communications Commission (Memorandum Opinion and Order, Applications of Ameritech Corp., Transferor, and SBC Communications Inc., Transferee, For Consent to Transfer Control of Corporations Holding Commission Licenses and Lines Pursuant to Sections 214 and 310(d) of the Communications Act and Parts 5, 22, 24, 25, 63, 90, 95 and 101 of the Commission's Rules, CC Dkt. No. 98-141, FCC 99-279, 1999 WL 809551 (rel. Oct. 8, 1999), app. pend. *„sub. nom.* Telecommunications Resellers Ass'n v. FCC, Case No. 99-1441 (D.C. Cir.)

implemented. AT&T did not attempt to move to the March 2001 release when it went into effect in March 2001 – and in retrospect, given the many problems found in the release, it is fortunate that it did not make this attempt. Nevertheless, because AT&T did not immediately move to LSOG 4, it was constrained to remain on a release version that was more than two years old and reflected what was essentially antiquated technology.

29. Of the various problems AT&T first encountered in migrating to LSOG 4 in the spring and summer of 2001, many of those problems remain. In total, AT&T's experience in attempting to access LSOG 4 and it successive "dot"[19] releases demonstrates the haphazard nature of SBC Ameritech's release; and this experience raises serous questions concerning SBC Ameritech's ability (from both a resource and system capability perspective) to support a major release without major problems.

30. Although we will not discuss all of the Change Management-related problems AT&T encountered when it migrated to SBC Ameritech's LSOG 4 interfaces, there are a few that we will describe to illustrate the point.[20] One prime issue was that

[19] From time to time, an RBOC will upgrade its operating system (LSOG 4) with less significant changes in "dot" releases. When Ameritech first released LSOG 4 in March 2001, it was Version "4.0." Since then Ameritech has upgraded its LSOG 4 operating system with two dot releases, LSOG 4.01 and LSOG 4.02.

[20] These problems were substantial. For example, AT&T found that SBC Ameritech's processes and the level of experience (or lack thereof) of its personnel for establishing "direct" connectivity between the two companies' systems (called an "ARAF") was wholly insufficient. the process itself was fraught with errors and delays caused by Ameritech's lack of internal processes for establishing connectivity. As the first carrier to attempt to establish LSOG 4 connectivity, it became clear to AT&T that Ameritech had not done adequate preparation to establish a process to assure that establishing connectivity to LSOG 4 proceeded as it should. This was especially frustrating to the AT&T testing team, who already had established connectivity with both SWBT and Pacific Bell, and who questioned but then complied with the different procedures that were first presented by the Ameritech representatives -- only to later learn that their original assumptions were correct and that the Ameritech representatives were simply insufficiently knowledgeable about the standard SBC practices. Overall, the Ameritech account team was unprepared to answer our questions. Quite frankly, it was our assessment that the Ameritech team had little knowledge of the new operating systems and related process and procedures being put into place by its parent company SBC. In some cases it was not until we were provided direct access to SBC (as opposed to Ameritech) subject matter resources that our questions were satisfactorily answered.

there was considerable ambiguity as to what Change Management Process ("CMP")[21] governed the release (e.g., the FCC Uniform and Enhanced CMP, the agreed-to 13-state CMP, or the previous 5-state Ameritech old process). This uncertainty stemmed from the fact that the now governing 13-State CMP was not officially implemented by SBC Ameritech until March of 2001, *contemporaneous with the LSOG 4 release itself.* Before that time, the CLECs were at a loss concerning which CMP process was being followed for the release.

31. SBC Ameritech has claimed in other proceedings that it implemented the March 2001 release in accordance with the 13-State Change Management Process. While this may appear to be true on the surface, SBC Ameritech used "exception" provisions of the CMP to continuously make "update" changes to system requirements, typically the result of improper and or sloppy documentation.[22] SBC Ameritech followed few, if any, of the timeframes in the 13-State CMP (or any CMP for that matter) in implementing the massive March 2001 release. The CMP provides specific timelines and intervals for the provision by Ameritech of information and specifications for the CLECs' use. As noted above, those timeframes are intended to allow CLECs sufficient time to prepare for the release themselves, i.e., by using the specifications to change their own systems in preparation for the new release. It is our experience (from the CMP forums) that CLECs require final release requirements at least seven weeks prior to

[21] The term "Change Management Process" refers to written agreements that exist in the various RBOC regions that govern the timeframes and process by which the ILEC is to initiate changes in its systems. The process is intended to protect CLECs from being forced into a change that they may not be prepared for, or to which they might object.

[22] *See* Exhibit WW-1 and our discussion below for a list of changes.

implementation of such a significant release in order to complete computer coding and testing on their side of the interface.

32. At the time the 13-State CMP became final many of the dates and timeframes provided in it had already passed for the March 2001 release. Thus, assuming the 13-State CMP was the governing CMP, the CLECs experience with CMP for LSOG 4 was wholly unacceptable. Ameritech missed its deadlines as evidenced by the continual "updates" and "exceptions" time after time, and in fact, the *only* deadline that was *technically* met was the publication of its Initial Release Requirements. But the plethora of exceptions that were subsequently issued belie that claim. All other deadlines (i.e., Final Release Requirements publication dates, CLEC comment periods and the CLEC testing 'window'), were shortened by SBC Ameritech by days or weeks.

33. While it is true that the CMP allows Ameritech in certain circumstances to take "exception" to the set timeframes, in practice the exceptions in the LSOG 4 release swallowed the rule and made a mockery of the entire change management process. Certainly there are times when slippage of the date in question is appropriate, but that Ameritech met so few of its dates in rollout of the most significant release in the history of this region is grounds for serious concern. The frequency of exceptions taken by Ameritech undermines the intent of the CMP process: to provide CLECs reliable documentation in reliable timeframes to allow them adequate time to plan for new releases as they happen.

