

Michigan Public Service Commission - Combined Comments to Draft MTP through Version 1.2 (June 3, 2000)

Number	Baseline MTP Page Number	MTP Section	Comment Source	Comments/ Revised Language	KPMG Consulting Notes
1	All	All	Ameritech Phase II Test Manager	Scan entire document and change "Phase II Test Manager" to "Test Manager"	Change accepted and document updated
2	All	All	AT&T	Changed "Phase II Test Manager" to "Test Manager"	Change accepted and document updated
3	All	All	KPMG	Changed Header	Change accepted and document updated
4	All	All	MWCOM	KPMG must remove all references to Bell South Florida and the OSS and make the document specific to Michigan.	Change accepted and document updated
5	All	All	MWCOM	Add the following comments: 1. Provisioning of OS/DA services is not included in the MTP. OS/DA service scenarios need to be added to the test for a CLEC customer. CLEC branding should be included in these scenarios. 2. Flow-through testing is mentioned but the details as to which orders will flow through are missing. 3. Test of Local PIC freeze and thaw should be included in the TV&V test scenarios. This feature must not be a hindrance to CLEC migrations. A CLEC should be able to thaw an Ameritech account with Local PIC freeze then migrate the customer with a Local PIC freeze for the CLEC.	Add to Scenario section Add to Reference Documents Section Add to Scenario Section
5a	All	All	Ameritech	Remove Certified Software Interface from the entire document	Change accepted and document updated (6/3)
6	Title	Title Page	KPMG	Changed to "Draft Version 1.0 May 4, 2000"	Change accepted and document updated
7	2	Table I-3 Version Control	KPMG	Updated Baseline and Draft release dates	Change accepted and document updated
7a	na	II. Introduction	KPMG	This section substantially revised for version 1.1 to address numerous issues discussed during the	Changes proposed

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				collaborative workshop review of version 1.0	
8	3	II. Introduction	McLEOD USA	Specific additional terms ¹ should be added to clarify the test principles and scope.	Several of these issues are already included in the Test Plan
9	3	II. A. Background	MWCOM	Does not include “parity” as part of the definition on non-discriminatory access for CLECs to SBCs (AIT) pursuant to the 1996 Telecom Act.	Background section substantially revised for version 1.1
10	3	II.A Background	MWCOM	In the last sentence of last paragraph, change the word “retained” to “authorized Ameritech to retain”, and change “it” to “the MPSC.”	Background section substantially revised for version 1.1
11	3	II.A Background	MWCOM	Add the following language after the last paragraph: “Some AIT systems may not be available for test until the completion of the SBC/AIT OSS POR. These systems, which will include a web-based ordering system similar to the SBC Verigate/Toolbar System as well as other systems and significant software enhancements must be addressed as part of the testing. While these systems may not be available at the beginning of the test, the test cannot conclude successfully until they have been tested. For this reason, supplemental test plans will be constructed for these interfaces/software releases.”	A-Y issues, tabled for further discussion
12	3	II.A Background	MWCOM	Test Plan must include significant changes (defined as one that replaces a system or causes a system to operate in a materially different way) resulting from SBC/Ameritech merger Condition. Expand the scope of the test by adding language to include additional processes ² to be tested.	Issues covered in change management discussion A-Y issues, tabled for further discussion
13	3-4	II.B Scope	McLEOD USA	As a means of accurately evaluating the real-world situations faced by CLECs operating in Michigan, consideration should be given to items A – K contained in the Statement of Principles filed with the Public Service Commission of Wisconsin (Docket No. 6720-TI-160 - Investigation Into the Operational Support Systems of Ameritech Wisconsin).	A-Y issues, tabled for further discussion

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14	3-4	II.B Scope	McLEOD USA	The MTP must ensure that the OSS Testing includes all systems and processes necessary for, or made available to, CLECs, including, without limitation, systems and processes that will be required for emerging products or services. Examples of such processes and systems include, but are not limited to, UNE-P, Sub Loops, Extended Loops, Line Sharing and Dark Fiber (as specified in the FCC UNE Remand Order). Products to be evaluated include, but are not limited to Centrex Mate. Furthermore, all flow through service offerings, should be defined and tested as such.	A-Y issues, tabled for further discussion
15	3	II. B Scope	KPMG	First paragraph first sentence changed "Ameritech" to "Ameritech's"	Scope section substantially revised for version 1.1
16	3	II. B Scope	KPMG	Changed "Further, each of the service delivery methods - resale, unbundled network elements (UNE) and combinations of UNEs, including the UNE Platform (UNE-P) - were included in the scope of the test." To " Further, each of the service delivery methods will be tested."	Scope section substantially revised for version 1.1 A-Y issues, tabled for further discussion
17	3-4	II. B Scope	MWCOM	KPMG must explain the limited set of test families.	Issue verbally clarified by KPMG Consulting and closed
18	4	II. B Scope	MWCOM	Second paragraph, last sentence, add the following service delivery methods to the scope of the test: "EELs, sub-loop unbundling, DSL, other potential service delivery methods."	A-Y issues, tabled for further discussion
19	4	II. B Scope	MWCOM	Third paragraph: Somewhere here we need to say that metrics must be available before the start of the test and that the way in which these metrics will be calculated will be audited here. Again, this may have to wait until the metrics collaborative is completed. If that's not possible, then we need to have a way to preserve the data. Also, we need a way to preserve the data in the event metrics are changed or expanded during the test process. In addition, these metrics and results will be compared to AIT performance reports to the PSC.	Issues pertaining to performance measures/ PM Audits, tabled for further discussion

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				Data collection methods and data integrity must be examined and evaluated.	
20	4	II. B Scope	KPMG	Fourth paragraph first sentence changed "Ameritech" to "Ameritech's"	Scope section substantially revised for version 1.1
21	4	II. B Scope	KPMG	This plan also describes the development and application of scenarios to be used within the TVV test families in evaluating Ameritech's OSS and related support services.	Scope section substantially revised for version 1.1 A-Y issues, tabled for further discussion
22	4	II. B Scope	KPMG	The following existing Ameritech interfaces will be tested: Maintenance (GUI/App-App), Pre-order (GUI/App-App), Ordering (EDI and ASR), Billing (usage and invoice feeds). Additionally, the test will be conducted using the most current release of the Ameritech business rules at the time of the test.	Scope section substantially revised for version 1.1 A-Y issues, tabled for further discussion
23	4	II.B Scope	AT&T	Removed the list of interfaces and added a note that "These are not systems used by Ameritech: KPMG should substitute Ameritech's systems here."	Change accepted and document updated
24	4	II.B Scope	AT&T	Added: The test will begin after Ameritech makes certain updates to its legacy systems, products, processes, interfaces, operations and OSS. The specific updates to be made prior to beginning any portion of third party testing is an issue that must be discussed and resolved in the MPSC collaborative process. Any issues that are not resolved by agreement of the Collaborative shall be resolved by the MPSC prior to the beginning of the test.	A-Y issues, tabled for further discussion
25	4	II.B Scope	AT&T	Removed: The Phase II Test Manager is expected to test Ameritech's OSS '99, scheduled for release in December 1999.	Scope section substantially revised for version 1.1
26	4	II.B Scope	AT&T	Added: [The term "Test Manager" is never defined by KPMG. It should be changed to Test Manager on a global basis throughout the document. The Term "Phase II Test Manager" is unique to BellSouth and should be stricken from this document.]	Scope section substantially revised for version 1.1

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27	4	II.B Scope	AT&T	<p>Added: Roles of the Test Manager and the Pseudo-CLEC</p> <p>The Test Manager has overall responsibility for the management of both the test and the preparation of the master test plan. This role would include, among other things, assisting participants in preparing for and conducting the test, providing change control throughout the testing cycle, and reporting results and evaluation to the Commission. The test manager would also, with the participation of the collaborative participants, specifically develop test parameters, create test specifications, determine transaction mixes for the markets being tested in terms of volumes by transaction type, and reasonably expected demand levels for the capacity tests. Finally, the test manager would be responsible for developing and submitting a final report that describes the test results. The parties agree that the test manager would take on similar managerial, evaluation, reporting, collection, and supervisory roles in regard to the test that may not be specifically described herein. The Test Manager has overall responsibility for the management of the testing process described in this document. This document will be used by the Test Manager to guide the various parties involved in this testing effort.</p> <p>The Pseudo-CLEC role is broken down into the following two separate roles:</p> <p>a. A pseudo-CLEC that would establish a CLEC-ILEC business relationship with Ameritech and establish interconnection relationships with</p>	Scope section substantially revised for version 1.1
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¹ Obviously, some element of Role (2)(a) will use the interfaces built by Role (2)(b) to place test orders.

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				<p>Ameritech, and in doing so it would interact with Ameritech like any CLEC in acquiring documentation, attending training, and the like. The pseudo-CLEC would also create and submit test transactions to Ameritech over the appropriate manual and electronic interfaces, collect measure and document the results of all transactions, and compile a test-duration log that captures the details of its experiences in dealing with Ameritech.</p> <p>b. A pseudo-CLEC that would acquire documentation, attend training, and build an application-to-application OSS interface with Ameritech.¹</p> <p>KPMG is the Test Manager and will provide part (a) of the pseudo-CLEC role, as designated above, so long as KPMG agrees to place appropriate firewalls (i.e., structural and procedural separation) between the person(s) working on the Test Manager and pseudo-CLEC rules. Specifically:</p> <p>(a) No KPMG-affiliated person(s) working on the Test Manager role should be involved in any way in the pseudo-CLEC function.</p> <p>(b) Any information disclosed to, or uncovered or received by KPMG in its work as the Test Manager shall not be disclosed to KPMG personnel working on the pseudo-CLEC function. In other words, there should be a firewall placed between these two separate work groups. KPMG will implement appropriate measures to ensure that information disclosed to KPMG in Role (1) could not be indirectly obtained by the KPMG personnel working on Role (2)(a).</p>	
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28	4	II.B Scope	AT&T	<p>Added: Blindness to Ameritech</p> <p>The Test will be conducted so that certain elements are “blind” to Ameritech, specifically:</p> <p>the pseudo-CLEC’s work to develop the application-to-application interfaces with Ameritech, and</p> <p>the content, sizing and conduct of the volume and stress tests.</p> <p>The pseudo-CLEC will not disclose its identity or function to the Ameritech technical staff, in order to assure that the pseudo-CLEC’s assessment of the documentation and consultative support that Ameritech provides, including access to business rules, is not affected by Ameritech efforts to assist the pseudo-CLEC in preparing for the Test. Ameritech shall not be given advance notification or knowledge of the sources of heavier than normal volumes nor the time at which those volumes would be presented to its systems for processing. The Ameritech staff involved in the Test and in the regulatory activities associated with the Test shall be precluded from transferring, directly or indirectly, that information obtained by them in connection with or relating to the Test to the Ameritech organizations involved in CLEC start-up and Account Management functions or to Ameritech operations groups that provide systems and support to processing activities and functions.</p>	KPMG Consulting amended language taking into account suggested comments
29	4	II.B Scope	AT&T	<p>Added: Performance Measure Audit</p> <p>The Performance Measurements audit must be undertaken and completed using the three months of data PRIOR TO the beginning of transaction</p>	Issues pertaining to performance measures/ PM Audits, tabled for further discussion

