

**SBC AMERITECH RESPONSE TO JULY 18, 2002 MPSC
QUESTIONS RELATING TO EXCEPTIONS 112 & 113**

A. Clarifying Questions Regarding the Scope of the Findings

1. *Ameritech, please specify the portion of pre-order inquiries submitted via each of the three available interfaces (EDI, GUI and CORBA).*

SBC Ameritech Response

Pre-order inquiry volumes for the months of September 2001 through June 2002 for the three available interfaces (EDI, CORBA and Verigate GUI), shown separately for LSOG4, LSOG5 and Issue 7 versions, are included in Attachment A.

As shown in Attachment A, there has been a clear trend in the use of the pre-order interfaces. During the month of January 2002, CLECs performed 92% of their pre-order transactions using the SBC Ameritech EDI interface, 7% using the Verigate GUI, and less than 1% using the CORBA interface. For the month of June 2002, the corresponding numbers are 43% EDI, 19% Verigate GUI and 37% CORBA. Looking solely at the two latest interface versions (LSOG 4 & 5), only 33% of the CLEC volumes utilize EDI, while 67% utilize the newer interface choices (Verigate and CORBA).

This decreasing use of the EDI interface for pre-order inquiries is expected to continue. The use of CORBA is anticipated to increase at SBC Ameritech as well as at other ILECs as additional CORBA interfaces come online and as CORBA transaction volumes grow. This additional use of CORBA is expected because CORBA as a technology is designed for real-time data access, and thus provides better performance as compared to EDI for the types of business-to-business transactions performed by CLECs using the pre-order interface.

2. *Ameritech, please specify the portion of total pre-order inquiries accounted for by each of the nine functions tested by KPMG in the subject volume tests (e.g., Service Appointment Scheduling Pre-order, Service Appointment Scheduling Pre-order, etc.).*

SBC Ameritech Response

The table below shows the portion of total pre-order transactions accounted for by transaction type. It is based on June 2002 data for all interface types (EDI, CORBA, and GUI) and versions (Issue 7, LSOG 4, and LSOG 5). Two of the pre-order functions, Customer Service Record Inquiry (with and without Directory Listings) and Address Validation, account for 58% and 19% of total monthly production pre-order transactions respectively. Loop Qualification transactions account for another 9%. All other transactions combined tally to the remaining 14%.

Transaction	Percent of Total
Address Verification	19.03%
Service Feature Availability	.36%
DSL Loop Qualification (Actual)	9.14%
Telephone Number Functions	3.80%
Service Appointment Scheduling	.95% (not including Issue 7 EDI)
Directory Listing Inquiry	.01%
Customer Service Inquiry (with and without Directory Listings)	57.89%
Other (includes CLLI)	8.82%

3. *KPMG, in several OSS Final Reports which KPMG has issued in other states, evaluation criteria for POP Volume tests include both functionality and timeliness criteria and are generally applied separately to each interface utilized in the test (in Michigan’s case this would include EDI, GUI and CORBA interfaces). Assuming that similar evaluation criteria will be utilized by KPMG in the Michigan volume test, please indicate whether the volume tests performed by KPMG for the Ameritech region would result in any unsatisfied determinations for the functionality criteria which KPMG will apply to these test. To the extent that unsatisfied evaluations will apply, please specify the affected interface and evaluation criteria.*

SBC Ameritech Response

KPMG Consulting to respond.

4. *Does KPMG concur with the test results presented by Ameritech in Table 1 of its response to Exception 112? In other words, is it correct to assume that, for example, KPMG performed tests on all nine pre-order inquiry types for the CORBA interface and that these tests were successful for eight of the nine interfaces?*

SBC Ameritech Response

KPMG Consulting to respond.

5. *KPMG indicates in version 2 of Exception 112 that, “Although results varied, the most consistent problems occurred in the area of EDI pre-order timeliness.” Is KPMG able to assess whether Ameritech would have passed the volume tests if it had successfully met the pre-order EDI timeliness benchmarks but all other test results remained unchanged?*

SBC Ameritech Comment

The data from the TVV1 and TVV2 testing (discussed further below) demonstrates that pre-order transaction timeliness for all interfaces (EDI, CORBA and GUI) is acceptable and not a volume-related issue. Further, if pre-order timeliness is assumed successful, but all other

volume test results are unchanged, the information contained in this document and in SBC Ameritech's Response dated June 3, 2002 provide KPMG with sufficient information to conclude that Exception 112 should be closed with a positive finding.