34. For example, the 13-state CMP provides that an Ameritech release is to take place: "within 110 to 130 calendar days from the date of the Final Release Requirements. This implementation interval for the release will not begin until all related

documentation is provided." Section 4.2.4.3 13 State CMP. Moving backward, that would mean that Ameritech should have provided Final Release Requirements (and all related documents) for the March 2001 LSOG 4 release in mid-November 2000.

35. The CLECs quickly found that Ameritech's so-called "final" release requirements were only the start of the process. Ameritech provided what they referred to as "final release requirements" in an Accessible Letter (CLEC AMS00-068), dated November 22, 2000. That iteration was followed by a series of review sessions (November 30th, December 1st and January 3, 2001), but Ameritech still never provided a complete and accurate set of LSOG 4 ordering and pre-ordering requirements with corresponding business rule documentation. In fact, CLECs continued to receive clarifying information and additional requirements for LSOG4 *well past the March 24th implementation date and even well into the summer of 2001* – months after the LSOG 4 release was allegedly ready for CLEC use. [23] And on May 23, 2002 – more than a year after LSOG 4 became available in its allegedly "final" form – Ameritech issued more sets of modifications to its LSOG. The full extent of the deficiencies in LSOG 4 is very hard, if not impossible, to determine. To the best of our knowledge, no CLEC ever entered production on LSOG 4.00, so the code remained essentially unused until LSOG 4.01 was first implemented. The truth is further obscured by the fact that SBC Ameritech does not explicitly document changes to a release once the release is "in-production". SBC

[23] In an accessible letter dated June 23, 2001, Ameritech circulated a document entitled "Ameritech-Second Clarification of Final Requirements Resulting from the CLEC Walk-Through for the June 23, 2001 EDI/LSR Ordering Release Version 04.01." While the stated intent of this document was to provide specification and final requirements for Ameritech's future release of LSOG Version 4.01, it turned out, once again, that many of the corrections listed in this document had to be made to our 4.00 production code. Thus, three months after its alleged "quality" release, Ameritech was still correcting coding errors discovered by CLECs concerning its 4.00 release.

Ameritech made documentation and perhaps code changes to LSOG 4.00, but it then "buried" those changes in documentation for 4.01 and 4.02., often without explicit reference to the impact on earlier code & documentation. Because of the confusion created by its careless documentation, especially following the "in-production" date of an LSOR or LSPOR, CLECs raised with SBC at the October and November 2002 Global Change Management meetings the need for SBC to specifically identify versions that are affected by changes and to track those changes using a sub-dot version number like LSOG 5.02.005. It remains to be seen whether SBC Ameritech will abide by this request. Until it does, SBC Ameritech will be able to make changes to versions of a release without appropriately or effectively documenting those changes.

36. To return to the past, however, the message from SBC Ameritech was clear during the LSOG 4 release: the CLECs were going to get LSOG 4 on SBC Ameritech's own timeline, without regard to change management agreements, regardless of whether they were ready, and irrespective of whether the systems work. The fact is these specifications continue to be issued months after the release.

B. SBC Ameritech's Change Management Problems Continue Into the LSOG 5 Release.

37. The LSOG 4 problems were troubling in their own right. Now, with the implementation of LSOG 5, we have seen a similar pattern of Ameritech ignoring or warping Change Management requirements.

38. ***Documentation violations:*** For example, there have been material deficiencies in the quality of the LSOG 5 uniform release documentation and the data

element matrices associated with the release. There are 1033 pages of revisions to LSOG 5.00 dating from 8/13/01 to 8/3/02. These deficiencies illustrate, once again, the fallout from inadequate resources having been made available within SBC Ameritech. Prior to the end of the Uniform Plan of Record collaborative sessions, SBC made corrections to its *documentation in more than 175 instances*. The number of corrections that SBC Ameritech recognized needed to be made, as well as the fact that they were not caught before it circulated the documentation to CLECs, is indicative of the lack of quality control that can result when resources are stretched too thin. Even after the close of the FCC OSS POR collaborative sessions, the Change Management Process LSOG 5 release "walk through" resulted in the tracking of some 298 additional problems.

39. The LSOG 5 Change Management problems have been continuing. On numerous occasions throughout the past year, SBC Ameritech has identified the need for extensive additional changes to its LSOG 5-related requirements documentation. Changes were first incorporated in revised documentation that SBC circulated on March 21, 2001. And even after implementing this set of corrections and revisions, documentation deficiencies have continued to surface. In meetings between CLECs and SBC on this issue, dozens of additional documentation deficiencies were identified.

40. After continual restatements of the documentation, SBC finally committed to deliver final and accurate documentation by August 31, 2001, and the CLECs and SBC agreed to "re-do" the Business Rule Plan of Record collaborative sessions in October, 2001. The version of the LSOR 5.0 published by SBC Ameritech in August, 2001, still did not address many issues from earlier versions on which CLECs and SBC Ameritech had already agreed. Further, new issues arising from typographical errors, updates that

were inconsistent with earlier agreements, inconsistent syntax and lack of synchronization with the LSPOR (Local Service Preordering Requirements) caused the list of issues to grow even longer at a time when the final requirements should have been complete and stable.

41. The overall quantity and breadth of the changes had a profound effect on the ability of SBC Ameritech and CLECs to make progress on the release. The August, 2001 version of the LSOR & LSPOR were to be used as source documents at the Business Rule Plan of Record ("BRPOR") meetings set to begin October 19, 2001. Because the LSOR and LSPOR were still very volatile, with significant open issues remaining to be closed, the BRPOR was deferred to November 6, 2001. SBC Ameritech agreed to put more time and energy in to the LSOR so that the documentation would be stable for the November BRPOR meetings. For the first time, SBC Ameritech agreed to publish documentation changes using markings to show revisions so that CLEC SMEs could review the documentation more efficiently. The LSOR documentation was updated on November 5, 2001 and again updated on February 23, 2002 and May 23, 2002. The revision log for the February 23, 2002 version of the LSOR is 962 pages covering the four revisions that have been issued since the original, baseline LSOG 5.0 document was issued. As I noted above, the most recent log spans over 1000 pages. Quite clearly, the ability of SBC Ameritech to provide clear and reliable documentation on its major releases is still very much in question.