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				testing. As provided by order of the Michigan Commission in its May 27, 1999 and February 9, 2000 orders in MPSC Case No. U-11830, a performance measurement auditor must attest to the fact that Ameritech has implemented the performance measures ordered by the Michigan Commission prior to the beginning of transaction testing.	
30	4	II.B Scope. Military Style	Ameritech Overall	<p>4th bullet “Observation and Exception status.” Need to discuss openness of information not related to P-CLEC that would be considered proprietary in nature</p> <p>The second sentence, should be modified as follows: “As appropriate, depending on the confidentiality of the subject matter being discussed, CLECs shall be able to listen to the calls as observers.”</p>	Scope section substantially revised for version 1.1
31	5	II.B Scope	AT&T	<p>Added: General Scope of Capacity Test</p> <p>Among other things, the test will demonstrate whether Ameritech’s OSS can serve commercial volumes that are reasonably forecast by the CLECs. The test should assume those demands not only for Michigan, but should replicate those demands to take into account demand in the entire Ameritech region. Since Ameritech’s systems are regional in nature, testing is necessary of not only Michigan-specific demand, but must also include regionally anticipated demand. The stress testing of Ameritech’s OSS should also demonstrate the scalability of Ameritech’s OSS, including the manner in which Ameritech could increase computer system capacity and manual processing capacity to meet increasing market demand. The company-specific demand forecasts provided by the CLECs to the Test Manager shall remain confidential and shall not be shared with the any</p>	<p>Issues pertaining to volume test, tabled for further discussion</p> <p>Ameritech to rewrite this section</p>

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				party except in an aggregated form.	
32	5	II. B Scope	MWCOM	Substitute listed interfaces to correctly reflect Ameritech systems.	Closed
33	5	II. B Scope	MWCOM	Last paragraph, add the following language: "Since major releases of software/ hardware/ products/ processes ("Systems") are proposed in the OSS POR and/or will be required to implement the proposed combinations tariff to be submitted to the parties on May 1 as part of the collaborative, a supplemental test plan will be required so that these critical Systems and related performance measurements can be tested. The test will not be judged as completed until all Systems that will be used to support CLEC entry must be tested."	A-Y issues, tabled for further discussion
34	5	II.B. Scope	MWCOM	Does not specify "what combinations" or "all combinations" of UNEs will be included. Leaves the statement up for interpretation.	A-Y issues, tabled for further discussion
35	5	II.B. Scope	MWCOM	"The Phase II Test Manager is expected to test OSS '99, scheduled for release in Dec 99" The test manager needs to verify the version of LSOG that will be used for the test and update the MTP accordingly.	Closed LSOG Version 4 is part of A-Y discussion, tabled for further discussion
36	5	II. B. Scope	MWCOM	Need to be specific regarding what release of business rules will be used. Ref: "Additionally, the test will be conducted using the most current release of the business rules at the time of the test."	Scope section substantially revised for version 1.1
37	5	II.B.Scope. Military Style Test	MWCOM	"The Phase II Test Manager will be responsible for determining if an Exception is resolved. If in responding to an Exception , (AIT) has made a change to a process, system, or document, the Phase II test manager will retest as appropriate" Comment: This leaves the assumption that the change was appropriately documented and distributed as a formal document. This is important for updating test script "expected results"	Scope section substantially revised for version 1.1

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38	5	II. B Scope. Military Style test	MWCOM	Paragraph 3 and 4: Change “system” to “systems”.	KPMG Consulting amended language taking into account suggested comments
39	5	II. B Scope. Military Style test	MWCOM	After paragraph 8, add: “CLECs may respond to Exceptions in writing, citing the impact of the exceptions on their business and/or customers.”	KPMG Consulting amended language taking into account suggested comments
40	5	II. B Scope Military Style test	MWCOM	Add language to indicate that both the Test Manager and the MPSC will be responsible for determining if an exception is resolved i.e. add “and the Michigan PSC.”	KPMG Consulting amended language taking into account suggested comments
41	5	II. B Scope	MWCOM	Add: “A detailed explanation of the re-test will be provided. Regression testing will be undertaken as required.”	KPMG Consulting amended language taking into account suggested comments
42	5	II. B Scope Before last paragraph	MWCOM	<p>Add: -If an Exception is not resolved, the cycle will continue to iterate until closure is reached, no further action is warranted, or the MPSC specifically exempts the Exception from further testing. Exceptions that are closed because of exemption rather than correction will be so documented in the final report.</p> <p>-Exceptions cannot be closed simply by pointing to plans for a new or enhanced Systems or software release. Such exceptions will be moved to the “supplemental test plan” and testing suspended until the new Systems are made generally available to CLECs. Testing of these specific Systems/exceptions can be resumed at that time. Depending on the length of the suspension or the significance of the change, previous data collected may be judged no longer valid, and complete end to end re-testing will be required. Examples of such changes include change to a later LSOG version (e.g., upgrade to LSOG 4 or other significant changes to the interface or business rules), which would invalidate previous transaction testing and</p>	KPMG Consulting amended language taking into account suggested comments

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				previous software results.	
43	5	II.C.Objective	KPMG	First paragraph first sentence changed "This" to "The"	Change accepted and document updated
44	6	II.D Audience CSI	Ameritech	Remove middle sentence, which begins "These technologies ..."	Issues pertaining to KPMG Consulting Role and Statement of Understanding, tabled for further discussion. KPMG Consulting will re-word items in this section.
45	5-6	II.D. Audience Test Manager	AT&T	Removed: The Phase II Test Manager has overall responsibility for the management of the testing process described in this document. This document will be used by the Phase II Test Manger to guide the various parties in this testing effort.	Issues pertaining to KPMG Consulting Role and Statement of Understanding, tabled for further discussion. KPMG Consulting will re-word items in this section.
46	6	II.D. Audience. Test Manager	MWCOM	Add: "A Test Manager with overall responsibility for the management of both the test and the preparation of the master test plan. This role would include, among other things, assisting participants in preparing for and conducting the test, providing change control throughout the testing cycle, and reporting results and evaluation to the Commission. The test manager would also, with the participation of the collaborative participants, specifically develop test parameters, create test specifications, determine transaction mixes for the markets being tested in terms of volumes by transaction type, and reasonably expected demand levels for the capacity tests. Finally, the test manager would be responsible for developing and submitting a final report that describes the test results. The parties agree that the test manager would take on similar managerial, evaluation, reporting, collection, and supervisory roles in regard to the test that may not be specifically described herein."	KPMG Consulting amended language taking into account suggested comments
47	6	II.D.Audience. Certified	MWCOM	Note that the CSI is the test transaction generator – mailman.	KPMG Consulting amended language taking into account suggested comments

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		Software Interface			
48	6	II.D.Audience. Certified Software Interface (CSI)	AT&T	Removed: The CSI is the entity responsible for the array of technologies, which enable transactions to be submitted to and received by Ameritech. These technologies will be developed and maintained by the Phase II Test Manager. Others, working under the direction of the Phase II Test Manager, may provide additional technology.	KPMG Consulting amended language taking into account suggested comments
49	6	II.D.Audience. The CLEC Community	MWCOM	Add – CLECs will be requested to provide input on additional tests needed as well.	Change accepted and document updated
50	6	II.E.Audience. Michigan PSC	AT&T	Added: The MPSC has previously pointed out failings in the Ameritech OSS, and effective remedies to those failings must be demonstrated during the course of the Remediation Testing.	Withdrawn
51	6	II.E.Audience The CLEC Community	AT&T	Removed: The terms ALECs and CLECs are synonymous, and the term CLECs will be used throughout this document.	Change accepted and document was updated.
52	6	II.E.Audience DOJ	AT&T	Added: In the context of evaluating Ameritech’s previous Section 271 filings at the FCC, the DOJ has previously pointed out failings in the Ameritech OSS, and effective remedies to those failings must be demonstrated during the course of the Remediation Testing.	Withdrawn
53	6	II.E.Audience FCC	AT&T	Added: In the context of evaluating Ameritech’s previous 271 filings at the FCC, the FCC has previously pointed out failings in the Ameritech OSS and effective remedies to those failings must be demonstrated during the course of Remediation Testing.	Withdrawn
54	6	II.D. AudienceMichigan AGO	AT&T	Added Section: The Michigan Attorney General’s Office:	Change accepted and document updated

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				The Michigan Attorney General’s Office may participate in the process of developing, conducting, and evaluating the tests.	
55	6	II. E. Open Process (added this new section E)	AT&T	<p>Added Section: E. Open Process All interested parties, including Staff of the MPSC, the Michigan Attorney General’s office, the Department of Justice, and the CLECs shall: (1) have the opportunity to verify what is being tested; (2) receive a list of all documentation that Ameritech provides to KPMG; and (3) be permitted to verify that the pseudo-CLEC (whose role is being shared by Hewlett Packard and KPMG) is using the same information and receives the same level of technical assistance that Ameritech provides to the CLECs.</p> <p>All interactions and discussions (whether written or oral) between any KPMG personnel and Ameritech should be made public and generally available to all collaborative parties. There will be “observations and exceptions” calls in which the collaborative parties can listen to the discussions between KPMG and Ameritech. The collaborative parties shall have access to (1) all underlying data (including raw data) supporting test results (including Ameritech’s raw performance data), (2) any analysis conducted by the Test Manager regarding the failures that are uncovered in the test, and (3) any root cause analysis conducted by the Test Manager.</p>	KPMG Consulting amended language taking into account suggested comments
					Comment withdrawn by MWCOM
					Comment withdrawn by MWCOM
58	7	II.E. Assumptions	MWCOM	Amend last bullet to read - Ameritech will maintain a stable environment for the duration of the	Covered in change management discussion