Other than pre-order timeliness, KPMG identified four limited issues that were either shown to be corrected in subsequent volume tests, or were explained in SBC Ameritech's response to Exception 112 version 1 and shown to be reasonable and immaterial. For example, Table 1 in SBC Ameritech's June 3 response to Exception 112 version 1 demonstrated that the majority of volume testing results were satisfactory, with only four areas of testing experiencing very limited issues:

- **EDI Order timeliness** – KPMG's concern was based on the performance of a single transaction type (mechanized rejects) during a single test, the Stress Day test. The criteria KPMG used was based on a benchmark that has since been revised from one hour to two hours during the PM six-month review collaborative. More importantly, the Stress Day test was not "pass or fail" based on PM benchmarks, but rather a report on system capacity performance, intended to identify "choke points," if any occurred, at the stress levels. KPMG did not identify any choke points and the system performed at stress levels. Therefore, based on the MTP criteria EDI Order timeliness results are satisfactory. See MTP TVV2, 2.1 "Description" and TVV2, Section 2.2, "Objective."
- **EDI Order functionality** – This issue was confined to the March 13, 2002 Normal Day test. The issue identified was due to test set-up and not system performance. This fact is demonstrated by KPMG's satisfactory testing on the April 11, 2002 Peak Day test, and the April 17, 2002 Stress Day test. Since the issue identified on March 13, 2002 did not reoccur in subsequent tests at even higher volumes, it is clear that the issue was not system or volume related. Therefore, EDI order functionality should be judge satisfactory for volume testing purposes.
- **GUI Order functionality** – Similar to EDI order functionality, KPMG identified only a single question regarding GUI order functionality during the March 13, 2002 Normal Day test. The issue involved eight of the 493 GUI test orders that were directed for manual handling. Seven of these eight were properly diverted due to a lack of available telephone numbers. Under these circumstances manual handling was the proper procedure and not a system or volume issue. This fact is demonstrated by KPMG's satisfactory testing on the April 11, 2002 Peak Day test, and the April 17, 2002 Stress Day test. Since this issue did not reoccur in subsequent tests at even higher volumes, it is clear that the issue was not system or volume related. The refore, GUI order functionality should be judged satisfactory for volume testing purposes.
- **GUI Pre-order functionality** – In response to early Normal Day and Peak Day testing, SBC Ameritech made a number of system modifications to eliminate a failure point and increase throughput in GUI pre-order. As a result, SBC Ameritech performed at 98.4%

on the April 11, 2002 Peak Day test and at 95.8% on the April 17, 2002 Stress Day test. These high levels of performance did not meet the KPMG established benchmark of 99% (there is no Commission-approved benchmark). SBC Ameritech's systems, however, successfully exceeded the benchmark of 95% used by KPMG in judging similar tests in the Qwest region. SBC Ameritech believes that the 95% benchmark is reasonable and should be used in this test as well. Therefore, GUI pre-order functionality should be judged satisfactory for volume testing purposes.

6. *KPMG has issued numerous exceptions and observations regarding failure of EDI pre-order timeliness measures in non-volume situations (e.g., Observations 285, 382, 543 for Michigan; Exception 123 and Observations 400, 404, 409, 417, 475, etc. for other states). To what extent if any do the timeliness issues in the volume situations differ from those experienced in the non-volume situations? Is there any information available to KPMG which would support a determination that volume was the cause of the timeliness failures cited in Exception 112?*

SBC Ameritech Response

The various pre-order timeliness issues identified by KPMG in Exception 112 are not volume related. As this question notes, a similar concern has been raised by KPMG in a number of non-volume situations.