42. ***Timeline violations:*** Mirroring the pattern we saw one year earlier with LSOG 4, SBC Ameritech did not adhere to the time frame/schedule for its LSOG 5 release. Once again, Ameritech's implementation of this major release was marked with

exceptions from the codified timeframes of the CMP that swallowed the rule. And the latest LSOG 5-documentation correction to the alleged "final" requirements was distributed on June 12, 2002 (CLECALLS02-063 - Updates to the LSPOR and LSOR Version 05.00 as a Result of May 30, 2002 CLEC Walkthrough), nearly two months *after* the release.

43. In an attempt to capture the many CMP exceptions and documentation errors related to SBC Ameritech's implementation of LSOG 4 and LSOG 5, I have attached as Exhibit WWRW-1 a summary list of all CMP exceptions and corrections to documentation Ameritech made on its LSOG 4 and LSOG 5 releases to date. We direct the Commission's attention particularly to the numerous LSOG 5 changes made in 2002. Many of the individual items listed on that exhibit involve literally hundreds of changes made to the Ameritech LSOG documentation.

44. ***Delay in Release:*** We would also direct the Commission's attention to SBC Ameritech's delay in releasing LSOG 5. Although AT&T had hoped that this release would take place on time (in March, 2002), we acquiesced to a delay based on SBC Ameritech's representations that its own testing of the release uncovered major systems problems. AT&T's first priority is always to assure a working interface. We attach as Exhibits WWRW-2 SBC's letter requesting this extension with the FCC and as WWRW-3 AT&T's response. We do not suggest that the Michigan commission take the time now to investigate the reason for delay – what is done is done. Our point in establishing the facts surrounding the delayed release of LSOG 5 is to support our ultimate conclusions regarding the critical faults in the change management processes practices (or not) by SBC Ameritech.

45. In other words, while we were certainly concerned about the problems SBC Ameritech is encountering with the LSOG 5 release, we believe the last minute nature of the delay raises larger questions. What we find most problematic is that the delay came literally just days before the release was scheduled to take place in SWBT/Pacific region on February 23rd and just over two weeks before the release was scheduled to take place in Ameritech's region on March 9th. In fact, CLECs were already engaged in joint testing of the LSOG 5 release. What this last minute decision tells us is that SBC Ameritech failed to conduct adequate internal testing of that release until the very last minute– testing that should have been conducted well in advance of the release date, and certainly in advance of allowing CLECs to begin testing that release themselves.

46. Our concerns have not been allayed since the April, 2002 release. As far as we are aware, only one competitive carrier (McLeod) has managed to transition to LSOG 5 – and our understanding is that the transition has been far from smooth.

47. In fact since the release, AT&T has experienced from time to time issues with the web Toolbar (LSOG 5) application and especially pre-order functions.[24] SBC Ameritech publicly acknowledged that it has had to modify the architecture of the web platform several times in an effort to improve performance. SBC Ameritech did not share with AT&T and CLECs the full extent of the web platform changes and has never offered an explanation as to why the platform was caught so grossly short of capacity.

[24] With the release of LSOG 5, SBC Ameritech retired its LSOG 4 Graphical User Interfaces ("GUIs"), which are web-based interfaces. SBC Ameritech allows for "versioning" of its EDI interfaces, thus carriers were able to continue using their current EDI interface – for example, LSOG 4.2 – after the release of the LSOG 5 version. However, SBC Ameritech plans to retire LSOG 4.2 in June, 2003, leaving carriers only the LSOG 5 release to work from.

The experience with the web platform raises serious concerns about SBC Ameritech's OSS capacity planning processes.

48. We believe AT&T's experience should lead the Commission to conclude that SBC Ameritech change management processes cannot yet be relied upon. CLECs must be able to rely on change management as the mechanism by which they can prepare for releases as they are being developed and eventually issued (pursuant to the agreed change management timelines). It has not served that important function with SBC Ameritech as of yet because SBC Ameritech's systems are in a constant state of flux, transition, update and instability. SBC Ameritech therefore cannot be said to have met this requisite 271 finding. *See, e.g.,* Bell Atlantic New York 271 Order, ¶ 102 n. 280 ("Demonstration of an adequate change management process to which the BOC has adhered over time is also part of the BOC's obligation to provide competing carriers with the specifications necessary to instruct competing carriers on how to modify their systems in a manner that will enable them to communicate with the BOC's legacy systems and any interfaces utilized by the BOC for such access."), *citing to* Ameritech Michigan 271 Order, ¶ 137. The Commission has no assurance that SBC Ameritech can support – from both a technical and support perspective – a major release.

IV. AT&T'S CURRENT EXPERIENCES ESTABLISH THAT SBC AMERITECH'S CHANGE MANAGEMENT PROBLEMS CONTINUE TO DENY CLECS NONDISCRIMINATORY ACCESS TO ITS OSS

49. AT&T's commercial experience to date, coupled with its testing of LSOG 4 and 5, continue to uncover numerous problems with SBC Ameritech's interfaces. In this section of our affidavit, we will detail some of the more recent problems and our view as to what larger issues these problems identify.

50. AT&T has two separate EDI interfaces with SBC Ameritech for sending business and residential local service orders. AT&T's Business Services uses Ameritech's upgraded LSOG 4.02 OSS to process its UNE-P and UNE-L business orders in the Ameritech region. AT&T Consumer Services has entered the Michigan, Illinois, Indiana and Ohio residential markets with a generally available unbundled network element platform offering. AT&T is again utilizing LSOG 4.02 to place its UNE-P orders in these states.