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				evaluation. Changes to the test or production environment during the test will be introduced following the normal change control process. Since such a process is not yet in place for Ameritech, the collaborative will need to determine what change management process will control during the test.	
59	7	II.E Assumptions	McLEOD USA	In reference to the statement that “Ameritech will maintain a stable environment for the duration of the evaluation.” The term “stable environment” needs to be explained and accurately defined, as does the “duration of the evaluation.” It is not clear whether the system being tested will be changed pursuant to developments in the merger between Ameritech and Southwestern Bell Corporation (“SBC”). Thus, it is not clear as to whether the system being tested will only be in place for a very short time frame, such as 1-2 years. Ameritech needs to clarify as to what systems and processes will be merged with those of SBC, and as to what systems and processes will remain with Ameritech (or as they were with Ameritech).	A-Y issues, tabled for further discussion
60	7	II. E. Assumptions (original section E)	AT&T	Added: Prior to the beginning of testing, Ameritech has successfully implemented the changes and updates to its legacy products, processes, and OSS that were agreed to by the collaborative and/or ordered by the MPSC.	A-Y issues, tabled for further discussion
61	7	II. E. Assumptions (original section E)	AT&T	Entire Section: Removed the term “Certified Software Interface”.	KPMG Consulting amended language taking into account suggested comments
62	7-8	II. F. Limitations	AT&T	Entire Section: Removed the term “Certified Software Interface”. First bullet, second to last sentence: Added: with concurrence of the CLECs and Ameritech.	KPMG Consulting amended language taking into account suggested comments
63	10	III. Test Plan Framework	KPMG	First paragraph second sentence changed "In constructing a master test plan, many factors were	Change accepted and document was updated.

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				considered, including the systems and processes to be tested, the measurement points and respective evaluation criteria, and the necessary conditions required to stage a successful, efficient, and objective test." To "In constructing a master test plan, many factors will be considered, including the systems and processes to be tested, the measurement points and respective evaluation criteria, and the necessary conditions required to stage a successful, efficient, and objective test."	
64	10	III.A Scenarios	MWCOM	Change "Georgia third party" to "Florida"	Change accepted and document updated
65	11	III.A Scenarios. Scenario Use	MWCOM	Amend second to last paragraph to read - For volume testing, normal expected volumes will then be assigned to a selected set of the test cases based on expected real world production 18 months from the expected completion date of the test. (This date is a floating date and will be automatically extended if the test takes longer than expected to complete). Individual test instances that match the test cases will be generated based on the volume that has been assigned.	Issues pertaining to volume test, tabled for further discussion
66	10	III.A.Test Scenarios	AT&T	First paragraph first sentence added: contributions from Michigan CLECs... Second paragraph second sentence added: Some test scenarios involve repair and maintenance activities and billing matters.	Change accepted and document updated
67	10	III.A.Test Scenarios	KPMG	First paragraph "Based on KPMG's industry experience, the knowledge gained from the New York Public Service Commission Test, the Pennsylvania Public Utility Commission Test, and the Georgia third party test, as well as a review of the available offerings in Michigan , KPMG has developed a representative set of test scenarios."	It is unclear what products and services will be included in the test. This statement applies to the entire document. A-Y issues, tabled for further discussion

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67a	11	III.A.1.0. Scenario Purpose	Ameritech	“In this regard...” sentence should be rewritten to be clear that the Production Environment is to be used.	
68	11	III.A.2.0. Scenario Use	AT&T	First paragraph added: The CLECs will supply additional scenarios during the course of MTP development activities.	KPMG Consulting amended language taking into account suggested comments
69	11	III.A.2.0. Scenario Use	AT&T	Second paragraph added last sentence: The CLECs will contribute to the development of the Test Case requirements in the course of the MTP development sessions.	KPMG Consulting amended language taking into account suggested comments
70	11	III.A.2.0. Scenario Use	AT&T	Third paragraph third sentence changed “that” to “than”; removed “500”, and added “To Be Determined (TBD)”.	Changed "that" to "than"
71	11	III.A.2.0. Scenario Use	AT&T	Third paragraph, fourth sentence, removed “requests that the Phase II Test Manager...”, and added, “as the Test Manager will...”.	Change accepted
72	11	III.A.2.0. Scenario Use	KPMG	Third paragraph third sentence changed "for each of more than 500 test cases" to "for each test case."	Generalized statement
73	12	III.A.2.0. Scenario Use	AT&T	Fourth paragraph, added last sentence: The CLECs will contribute to the development of Test Instances requirements in the course of MTP development sessions.	KPMG Consulting amended language taking into account suggested comments
74	11-12	III.A. 2.0 Scenario Use	MWCOM	Would like to see the following paragraphs more specific on how the volume for “Stress and Volume” testing will be determined and what “some multiplier” will be.	Issues pertaining to volume test, tabled for further discussion
75	12	III.A.2.0. Scenario Use	KPMG	Deleted fourth paragraph, "Detailed test instances will be generated from these test cases. Test instances represent a set of transactions described by a test case for a specific customer account. For example, a test case might specify “migrate a two-line business customer from Ameritech to a CLEC and add call waiting on the primary line.” A test	This paragraph contained the same information as the third paragraph in this section. KPMG Consulting amended language taking into account suggested comments

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				instance would perform the necessary pre-ordering inquiries and send an order to accomplish this activity for a specific two-line business customer account."	
76	12	III.A.2.0. Scenario Use	KPMG	For volume testing, normal expected volumes will then be assigned to a selected set of the test cases based on expected real world production in the July 2001 timeframe.	It is unclear what date will be used to base volume projections. Issues pertaining to volume test, tabled for further discussion
77	13	III.B.Test Domains. M&R Domain	AT&T	Added last sentence: Tests will also evaluate Ameritech's compliance with maintenance and repair performance measurements.	Change accepted and document was updated
78	13	III. B. Test Domains. Billing Domain	AT&T	Second sentence: Changed "to" to "with"	Change accepted and document was updated.
79	13	III. B. Test Domains. RMI Domain	AT&T	Added wording in bold: This domain is comprised of the systems, processes and other operational elements associated with Ameritech's establishment and maintenance of business and technical relationships with the CLECs.	Change accepted and document was updated
80	13	III.C.Test Families	MWCOM	<p>"CLECs operating in Michigan will be asked to volunteer to participate in certain portions of this test. The inclusion of selected CLEC live transactions provides an alternative test method for transaction which may not be practical to provide through the test CSI and further facilitates a more realistic depiction of real world production. CLEC participation will also be solicited to provide real test cases during the test period.</p> <p>Interpret: Does this mean that a CLEC must participate in live testing to provide "real test cases during test period"? How much notice will the CLEC get for providing the participation?</p>	KPMG Consulting amended language taking into account suggested comments

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81	14	III.D. 1.0. Transaction Driven Analysis	AT&T	Second paragraph, first sentence: Deleted the words, “developed from test scenarios.” Last paragraph, last sentence deleted entire sentence: See the Scenario section above for additional discussion. Many transaction-driven tests utilize a Certified Software Interface (CSI) to facilitate testing.	KPMG Consulting has clarified language
82	14	III.D.1.0.CSI	AT&T	Deleted entire section on CSI	Removed reference to CSI
83	15	III.D Test Processes	Ameritech CLEC Involvement in Transaction Testing	Need clarification that direction is provided by the test manager How is the capability of the CLEC going to be assessed?	Change accepted and document was updated
84	15	III.D.1.0 CLEC involvement in Transaction Testing	McLEOD USA	Language should be added to clarify and expand the role of CLECs in the testing process. Specifically, it would be highly useful to test the current real-world experience of CLECs operating in Michigan.	Change accepted
85	15	III.D. 1.0 CLEC involvement in Transaction Testing	AT&T	First Paragraph, second sentence: Added words in bold: The inclusion of selected CLEC live transactions provides an alternative test method for transactions that may not be practical to provide through the interfaces being tested and further facilitates a more realistic depiction of real world production. Deleted reference to CSI in same sentence.	Removed reference to CSI
86	15	III.D. 1.0 CLEC involvement in Transaction Testing	AT&T	Third paragraph, first sentence: Added words in bold: Additionally, some of the transaction types submitted through the interfaces being tested can only be properly executed with direct involvement from the CLECs. Deleted reference to CSI in same sentence.	Change accepted and document was updated Removed reference to CSI
87	15	III.D. 1.0 CLEC	AT&T	Sixth paragraph: Added words in bold: Additionally, the Test Manager will host weekly	Change accepted and document updated

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		involvement in Transaction Testing		meetings with the MPSC, the CLECs, and Ameritech to address testing status, issues, and proposed resolutions and keep them apprised of all relevant aspects of the project.	
					Comment withdrawn by MWCOCM
89	16	III.E E. Evaluation Criteria	MWCOCM	Interpret. Parity maybe limited to stove-pipe testing of processes of individual OSS functions. “ These are criteria that require two measurements to be developed and compared, such as whether external response time is at least as good as internal response time” “Examples” CLEC transaction time no greater than SBC Retail transaction time. MTP does NOT state that it is responsible to test for data consistency between function, e.g. Pre-Order to Order, which is vital for parity of order rejection rates and flow through rates. Evaluation criteria is not clear if or how this import testing issue would be considered under criteria for evaluation. Reference to the OSS needs to be removed.	A-Y issues, tabled for further discussion
90	16	III. E. Table III-2: Sources of Evaluation Criteria	MWCOCM	Delete first row in table III-2: Sources of Evaluation Criteria	Comment withdrawn by MWCOCM
91	16-17	III. E. Table III-2: Sources of Evaluation Criteria	AT&T	Legal and Regulatory Requirements, Description: Added words in bold: Requirements specified by statute and regulation, such as FCC orders, court orders, MPSC regulations, federal and state statutes, and other binding requirements such as interconnection agreements and others resulting from judicial or governmental proceedings.	Change accepted and document was updated.
92	16-17	III. E. Table III-2: Sources of Evaluation	AT&T	Good Management Practices (GMP): Added words in bold: Widely recognized standards and guidelines	Change accepted and document was updated.