Based on SBC Ameritech's analysis of the EDI pre-order timeliness data supplied by KPMG from both the TVV2 volume testing as well as the TVV1 POP transaction testing, it appears that that EDI pre-order transaction timings do not vary significantly based on volume. Rather, SBC Ameritech believes that the timeliness issue is caused by the difference in KPMG's time stamp methodology and KPMG's interpretation of the business rules for Performance Measurement 2.

The basis for this conclusion is detailed in SBC Ameritech's responses to Exceptions 112 and 113. This same issue has been addressed by SBC many times in the context of TVV 1 pre-order functionality testing, for example:

- Customer service records. SBC Ameritech's Response dated June 25, 2002 to Observations 283 (MI) (and other states: 400, 417 and 475); and SBC's Response to Observation 541(IL).
- Customer Service Inquiry & Listing. SBC Ameritech's Response dated July 18, 2002 to Observation 285(MI)
- Order Status-Provisioning Query. SBC Ameritech's Response dated May 17, 2002 to Observation 382(MI) and SBC's Response dated July 1, 2002 to Exception 130 (IN); and SBC Ameritech's Response dated July 18, 2002 to Exception 140 (WI).

- Dispatch required. SBC Ameritech’s Response dated July 1, 2002 to Observation 543 (MI) (and other states: 361,381, 408,445, and 5151 and SBC’s Response to Exception 50 (MI) dated June 28, 2002.
- Due Date. SBC Ameritech’s Response dated June 25, 2002 to Observation 404(MI).
- Telephone number request. SBC Ameritech’s Response dated July 3, 2002 to Exception 123(OH); and SBC’s Response to Exception 139(WI) dated July 23, 2002.

In each of these responses, SBC has demonstrated that if consideration is given for the difference timestamp methodology used by KPMG, and if PM2 is properly applied, then SBC Ameritech’s pre-order transactions are provided in a timeframe consistent with the Commission’s approved PM2 benchmarks. Therefore, in addition to Exceptions 112 and 113, each of the above referenced Observations and Exceptions related to the Michigan test should be closed with a positive finding.

B. Question related to Business Rule of Performance Measure 2

1. *The present business rule for PM 2 was approved by the Michigan Commission on July 17, 2000 in Case No. U-11830 as a result of a Joint Motion by Ameritech and CLECs. Is there information beyond that already included in Exceptions 112 and 113 and the responses thereto which you would like to present which supports either KPMG’s or Ameritech’s interpretation of this business rule.*

SBC Ameritech Response

SBC Ameritech’s responses dated June 3 and June 20, 2002 regarding the PM 2 business rule demonstrate that there are two basic differences between KPMG and SBC Ameritech regarding the interpretation of PM2.

The first difference involves transmission time to and from the test CLEC’s interface and SBC Ameritech. KPMG has frequently acknowledged that the first difference is not consistent with the business rules in PM 2. See, for example, Observation 543 where KPMG acknowledges that their time stamp approach is different from that included in PM2. KPMG states for pre-orders, their timestamp starts when Hewlett-Packard Consulting (“HPC”) sends the pre-order to SBC Ameritech and ends when HPC receives the pre-order from SBC Ameritech. As KPMG correctly notes: “These timestamps are not the same as those captured by SBC Ameritech for reporting of Performance Measure 2.” Rather, SBC Ameritech starts and ends the timestamp within its systems, not outside its systems. SBC Ameritech understands the reason KPMG has taken this approach for its testing purpose and recommends that an additional 1 to 2 seconds be added to KPMG’s test evaluation benchmark. This would be consistent with the disposition of Exception 51 dated April 23,

2002, where SBC Ameritech suggested that it was reasonable to include an additional 1 to 2 seconds to reflect network activities outside of SBC Ameritech premises and control.