51. Even after using SBC Ameritech's OSS for several months on a commercial basis, we continue to see unexpected, major flaws in Ameritech's OSS that are reflective of its poorly designed change management processes. The problems we describe in more detail below are as follows:

- AT&T has experienced a high volume of orders (more than 5000 lines affected) that SBC Ameritech has failed to provision due to a change in its ordering processes involving the "Working Service In Conflict" process.
- AT&T continues to experience instability in its interface capabilities due to SBC Ameritech's failure to properly implement the capability to support multiple OCNs per ACNA.
- AT&T has experienced numerous occasions of blocked voicemail orders due to unexplained "G408" errors.

52. In the following paragraphs, we will explain each of these issues in greater detail. While we do not claim that any one of these problems has prevented AT&T from successfully entering the Michigan market, each of these issues has diminished AT&T's overall ability to efficiently compete with Ameritech Michigan. Particularly troublesome is the fact that if SBC Ameritech had followed both the letter and the spirit of the appropriate change management processes involved, none of these issues would have

created the critical problems that we describe below. The totality of these problems confirms our overall conclusion that SBC Ameritech's change management process is so fault-ridden as to be considered essentially unworkable.

53. ***Working Service In Conflict*** – The Working Service In Conflict or WSIC issue arises when a CLEC requests new service at an established customer location – in most cases, this means an additional line to current customer location. In such cases there may be a "working" facility in place already, which may mean that the loop facility required to provision the new services either is or was being used by another carrier (most often SBC Ameritech). Where working service exists, there is a concern that the existing service may have been abandoned and that the existing service may no longer be needed.

54. While the actual difficulties relating to WSIC are important, we would like to focus the Commission's attention on the change management aspect of this issue. On July 24, 2002, SBC Ameritech issued an Accessible Letter (CLECAM02-295), and a subsequent Accessible Letter (CLECAM02-349), announcing a new WSIC process to take effect on August 30, 2002. These Accessible Letters advised CLECs that all UNE-P "new" installation orders where SBC Ameritech's systems showed "working service" at the service address would be automatically be given a Firm Order Confirmation (or FOC), and then, in effect, put in jeopardy status (although it is our understanding that for LSOG 4.02 no mechanical jeopardy would ever be sent by SBC Ameritech to the CLEC). After being placed in the jeopardy status, SBC Ameritech's new process would transmit a fax paper form to the CLEC (known as a WS1A form). Upon receipt of this fax notice, SBC Ameritech's new process indicated that the CLEC was expected to research the

status of existing service at the address, and then supplement the already FOC'd order with additional information before SBC Ameritech proceeded with provisioning the order.

55. SBC Ameritech's new WSIC process created all sorts of problems, most of them unforeseen. For example, SBC Ameritech's process assumed that the CLEC has the capability to supplement a FOC'd order when no mechanical jeopardy had been received, although this capability has never been discussed in the Change Management forum, or other forums. Moreover, AT&T's Consumer gateway/interface *is not designed to supplement an order where we have received a FOC and did not subsequently receive a jeopardy*. [25]

56. SBC Ameritech's new WSIC process created new manual/fax requirements that AT&T is not set up to handle. This new fax process violates one of the basic rules that SBC Ameritech has strictly enforced in other instances, specifically that an order lives and dies in the interface in which it originated. Similarly, for example, SBC Ameritech often insists that for mechanically submitted orders all acknowledgements and transactions for that order must be in the same mechanical form over the same interface. Any carrier with a sizable customer base will try to avoid at all costs manual processes, which is what a fax process is. Such processes interrupt the smooth, mechanical flow of ordering and do not lend themselves easily to the creation of timely and accurate notifications (FOCs, jeopardies, SOCs, etc.) Moreover, AT&T's

[25] It is important to note that one of the reasons for using a standard like EDI is so that AT&T can design back-end systems to meet our business needs. AT&T's systems are designed to maximize the mechanical handling of the LSR and minimize human intervention. What may appear to be a "simple" change - to send a supplemental LSR after a FOC - is indeed a significant program change that violates the rules that we have implemented to insure consistency and efficiency.

systems are designed based on the assumption, indeed the "rule" of SBC Ameritech, that the original ordering interface will be used throughout the course of a transaction. In other words, if an order is placed electronically, it will be completed electronically. Orders that "drop to manual" – as is automatically the case with this new WSIC process – introduce inherent unreliability into an OSS system.

57. In fact, this is exactly what happened to AT&T. As a result of SBC Ameritech's WSIC change, AT&T received more than 2,000 faxed WS1A forms in the first month, 800 of which SBC Ameritech subsequently acknowledged were sent in error (*e.g.* should have been sent to another CLEC, belonged to an unknown CLEC, sent without identifying TNs, etc.). In the end, over 5,000 orders were delayed or held as a result of this process between August and October of this year. Many end users complained to AT&T about the delay; we are told that some even complained to the Commission. When AT&T and SBC Ameritech began to work through the back log, allowing AT&T to contact some of the affected end users, these customers cancelled their orders.

58. Our point here is that this situation would never have occurred had SBC Ameritech focused on correctly implementing this change consistent with sound change management principles. It is clear that SBC Ameritech recognized that it had a key deficiency in its OSS. In pre-order LSOG 4.01, SBC Ameritech is unable to provide CLECs with a Working Service on Premise indicator ("WSOPI").[26] If the WSOPI were available, when a CLEC did a preorder validation it would see the WSOPI indication and know that the order potentially could involve working facilities. This might even allow

the CLEC to ask the customer at the time of the order about the possibility of such working services.