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		Criteria		promulgated by sanctioned industry and governmental organizations and other bodies (e.g., Association for Telecommunications Industry Solutions (ATIS), Ordering and Billing Forum (OBF) , Telecommunications Industry Forum (TCIF)); also includes benchmarks, performance goals, and guidelines derived from industry and topic area experts, Ameritech and CLEC performance targets, publications, academic journals and other sources.	
93	17	III. F. 1.0.3. The MPSC has verified measurements to be used in the test	AT&T	Added sentence and phrases in bold: The Performance Metrics to be used in the test must be determined by the MPSC and fully defined. In addition they must be fully functional, tested, and operationally ready. The Performance Measurements Audit will be one of the first components of the Test, as described in that Section of the MTP. Fully functional Ameritech measurements are required to support collection of test results and to ensure a method exists to monitor on-going compliance. With assistance from the Performance Measurements Auditor and the Test Manager, the MPSC will assess the operational readiness of all required Ameritech measurements and verify that all requirements have been met.	Issues pertaining to performance measures/ PM Audits, tabled for further discussion
94	17-18	III. F. 1.0.4. All required Ameritech interface capabilities must be operationally ready	AT&T	Added following sentence to end of paragraph: The changes and updates in Ameritech systems, processes and interfaces that the collaborative or the Commission believe necessary are required to be successfully implemented and available for CLEC use before any testing begins. .	A-Y issues, tabled for further discussion
					Comment withdrawn by MWCOCM

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96	18	III. F. 1.0.5. For transaction tests to begin, the CSI must be operationally ready	AT&T	Removed CSI from title of section	Removed reference to CSI
97	18	III. F. 1.0.5. For transaction tests to begin, the CSI must be operationally ready	AT&T	Removed all references to CSI in this section and replaced it with, "pseudo-CLEC interface"; removed Phase II Test Manager and replaced it with, "pseudo-CLEC"; removed CSI in second sentence and replaced it with, "interface."	Removed reference to CSI
98	18	III. F. 1.0.6. The Phase II Test Manager will review relevant source documentation from other states in the Ameritech region: Table III-3 Global Entrance Criteria	AT&T	Table III-3 Global Entrance Criteria: Removed all references to CSI	Removed reference to CSI
98a	17	III. F. 1.0.6. Global Entrance Criteria	MWCOM	Test plan calls for the Test Manager to assign a category of duplicative testing to any functionality that has been successful validated in another part of the Ameritech region. This amounts to a form of regional testing. Has this been approved by the collaborative?	(6/3)
99					Comment withdrawn by MWCOM
100	20	IV. Performance Metrics	MWCOM	Somewhere here we need to say that metrics must be available before the start of the test and that the way in which these metrics will be calculated will	Issues pertaining to performance measures/ PM Audits, tabled for further discussion

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		Review Test Section		<p>be audited here. Again, this may have to wait until the metrics collaborative is completed. If that's not possible, then we need to have a way to preserve the data. Also, we need a way to preserve the data in the event metrics are changed or expanded during the test process.</p> <p>A. We need to have some final reporting on metrics and evaluation on standards that come out of MI collaborative at least. We also will need a way of coming back and auditing new measures and business rules changes added in other collaborative discussions.</p> <p>B. MI metric discussions also has highlighted issues KMPG will need to resolve:</p> <ol style="list-style-type: none"> 1. Are the OSS Query benchmarks from TX appropriate (i.e. not too Generous) for AIT OSS processes? An examination of what AIT's actual retail performance for the query intervals will have to be measured. 2. FOC Interval: KMPG examination of how quickly AIT reps can provide due dates to customer to develop more appropriate benchmark is needed. In addition, time missing from the FOC interval (pulling batched orders every half hour and unknown unpacking intervals that could take hours) that take place before AIT measurement even begins. 3. Hot cuts: Whether hot cut metrics are adequate to capture all interval and quality issues with hot cuts in general and migrations in particular--including the ability to log troubles during and shortly after the cut. 4. Are the database loading intervals and accuracy truly parity by design for E911, DA/DL, LIDB, etc. 	
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				<p>Also re clearing of errors and unlock problems (for E911 updates), accidental deletion of DA updates due to orders sequence--disconnect comes in after update on new LNP customer—problems handled in a parity manner as well.</p> <p>5. Missing notices: Metrics only capture intervals for things sent. When notices are not sent, are there ways to ensure that situations where 10 orders are sent and 5 get on-time notice and 5 don't arrive at all are captured in the metric. Are metrics such as those adopted for BA necessary or are other means available to capture those items missing notices?</p> <p>6. Based on KPMG's findings on other parts of OSS test--help desk responsiveness, software validation and error correction, hot cuts, etc.--are additional metrics needed to address deficiencies. (i.e. KPMG's NY findings led to adding various change control metrics in addition to those posed by CLECs in NY.)</p> <p>In a more global issue, can KPMG calculate the impact application of statistics to benchmarks to AIT's metric failures--i.e. what percentage of measurements passed as parity that would have failed if only whether the benchmark was made or missed was used?</p> <p>Need to address the issue of whether using a third-party vendor should have any impact on how AIT measures system availability, change and documentation notice, query response times.</p> <p>KPMG also needs to do a study comparing retail and wholesale response times.</p>	
100a	21, 25, 26	IV. Performance	KPMG	Removed “Definitions and Standards” from title of PMR3: Metrics <u>Definitions and Standards</u> Change	Change accepted and document updated to more accurately reflect the title of this

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		Metrics		Management Verification and Validation Review	test (6/3)
100b	21, 29	IV. Performance Metrics	KPMG	Inserted words into title of PMR5: Metrics Calculations <u>and Reporting</u> Verification and Validation Review	Change accepted and document updated to more accurately reflect the title of this test (6/3)
101	20	IV. D. Test Processes	MPSC	Add new language to statement of purpose and Test Process description. Also rename section IV as "Performance Metrics Audit/Test Section".	Change accepted and document was updated
101	20	IV. D. Test Processes	AT&T	In last paragraph, first sentence, removed Phase II Test Manager and replaced it with, "Test Manager and pseudo-CLEC." In fifth sentence, removed Phase II Test Manager and replaced it with, "Test Manager."	Change accepted and document updated
	20	IV Entire Section	AT&T	Rename the section as "Performance Measures Audit" and edit the sections as specified in AT&T's supplemental document.	KPMG will reword this section
102	21	IV.D.Test Process	MWCOM	Second to last paragraph, last two sentences should read - This determination will be based on the collaborative process and other processes set forth in Case Nos. U12320 and U11830. When these metrics have been determined, they will be listed in Appendix D. The MPSC will let KPMG know when Appendix D should be added and what it will contain.	Issues pertaining to performance measures/ PM Audits, tabled for further discussion
103	21	IV. D.Test Process	MWCOM	Last paragraph, sentence beginning "In addition ..." should read "In addition, the test should analyze the adequacy and appropriateness of the measures provided in appendix D.	Issues pertaining to performance measures/ PM Audits, tabled for further discussion
104	21	IV. D. Test Processes	KPMG	Deleted third paragraph, sentences four through six, "In addition, the MPSC Staff Proposal indicated that the test should "[analyze] the adequacy and appropriateness of the measures provided in Ameritech's SQM." To address this need, the Test Manager will make an assessment, based on its professional judgement, of whether there are any major gaps in the coverage of, or in design	This section applies directly to the Florida test. Issues pertaining to performance measures/ PM Audits, tabled for further discussion

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				problems with the Ameritech metrics. This judgement could be based in part on the results of the Processes and Procedures Reviews and the Transactions Verification and Validation tests described elsewhere in this test plan."	
104a	22	IV.1.1 Description	KPMG	Added the words into the last sentence of the paragraph, "This test will rely on checklists, document reviews, and inspections."	Change accepted and document updated to more accurately reflect the inputs to this test (6/3)
105	23	IV. 1.6. Test Approach	AT&T	2. PMAP Documentation AT&T indicated that this documentation is unfamiliar in Ameritech	Change accepted and document was updated. Deleted PMAP reference.
105a	23, 25, 28, 30	IV. 1.6.1, 2.6.1, 4.6.1, 5.6.1	KPMG	Added into the Inputs: Ameritech Metrics Definitions Documentation	Change accepted and document updated to more accurately reflect the inputs to these tests (6/3)
106	25	IV. 2.6.1 Inputs	AT&T	2. PMAP Documentation AT&T indicated that this documentation is unfamiliar in Ameritech	Change accepted and document was updated. Deleted PMAP reference.
107	25	IV. 2.6.2 Activities	KPMG	Deleted Activity four. "Analyze the adequacy and appropriateness of the measures provided in Ameritech's SQM."	This section applies directly to the Florida test. Issues pertaining to performance measures/ PM Audits, tabled for further discussion
108	26	IV. 3.6.1. Inputs	AT&T	2. PMAP Documentation AT&T indicated that this documentation is unfamiliar in Ameritech	Change accepted and document was updated. Deleted PMAP reference.
108a	26	IV. 3.6.1. Inputs	KPMG	Updated first input to read: Ameritech Metrics <u>Change Management Policies and Procedures Documentation</u>	Change accepted and document updated to more accurately reflect the inputs to this test (6/3)
108b	27	IV.4.3	KPMG	Added an Entrance Criteria: <u>Preliminary Analysis of PMR5</u>	Change accepted and document updated to more accurately reflect the entrance criteria of this test (6/3)
109	28	IV. 4.6.1. Inputs	AT&T	2. PMAP Documentation	Change accepted and document was updated. Deleted PMAP reference.