The second difference is related to the protocol translation that takes place once SBC Ameritech receives an EDI or CORBA pre-order. This protocol translation is performed when a transaction is received from the CLEC and again when returned to the CLEC. SBC Ameritech has shown that the existing business rules and performance disaggregations for PM2 do not include or account for any protocol translation time. SBC Ameritech has proposed modifications in the current six month PM review that would address protocol translation in an identical manner to how it is addressed in the SWBT region. Because the current business rules do not contain a benchmark for the protocol translation function, and because KPMG's methodology includes this function within their timestamp, SBC Ameritech has recommended that the same protocol benchmarks that have been approved for the SWBT region be used by KPMG as part of its evaluation. Because this is an issue that may not be obvious from a plain reading of the business rule, SBC Ameritech provided a detailed history and status of PM 2 in its responses to Exception 113, which included:

- The history of the implementation of the SWBT and SBC Ameritech PMs from merger close to the implementation of LSOG 4 and the recent 6-month review proposal. This chronology addresses the origin of the performance measure business rules and the intent of those business rules. It is to be used with the business rule examples and the SWBT transcript in order to establish the intent and origin of the business rules used in SBC Ameritech.
- Business rule examples from both SWBT and SBC Ameritech that provide support to the chronology and the relationship from the SWBT rules to the SBC Ameritech rules.
- A transcript of proceedings from SWBT where SWBT explained the separate interface translation time identifying how and when the CLECs were informed and aware that the business rules adopted by SBC Ameritech did not include the protocol translation time. CLECs were made aware that the business rule as written did not apply to the protocol translation time nearly one year prior to the implementation of LSOG 4 in SBC Ameritech as a part of the commitment to the FCC to implement common systems.
- A description of the protocol translation time and a description of SBC Ameritech's processing steps. This provides a technical description of what is at issue in these Exceptions and relates that back to the discussions between SBC Ameritech/SWBT, state commissions, and CLECs.
- A description of the process that occurred at the SBC Ameritech six-month review sessions, where SBC Ameritech proposed the addition of new disaggregations for PM 2 that would measure the protocol translation time for each interface type. The specific benchmarks for the PM 2 disaggregations were under discussion with the CLECs and

commission staffs prior to the publishing of Exceptions 112 and 113 by KPMG. CLECs initially did not oppose SBC Ameritech's proposal to add a separate disaggregation to address this function and the only open issue was reaching agreement on what the appropriate benchmark interval should be for the protocol translation. This was consistent with the position many of the same CLECs took in prior SWBT six month PM reviews, where they agreed to a proposal identical to that made by SBC Ameritech. However, once Exceptions 112 and 113 were issued in May, CLECs withdrew support for the SBC Ameritech proposal for adding new disaggregations to measure the protocol translation time. As shown in the Final Issue Matrix for the current six-month review distributed by Facilitator John Kern on July 29, 2002, no agreement was reached on SBC Ameritech's protocol translation proposal, and this issue for the proposed revisions to PM2 will be resolved as part of the dispute resolution process in the current six-month review.

C. Options for Improvement of EDI Timeliness

1. In Ameritech's opinion, what alternatives exist to improve EDI timeliness? Please include estimates of cost and time to implement each alternative discussed. Which alternatives if any will Ameritech pursue to reduce the time related to pre-order EDI inquiries?

SBC Ameritech Response

SBC Ameritech does not believe there is significant need for improvement of EDI pre-order timeliness. This assessment is based on current performance results, and takes into consideration the significant shift and trend by CLECs to use the CORBA and Verigate interfaces, rather than the EDI interface for pre-order inquiries. Of course, SBC Ameritech will continue to manage EDI pre-order timeliness through monitoring of its production environment, communication with CLEC users, and regular review of its performance results against the approved PM benchmarks in both SBC Ameritech and SWBT regions. As individual issues arise they are and will continue to be addressed. None of the issues identified to date, however, have indicated a need to create extensive or detailed plans to significantly alter the EDI architecture to improve EDI pre-order timeliness. However, in response to these questions from the Michigan Commission Staff, SBC Ameritech has performed a preliminary, high-level time and cost estimate for an alternative to improve EDI pre-order timeliness.

This alternative would be to upgrade the existing SBC Ameritech commercial EDI translator to the most recent version of software, and to add a new "software workbench" to facilitate additional performance tuning. The software vendor, Sterling Commerce, believes this upgrade, coupled with appropriate application tuning, should produce a reduction in EDI translator processing time. A copy of this software is presently being tested by SBC EDI personnel and, if shown to deliver the promised processor time reductions, will be implemented in the fourth quarter of this year. This option will cost SBC Ameritech \$200K to \$300K.