59. It has been our understanding with SBC in the other operating regions that CLECs have the option of providing working service/additional line disposition, but are not obliged to do so. Even in the Ameritech region, the LSOR for version 4.02 shows the WSOP as not in use, and for version 5.01 as optional for new UNE-P residential lines. In order to bypass these standard/uniform business rules for the WSOP field, SBC/Ameritech created requirements to populate non-standard and apparently undocumented information in the Remarks section of the LSR. This new requirement concealed as a "process change" would have, had AT&T implemented it, caused AT&T to change our system coding. Here again, AT&T made a business decision not to make the Remarks field of the LSR available to our representatives. Thus, this seemingly innocuous and simple requirement to populate the Remarks field became an insidious violation of the change management process.

60. In addition to shifting work to CLECs and unnecessarily holding orders, this new process in the Ameritech region is a deviation from previously-negotiated and agreed-to business rules, and constitutes a Change Management and Uniform POR violation. LSOR 4.02 dated August 3, 2002, contains the OBF-compliant WSOP (Working Service on Prem) field on the End-user form, field number 27 and SBC Ameritech has designated this field as "This field is not used at this time." In LSOG 5.0 and later the WSOP field is available as an optional field for use at the CLEC's discretion. SBC Ameritech introduced Working Service in Conflict as a "process"

[26] This field will be available in LSOG 5.

change through it's CLEC User Forum and by doing so was able to implement the process quickly. The 1-month that was required to implement the new process was far faster than the 110 days that would have been required if SBC/Ameritech had chosen to begin using the WSOP field. Additionally, compliance with change management procedural rules would have raised other challenges for SBC Ameritech that it just chose not to deal with.[27] Had the change management process been used, the WSIC process could not have been implemented in any pre-LSOG 5.0x version of the LSOR that is already in production, because change management process rules prohibit the introduction of new requirements in versions that are in production.

61. Thus, while SBC Ameritech did present this change to CLECs, it did not do so through the appropriate change management process. Instead, it disguised this problem as a "process" change – rather than an interface change and presented it to the CLEC User Forum. At first, because SBC Ameritech had not identified this as a true change to its systems, AT&T did not object. Once it became apparent, however, that SBC Ameritech had truly changed how orders should be placed and therefore code changes would be required by AT&T to comply, we raised this issue with SBC Ameritech. Of course, by then, more than 5,000 end user orders had been impacted. SBC Ameritech has refused to recognize this issue as a change management violation.

[27] Aside from calling the WSIC a "process' change and using the CLEC User Forum to foist this burdensome process on the CLECs without activating the WSOP field , the changes called for in SBC Ameritech's Accessible Letter CLECAM02-295 are clear violations of CMP because the letter specifies changes to the LSR (the addition of the "FID" and text in the remarks section of the LSR). The requirement to add something to the LSR that is not presently there could not be met by AT&T without making coding changes to our EDI ordering interface and compromising the intentional design of our system not to make the remarks field of the LSR casually available to our service representatives.

62. ***Multiple OCN Capability*** – Another area where SBC Ameritech has violated the essence, if not the actual terms, of an effective change management process relates to its inability to support multiple OCNs mapped to a single ACNA. While this may appear at first to be nothing more than "alphabet soup," in reality, it is a serious problem for any carrier of size and complexity who wishes to use SBC Ameritech's systems using multiple EDI platforms.

63. An OCN is an Operating Company Number. An ACNA is an Access Carrier Name Abbreviation. These acronyms are really alpha and numeric codes that identify a party placing an order in SBC Ameritech's OSS. In the SBC Ameritech region, each ACNA has an associated state level OCN. In other words, the ACNA identifies the carrier, and the OCN identifies the jurisdiction in which that carrier operates.

64. Coincident with LSOG 4.0, SBC Ameritech required CLECs to provide state specific OCNs for each state. SBC Ameritech indicated that a company would have the ability to have multiple state-level OCNs mapped to a single ACNA.

65. Having the ability to map multiple state-level OCNs to a single ACNA is important to a company like AT&T. AT&T has two major business units (Business and Consumer). In each Ameritech state, it has two Interconnection Agreements ("ICA") (AT&T and TCG). AT&T Business generally orders products that are supported by the TCG ICA (under the TCG ACNA), except that the AT&T Digital Link (ADL) product, which is a business product, depends on key provisions of the AT&T ICA (using the AT&T ACNA). AT&T Consumer orders also use the AT&T ICA (and thus the AT&T ACNA).

66. In the summer of 2002, SBC Ameritech, for the first time, confirmed that it does not have the ability to support multiple OCNs "mapped" to a single ACNA and that this capability will not be available until June 2003. This has created tremendous difficulties for AT&T. SBC Ameritech's EDI versioning is driven by OCN values. Within a company like AT&T, two different EDI platforms that send orders using a common OCN must be on the same EDI LSOR version. If one of the EDI platforms moves to a "higher" version (i.e., LSOG 5.02) for a particular OCN, all orders with the same OCN but using a "lower" version will be rejected, regardless of the EDI platform from which they were sent. In other words, if the Consumer EDI platform using an OCN assigned to an AT&T ACNA moves to LSOG 5.02, but the ADL ordering platform using an OCN assigned to the same AT&T ACNA does not move to LSOG 5.02, the ADL ordering platform becomes essentially defunct.

67. In fact, this is exactly what has occurred. In May 2002, AT&T Consumer attempted to implement a new state level OCN for our Indiana market entry. This OCN would have been an additional OCN under the AT&T ACNA. Thus, under the AT&T ACNA in Indiana, there would have been one OCN for Business (ADL) and one for Consumer. In June 2002, our Account Team advised us that SBC Ameritech could not support multiple OCNs to a single ACNA, but also advised that a "fix" would not be too long in coming. AT&T escalated and in August we were informed that this capability would not be offered until June 2003, at the earliest. Today, both platforms remain at LSOG 4.02. However, AT&T Consumer will migrate to LSOG 5.02 next month. Our ability to do so is compromised by this issue. Thus far, SBC has not offered a solution to

the business problems that have been created by their inability to deliver this important capability.