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				AT&T indicated that this documentation is unfamiliar in Ameritech	
109a	29	IV.5.3. Entrance Criteria	KPMG	Removed second Entrance Criteria: Successful Completion of PMR3	Change accepted and document updated to more accurately reflect the Entrance Criteria of this test (6/3)
109b	29	IV.5.4.test Scope	KPMG	Added verbiage to Test Target Table: Process Area; Metrics Calculations <u>and Reporting</u> Added verbiage to Test Target Table: Second Evaluation Measure; Consistency between <u>definitions</u> and metrics <u>calculations</u> programs	Change accepted and document updated to more accurately reflect the Test Targets of this test (6/3)
110	30	IV. 5.6.1. Inputs	AT&T	2. PMAP Documentation AT&T indicated that this documentation is unfamiliar in Ameritech	Change accepted and document was updated. Deleted PMAP reference.
111	30	V.A. Purpose	MWCOM	In MTP the OSS functions are to be tested like unrelated stove-pipe operations. MTP does NOT clearly state anywhere that it will test for data consistency between functions, e.g. Pre-Order to Order or Order to Maintenance. Unless this limitation prohibits testing to achieve the best metrics for order rejection rates and flow through rates.	A-Y issues, tabled for further discussion Comment withdrawn by MWCOM
112	31	V. C. Scope	AT&T	First bullet, added to Change Management words in bold: Change Management, including ongoing development of CLEC interfaces with Ameritech's OSS, and Ameritech interface testing facilities made available to CLECs	Change accepted and document updated in change management section
113	31	V. C. Scope	MWCOM	Last bullet point should read - Release Management. Change Management testing should include specific test for Release Management.	KPMG Consulting amended language taking into account suggested comments

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				Testing and rollout processes and procedures for new software release that impact systems utilized by the CLECs. Ameritech has an extended and extensive plan to upgrade its systems. For this reason Release Management will be critical to the CLEC business operations that interface with Ameritech.	
					Comment withdrawn by MWCOM
115	33	V.1.1 Description	Ameritech Last sentence referencing "Ameritech OSS '99..."	Remove this sentence, does not apply to Ameritech	Change accepted and document updated
116	33	V 1.1. Description	KPMG	Additionally, data will be reviewed to evaluate change management of a major software release from initiation through implementation.	Change accepted and documented in change management section
117	33	V.1.1. Description	AT&T	Removed last sentence, "Ameritech's OSS '99..."	Change accepted and document was updated.
118	34	V. 1.1 Description	MWCOM	Deleted first paragraph, last sentence, "Ameritech's OSS '99..."	Changed accepted
119	35	V.2.1 Description	KPMG	First paragraph, first sentence, changed "Ameritech-FL's" to "Ameritech's"	Change accepted and document was updated.
119 (a)	36-37	V. 2.2 Objectives	KPMG	Delete last sentence "Additionally, account establishment and management will be compared with retail practices for parity..."	It is unclear to KPMG Consulting whether retail analogs exist for the account establishment and management practices
120	36	V.2.6.1. Inputs	AT&T	2. Added words in bold: Ameritech instructions to CLECs for interacting with account managers, including escalation procedures and processes	Change accepted and document updated
120a	40-41	V. 4.1 Description	KPMG	Delete sentence "Additionally, the CLEC training program will be compared with retail practices for parity..."	It is unclear to KPMG Consulting whether retail analogs exist for the CLEC training program
120b	44	V. 4.4 Description	MWCOM	The Ameritech OSS Interface systems that are relevant to the testing should be identified. Even if it is based on a timeline of availability the scope of testing will be much clearer	(6/3) Not sure what specific test this is referencing. Possibly PPR4: CLEC Training

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121	41	V.5.1. Description	AT&T	Last sentence: Removed info on interfaces and replaced it with, "OSS suite."	See item below.
122	41	V.5.1. Description	KPMG	Deleted first paragraph, first sentence "The interfaces that are relevant to this test include Ameritech's TAG, EDI, LENS99, TAFI, and ECTA products."	This section applies directly to the Florida test.
123	43	V.6.0 Collocation & Network Design Verification and Validation review	Rhythms	Because collocating at Ameritech's premises is essential for all carriers, OSS testing should address the efficiency and timeliness of processing orders and provisioning all types of collocation, including caged, cageless, shared and adjacent collocation. Further, Ameritech's OSS must ensure for scalability to process orders for collocation. Specifically, KPMG should test the processes on the basis of specific quantitative standards for missed collocation due dates, the number of days a collocation turnover is delayed, and the percentage of processed orders for competitors. The testing must also address the efficiency and timeliness of the processes for ordering and obtaining all types of collocation at the Ameritech premises, including caged, cageless, shared and adjacent collocation arrangements.	A-Y issues, tabled for further discussion
124	45-46	V.7.1. Description	AT&T	Added sentence in after first sentence: Testing will also consider manual processing of CLEC pre-order requests that Ameritech has not mechanized,	Change accepted and document updated
124a	46	V.7.1. Description	MWCOM	Testing will also consider manual processing of CLEC pre-order requests that Ameritech has not mechanized. What pre-order requests is this referring to? What pre-order functionality will the CLECs have to perform manually?	(6/3)
124b	46	V.7.4.Test Scope	Ameritech	Remove reference to SOCS since this is not an Ameritech system; Change to appropriate service order systems.	Change accepted and document updated (6/3)

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125	50-51	V.9.1 Description	Rhythms	KPMG should evaluate whether Ameritech currently has in place adequate coordinated testing prior to the turnover of unbundled facilities, such as unbundled loops used to provide xDSL services. Such testing is essential to uncover problems in the provisioning process, before a problem becomes a trouble ticket. Such testing minimizes customer disruption and delay.	Not available for comment A-Y issues, tabled for further discussion
126	51	V.9.1. Description	AT&T	Last paragraph: Removed reference to SOCS	See item below
127	51	V.9.1. Description	KPMG	Deleted paragraph five last phrase of first sentence, "with both using SOCS and the same downstream provisioning and maintenance systems."	This section applies directly to the Florida test.
128	51	V.9.1. Description	KPMG	Fifth paragraph, first sentence, "Ameritech has indicated that the provisioning systems for Wholesale and Retail are the same."	KPMG Consulting amended language taking into account suggested comments
129	52	V.9.4. Test Scope	KPMG	First paragraph, first sentence, changed "Ameritech" to "Ameritech's"	Change accepted and document was updated.
129 (a)	56-59	V. 10.1 Description	KPMG	Delete sentence "Additionally, the billing work center will be compared with retail practices for parity..."	It is unclear to KPMG Consulting whether retail analogs exist for billing work center
129 (b)	60-61	V. 11.1 Description	KPMG	Delete sentence "Additionally, the daily usage feed return process will be compared with retail practices for parity..."	It is unclear to KPMG Consulting whether retail analogs exist for the daily usage feed return process
129 (c)	62-63	V. 12.2 Objectives	KPMG	Delete sentence "Additionally, the daily usage feed production and distribution process will be compared with retail practices for parity..."	It is unclear to KPMG Consulting whether retail analogs exist for the daily usage feed production and distribution process
130	63	V.13.6.2.Activ ities	MWCOM	Number two should read - Daily Usage Feed Return testing should include tracing transactions back to the CLEC bill. Ameritech should produce a summary or detail bill that will allow the CLEC to reconcile credits for usage returned.	Change accepted and document updated
131	66	V.15.2. Objective	AT&T	First paragraph: Removed words, (e.g. TAFI)	Change accepted and document was updated.
132	69	V.16.1.	AT&T	Last sentence, removed INSAC and NRC and	See below

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		Description		added, "various Ameritech work centers."	
					Comment withdrawn by KPMG Consulting
134	71-111	VI. All	AT&T	Removed all references to CSI	Change accepted and document updated
135	72	VI. D. Test Processes	KPMG	<p>Changed first paragraph</p> <p>"Eleven tests have been designed to address the three test sections. The organization of the subject test processes is as follows: ... TVV5: M&R TAFI Functional Evaluation TVV6: M&R ECTA Functional Evaluation TVV7: M&R TAFI Performance Evaluation TVV8: M&R ECTA Performance Evaluation TVV9: End-to-End Trouble Report Processing TVV10: Billing Functional Usage Evaluation TVV 11: Functional Carrier Bill Evaluation"</p> <p>To "Nine tests have been designed to address the three test sections. The organization of the subject test processes is as follows: ... TVV5: M&R Functional Evaluation TVV6: M&R Performance Evaluation TVV7: End-to-End Trouble Report Processing TVV8: Billing Functional Usage Evaluation TVV9: Functional Carrier Bill Evaluation"</p>	Removed Florida specific test references.
136	73	VI. 1.0 POP Functional Evaluation	Rhythms	KPMG must examine the information and processes available for advanced services providers in the pre-ordering phase of OSS. Prior to ordering loops, Rhythms requires access to specific loop makeup information in order to service its customers competitively. Rhythms must be able to discern the capability of a loop for the provisioning of its xDSL services in the same manner and timeframe that Ameritech uses for provisioning of its own loop-	A-Y issues, tabled for further discussion

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				<p>based services, including all advanced services. In particular:</p> <ol style="list-style-type: none"> 1. KPMG should evaluate the adequacy and completeness of the loop makeup information provided to CLECs. Ameritech must provide sufficient information about the characteristics of a particular loop to establish its suitability for certain types of xDSL services prior to ordering. 2. KPMG should evaluate the intervals by which such information is provided, both on an electronic and manual basis. 3. KPMG should evaluate 	
137	73	VI. 1.1. Description	KPMG	<p>Second paragraph first sentence, The test will include the submission of live transactions over three Ameritech-supported interfaces: 1) interactively via graphical user interfaces, 2) machine-machine interfaces, and 3) manually.</p>	<p>It is unclear what interfaces will be included in the test.</p> <p>A-Y issues, tabled for further discussion</p>
138	73	VI.1.1 Description	Ameritech First Table Paragraph 2	<p>Remove check marks under ordering GUI column</p> <p>Remove all reference to LENS99, TAG and RoboTag. Look through entire document. Replace with references as noted above for p. 4.</p>	<p>Change accepted and document updated to remove check mark under GUI for ordering, remove references to LENS99, TAG and RoboTag. Inserted a GUI row and included a X under GUI Pre-Order. (6/3)</p>
139	73	VI. 1.1. Description	KPMG	<p>Deleted second paragraph sentences two - four. "In addition to the manual submission of orders, current plans call for testing the following electronic Ameritech interfaces: LENS99, TAG, and EDI. TAG consists of two interfaces: 1) RoboTAG—current name for the GUI TAG interface, and 2) TAG—the name of the machine-machine interface. In addition, LENS99 will also be based on the TAG architecture but will continue to have the “look and</p>	<p>This section applies directly to the Florida test.</p>

