Attachment A

MPSC Case No. U-12320

Customer Service Inquiry Accuracy Plan

March 13, 2003

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1. Purpose

The purpose of this plan is to describe the actions Michigan Bell Telephone Company ("SBC") proposes to take to improve certain aspects of Customer Service Inquiry ("CSI") accuracy. SBC originally proposed a CSI plan on October 30, 2002 ("October 30 Filing"). Pursuant to the Michigan Public Service Commission's ("MPSC's") Order issued January 13, 2003 ("January 13 Order"), in Case No. U-12320 (SBC's §271 Checklist Compliance Docket), the plan was revised and filed on February 13, 2003 as a draft. The February 13 draft further addressed the operational concerns with CSI accuracy identified in BearingPoint's Report, and those discussed in the technical workshop and submitted in written comments. SBC further modified this plan based on input received during the collaborative session held at the MPSC Offices in Lansing, Michigan on March 4-5, 2003. Additionally, SBC reviewed the changes with the MPSC Staff and collaborative participants on a conference call held on March 12, 2003. SBC has retained BearingPoint to evaluate SBC's implementation of this plan.

2. Issue Definition

BearingPoint, Inc. (f/k/a KPMG Consulting) first raised this issue in Exception 33 as part of the Third Party Operations Support Systems ("OSS") testing on January 28, 2002 stating that they have observed instances where SBC has failed to accurately update the Customer Service Inquiry ("CSI") records. In this test, information contained within the Customer Service Record ("CSR") extract returned by a Customer Service Inquiry was evaluated for accuracy against field inputs from submitted Test CLEC orders, i.e., Local Service Requests ("LSRs"). In the course of evaluating this issue, BearingPoint retested CSI accuracy three times over a nine-month period. On October 24, 2002, SBC requested that no further retesting be performed, and a final disposition report was issued on November 14, 2002. BearingPoint's October 30, 2002 Michigan OSS Evaluation Project Report at p. 934 found that test criteria for TVV4-27 was "not satisfied."

In response to BearingPoint's evaluation, SBC implemented system modifications and process improvements that improved tested performance from 88% to 92%; the MPSC found the difference between 92% and the 95% benchmark selected by BearingPoint was not indicative of discriminatory behavior[1]. SBC believes that the remaining errors identified in the OSS test are either immaterial in terms of billing or provisioning, or are associated with product ordering scenarios not widely seen in the commercial environment.

[1] MPSC Report, January 13, 2003, pg. 67 – "[T]he Commission does not believe that the amount by which the benchmark has been missed is of a level of significance to indicate discriminatory behavior on the part of SBC and failure of an opportunity to provide CLECs a reasonable opportunity to compete."

3. Root Cause Analysis

The process for updating a customer service record begins when a CLEC submits a local service request through the EDI or GUI interfaces, or via fax, to migrate, install, convert, change or disconnect network elements or services. These LSRs are further processed by SBC's internal Local Service Center ("LSC") systems or service representatives, where service orders internal to SBC are created. These service orders travel further to downstream processing systems. When provisioning work is completed, SBC creates and stores an updated CSR in the SBC Midwest Customer Information System ("ACIS"). A CLEC may obtain access to a CSR by issuing a customer service inquiry using the Verigate, EDI or CORBA interfaces.

As noted above, BearingPoint conducted three separate CSI accuracy tests over a nine-month period. In keeping with the "military style" nature of the OSS test, these tests were executed in a serial fashion, with each succeeding test validating the changes made by SBC to correct the failures of previous tests. Therefore, all failure points from the first two CSI accuracy tests that were not identified by BearingPoint in its report of the third and final test can be considered properly corrected by SBC and validated by BearingPoint. Accordingly, SBC's root cause analysis will focus on the remaining failure points of the third test.[2] However, as noted below, BearingPoint will conduct an evaluation based on sampling of commercial production orders that include a diverse set of product types and not limited to UNE-P and resale orders.

The results of the third CSI accuracy test, as reported by BearingPoint, show Resale and UNE-P orders failing to accurately update the post-completion CSR. In its analysis of these results, SBC determined that the primary cause of CSI inaccuracies was errors on manual handling. In these situations, the data on the CLEC-submitted LSR was not accurately input on the internal service order by the SBC service representative. Any inaccuracy on the service order is then reflected in the ACIS CSR database when the database is updated upon order completion.

These manually-handled service orders are generally associated with the ordering of complex products. CSIs for other products were successfully tested by BearingPoint and, thus, are not addressed in SBC's root cause analysis or action steps. [3] In response to comments raised in the collaborative, SBC again reviewed the latest version of the BearingPoint test results and confirmed that the only two products that were failing were resale and UNE-P. Furthermore, BearingPoint also successfully tested the EDI and GUI

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[2] See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 20, ¶ 45 and pg. 22, ¶ 50. During the BearingPoint test, only the UNE-P and Resale product types did not meet BearingPoint's benchmark. One issue had been identified in relation to unbundled loops during the test; however, that issue was corrected and the correction confirmed by BearingPoint. Thus, it is unnecessary to review all product types.