68. As with the WSIC issue, the multiple OCN to ACNA issue is both a pragmatic problem (*i.e.* how can AT&T solve this issue so that our interface is not affected) and a change management problem (why was SBC Ameritech's documentation incorrect). As with other errors, given time and appropriate, controlled change management compliance, these issues can be managed. Despite the fact that SBC Ameritech was apprised of this problem as early as July, 2002, SBC Ameritech has still not offered any potential solutions to prevent disruption to AT&T's ordering capabilities.

69. ***G408 Errors*** – The G408 error represents another aspect of change management violation that is customer affecting. It arose after SBC Ameritech made an "unannounced" coding change that modified the correct method for submitting a particular type of order. The result of such a change to a CLEC is that, inexplicably, and without warning, orders that were accepted by SBC Ameritech's systems on one day are rejected the next. The obvious impacts from such a problem are confusion on the part of the CLEC, the cost of investigating and potentially modifying systems, and the delay or prevention of fulfilling customer orders.

70. In the case of G408, on September 19, 2002, SBC Ameritech made a change in their EDI coding that caused many AT&T orders to reject, with a "G408 error code" being returned (hence the reason we have called this problem the G408 error).[28] Multiple transaction types were affected. For example, order transactions necessary to add the feature known as Call Forward Busy/No Answer Number and Ring Count were

inexplicably rejected. Prior to September 9, the information used to submit the order was sent as: EVD 12345678910 /4. In this value, the rules required a space between the EVD and the start of telephone number and a space between the end of the telephone number and the slash (/) that denotes the ring count variable. Apparently, SBC Ameritech changed the coding to eliminate the spacing.

71. As many as 15,000 AT&T orders were delayed up to a month due to the problems created by G408 errors and subsequent attempts to resolve the condition. Although SBC Ameritech acknowledged that they had introduced a change to synchronize what they believed to be their edits and published documentation, SBC Ameritech did not know how to easily or quickly undo the change. Therefore, in an attempt to quickly resolve the problem, AT&T attempted to implement coding changes in our EDI gateway. Adding to the difficulty, SBC Ameritech's initial instructions and documentation regarding the proper syntax for coding turned out to be also invalid and AT&T's orders continued to reject (more than 800 on the first attempt).

72. The problem identified by this type of issue is that it places the burden on the CLEC to resolve a problem created by SBC Ameritech's error and failure to follow change management. The coding change made by SBC Ameritech is a clear change management violation that has had a direct impact on AT&T and other carriers using LSOG 4.02. SBC Ameritech's code change was unannounced and undocumented. Indeed, SBC Ameritech has acknowledged to AT&T that its web site documentation continues to be incorrect, even as of the date of this affidavit.

[28] The actual meaning of the G408 code is not pertinent to this discussion.

73. SBC Ameritech compounded its error by trying to work around it on an *ad hoc*, carrier by carrier basis. It tells AT&T to code one way to "fix" the problem. Is it telling another carrier something different, which may or may not affect the way AT&T's orders will be handled? We suspect this may be true. On November 13, 2002, AT&T learned that another CLEC had opened a Defect Report (DR 59661) for G408 errors; but SBC Ameritech has never advised AT&T that the problem had been known to SBC Ameritech and was being "worked" through a DR. Although SBC Ameritech has previously agreed in CMP to post open DR's on its CLEC web site as a tool to inform the CLEC community about reported problems, the DR for G408 errors still does not appear on the open DR report, and hence does not appear on Ameritech's CLEC web site.

74. These three error conditions are troubling in their own right because each has (or will) caused numerous customer affecting problems. They also show that SBC Ameritech's OSS remains unstable, and that SBC Ameritech has demonstrated no consistent pattern of adhering to change management principles. Issues arise because of changes in the requirements for ordering that are "slipped" through the CLEC User Forum rather than the more appropriate Change Management Process, with enormously disruptive (and unexpected) results. Issues arise because of a promised functionality that never materializes. Issues arise because of unannounced, undocumented coding changes, which are then passed off to CLECs as problems to be solved by the CLEC changing their practices. In light of AT&T's other experiences with SBC Ameritech's persistent problems with change management, in other words, the totality of AT&T's experiences, we find the following conclusion to be inescapable: SBC Ameritech has not deployed the necessary systems and personnel to provide sufficient access to each of the necessary

OSS functions and is not adequately assisting competing carriers to understand how to implement and use all of the OSS functions available to them.

75. In other words, SBC Ameritech fails the test for change management. The Commission should refrain from finding that the company has met this important § 271 requirement.

V. AT&T CONTINUES TO EXPERIENCE SBC LINE LOSS FAILURES.

76. We would also like to take this opportunity to inform the Commission that AT&T continues to experience problems with OSS defects that have been identified previously to the Commission, either by CLECs or through the BearingPoint test. What is most surprising about this issue is the length of time that it has continued to impair SBC Ameritech's OSS and the CLECs' ability to efficiently manage their customer base. SBC Ameritech's Line Loss problems must be considered as nearly conclusive proof that SBC Ameritech's commitment to correct major faults in its OSS has not been fulfilled.

77. Like many other CLECs, AT&T has – from time to time – failed to receive significant numbers of loss notifiers (or 836 records) from SBC Ameritech. Since our UNE-P market entries in the Ameritech region, we have monitored the extent of this problem, which has been pervasive for other CLECs. Our experience to date has not been much different than theirs. Even though Ameritech has been working to correct these problems since mid-2001, AT&T has encountered serious problems with SBC Ameritech's Line Loss performance since April 2002.