In addition, Sterling Commerce will be bringing out a new version of their EDI translator software in late 3Q02 or early 4Q02 which is expected to provide further performance improvement. SBC Ameritech is committed to working with the vendor to evaluate this new translator software once it is available, and to implementing the software dependent on the results of that evaluation.

D. Pre-Order Inquiry Benchmarks

In soliciting input in regard to pre-ordering performance measurements, the FCC in its 1998 NPRM (FCC 98-72) and more recently in its 2001 NPRM (FCC 01-331) stated the importance of timely access to pre-ordering information. “Because many competing carriers retrieve pre-ordering information from the incumbent LEC’s databases while a customer is on the line (as an incumbent LEC does), timely access to pre-ordering information is critical to a competing carrier’s ability to interact with its customers.” The goal of pre-ordering metrics according to the FCC will “permit us to determine whether an incumbent LEC provides requesting carriers with nondiscriminatory access to pre-ordering functionality.” The following questions are meant to elicit information regarding these determinations of nondiscrimination.

- 1. In its response to Exception 113, Ameritech refers to the “separate EDI translation functionality that was implemented with LSOG4.” Please distinguish the translation functionality existing under LSOG1 from that implemented under LSOG4. To the extent that the translation function changed, is there any support for a belief that the time related to this translation function differed as well?*

SBC Ameritech Response

At the time of the SBC Ameritech merger closing in October of 1999, SBC Ameritech had in place a version of OSS known as LSOG 1. The major difference between SBC Ameritech’s LSOG 1 and LSOG 4 is how/where the translation is done and the implementation of the industry standard connection process. Prior to the implementation of LSOG 4, SBC Ameritech’s pre-order system had an integrated, hard-coded protocol translation that was included in its internally developed pre-order front-end application, and an Ameritech-proprietary connectivity process. SWBT had implemented a separate, stand-alone, commercial EDI translator in front of its pre-order processing routines. With the commitment to the FCC and CLECs to implement uniform and enhanced interfaces, SBC Ameritech implemented LSOG 4 and moved to the uniform SBC EDI architecture.

LSOG 4 implemented SBC’s Electronic Data Interchange (EDI) architecture, which included the need for an EDI translation or protocol conversion as part of the OSS pre-order transaction. Therefore, after the March 2001 implementation of LSOG 4, the EDI interface and processing, including protocol translations, are done in a similar manner and time in both the SWBT and SBC Ameritech regions, using similar interfaces and technology, and on the same servers. The use of this separate standalone protocol converter adds a small amount of additional time to transaction processing. The protocol translation benchmarks in use in

SWBT and proposed by SBC Ameritech reflect this additional time. However, by utilizing a uniform, commercially available translator, SBC Ameritech handles transactions in a manner that is standard across the SBC territories and is better equipped to deal with industry change.

- In response to Exception 112 Ameritech estimates that it takes a CLEC approximately two seconds to send or receive a pre-order query for EDI and CORBA interfaces and a longer interval for GUI transactions. Similarly, Ameritech estimates that protocol translation for each query and response is approximately eight seconds for EDI transactions and two seconds or less for CORBA. No protocol translation is required for GUI transactions. On what does Ameritech base these estimates? If others have information regarding timeframes for these functions, please address this issue.*

SBC Ameritech Response

Below are SBC Ameritech's views of the appropriate time elements involved and the underlying basis for each:

Network Transmission Time

EDI and CORBA—SBC Ameritech proposes 1 to 2 seconds. This is the same amount of time that SBC Ameritech recommended as a reasonable estimate to reflect network activities outside of SBC Ameritech's systems. See KPMG Disposition of Exception 51 dated April 23, 2002.

GUI transactions— Due to the nature of the Internet, which is used to convey GUI pre-order transactions between SBC Ameritech and the test CLEC, an undetermined but significant portion of the time measured by KPMG, estimated by SBC Ameritech at ten seconds, must be considered beyond SBC Ameritech's control.

