

49-52

00-0592



David J. Chorzempa
Senior Attorney

Suite 1500
222 W. Adams St.
Chicago, IL 60606
312 230-3503
FAX 312 230-8210/8211

September 1, 2000

Ms. Donna M. Caton
Chief Clerk
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

CHIEF CLERK'S OFFICE
SEP 1 4 03 PM '00
ILLINOIS
COMMERCE COMMISSION

Dear Ms. Caton:

Attached please find initial comments on behalf of AT&T Communications of Illinois, Inc. related to the Joint Submission for Arbitration per the Amended Plan of Record for Operations Support Systems ("OSS").

AT&T notes that it has only provided comment on the items in the plan of record that SBC/Ameritech has released at this time. Although SBC/Ameritech agreed to revise attachments B and D to the original Plan of Record, at the time of this filing SBC/Ameritech has not provided those attachments to the parties. AT&T reserves its right to comment on, and provide language changes to, those attachments whenever they might be provided.

Very truly yours,

David J. Chorzempa
David J. Chorzempa

DJC/mp
Attachment

cc: Collaborative (via email)

AT&T
LAW Dept.
CHICAGO, IL
DATE REC'D

ILLINOIS
COMMERCE COMMISSION
SEP 1 4 03 PM '00
CLERK'S OFFICE

AT&T'S VERIFIED INITIAL COMMENTS TO OSS ARBITRATION ISSUES

AT&T Communications of Illinois, Inc. ("AT&T") submits the following comments to the Illinois Operational Support System ("OSS) Issues In Dispute, attached as Exhibit 2 to the Joint Petition for Arbitration submitted on this same day.

I. Introduction

The Commission's merger conditions require SBC/Ameritech to implement a "comprehensive plan" for improving the OSS systems and interfaces available to CLECs in Illinois. Paragraph 29 of the Merger Conditions provides that SBC/Ameritech is to "deploy. . .commercially ready, application-to-application interfaces, *as defined, adopted, and periodically updated by industry standard-setting bodies for OSS that support pre-ordering, ordering, provisioning, maintenance and repair, and billing for resold services, individual UNEs, and combinations of UNEs.*" In its merger approval order, the Commission set forth a three-phase expedited process for SBC/Ameritech to identify in a plan of record ("POR"), further develop through collaborative discussions with CLECs, and eventually implement needed enhancements to its "interfaces, businesses processes and rules, hardware capabilities, and security provisions."¹

When SBC/Ameritech first presented its POR to the Commission, numerous CLECs, including AT&T, objected to it as fundamentally lacking in the specificity needed for CLECs to evaluate SBC's plans. As AT&T stated:

[T]he POR identifies various changes to Ameritech's OSS for pre-ordering and ordering functions effective April 1, 2000, but in describing its "Future Method of Operation" it fails to provide the most important (and basic) information about the nature of those changes. In the absence of such information, however, CLECs are in no position to prepare for and

¹ Order, Case No. 98-0555 (September 23, 1999) ("Merger Approval Order"), pp. 253-255.

systems would follow the Versioning method and result in the availability of (a) the system that partially employs industry standard upgrades to LSOG 4, (b) the current release of LSOG Version 2, and (3) the most recent past release of LSOG 2. AT&T's proposed POR language is provided in its markup of the Versioning Section of the revised POR, attached as Exhibit 1.³⁷

Disputed Issue 62: Directory Listing Retrieval

- a) SBC Ameritech has committed to support the inquiry of directory listing orders over a single interface for all orders, except partial migrations, in September 2001. CLECs would like directory listing orders to be supported over a single interface prior to September 2001.**
- b) The functionality and or process by which SBC/Ameritech will provide CLECs with directory listing information published for UNE loop end users after those listings have been published is in dispute.**
- c) Ameritech has stated the yellow page headings will only be available via their affiliate, Ameritech Advertising, Inc. regardless of how the order is originally placed.**

AT&T Comments

When signing up a new local service customer, CLECs need to be able to provide their new customers directory listings. Presently, if a CLEC order involves resale service or UNE-P services, the CLEC integrates its directory listing order with the telephone service order and processes it through the SBC/Ameritech OSS interface. On the other hand, if a CLEC places a UNE loop order, it must place its directory listing order through a separate interface that connects to SBC/Ameritech's advertising affiliate Ameritech Advertising, Inc.. SBC/Ameritech has agreed to modify this procedure in September

³⁷ See Exhibit 1, FMO, Section A, Versioning.