78. For example:

- Early in March 2002, without warning, Ameritech began sending AT&T Line Loss Notifiers with the relevant telephone number omitted (or stripped) from

the record. Obviously, a LLN record that omits the telephone number of the customer who is leaving AT&T's service is of little use.

- When this error was discovered, the Ameritech and AT&T account representatives communicated about the condition, and a "fix" was promised (on March 25, 2002). Ameritech committed to perform a "root cause" analysis of this error condition, subsequently reported that the missing TN in the 836s problem was inadvertently created when they were making coding changes in the software module that handles notifications like FOC, SOC and 836's

- When this "fix" was implemented, Ameritech again began flowing 836 records to AT&T (and "reflowing" records that had been previously submitted in error). However, these 836 records were unusable by AT&T because Ameritech – without advance notice to AT&T – had changed the EDI format for the 836 record. AT&T's systems could not "read" these records because the data fields had been changed.

- Again AT&T's and Ameritech's account representatives conferred and another "fix" was implemented, correcting the formatting error by Ameritech. The "root cause" for this error was explained as arising from changes in coding relating to an unrelated EDI record format. It is our assumption that this coding (and the error that resulted) was related to Ameritech's testing in preparation for the transition to LSOG5.

- That was not the end, however, because on March 26, 2002, AT&T stopped receiving any new 836 records from Ameritech.

- Again AT&T's and Ameritech's account representatives conferred and it was discovered that, for reasons that have never been adequately explained to AT&T, Ameritech had changed certain "table" references on AT&T's CLEC profile (without a request or authorization by AT&T) such that the 836 records were misdirected to the wrong receiving location. No "root cause" for this error has been disclosed to AT&T.

79. More recently between August 15, 2002 and September 11, 2002, SBC Ameritech experienced another major outage in its Line Loss Notifier systems. For several days, SBC Ameritech failed to send AT&T more than 6,900 Line Loss Notifiers. According to SBC Ameritech's eventual explanation to us, there were three "root" causes for this problem. First, a table-update management tool (GUI) corrupted certain tables

used in the line loss process when updates were made to CLEC profiles. AT&T's profile was not corrupted but we suffered from corruption introduced in the tables of other CLECs. Second, the EDI translator failed to send 836 transactions that were not corrupted. And third, SBC Ameritech failed to monitor the EDI error queues and therefore failed to detect the problem. We describe this problem in more detail in the following paragraphs.

80. Line loss notices are generated in real-time as conversion orders complete in back-end systems. Depending on the version a CLEC is using the back-end system is either LASR (LSOG 5) or MOR (LSOG 4). The line loss notices sent by fax are sent directly from these systems. These systems use profile information contained in tables for each CLEC to determine how the LLN is to be processed. One of the data elements contained in those tables is a "control number sequence" value that is used to determine the EDI control number. The sequence number is a numeric value only.

81. In the case of the first significant flaw noted above, the table-update management tool used by SBC Ameritech caused the sequence number value on line loss notices for a particular CLEC, not AT&T, to be populated with a blank character, an invalid value. For EDI, all line loss notices are dumped into a queue for the EDI translator. The EDI translator seizes the pending transactions every 1-3 minutes and picks-up all pending line loss notices for all CLECs so that they can be translated and sent out to the CLECs via EDI or Interactive Agent.

82. SBC Ameritech failed to send line loss notices when one or more LLN transactions for the CLEC where the sequence number table had been corrupted were

placed in the queue with other line loss notices for other CLECs. As the EDI translator attempted to process the 'mini-batch', a corrupt LLN was identified.

83. The second significant flaw was that the EDI translator then placed the entire batch, both good and corrupt, in different error queues. Therefore, none of the line loss notices (for any CLEC) that were in the batch containing one or more defective LLN's were sent. The problem was intermittent because if there were no LLNs with a corrupt control number sequence value then the 'mini batch' was good and the LLNs were successfully formatted as 836 transactions and sent out.

84. The third significant flaw is that SBC Ameritech failed to monitor the EDI error queues and therefore failed to detect the problem. The problem was discovered during BearingPoint third party retesting of a line loss problem that BearingPoint had noted earlier in the test. SBC Ameritech had specifically notified BearingPoint that the earlier line loss problems had been corrected and advised BearingPoint they could restart testing. On September 11, 2002, BearingPoint notified SBC Ameritech that it was continuing to experience line loss problems. That is when SBC Ameritech began investigating and discovered the problem.

85. When the problem was discovered, SBC Ameritech compared the line loss notices generated in LASR and MOR to the EDI 836 transactions that were sent to CLECs to determine which line loss notices were <u>not</u> sent. For AT&T, SBC Ameritech identified 6900 line loss notices that did not get sent and those were "reflowed" to AT&T from September 16 to September 17, 2002.

86. Since that time, AT&T has continued to experience intermittent Line Loss failures by SBC Ameritech, and, equally disturbing, has received a serious of erroneous

rejection and/or completion notices that affect the ability of AT&T to accurately track the status of our customers:

- AT&T has received line loss notifers for customer lines that have not left AT&T's service.
- AT&T has received rejection notices when it should have received completion notices.
- AT&T has been informed that end users have been transferred to AT&T services incorrectly by SBC Ameritech representative error.
- SBC Ameritech has failed to update CSR information to accurately show that AT&T is servicing the account.

87. Most recently, on November 12, 2002, SBC Ameritech issued an Accessible Letter (CLECAMSO2-122) indicating that it had experienced yet another major Line Loss outage. SBC Ameritech discloses that as a result of "software release implemented November 9, 2002, errors have been noted on EDI 836 LLNs sent to the few customers using the EDI version 5.02." This is disturbing news, given AT&T's impending migration to that version of LSOG. AT&T had expected that one of the "benefits" of migrating to LSOG 5 would be that it might experience greater stability with what is supposed to be a more advanced level of OSS systems. It would appear that LSOG 5 will be similarly suspect when in comes to LLN and other Notifier performance.