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				feel” of the current LENS interface.”	
140	73	VI. 1.1. Description	KPMG	Table - Ameritech Supported Interfaces	It is unclear what interfaces will be included in the test.
141	73	VI.1.1 Description	MWCOM	Delete original last sentence of second paragraph beginning with , “TAG consists of...” Added last sentence of second paragraph, “In addition to the manual submission of orders, current plans call for testing the following electronic Ameritech interfaces: GUI and EDI.”	Comment accepted
142	73	VI.1.1 Test Description Table	MWCOM	Edit chart ³ , see end notes for proposed chart.	A-Y issues, tabled for further discussion
143	74-75	VI. 1.3. Entrance Criteria	Rhythms	KPMG should validate the existence (or lack of) a GUI interface for obtaining loop make-up information. Such access is essential for smaller CLECs.	A-Y issues, tabled for further discussion
144	75-77	VI. 1.3. Entrance Criteria	Rhythms	To the extent that loop makeup information is available only through manual processes (and particularly not via GUI), the Master Test Plan must test those processes to ensure that they retrieve pre-ordering information for the competitors. This in a manner that will allow competitors access to the information necessary for the provisioning of particular services.	A-Y issues, tabled for further discussion
145	75-77	VI. 1.4. Test Scope	Rhythms	In testing the processes for ordering UNEs, KPMG must be careful to recognize the inherent complexities in ordering UNEs for xDSL services. Thus, Rhythms urges KPMG to include numerous testing scenarios for ordering all xDSL types in significant volumes. Rhythms also recommends that KPMG test the processes specific for provisioning loops capable of xDSL transmission.	A-Y issues, tabled for further discussion
146	75-77	VI. 1.4. Test Scope; Appendix A	Rhythms	The Master Test Plan must test Ameritech’s processes for pre-ordering, ordering, provisioning, repair and maintenance, and billing of line shared	A-Y issues, tabled for further discussion

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		(page 95)		loops. (Ameritech also refers to this UNE as the High Frequency Portion of the Loop, or HFPL.) In particular, KPMG must ensure that Ameritech's processes are adequate to process orders at commercial volumes. Such testing must verify the adequacy of all of Ameritech's EDI, GUI, and manual processes for line sharing. Appendix A should include line shared loops as a separate category in the test scenarios.	
147	75-77	VI. 1.4 .Test Scope	Rhythms	The test plan should test conditioning of loops as a provisioning process.	A-Y issues, tabled for further discussion
148	75	VI. 1.4. Test Scope	KPMG	Second paragraph, "The Ordering Transactions test suite will be comprised of "real-life", end-to-end test cases that cover the entire spectrum of pre-order, order, and provisioning. The following order types will be tested:"	It is unclear as to what order types will be tested. A-Y issues, tabled for further discussion
148a	75	VI. 1.4. Test Scope	Ameritech	Remove INP. Interim Number Portability is not an Ameritech offering	Change accepted and document updated (6/3)
149	76	VI. 1.4. Test Scope	KPMG	Third paragraph, "The order types identified above will be ordered using the available and applicable Ameritech service delivery methods. The following service delivery methods will be tested:"	It is unclear as to what service delivery methods will be tested. A-Y issues, tabled for further discussion
149a	76	VI. 1.4. Test Scope	Ameritech	Change LCSC to LSC (Local Service Center)	Change accepted and document updated (6/3)
149b	76	VI. 1.4. Test Scope	MWCOM	The GUI will be tested from multiple terminals at the same time. What existing Ameritech GUI will be tested? Assumption is that the GUI interface availability (needed by the CLECs) will be determine within the collaborative process. Reference to LENS are place holders for the AIT GUI.	(6/3)
150	77	VI.1.4 Test Scope	MWCOM	Eighth paragraph before POP Process table, amend paragraph as follows: The test will be conducted using the most Add-current release of the Ameritech business rules at	A-Y issues, tabled for further discussion

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				<p>the time of the test. Ameritech must be able to handle pre-ordering and ordering via industry standard protocols (LSOG 4 as of today and whatever else replaces LSOG 4 during the testing process) at commercial volumes. If Ameritech can not do this, then the test should be suspended until such time as Ameritech asserts that it has made corrections so as to comply with this requirement. If it is then shown that Ameritech still does not comply with this requirement, then testing should again be suspended until Ameritech demonstrates that appropriate additional corrections have been made. Any Ameritech updates to these rules and Systems released during the test period will be incorporated into the remaining orders, which may cause delays. In addition, any interface business rules and format changes necessitated during the course of the test to conduct the test scenarios stated in Appendix A, and which may lead to a Change Control initiative, will be included in the test transaction formats.</p>	
151	77	VI.1.4. Test Scope	AT&T	<p>Removed the sentence, "Ameritech's scheduled release of OSS'99...CLEC community." (This is 3 paragraphs up from Table VI-1)</p>	Comment accepted
152	77	VI. 1.4. Test Scope	KPMG	<p>Deleted paragraph eight second sentence, "Ameritech's scheduled release of OSS '99, planned for December 1999, incorporates functionality from LSOG2, LSOG3, and LSOG4 reflecting the priority items requested by the CLEC community."</p>	This section applies directly to the Florida test.
153	77	VI. 1.4. Test Scope	KPMG	<p>Deleted paragraph 9 part of first sentence, "including the LEO volume set,"</p>	This section applies directly to the Florida test.
154	77	VI. 1.4. Test Scope	KPMG	<p>Paragraph ten, "The following chart (applicable to TVV1, TVV2, TVV3, and TVV4) contains the processes and sub-processes that will be used in evaluating Ameritech's pre-ordering, ordering, and</p>	It is unclear as to what processes and sub-processes will be used to evaluate Ameritech's pre-order, ordering , and provisioning functionality and

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				provisioning functionality and performance:" Also see Table VI-1 POP Processes	performance. A-Y issues, tabled for further discussion
154a	77	VI. 1.4. Test Scope	Ameritech	Remove reference to CRIS, it is not an Ameritech system. Change to Customer Information Systems.	Change accepted and document updated (6/3)
154b	8	VI. 1.4. Test Scope	Ameritech	Add "qualitative" to Clarity and accuracy of error messages test.	Change accepted and document updated (6/3)
155	79	VI. 1.6.1. Inputs	KPMG	Deleted part of number 4 "LEO guides"	This section applies directly to the Florida test.
155a	78, 88	VI.1.1 and 2.1	KPMG	Refined language to indicate the MPSC will finalize what interfaces and volumes will be tested.	Change accepted and document updated (6/3)
156	81	VI. 2.1 Description	MWCOM	First paragraph, last sentence amended as follows: "There will be three parts to the test: 1) A "normal volume" test using anticipated transaction volumes for the 18 months after the expected ending date of testing. If the testing is taking longer than expected, then this expected ending date is automatically extended. 2) A "peak" test using volumes at 150% (1.5 times) of the normal volume test. and 3) A "stress" test using volumes at 250% (2.5 times) of the normal volume test. The "normal volume" and "peak" tests will be conducted in Ameritech's production environment."	Issues pertaining to volume test, tabled for further discussion
157	81	VI. 2.1 Description	MWCOM	Last paragraph , last sentence amended as follows: "There will be one 4-hour, "stress" test during normal business working hours."	Comment noted, KPMG to amend language in consideration of comment
157 (a)	81	VI. 2.1 Description	AT&T	In the sentence beginning "There will be three parts to the test..." add the following language in bold print "a normal test using anticipated transaction volumes for available services and products for the time frame mutually agreed to by the Collaborative, "	KPMG Consulting amended language taking into account suggested comments

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				<p>Add the following language to the last sentence of the first paragraph “For the purposes of this section, available services and products are those Ameritech offerings the Collaborative mutually agrees should be subject to the OSS third party test. These offerings include currently available Ameritech products and services and known future offerings. Additionally, the Collaborative will establish mutually agreed definitions of what constitutes “normal volume” for the purposes of the OSS third party test.</p> <p>Add the following language to the second paragraph “The orders submitted in the Volume Performance Test will be submitted into the service order processor, but then would be cancelled before provisioning begins.” The test will include a mix of stand-alone and integrated pre-ordering and ordering transactions.”</p> <p>Edit language pertaining to stress test.</p>	
158	81	VI. 2.1. Description	KPMG	<p>The Volume Performance Test will identify the capacity and potential choke points, at projected future transaction volumes, of the Ameritech GUI, manual, and machine-machine interfaces and Ameritech systems and processes for responding to pre-ordering queries and for initial processing of orders. There will be three parts to the test: 1) a “normal volume” test using anticipated transaction volumes for the July 2001 time frame, 2) a “peak” test using volumes at 150% (1.5 times) of the normal volume test, and 3) a “stress” test using volumes at 250% (2.5 times) of the normal volume test. The “normal volume” and “peak” tests will be conducted in Ameritech’s production environment.</p>	<p>It is unclear what date will be used to base volume projections and it is unclear what percentage levels will be used to calculate the number of volume transactions.</p> <p>Issues pertaining to volume test, tabled for further discussion</p>
158a	81	VI. 2.1. Description	Ameritech	<p>Add clarity that all volume performance tests should be unannounced to both Ameritech and</p>	<p>Change accepted and document updated to include, “The exact timeframe for the</p>

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				CLECs	volume test will remain unannounced to both Ameritech and the CLECs.” (6/3)
159	82	VI. 2.6.1. Inputs	KPMG	Deleted part of number 4 "LEO guides"	This section applies directly to the Florida test.
160	84	VI. 3.1. Description	KPMG	Deleted first paragraph part of first sentence, "SOCS" reference	This section applies directly to the Florida test.
160a	84	VI. 3.1. Description	MWCOM	The order transactions will be monitored to verify that they do not “fall out” for manual handling in the Ameritech work center. The orders should be monitored to verify that they produce the appropriate FOC and CN within the correct interval.	(6/3)
160b	90	VI.5.4.Test Scope	Ameritech	Remove TAFI reference from Test Scope matrix Not an Ameritech system.	Change accepted and document updated to replace TAFI with “M&R system” (6/3)
161	92 - 95	VI. 6.0. Test TVV6	KPMG	Deleted entire test.	This section applies directly to the Florida test.
161a	92	VI.6.1 Description	Ameritech	Need Clarification. It is unclear as to what are the overall test cases and what is the duration of the tests.	(6/3)
161b	101	VI.6.3 Entrance Criteria	KPMG	Second Entrance Criteria: Removed reference to CSI and changed responsibility to Test Manager	Change accepted and document updated (6/3)
162	95	VI. 7.1. Description	KPMG	First paragraph sentences two - four, "This test will be conducted twice. The first execution will use transaction sets established to simulate projected July 2001 volumes for peak busy hour and peak busy day operations. The second execution will use a multiple of the volumes used in the first execution."	It is unclear as the number of times this test will be conducted and what date will be used to base volume projections. Issues pertaining to volume test, tabled for further discussion
163	97- 99	VI. 8.0. Test TVV8	KPMG	Deleted entire test.	This section applies directly to the Florida test.
163a	99, 100-101	VI.9.1 Description; 9.3 Entrance Criteria	Ameritech	Remove reference to CRIS, it is not an Ameritech system. Change to Customer Information Systems.	Change accepted and document updated (6/3)

