

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion,)
To consider AMERITECH MICHIGAN's compliance) Case No. U-12320
with the competitive checklist in Section 271 of)
the federal Telecommunications Act of 1996.)
_____)

**INITIAL COMMENTS OF McLEODUSA
TO MASTER TEST PLAN RE OSS EVALUATION PROJECT**

McLeodUSA Telecommunications Services, Inc. (“McLeodUSA”), by its undersigned counsel, and pursuant to the directive of the facilitator, John Kern, hereby submits its initial comments to the Master Test Plan developed in conjunction with the Ameritech OSS Evaluation Project (the “Master Test Plan” or “MTP”). McLeodUSA generally agrees with and supports the Master Test Plan, but presents the following comments and suggestions:

I. GENERAL COMMENTS

1. The MTP must ensure in Sections II.A(Scope) and B(Objective) that the Operations Support Systems 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). In order to achieve the foregoing and to otherwise ensure the adequacy of the testing, it is necessary for CLECs to be directly involved with and allowed to participate in the testing. Thus,

language should be added to Section III.D in the portion entitled “CLEC Involvement in Transaction Testing” that clarifies and expands 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. Indeed section II.B of the MTP indicates that the test has been designed to “depict the real-world situations that CLECs currently face.” 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 in Docket No. 6720-TI-160 (Investigation Into the Operational Support Systems of Ameritech Wisconsin). McLeodUSA would be glad to volunteer as a representative CLEC to have its real-world experience in Michigan tested and evaluated. In order to further ensure that the real-world experience of CLECs is properly tested and considered, the results of the (soon to be distributed) CLEC survey in this docket should be tabulated and reviewed. This should be accomplished prior to finalization of the Master Test Plan and commencement of the testing.

2. The MTP must require in Section II.B(Scope) that all systems, processes, and product offerings that are necessary for CLECs to be competitive, including, but not limited to, products such as Centrex Mate, are properly tested and evaluated. Furthermore, all flow through service offerings, should be defined and tested as such.

3. The MTP should provide that an audit of agreed to, or required, performance measures be validated for accuracy and compared to CLEC data and performance evaluation where such exists.

4. Section II.E of the Master Test Plan states: “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 in the current draft of the MTP, as to 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).

II. SPECIFIC PROPOSED ADDITIONAL ITEMS

In addition to the foregoing general comments, McLeodUSA proposes that specific additional terms be added to Section II (Introduction) of the MTP. In particular, McLeodUSA believes that additional language clarifying the test principles and scope are essential to an accurate and meaningful test process.

Performance Measures

5. 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

6. 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

7. 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.

8. 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.
9. 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.
10. 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.
11. 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.

12. 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.

13. 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.

14. 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.

15. 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.

16. 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.

17. 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.

18. 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.

Test Administration

19. The appointment of a Performance Measures Auditor to audit the wholesale performance measures and retail parity standards should be required.

20. 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.

21. 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.

CONCLUSION

McLeodUSA agrees with and supports the Master Test Plan, but strongly believes that the MTP should be revised to provide more clarification and direction as set forth above. Being of the understanding that the facilitator has requested initial comments focused primarily, if not exclusively, on the items contained in Section II of the MTP, McLeodUSA has endeavored to comply with this directive and has limited its comments accordingly. McLeodUSA reserves its right to provide, and looks forward to providing, further and more detailed comments to the entire MTP.

Respectfully Submitted

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