[3] AT&T questioned why more products were not included in this plan in its 11/15/02 comments; see Connolly affidavit, pp. 20 & 22; ¶¶ 45 & 50.

interfaces, as well as the faxed order mechanism, that deliver the LSR information to the Mechanized Order Receipt ("MOR") and Local Access Service Request ("LASR") applications that store this information prior to further processing; therefore the translation of LSR information from these input sources also does not need to be addressed in this plan.[4]

It is also important to note that a failure in the CSR update process does not imply a failure in provisioning processes or systems. While some failures in the CSI accuracy test resulted in switch features not being updated according to the LSR, the failures were due to manual order process failures, not provisioning process failures. In fact, BearingPoint determined in its evaluation of test criteria TVV4-2 and TVV4-24 that SBC provisioned and disconnected switch features accurately in Michigan.

4. Actions

The plan for CSI Accuracy proposed by SBC in its October 30 Filing was constructed to address the reliability and accuracy of manual service orders. The plan included the development and delivery of a quality awareness training package to the hundreds of SBC service representatives that handle CLEC service orders. Additionally, it called for the implementation of a service order quality review process consisting of reviews of daily production service orders, corrections of identified errors, and coaching and/or process/system improvements based on data gathered from the review process.

The MPSC in its January 13 Order indicated that the CSI Accuracy plan should be expanded, to the extent possible, to address the specific comments of AT&T. In reference to the CSI Accuracy plan, AT&T made recommendations regarding the content of the service representative training package, the period of the training, the scope of the quality improvement effort, the commitment by SBC to fix errors identified as part of its quality review, the scope of testing beyond UNE-P and resale[5], and the potential need for a performance measure of CSI Accuracy.[6] SBC has addressed the

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[4] BearingPoint test criterion TVV1-4, which states "SBC Ameritech provides required order functionality," was reported as "not satisfied" in BearingPoint's October 30, 2002 report; however, none of the observations cited in the report for that test criterion were related to LSR translation, and in any case have since been closed successfully.

[5] As revised, the scope of BearingPoint's analysis of commercial production includes a diverse set of products, and is not limited to UNE-P and resale. This will help determine if additional reasons for errors, beyond those covered in the actions steps in this plan, require further or additional root cause analysis.

[6] See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 23, ¶ 51. SBC does not believe that a separate performance measure is necessary. Performance measure changes are discussed in the performance measure six-month review; one of which has just concluded.

requirements of the MPSC and responded to the comments of AT&T in the following enhanced plan.

SBC is taking the following steps to improve the accuracy of CSI:

1. <u>Service Representative Training</u>

SBC developed for Local Service Center ("LSC") Service Representatives a Service Order Quality informational package[7] directed at improving service representative order accuracy. The package is similar in form to the Student Guides provided during the training of service representatives involved in producing ACIS service orders. This package provides information on the importance of accurate orders, and the impacts of inaccurate orders on CLECs and end-users. The package includes service order examples and a listing of available on-line resources. This package was completed December 31, 2002, and applies across the entire SBC Midwest region.

- Starting in January 2003[8], service representatives are receiving training using the Service Order Quality informational package.
    - The training is scheduled to be completed by May 31, 2003 with a majority of targeted Service Representatives trained by March 31, 2003.
    - The intended audience for training is service representatives that produce and process Resale and UNE-P service orders for the ACIS system.
    - Review of the package is accomplished in mandatory training sessions facilitated by SBC's Training Department. Logs will be maintained to track attendance and manage attendance compliance.
    - A General Manager, Area Manager or Line Manager will address each class with a list of Talk Points to emphasize management's commitment to this process.

2. CSI Quality Review

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[7] See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 19, ¶ 43. SBC has expanded the detail provided in this plan to address the description of the information contained in the training package as well as its goal, and inclusion of a review of that information package by the third party contractor.

[8] See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 20, ¶ 44. SBC has expanded the detail provided in this plan to address specific timeframes for each action item, including component items of each action item.

- SBC is designing an internal quality review process for CSI accuracy[9]. This review will rely on sampling UNE-P and Resale production service orders that drop to manual handling ("manual-manual" and "auto-manual") to monitor CSI accuracy. The intent of the sampling activity is to assist in identifying potential problem areas in the manual processing of these orders; while SBC initially intends to conduct this sampling activity in a statistically valid manner by randomly selecting 150 orders each month from the total population under review, it may determine the need to modify this activity to meet its ultimate goal: Monitoring the effectiveness of its training and helping identify potential corrective actions. In fact, as a result of discussions during the March 4 - 5, 2003 collaborative session, SBC agreed to augment its sample of 150 orders to include at least 10 complex orders each month.

  These quality reviews will be conducted on an ongoing basis. Initially, the reviews are intended to be conducted daily.