Protocol Translation Time

For EDI and CORBA, SBC Ameritech has proposed the same diagnostic "benchmarks" that are in use in the SWBT region for the same functions using the same technology, which are also the same benchmarks SBC Ameritech proposed in the current six month review for this function¹. The diagnostic "benchmark" for protocol translation for EDI is 95% within 4 seconds for input and another 4 seconds for output. The diagnostic "benchmark" protocol translation for CORBA is 95% within 2 seconds for input and another 2 seconds for output.

For LSOG 4 GUI transactions, no protocol translation was required².

¹ Compare Supplemental Appendix 2, attached to June 20 Exception 113 Response with Appendix 5, attached to June 3 Exception 113 Response.

² With the implementation of the LSOG5 version of Verigate, protocol translations do exist for the GUI and a corresponding disaggregation and benchmark for PM2 has been proposed.

3. *To the extent that information is available to KPMG or others, please compare EDI LSOG 4 benchmarks in PM 2 for the Ameritech region to pre-order timeliness metrics in other regions. Identify the point at which timestamps are taken in each example.*

SBC Ameritech Response

SBC Ameritech does not have the information available to provide a response to this question.

SBC Ameritech requests that if KPMG or other party provides comparison data for other regions, it be precise as to the type of interface (EDI, CORBA, GUI, proprietary), the equivalence of the measured transactions, the method of transaction timestamping, and the measurement approach (e.g. % within period or average transaction time). Unless these attributes are known and the same, comparisons should not be made.

4. *To the extent KPMG is able to share information, please compare pre-order timeliness results from the Ameritech volume tests to results available for volume tests in other regions. To the extent that both average times for pre-order completion can be presented in addition to portion completed prior to a benchmark time, please delineate both (e.g., average 4.4 seconds and 90% # 10 seconds). Separate by type of inquiry, type of interface, and identification of where timestamps are applied.*

SBC Ameritech Response

SBC Ameritech requests that if KPMG provides comparison data for other regions, it be precise as to the type of interface (EDI, CORBA, GUI, proprietary), the equivalence of the measured transactions, the method of transaction timestamping, and the measurement approach (e.g. % within period or average transaction time). Unless these attributes are known and the same, comparisons should not be made.

5. *What information is available from any party regarding average timeframes to process retail pre-order inquiries? In 1999, prior to the SBC/Ameritech Merger agreement and prior to the implementation of any of the metrics discussed by Ameritech in its responses to Exceptions 112 and 113, the Michigan Public Service Commission adopted a parity performance metric for pre-order timeliness (May 27, 1999 Order in Case No. U-11830; Pre-order Average Response Times). Ameritech's request for reconsideration of this decision or delays in the implementation of this measure were rejected by the Commission (September 3, 1999 Order in Case No. U-11830). This measure was changed in the Commission's July 17, 2000 Order by granting the Joint Petition of Ameritech and CLECs to do so. What results for specific pre-order inquiries are available from this original metric or from other sources which might shed some light on retail pre-order timeframes?*

SBC Ameritech Response

SBC Ameritech's performance metrics team does not have measurement data for retail pre-order inquiries available. During the time frame referenced, SBC Ameritech was in the process of working towards compliance with the MPSC Order, but had not completed its work. Prior to completing this work, the collaborative sessions were convened in March 2000, which resulted in the July Order and the subsequent implementation of the SBC merger measures.

In the normal course of business, SBC Ameritech does not measure any separately identifiable and comparable retail pre-order transactions and therefore does not have data to offer in response to this question.

6. *What is the average number of pre-order inquiries made by a CLEC per new customer call? Are pre-order inquiries made simultaneously or consecutively? What is the effect of extending pre-order inquiry activity by 60-90 seconds? What activity is occurring between a CLEC and its customer during pre-order inquiry processing?*

SBC Ameritech Response

This question is primarily directed to CLECs.