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164	103	VI. 10.6. Test Approach	KPMG	The test calls will include a variety of call types with the exception of 911, and will be placed from a variety of locations, throughout the state of Michigan, encompassing all the available switch types and rate zones.	It is unclear what switch types will be included in the test. KPMG Consulting and MWCOM to propose language
165	104	VI 11.0 Test TVV11	KPMG	Charges will be examined for all the available service delivery methods and the corresponding billing systems they employ. Table VI-9 reflects a number of key billing characteristics that will be used in the design of test cases.	It is unclear what billing systems will be evaluated during the test. KPMG Consulting amended language taking into account suggested comments
166	107	VI. 11.1 Description	MWCOM	Table VI-10: Table needs to be updated for UNE-P and EELs and what will be required for these offerings.	A-Y issues, tabled for further discussion
167	109	Appendix A Test Scenarios	MWCOM	Make editions to chart. See end notes ⁴	A-Y issues, tabled for further discussion
168	109-113	Appendix A	KPMG	Test Scenarios	It is unclear what test scenarios will be used during the test. A-Y issues, tabled for further discussion
169	111	Appendix A	AT&T	Removed, "if available" from UNE-P products table)	A-Y issues, tabled for further discussion
169a	104-108	Appendix A	Ameritech	Remove Appendix A since it is from the Florida plan . Replace with the CLEC submitted scenarios after they are reviewed and agreed to at the Collaborative.	(6/3)
169b	105	Appendix A	MWCOM	UNE Combinations Involving Switch Ports (including <u>UNE Platform, if available</u>): This table should reflect at least a proposed date for UNEP availability and the testing criteria associated with the product. UNEP and DSL Line Sharing should be tested. If Ameritech is offering DSL Line Sharing then they should test.	(6/3)
169c	106	Appendix A	MWCOM	The proper time intervals should be added to the	(6/3)

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				Standalone Preorder Activity test. Reserve Telephone number interval will be important to CLEC ability to reserve then get the order down the pike to AIT. DDD reservation time interval should be tested to determine the length is adequate to allow order flow. WCOM needs these intervals extended.	
169d	107	Appendix A	MWCOM	Stand Alone Maintenance & Repair Additional Activity Line Items: Add MLT Testing should be a part of the testing. Establishing DSL service on an existing residential line should be tested.	(6/3)
170	114	Appendix B	KPMG	C. Data Development last paragraph, "The peak volumes are planned to be 150% of normal volumes. The stress volumes are planned to be 250% of normal volumes."	It is unclear what percentage levels will be used to calculate the number of volume transactions. KPMG Consulting amended language taking into account suggested comments
170a	109	Appendix B	Ameritech	Add reference to submission of test data to Ameritech. Suggested change: "...provide this data to the test Manager" and Ameritech "... for its analysis."	(6/3)
171	117	Appendix D	KPMG	Metrics - Quantitative	It is unclear what performance metrics and standards will be used in the test. Issues pertaining to performance measures/ PM Audits, tabled for further discussion
172	117	Appendix D Metrics – Quantitative First paragraph	MWCOM	First paragraph amended as follows: "The Performance Metrics and Standards to be used for this test will be determined in accordance with the MPSC orders and procedures developed in Case Nos. U-11830 and U-12320. When these Metrics and Standards have been determined, they will be listed in this Appendix."	Comment accepted
173	118-119	Appendix E	KPMG	Delete all reference documents	This section applies directly to the Florida

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					test.
174	118	Appendix E Reference documents	MWCOM	Table needs to be made Michigan specific	Comment accepted
175	120	Appendix F Glossary	MWCOM	Table needs to be made Michigan specific	Comment accepted
175a	115	Appendix F Glossary	Ameritech	Remove CRIS, INP, MCRIS they are not offered or relate to Ameritech systems. Verify that no references of these item exist in the document.	Change accepted and document updated to remove references (6/3)
176			AT&T	The Revised MTP provides insufficient detail concerning the testing that KMPG will manage: The Revised MTP refers to “evaluation checklists” in nearly all test descriptions that, ostensibly, will be used throughout the test. However, the Revised MTP does not provide such checklists, nor does it even provide a sample checklist. Without such information, the collaborative participants cannot conclude that the checklist(s) will be thorough and encompassing. In addition, the Revised MTP fails to provide a procedure for parties to evaluate checklists prior to the beginning of the test.	(6/3)
177			AT&T	The Revised MTP provides insufficient detail concerning the testing that KMPG will manage: The Revised MTP provides no information about the volumes of transactions that will be tested, presumably deferring this matter. However, the volumes for transaction testing and volume testing must be determined in advance if the collaborative participants are to evaluate whether the test scenarios are sufficiently sized to provide statistically valid conclusions.	(6/3)

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178			AT&T	<p>The Revised MTP provides insufficient detail concerning the testing that KMPG will manage:</p> <p>The Revised MTP indicates that a “test bed” will be built and is vital to the conduct of the test. KPMG provides a definition of the “test bed” in the glossary: “A set of fictitious customers that are designed to assist with testing. The test bed consists of working lines and provisioned products, although the owning customer is fictitious. The test bed is used to test all Ameritech system functions.” KPMG should provide some indication of the size of the test bed, the amounts of time it has allocated in its project plan to build the test bed with Ameritech, and the role and responsibility attached to managing the test bed.</p>	(6/3)
179			AT&T	<p>The Revised MTP provides insufficient detail concerning the testing that KMPG will manage:</p> <p>The Revised MTP confirms that KPMG will test Ameritech’s provisioning processes, but it does not provide any indication of the types of services and the volumes of those services.</p>	(6/3)
180			AT&T	<p>The Revised MTP provides insufficient detail concerning the testing that KMPG will manage:</p> <p>The Revised MTP proposes to review the functionality of the Ameritech wholesale and retail systems, but it provides no information about how it will determine what that functionality should encompass.</p>	(6/3)
181			AT&T	<p>Significant omissions in the Revised MTP:</p> <p>The Revised MTP fails to obligate KPMG to</p>	(6/3)

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				perform a test of the Ameritech documentation and specifications that CLECs use to build interfaces to Ameritech's OSS. This is a key test that should be added to the Revised MTP.	
182			AT&T	Significant omissions in the Revised MTP: The Revised MTP refers to a "Certified Software Interface" but fails to explain the term or present any information that places the term into any context within the test.	(6/3)
183			AT&T	Significant omissions in the Revised MTP: The Revised MTP fails to provide for testing to verify that Ameritech's pre-ordering and ordering interfaces can be integrated. This must be part of the test.	(6/3)
184			AT&T	Significant omissions in the Revised MTP: The Revised MTP fails to provide for testing by which KPMG would evaluate the compliance of Ameritech's OSS with industry standards, nor does it indicate which version of industry standards should be the basis for testing.	(6/3)
185			AT&T	Significant omissions in the Revised MTP: The Revised MTP fails to provide for connectivity testing that KPMG should perform in the course of testing each of the Ameritech electronic interfaces.	(6/3)
186			AT&T	Significant omissions in the Revised MTP: The Revised MTP fails to provide the audit standards that will be applied by KPMG in conducting the audit of the Ameritech performance measurements system.	(6/3)

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187			AT&T	<p>Significant omissions in the Revised MTP:</p> <p>The Revised MTP does not indicate the standards against which Ameritech's OSS and interfaces will be held for the volume performance tests. The capabilities of the systems to sustain performance at some level of proficiency while processing higher volumes of transactions should be described thoroughly in the Volume Test sections of the Draft MTP.</p>	(6/3)
188			AT&T	<p>Key issues that are not addressed in The Draft MTP:</p> <p>The Ameritech OSS were reviewed by the Michigan Public Service Commission ("Michigan PSC"), the United States Department of Justice ("U.S. DOJ") and the Federal Communications Commission ("FCC") in 1997 and were found to be inadequate. The key findings have been previously supplied and AT&T expects the MTP to specify the testing that KPMG would undertake in validating that Ameritech has remedied the failings in its systems and operations identified by the Michigan PSC, the U.S. DOJ and the FCC.</p>	(6/3)
189			AT&T	<p>KPMG's initial concerns have not been addressed:</p> <p>In fact, many of these same concerns were highlighted by KPMG when it first circulated the Florida/Michigan Baseline Master Test Plan. KPMG identified the following concerns:</p> <ul style="list-style-type: none"> • It is unclear as to what service delivery methods will be tested. 	(6/3)

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				<ul style="list-style-type: none"> • It is unclear what products and services will be included in the test. • It is unclear what interfaces will be included in the test. • It is unclear how many test cases will be included in the test. • It is unclear what date will be used to base volume projections. • It is unclear if a major software release will take place during the test period. • It is unclear if Ameritech has indicated that the provisioning systems for wholesale and retail are the same. • It is unclear what Network Surveillance Support Centers exist within Ameritech. • It is unclear as to what order types will be tested. • It is unclear as to what processes and sub-processes will be used to evaluate Ameritech's pre-order, ordering , and provisioning functionality and performance. • It is unclear what date will be used to base volume projections and it is unclear what percentage levels will be used to calculate the number of volume transactions. • It is unclear as to the number of times this test [VI. 7.1. Description End-to-End Trouble Report Processing] will be conducted and what date will be used to base volume projections. • It is unclear what switch types will be included 	
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				<p>in the test.</p> <ul style="list-style-type: none"> • It is unclear what billing systems will be evaluated during the test. • It is unclear what test scenarios will be used during the test. • It is unclear what percentage levels will be used to calculate the number of volume transactions. • It is unclear what performance metrics and standards will be used in the test. 	
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¹ **Performance Measures**

1. The MTP should note the use of the performance measures developed by the Michigan collaborative process, and should make clear that additional measures from other states as accepted and developed will be added when available prior to OSS testing.