88. Unfortunately, that is also not the whole story. The November 12, 2002 Accessible Letter also states that a "second issue has been detected affecting LLNs sent to customers using version 4.02 of EDI in Ameritech." Of course, AT&T and most other CLECs in Michigan are "customers using version 4.02" – AT&T alone had more than 1000 notices affected.

89. With these most recent outages SBC Ameritech's remarkably poor trend of LLN performance continues almost without a break. Nearly every month of 2002 has seen SBC Ameritech experience some form of Line Loss Notifier issue and outage. The effect of this instability is dramatic. CLECs continue to expend considerable time and capital monitoring Line Loss Notifier performance. CLECs continue to be exposed to customer complaints and even the possibility of legal recourse against them for inadvertent billing of an end user.

90. Until CLECs and SBC Ameritech can jointly report to the Commission that there are no further line loss problems, the Commission cannot make any finding that SBC Ameritech has rectified this problem. In its December 2001 order in this case, the Commission stated: "this problem has a grave potential effect on competition for local exchange service and is one of the most serious of the problems raised in this case." (12/20/01 Order in Case U-12320, p. 6.) The Commission went on to say:

> Failure to provide timely notice of migrations is an egregious and anticompetitive neglect of Ameritech Michigan's duty. This problem, including both CLEC-to-CLEC migrations and Winback changes, must be resolved promptly. (*Ibid.*)

91. It is clear that SBC Ameritech has neither resolved this problem or is acting promptly to do so. A year has gone by and it is still egregiously failing to provide timely notice of migration – with the only results being that its competitors are being harmed.

92. This is because line loss notifiers are a critical part of the ILEC/CLEC relationship. SBC Ameritech sends line loss notifiers to alert CLECs when they have lost a customer to another CLEC or to Ameritech itself, *i.e.*, a win-back. A UNE-P provider

must rely upon Ameritech's line loss reports to alert them if a customer has switched carriers. The failure of SBC Ameritech to provide timely and accurate line loss notifiers results in former customers being double billed. The former customer receives a bill from its new provider, as well from its former provider. Ameritech's failure to provide line loss notifiers has serious negative effects on the reputations of competitive providers. Even worse, a CLEC can be accused of slamming or cramming if it does not receive a notifier in a timely manner.

93. It is clear that – even now, after twelve months of SBC Ameritech efforts to redesign its line loss notifier systems – SBC Ameritech's Line Loss Notifier systems are *unstable*. What is troubling about SBC Ameritech's performance relating to Line Loss Notifiers and the errors and mistakes that have been discovered is the variety of causes and circumstances underlying these problems. Some of SBC Ameritech's problems have been or are caused because of the excessive amount of manual handling involved in these processes (e.g., the win-back process where the SBC Ameritech win-back group had to fax a document to the LSC so that orders could be manually created). Some of the problems occur because of SBC Ameritech's ill-defined or mis-implemented business processes (e.g., SBC Ameritech's difficulty in maintaining CLEC profiles accurately). Some of the problems occur because of the ever-evolving status of SBC Ameritech's OSS (e.g., the change in EDI format that was explained as a error made by SBC/Ameritech while they were making a code correction to another type of notifier or the most recently reported problem resulting from the November 9, 2002 software release).

94. In other words, there is no one program SBC Ameritech can run, no single work center it must reform, and no isolated management practice it must revise in order to solve the Line Loss Notifier problem. SBC Ameritech's problem with Line Loss Notifiers is endemic and will only be resolved when its operational support systems, its work center personnel and its management practices mature to a level of uniform *accuracy* and *consistency*.

95. We remain very concerned about the manual intervention that SBC Ameritech's current systems rely upon for generating line loss notifiers. As this problem illustrates, any time human intervention is relied upon to generate an OSS response, errors will likely increase. And as CLEC UNE-P volumes increased in the SBC Ameritech region, so too did the errors of Ameritech's service representatives that CLECs relied upon to generate line loss notifiers.

V. SBC AMERITECH MUST ESTABLISH A WORKING, EFFICIENT CHANGE MANAGEMENT PROCESS TO GIVE CLECS FULL, NONDISCRIMINATORY ACCESS

96. The importance of well-functioning OSS cannot be overstated. SBC Ameritech's OSS truly are the gateway through which CLECs must pass to enter the local market in Michigan. No matter what a particular CLEC's entry strategy may be (e.g., UNE combinations, UNE loops, DSL Loops, or fully –facilities-based), at some point every CLEC must rely upon Ameritech's OSS to process orders for their Michigan local customers as well as for maintenance and billing. If Ameritech's systems and processes do not function properly and CLEC customer orders are delayed, lost or mishandled, the customers are likely to blame the CLEC, thereby irreparably harming the

CLEC's reputation and relationship with its customers. The CLEC cannot afford to accept, on faith, the incumbent's OSS claims.

97. We believe that this affidavit provides conclusive proof that SBC Ameritech's OSS lack a stable, reliable, and working Change Management Process. We recommend that the Commission allow BearingPoint to continue its testing, and that the Commission require BearingPoint to examine more closely the many faulty aspects of SBC Ameritech's' change management that we identify in this affidavit. We recommend that the Commission direct BearingPoint to investigate CLEC experience transitioning to LSOG 5, because this is the interface version that will support competitive entry for at least the next year.

98. Additionally, we recommend that the Commission again order SBC Ameritech to address its pervasive problem of failing to issue timely and accurate Line Loss Notifiers.

99. Until these issues have been addressed, we do not believe that the Commission has a basis to conclude that SBC Ameritech has satisfied the FCC's or the Act's requirements for § 271 authority

100. This concludes our affidavit.