SBC Ameritech provides the following information available to it, based on recent monthly volume data. On a regional basis, SBC Ameritech receives approximately 640,000 orders from CLECs and approximately 1.7M pre-order transactions. Accordingly, it seems fair to assume that the maximum number of pre-order transactions performed per average order would be no greater than 2.65. The data available to SBC Ameritech does not allow it to determine how many of these pre-order transactions are performed by the CLEC either 'on-line' or 'off-line' with the end customer. Depending on how the CLEC chooses to structure its negotiation and ordering process, some pre-order transactions are likely to be performed outside the actual customer negotiation session.

For example, the data provided in response to Question A.2 shows that almost 60% of pre-order transactions performed by CLECs are CSI requests which is more than one CSI request per order received by SBC Ameritech. This suggests that some CSI inquiries do not result in an order to SBC Ameritech, reducing the average number of pre-order transactions per order.

E. Retest Requirements

1. *In items #2 and 3 of Version 2 of Exception 112, KPMG discusses volume retest requirements. Please specify the minimum timeframes which would be required for the proposed retest activity including specific estimates for each component of the test discussed (e.g., updated forecasting, test preparation including LSOG 5 GUI preparation, pretests,*

actual testing, etc.). If only the EDI pre-order interface were modified, would the proposed retest activities be altered?

SBC Ameritech Response

It is SBC Ameritech's position that the volume test uncovered no outstanding issues related to processing large volumes of transactions. As discussed above, the only timeliness issues remaining are not volume-related. As pointed out in Question A.6, KPMG has performed testing of pre-order transaction timeliness as part of its functional testing, and is able to form conclusions regarding timeliness from that testing. Consequently, given the nature of any likely EDI pre-order interface modification directed at timeliness, SBC Ameritech anticipates that associated KPMG retesting, if required, would parallel the transaction timeliness testing performed as part of TVV1 POP functional testing, which typically has required a five-day KPMG retest interval. SBC Ameritech also suggests that pre-order timeliness is better evaluated through the ongoing monitoring of PM 2 results, particularly with the addition of the pending additional protocol conversion disaggregations.

F. Other Information

- 1. Is there other information on this issue which any party would like the Commission to consider in its deliberations?*

SBC Ameritech Response

In reviewing these very comprehensive and complex issues, SBC Ameritech requests that the Commission put KPMG's evaluation in context considering the test purposes, the apparent ambiguity in the proper interpretation of PM2, the immaterial nature of the few concerns raised not related to PM2, and the numerous pre-order options available to Michigan CLECs today.

First, KPMG's volume testing clearly satisfied the "test until you pass" approach. SBC Ameritech acknowledges that consistent with the military style testing used by KPMG, early iterations of the volume testing prompted it to make system modifications, as well as fine-tuning of the testing set-up. As described above, and in SBC's June 3, 2002 Response, including Attachment A, a number of system corrections were made as a result of volume testing to eliminate a failure point and to improve EDI and GUI throughput. The results of the succeeding volume test iterations prove that these modifications were effective. As a result, no further modification of SBC Ameritech's systems is required to insure the capacity for projected future volumes and, therefore, no further volume re-testing is needed.

Second, KPMG's testing satisfied the specific purpose and objective of the volume test. The purpose of the volume testing was to "identify the capacity and potential choke points, at projected future transaction volumes..." (See TVV2, 2.1 "Description.") Likewise, the

objective of the volume testing is “to measure Ameritech’s capability and identify potential choke points of the manual, GUI, and machine-machine interfaces and systems . . . at projected future volumes.” (See TVV2, Section 2.2 “Objective.”) Following system modifications by SBC Ameritech, KPMG’s comprehensive volume testing did not identify any material capacity issues or any potential choke points that could adversely affect a CLEC’s ability to perform and compete at anticipated future volumes.

Third, the results of KPMG’s volume testing make clear that subjecting SBC Ameritech’s systems and interfaces to projected future volumes exposes no such potential choke points or capacity concerns. Even at stress levels, SBC Ameritech’s systems continued to process transactions; there were no overall system breakdowns nor any inability to process the volumes sent. The few variances that were not related to pre-order timeliness, or the proper interpretation of PM2, were immaterial in nature as shown above. Clearly, it is not reasonable to conclude that the slight differences identified in the four limited areas discussed above demonstrate that SBC Ameritech’s systems failed to provide capacity under stress, or experienced choke points; they did not.