Entrance and Exit Criteria

2. Entrance criteria need to be identified as those requirements that must be met before individual tests can commence. It is necessary that global entrance criteria must be satisfied prior to commencement of any testing, and apply to every individual test. Exit criteria need to be identified as those requirements that must be met before the test can be concluded. Global exit criteria should also apply to every individual test. Individual tests should each have individual entrance and exit criteria. Additionally, entrance and exit criteria must link the test plan with performance measures. Entrance criteria generally require that performance measures are completely defined, available and operational.

Test Scope and Principles

3. The MTP needs to make clear that the test is intended to evaluate whether Ameritech provides non discriminatory access to its OSS for associated resale, unbundled network elements (UNEs), and interconnection services, in order to demonstrate the operational readiness of these OSSs to support sustained commercial operation. As part of non-discriminatory access, the MTP must indicate that the test will evaluate whether Ameritech has deployed the necessary systems and personnel to provide sufficient access to each of the required OSS functions, including pre-order, order, provisioning, maintenance and repair, and billing. The test must include an evaluation of Ameritech's adherence to telecom industry guidelines for OSS interfaces. The test must also evaluate whether Ameritech is adequately assisting CLECs to understand how to implement and use all of the OSS functions available to them.
4. The MTP should provide that an independent test administrator (TA), an independent pseudo-CLEC (P-CLEC), and a performance measure auditor (PMA), each performing three separate independent and distinct roles, under the oversight of the MPSC, will conduct this test.

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5. The MTP should provide that the OSS access that Ameritech provides to itself and to CLECs will be evaluated using both qualitative and quantitative methods.
6. The MTP should require that all documentation and assistance made available to the P-CLEC by Ameritech for use in building and/or setting up the required OSS interfaces, should be made available to all participants so they may verify that the P-CLEC is not being given special treatment.
7. This test should include a thorough and well-documented independent assessment of data collection and calculation processes for performance measurement data - both qualitative verification and against business rules.
8. The MTP should provide that the test will include an independent review of the change management processes and procedures used by Ameritech to communicate with CLECs regarding OSS system performance and system updates. This review should include an evaluation of how CLEC suggestions and requests for system corrections, enhancements or new functionalities are handled. The test should evaluate at least one significant software release implementation. Any testing fixes applicable to production should be introduced into the Ameritech/CLEC Change Management process, unless otherwise determined by MPSC.
9. The MTP should indicate that the test will include normal, high and stress volume testing using a replicate mix of expected transactions that includes normal transactions, transactions with errors, changes and supplements. Scalability of manual processes and supporting hardware and software should be evaluated in lieu of volume testing for manual processes.
10. The MTP should state that the test can be conducted using transactions (e.g. pre-orders, orders and trouble reports) from a combination of existing CLECs and a P-CLEC. Similar test cases should be run by both the P-CLEC and a production CLEC that has completed interface verification with Ameritech in order to validate the process under the oversight of the Test Administrator.
11. The MTP must define the test scope to include functional testing of preordering, ordering, provisioning, maintenance and repair and billing. These functionalities must include a replicate mix of manual requests, electronic transactions, errors, changes, and supplements, in both flow-through and non-flow-through provisioning as appropriate, with CLECs consulted on the determination of the mix. Functional testing must be conducted on an end-to-end basis that results in orders actually being provisioned, as applicable, as determined by the MPSC.
12. The MTP needs to require that the 3rd party test will test significant volumes of transactions for xDSL-capable loops, and include a qualitative evaluation of preordering functions including loop qualification.
13. The MTP should also provide that, as testing progresses, the need to test or evaluate new products/services or delivery methods will be determined on an individual case basis as they are identified. Based on the associated facts, the new products/services or delivery methods should either be incorporated in the test or handled separately.
14. CLECs may serve as direct test participants and/or as members of the TAG. A test participant will have an active role in all phases of testing including planning, preparation, execution, and analysis.

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Test Administration

15. The appointment of a Performance Measures Auditor to audit the wholesale performance measures and retail parity standards should be required.
16. The MTP should provide that CLECs may serve as direct test participants, and make clear that CLECs, as test participants, shall have an active role in all phases of testing, including without limitation, planning, preparation, execution, and analysis.
17. The MTP should provide that the primary role of the P-CLEC is to emulate a newly established CLEC that will serve as an unbiased vehicle for testing Ameritech OSS, documentation and processes. P-CLEC primary responsibilities should include:
 - Establish the LCEC-ILEC business and technical assistance relationship with Ameritech.
 - Acquire appropriate documentation, attend training and build an application-to-application OSS interface. Establish any necessary interfaces required for a new CLEC to trade with Ameritech.
 - Develop a list of the documentation that was used to establish interfaces with Ameritech and post that list on the MPSC OSS web site.
 - Evaluate the adequacy of documentation and assistance provided by Ameritech to CLECs for the establishment, maintenance and use of all necessary interfaces.
 - Build the capabilities, install facilities and connectivity for all necessary interfaces to Ameritech as required to process the volume and mix of transactions for tests specified in the MTP and test specifications prepared by the Test Administrator.
 - Create and submit test transactions to Ameritech over the appropriate interfaces under the direction of the Test Administrator.
 - Collect, measure and document the results of all transactions.
 - Compile a daily event log that captures the details of its experiences in dealing with Ameritech
 - Prepare an interim report or provide input for an interim report to the Test Administrator as directed by the MPSC.
 - Prepare a final report or provide input for a final report to the Test Administration.

- ² A. New loop assignment process, including voice grade loops served through integrated digital loop carrier equipment as well as xDSL loop prequalification processes. No plans currently exist to provide these functionalities to CLECs who do not use an Electronic Data Interchange system (“EDI”); however, Ameritech should discuss and develop means to make these functionalities available to non-EDI CLECs, such as a GUI – and the GUI needs to be tested.
- B. A process to order unbundled network element platform (“UNE-P”) in commercial volumes for both business and residential customers. Ameritech should also develop means to make these functionalities available to via GUI. Also, Ameritech presently is not offering combinations such as UNE-P or Enhanced Extended Link (EELs). To the extent to which Ameritech subsequently files a combinations tariff with respect to UNE-P or EELs or any other combination, these combinations (along with applicable business rules, performance measurements, etc.) should be tested. As used throughout, the term “UNE-P” shall refer to any future tariff filing by Ameritech which addresses combinations.
- C. An ordering process for adding ADSL functionality to a voice local loop.
- D. A process to order sub-loop unbundling.
- E. A process to order dark fiber.
- F. A new firm order confirmation process – including a new order jeopardy notification process for both EDI and GUI.
- G. Fail safe Hot-Cut procedures with dial tone and ANI testing completed 48hrs. prior to cut.

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H. The Street Address Guide (“SAG”) and Customer Service Record (“CSR”) should be tested to show that they are synced up. (In other words, CSRs will be compared to the SAG, and errors in the CSRs will be corrected).

I. Parsed CSRs will be provided and the parsed CSRs will be tested. The Pre Order CSR retrieval function will provide, via current in effect industry standard EDI (such as LSOG 4) and CORBA industry standards, complete end-user customer, service, location, directory, and feature details. The parsed CSR response transaction will provide the user fielded service location, listed, and directory delivery address details as well as an itemized collection of customer services and features.

J. Ameritech must be able to handle pre-ordering and ordering via industry standard protocols (LSOG 4 as of today and whatever else replaces LSOG 4 during the testing process) at commercial volumes. If Ameritech can not do this, then the test should be suspended until such time as Ameritech asserts that it has made corrections so as to comply with this requirement. If it is then shown that Ameritech still does not comply with this requirement, then testing should again be suspended until Ameritech demonstrates that appropriate additional corrections have been made.

K. Testing will also include testing of industry standard versions of EDI (Version 10) and LSOG (Version 4) for ordering, including all associated functionalities (which is expected to be implemented by August, 2000).

L. Whatever systems for preordering, ordering, provisioning, maintenance, repair, and billing which Ameritech has in place during testing (and which Ameritech intends to have available to CLECs after obtaining 271 entry) must be tested.

Ensure that wholesale production volumes can be supported by the AIT OSS

Prove that CLECs can use AIT generally available documentation to create an integrated pre-order/order application, where CLECs can take information on the customer’s service, directory listing, and billing address and place that information directly into the LSR for EDI transmission to AIT.

Prove that CLECs, in the preorder process, can identify those customers with LEC Protection and PIC Protection, have the LEC/PIC Protection lifted or suspended with the customer on the line, proceed to immediately order local service via UNE-P and/or EELs, and have these orders provisioned by Ameritech. Similarly, if test the process whereby the CLEC can use a LOA to lift LEC protection whereby when the CLEC has a customer on the line, after performing a TPV it can immediately send the order to Ameritech and send the LOA form to the customer, wait for the customer to mail the LOA form back to the CLEC and have the CLEC (within 21 days submits of submitting the initial order) send the LOA to Ameritech and have Ameritech provision the original order.

3

System	Pre-Order			Order		
	GUI	Machine-Machine	Manual	GUI	Machine-Machine	Manual
GUI	X			X		

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EDI		x			X	
Manual			X			X

⁴ (including UNE Platform, when proposed tariff has been filed)

Activity	Res. POTS	Bus. POTS	Res. ISDN	Bus. ISDN	Res. xDSL Capable Loop	Bus. xDSL Capable Loop	Bus. DS1 Loop
Migration from Ameritech "as is"	X	X	X	X	X	X	X
Migrate from CLEC to CLEC	X	X			x	X	X
Feature changes to existing customer	X	X			X	X	X
Migration from Ameritech "as specified"	X	X	X	X	X	X	X
New customer	X	X	X	X	X	X	X
Telephone number change	X	X			X	X	X
Directory change	X	X			X	X	X
Add lines/trunks/ circuits	X	X	X	X	X	X	X
Suspend/restore service	X	X			X	X	X
Disconnect (full and partial)	X	X	X	X	X	X	X
Moves (inside and outside)	X	X			X	X	x

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Convert line to ISDN			X	X			
Migrate from CLEC to Ameritech	X	X			x	x	X
Convert from Resale to UNE-Combinations	X	X	X	X	x	x	x

Please note: The scenarios will include variations such as planned errors and supplements to cancel, change an order, or revise due dates (based on a 4 hour reservation interval).