  - Samples of orders will be pulled based on information in a reporting system called the Local Service Center Decision Support System (DSS). DSS is a reporting system used by the LSC to track and capture information on order activity. The DSS system is separate from the systems that process the actual production order.
  - The criteria for sampling will include product type and process type. Sampled orders will come from auto-manual and manual-manual orders.
  - Quality Assurance ("QA") service representatives, experienced service representatives selected for this purpose, will conduct reviews using methods and procedures developed specifically for this process.
  - Potential order discrepancies will be reviewed to:
    - Verify that discrepancies are in fact errors;
    - Correct identified errors;
    - Identify root causes of errors;
    - Provide the basis for individual coaching of service representatives.
  - The QA service representatives will compare the CLEC LSR to the corresponding internal service order on a field by field basis. Corrections will be made as necessary.

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[9] See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 21, ¶ 46. SBC has expanded the detail provided in this plan to address the description of how SBC is designing its quality review process, including sampling, frequency, timing, and how accuracy will be determined, as well as describing the purpose of this type of quality review process. SBC is unable to comment on how the third party may design its sampling plan.

3. Corrective Actions

- SBC plans to address discrepancies identified during its quality reviews as described above in the following manner:[10]
    - Review results will be documented in a new LSC database to track performance, identify trends, and provide reports for LSC management.
    - Information on the errors and root cause(s) identified will be analyzed using tracked data to ascertain if common issues or trends are apparent.
    - This information will be used to determine whether individual service representative coaching is needed, and/or additional training, changes to processes, methods and procedures, and/or systems are needed. SBC will implement appropriate corrective actions as warranted, including additional training and/or changes to processes or systems.

The following table provides the schedule for the actions discussed in this section:

Task	Begin	End	Status
Quality Assurance-Related Tasks			
1. Develop Service Order Quality informational package and provide training to all LSC UNE-P and Resale Service Representatives.	11/15/02	5/31/03	In progress
A. Determine and assign resource to lead "informational package" development effort	11/15/02	12/31/02	Complete
B. Produce "informational package"	12/01/02	12/31/02	Complete
C. Determine training deployment method	12/01/02	01/06/03	Complete
D. Create training schedule or plan	12/01/02	01/14/03	Complete
E. Conduct training	01/15/03	05/31/03	In progress

[10] See AT&T's comments filed 11/15/02, Connolly affidavit at pg. 21, ¶ 47 and pp. 19-22, ¶¶ 42, 45, 48, and 49. SBC has recognized that errors have been caused by manual handling of orders; thus, the emphasis on the training package and dissemination of same to LSC service representatives. The quality review process will address accuracy improvement and maintenance. SBC has expanded the detail provided in this plan to address the description of how SBC will use the information collected from the quality review process to institute correction of identified errors, provide service representative coaching, as well as to ascertain needed improvements in processes, systems, and/or training.

Task	Begin	End	Status
2. Design and implement a quality review process for validating the accuracy of the ACIS CSI record updates, which includes both sampling and quality reviews of Unbundled Network Elements – Platform ("UNE-P") and Resale orders.	12/15/02	Ongoing	In progress
A. Design quality review process	12/15/02	1/31/03	Complete
B. Implement daily quality review of Resale and UNE-P orders	02/03/03	Ongoing	In progress
3. Identify root causes of errors identified by quality review and sampling processes	12/15/02	Ongoing	In progress
A. Develop identification and tracking process	12/15/02	2/5/03	Complete
B. Identify training or other 'correcting' opportunities	02/03/03	Ongoing	In progress
C. Implement corrective actions	02/03/03	Ongoing	In progress

5. Third Party Examination Approach

This plan will be evaluated by a third party. While the third party selected, BearingPoint, will design its own work program and parameters, SBC anticipates that the third party evaluation will address and include a process evaluation and a review of actual commercial transactions as follows:

- The third party will evaluate SBC's implementations of the actions described in the "Actions" section of this plan by reviewing documents, conducting interviews, and performing site visits, as deemed necessary by the third party. This evaluation will include a review of SBC's quality review results. SBC expects this process evaluation to begin shortly after the MPSC approves this plan with a final report pursuant to BearingPoint's project plan.

- The third party will report the accuracy of customer service inquiry updates by comparing CSR updates with the local service requests for such activity using a nonbiased sample from the entire population of commercial production in the SBC Midwest region. The sample design and the evaluation methodology for this transaction analysis will be reviewed with SBC and with the MPSC staff prior to its implementation. SBC expects BearingPoint will begin its analysis of commercial production transactions no later than July 1, 2003 with a final report pursuant to BearingPoint's project plan. The accuracy of Customer Service Record updates is expected to improve when compared to BearingPoint's test results of 92% accurate. SBC's internal target is 95% accuracy. If the third party evaluation does not show the target has been achieved, any further required action will be determined by the MPSC.

- SBC will file bimonthly third party reports beginning with April-May 2003 period, to be filed by June 15th, until final process and transactions reports are completed. These reports will be filed with the MPSC by the 15th of the following month and served on the parties of record for MPSC Case No. U-12320.