

## AT&T Comments on the Disposition Report for Exception 74

### Summary of

**Recommendation:** **BearingPoint should not close Exception 74. Several issues surrounding the system and process problems that fail to issue line-loss notifiers have not been investigated and those that cause late line-loss notifiers have not been sufficiently explained. The SBC Ameritech line-loss provisioning processes (PPR) have not been tested to determine whether the defects are remedied.**

BearingPoint found the SBC Ameritech order processing systems were defective where the systems failed to issue line-loss notifiers for Michigan winback orders involving the Test CLEC. BearingPoint reported those failings in Exception 74. Each version of Exception 74 has exposed a different flaw in SBC Ameritech's processing systems. Through the three tests on this system function, as described in the Disposition Report, SBC Ameritech has managed to trim its failure rate to 4% (i.e., of the line loss notifiers that it fails to provide,) but as indicated below substantial questions remain unanswered concerning the underlying system failures that produce these results. BearingPoint also tested the timeliness of the provisioning of line-loss notifiers as it pursued resolution of the missing line-loss notifiers, but as pointed out below, the Disposition Report does not provide information that resolves the BearingPoint timeliness concerns..

### **Background**

Line-loss notifiers have been at the forefront of competition-affecting system failures in Michigan. The MPSC has received briefs, testimony, and status reports on the progress, or lack thereof, in solving the myriad problems in the SBC Ameritech system that prevents CLECs from receiving timely, accurate, and complete notices when end user lines are migrated from one CLEC to another or from a CLEC to SBC Ameritech, *i.e.*, a winback. Line-loss notifiers are critical to managing the customer's account and service. Absent the notifiers the CLEC will continue to maintain the end-user account, including billing the end user after service has

migrated to the other carrier. In a market with healthy local competition the notifiers play a critical role in the smooth transition of customers from carrier-to-carrier. Through its testing and retesting, BearingPoint has time and again found the SBC Ameritech systems fail to achieve appropriate levels of line-loss notifier effectiveness. Nevertheless, the problems identified have not been explained, which is an important reason to not close the Exception. These problems should be investigated further and explained, as this is the best way to ensure the process problems are sufficiently understood (by SBC Ameritech, BearingPoint and the Commission) to allow a Disposition Report.

### **Missing Line-Loss Notifiers**

Exception 74 versions 1, 2 and 3 taken together point out a deficiency in the SBC Ameritech system that has not been explained. The specific cause of the failures to provide line loss notifiers has not been found and the testing work by BearingPoint provides strong support for SBC Ameritech to continue to look for the root cause and appropriately address the defect(s).

- Version 1 noted all of the 14 winback orders placed involving the Test CLEC lines resulted in no line-loss notifiers.
- Version 2 reported that 57% of the required notifiers were not received.
- Version 3 originally reported a success rate of 92% of the notifiers received.

While this sequence of events shows progress, it does not explain the cause(s) for failures to provide line-loss notifiers. The Exception 74 documentation does not provide insight into the types of orders that do not result in line-loss notifiers, the types of services ordered that cause SBC Ameritech to not issue the notifiers, or the processing methods that have been demonstrated to be unreliable. Disclosure of these facts are important for the Commission and CLECs to better understand the experiences of BearingPoint as the Test CLEC. In discussions and

workshops with SBC Ameritech to have it address the systematic failures to provide line-loss notifiers, disclosure of meaningful facts has been a frustration. BearingPoint's insights will be helpful.

### **Test Bed Set-up Issue**

Subsequent correspondence regarding Version 3 provides the SBC Ameritech position that five of those orders were the result of "test bed set-up problems". See SBC Ameritech response to BearingPoint additional information October 7, 2002.

Items 1-1 through 1-6 represent line loss notifications that were not transmitted to the Billing Test CLEC due to test bed administration issues. In establishing the Billing Test CLEC, certain system setup procedures were intentionally bypassed due to the anticipated limited use of the Billing Test CLEC for transaction testing. When this setup was changed in March 2002, a system table that controls the transmission method for a subset of line loss notifications was not updated for the Billing Test CLEC. Items 1-1 through 1-6 were the first items encountered using the Billing Test CLEC in this particular manner associated with line loss notifications and therefore the first to require the use of this table information. Since the table had not been updated, the line loss notifications were not sent. The table entry for the Billing Test CLEC has been updated as of October 8. Due to these transaction errors being caused by test setup administration oversight, SBC Ameritech requests that they removed from the overall sample in this retest.

BearingPoint accepts, without additional explanation, that the test results should be modified because of this set-up problem. The SBC Ameritech explanation is one sided in that it identifies the reasons that the five notifiers were not sent but it does not identify whether other test lines were processed correctly where they involve the Billing Test CLEC. If other Billing Test CLEC lines were processed correctly, another cause for the missing 5 notifiers must be offered by SBC Ameritech and analyzed by BearingPoint. BearingPoint should provide additional information about the Test bed set-up issue.

### **Timeliness of Line-Loss Notifiers**

It is unclear from the Disposition Report for Exception 74 that line-loss notifiers are being timely provided by SBC Ameritech to the Test CLEC.

BearingPoint conducted the third retest from September 13 through October 14, 2002. BearingPoint reviewed 186 lines where the Test CLEC should have received Line Loss Notifications and found 7 lines with discrepancies; this constitutes a success rate of 96.2 percent. Based on this third retest, BearingPoint has determined that the issues identified in this Exception Report have been addressed.

The BearingPoint testing has examined whether SBC Ameritech actually provides the line-loss notifiers at all (the subject line of the Exception is “KPMG Consulting has observed instances where Ameritech has not provided Line Loss Notifications.” And has also addressed cases where the notifiers were not timely provided. When it receives the notifiers, BearingPoint has determined whether they are timely. See for example, Exception 74 Version 2 “Furthermore, out of 70 CLEC to CLEC Migrations, the Test CLEC did not receive Line Loss Notifications within an hour for 27 orders.” The Disposition Report is silent on the timeliness that BearingPoint has observes and whether there are continuing concerns about timeliness of the notifiers. The test participants should not be required to presume timeliness based on the absence of commentary since this Exception has dealt with timeliness through the second and third tests.

### **Line-Loss Notifier Process Testing**

The failure(s) in SBC Ameritech systems that cause line-loss notifiers to be omitted has been experienced in BearingPoint testing and it happens in the real world as well. SBC Ameritech’s record of timely and thoroughly notifying CLECs when it finds instances of failure to issue line-loss notifiers has not proven to be acceptable under any standard. BearingPoint’s evaluation stops short of determining that the causes have been found because its testing at the

transaction level does not examine the processes and procedures that are contained in the SBC Ameritech system – working, or occasionally working as they may be, that are to generate line-loss notifiers to CLECs under the appropriate circumstances. A process and procedure evaluation of line-loss notifier generation is not a scope change for the MTP. It is well within PPR-9 “Provisioning Process Evaluation” as described in the MTP.