2001. The modification will enable a CLEC to order listings for UNE loops on an integrated basis, through the SBC/Ameritech OSS interface.

After the order process is final, and the CLEC has retained a new customer with a listing, the CLEC still needs access to Ameritech's listing databases to assist customers with questions about the listings that were placed, to facilitate changes to those listings, and to update listing information. This listing information is retained in SBC/Ameritech's databases. Access to those databases is referred to as "directory listings inquiries." Presently, for UNE-loop serviced customers, CLECs access this information via a separate EDI interface with Ameritech Advertising, Inc.. All other listing information is retained in Ameritech's databases as part of the customer service record in addition to the Ameritech Advertising, Inc..

SBC/Ameritech intends to implement a process that will enable CLECs to acquire listing information via both the SBC/Ameritech application-to-application interface and the GUI in March 2001. Thus, CLECs could then obtain the directory listing information directly from SBC/Ameritech.

However, SBC/Ameritech's March, 2001 implementation is flawed and incomplete because SBC/Ameritech will not provide access to *all* CLEC listings in this fashion. SBC/Ameritech will only make available those listings that relate to resale and UNE-P customers by this separate inquiry. Other listings would be blocked from CLECs. CLECs that need access to these listings would be required to separately process their inquiries as they do now, through SBC/Ameritech's affiliate Ameritech Advertising, Inc..

The Commission should direct SBC/Ameritech to design its directory listing inquiry systems and ordering system to function over a SBC/Ameritech provided interface. In addition, the Commission should order SBC/Ameritech to move up the delivery date of the integration of loop and directory listing order by six months, to March 2001.³⁸

Ameritech has also designed the customer service record information that is provided to CLECs to exclude information about the sections of the yellow pages where business end user listings are located. These sections and headings are provided on CLEC orders to establish service and change listing information to instruct the directory publisher to place the listing according to the end user's desire for having the listing associated with businesses in similar pursuits. For example, a pizza restaurant could request placement in the Restaurants heading and in the Pizza and Italian sections. These are necessary order entries that the CLEC must present to Ameritech to fulfill the end user's requirements for advertising in the directory. The ad content is not placed on the order to Ameritech, just the listing "Joe's Pizza", the address, telephone number, and the section and heading instructions.

Ameritech's customer service record provided to CLECs does not contain the yellow page heading and section information. If an end user requests confirmation of the heading and section order entries once the order is completed by Ameritech, the CLEC must send a separate query to the Ameritech directory subsidiary to resolve the end user's questions or to add or change the sections and headings. This separate inquiry adds time and costs to CLEC operations and is unique to CLEC inquiry requirements. CLEC

³⁸ See Exhibit 1, FMO, Section B, Directory Listing Inquiry.

representatives have access to all directory listing information, incorporated within the Ameritech customer service record, and need not separately query the Ameritech advertising system to determine the section and heading entries.

Ameritech should modify its customer service record design so that CLECs and Ameritech have equivalent information about business end user listings. Ameritech's design for the separate directory listing query (due in March 2001) should also be modified to provide the same information on business end user listings. AT&T has proposed additions to the revised POR to effectuate these proposals.³⁹

Disputed Issue 74: Line Splitting

Line Splitting is the physical division/split of the high frequency portion of the loop (used for data services) from the low frequency portion of the loop (used for voice services). One provider supplies a customer data service while a separate provider, not Ameritech, offers the same customer their voice service.

CLECs have requested that SBC/Ameritech support ordering that will allow a CLEC to provide voice services over a loop and the same CLEC, or a different CLEC, to provide data services over the high frequency portion of the loop. Ameritech in this scenario would not provide either the voice or the data on the loop in question. Today, SBC/Ameritech cannot support this functionality being requested by the CLECs.

AT&T Comments

The term "Line-splitting" refers to the circumstance in which a customer's voice and data service are provided by competing carriers other than SBC/Ameritech over a single loop. As with "line sharing," the high frequency and low frequency portions of the loop are separated or split, the difference being that in the case of line sharing the incumbent LEC remains the provider of the voice service to the customer. It is the

³⁹ See Exhibit 1, FMO, Section B, Directory Listing Inquiry.