Fourth, KPMG’s main concern regarding SBC Ameritech’s performance during volume testing was with pre-order transaction timing. However, once the transaction timing results are examined carefully, it is clear that with allowance for the necessary protocol translation and the latency in the network outside of SBC Ameritech’s control, SBC Ameritech’s systems performed at a satisfactory level. Therefore, the concern raised by KPMG is not system related, but is caused by KPMG’s interpretation of the business rules for PM2. SBC Ameritech has demonstrated above, and in its Responses to Exception 113, dated June 3 and June 20, 2002, that the existing business rules for PM2 do not include network activities outside its systems and do not include protocol translation time. The Commission should accordingly resolve this apparent ambiguity regarding the existing business rule for PM2. SBC Ameritech recognizes that the Commission will need to address the appropriate manner to measure protocol translation, and a benchmark interval for protocol translation, in resolving the on-going six-month PM review. However, it is not necessary to resolve that issue here because KPMG’s interpretation in Exception 113 is of the existing business rule for PM2, not the proposed changes made in the current six-month review.

Finally, a reasonable evaluation of KPMG’s results should take into consideration the pre-order options available to Michigan CLECs. Prior to March 2001, SBC Ameritech offered CLECs a single pre-order interface type – EDI. Following the SBC Ameritech merger, two additional pre-order interfaces were made available to CLECs – CORBA and the Verigate GUI. While each interface provides the same functionality, they differ in how the user interacts with the interface and in performance characteristics. These choices provide each CLEC the opportunity to select the most appropriate interface type according to its specific business needs. The EDI pre-order interface operates in a timely manner. When maximum timeliness is desired, though, the CORBA interface is available and should be selected by the CLEC.

Therefore, based on the criteria in the MTP, SBC Ameritech has satisfactorily completed volume testing, and Exception 112 should be closed with a positive finding.

In addition, the Commission should remove the apparent ambiguity regarding the proper interpretation of the existing version of PM2. The Commission should clarify the proper interpretation of the existing PM2 does not include time outside of SBC Ameritech systems, nor does it currently include protocol conversion time. Accordingly, Exception 113 should be closed in a manner consistent with such Commission clarification. The proper time interval and approach for protocol conversion on an on-going basis should be determined by the Commission as part of the six-month review process, where this precise issue will be presented for the Commission's resolution.

Environment	Pre-Order	Sep-01	Oct-01	Nov-01	Dec-01	Jan-02	Feb-02	Mar-02	Apr-02	May-02	Jun-02
LSOG 4	CORBA Totals	-	-	-	797	11,952	24,563	154,313	390,484	587,822	713,524
	EDI Totals	-	-	-	7,868	86,493	241,168	412,516	287,281	403,088	535,388
	Verigate Totals	125,571	184,993	232,793	259,409	96,176	329,435	393,970	312,879	-	-
	LSOG 4 Totals	125,571	184,993	232,793	268,074	194,621	595,166	960,799	990,644	990,910	1,248,912
LSOG 5	CORBA Totals	-	-	-	-	-	-	-	-	-	329
	EDI Totals	-	-	-	-	-	-	-	-	-	3
	Verigate Totals	-	-	-	-	-	-	-	87,990	333,733	370,741
	LSOG 5 Totals	-	-	-	-	-	-	-	87,990	333,733	371,073
Issue 7	Issue 7 (EDI)	1,207,528	1,425,236	1,389,928	1,143,967	1,133,062	721,835	643,971	533,347	425,402	288,929
Total Volume		1,333,099	1,610,229	1,622,721	1,412,041	1,327,683	1,317,001	1,604,770	1,611,981	1,750,045	1,908,914

CORBA Total	-	-	-	797	11,952	24,563	154,313	390,484	587,822	713,853
EDI Total	1,207,528	1,425,236	1,389,928	1,151,835	1,219,555	963,003	1,056,487	820,628	828,490	824,320
Verigate Total	125,571	184,993	232,793	259,409	96,176	329,435	393,970	400,869	333,733	370,741

