



# **Change Management Communications Plan**

**March 13, 2003**

# Change Management Communications Plan

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# Change Management Communications Plan

## 1. Purpose

The purpose of this plan is to describe action Michigan Bell Telephone Company (“SBC”) has taken and will take to improve its 13-State Change Management process of Operational Support Systems (CMP). 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 filed on February 13, 2003 as a draft. The February 13 draft addressed the specific issues identified in the January 13 Order regarding the communication between SBC and CLECs regarding certain aspects of SBC’s management of the CMP processes. 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.

This change management communications plan includes process updates and quality assurance efforts that will be implemented and monitored by SBC.

## 2. Issue Definition

SBC has developed, in collaboration with CLECs, and implemented a uniform change management process – the 13 State Change Management Process (“13-State CMP”) pursuant to the FCC’s required Uniform and Enhanced Plan of Record (“POR”). The MPSC concluded in its report on SBC’s §271 Application that “SBC’s 13-State CMP complies with the FCC’s requirements and that the testing [performed by an independent third party auditor BearingPoint (formerly KPMG Consulting LLP)] indicates SBC’s compliance with that process.” (January 13 Order, p.10)

However, the MPSC did determine that certain recent OSS changes were implemented without prior announcement and did negatively affect CLECs. The MPSC further determined that “[a]lthough . . . SBC did comply with the letter of its change management process . . . a more encompassing definition of items covered by the exception process is necessary”. (January 13 Order, p. 10; See also “Report of the Michigan Public Service Commission” dated January 13, 2003, at p. 76, finding that SBC should “...propose a more comprehensive means for inclusion of items in the exceptions portion of its change management processes.”) With this plan, SBC proposes changes to

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its procedures regarding notification of OSS modifications responsive to CLEC feedback<sup>1</sup> and the MPSC's requirements.

Pursuant to the Federal Communication Commission's ("FCC's") SBC/Ameritech Merger Condition 8, SBC developed and offered to the state commissions a uniform change management process – 13 State CMP. It was developed with significant Competitive Local Exchange Carriers ("CLEC") collaboration and negotiations. SBC implemented the 13-State CMP process in early 2001. This CMP was also reflected in the *Joint Report of the Participants Regarding Resolved OSS Enhancements And Process Improvements*, filed by the collaborative participants in this proceeding on December 27, 2000.

BearingPoint, Inc. ("BearingPoint") conducted an exhaustive and comprehensive test of SBC's change management methods and procedures. BearingPoint found that the 13-State CMP being used by SBC provides for input from interested parties and contains clearly defined and reasonable intervals for notifying CLECs about proposed changes. BearingPoint also found that the 13-State CMP is clearly defined and documented and that related documents are accessible via CLEC OnLine. Finally, as part of the assessment of the 13-State CMP documentation, BearingPoint reviewed detailed procedures for dispute resolution.

The 13-State CMP provides guidelines for the management of changes to the OSS interfaces provided by SBC and used by CLECs in the various SBC operating regions. For example, the 13-State CMP specifies timelines to guide the development and publishing by SBC of interface specifications for periodic, scheduled "releases", or enhanced versions of the interfaces.

In addition, in order that parties may manage the modifications required between releases, the 13-State CMP provides a process for notification of these changes referred to as the Exception process. A notification to CLECs is required under the Exception process whenever a change is to be implemented by SBC will have an impact on CLECs using the interface due to a change in interface business rules that occurs outside of the quarterly release requirements Accessible Letters ("ALs"). In a specific instance described by AT&T and noted by the MPSC, SBC did not issue an Exception notification of a planned change generally due to SBC's belief there would be no impact on CLECs.

This plan will facilitate communicating system changes that occur between releases and, more specifically, for the types of changes that were the basis for the comments filed by AT&T and noted by the MPSC.

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<sup>1</sup> See: AT&T Comments filed 11/15/02, Willard-Webber affidavit, pp. 35-37, ¶¶ 69-73; and, AT&T Comments filed on 12/19/02. DeYoung affidavit, pp. 23-32, ¶¶ 49-71.

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Certain changes made to SBC Midwest's OSS were implemented without announcement to the CLEC community. These changes resulted in the following error codes being encountered and were the basis for the AT&T comments:

- Error G408 (a. Invalid Trailing Data for Call Forward Busy No Answer Feature and b. Pay Per Use blocking and Custom ring feature)<sup>2</sup>
- Error L100/L101 (PIC/LPIC Change)<sup>3</sup>
- Error B103 (Additional Directory Listings issue for non- published accounts)<sup>4</sup>

### 3. Root Cause Analysis

At the time that each of the above errors occurred, SBC conducted an analysis to determine the cause. Only one of the above changes, L100/101 PIC/LPIC, should have followed the Exception Process as noted in the 13-State CMP. The Exception Process is invoked in those situations where SBC needs CLEC approval to modify an existing documented business rule outside of the normal notification timelines. In such a situation, SBC would distribute an Accessible Letter ("AL"), detailing the issue and requesting CLEC concurrence with the change/modification. For the L100/101 PIC/LPIC error, SBC applied an LSOG 5 edit in the LSOG 4 version in an attempt to correct an open Defect Report ("DR") related to flow through improvement. Since the business rule was changed for version 4.02, based on the Exception Process requirements, an Exception Request AL should have been distributed to CLECs. SBC is taking corrective actions to minimize the chance of this type of mistake reoccurring, as explained below.

In the case of both G408 and B103 errors, SBC was not *changing* any business rules, but either *creating an edit to enforce an existing rule*, or further *tightening an edit of an existing business rule*. SBC acknowledges that notifying CLECs of these types of modifications is beneficial. Accordingly, SBC will adopt a more encompassing definition of items covered by the exceptions process in the 13-State CMP and institute procedures to send Exception Request Accessible Letters to alert CLECs of any new edits that will be implemented in support of existing business rules. SBC will also enhance its Defect Report to provide more information to CLECs regarding modifications to existing edits in support of existing business rules that will be implemented in support of an open CLEC-impacting DR.

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<sup>2</sup> AT&T Comments filed 11/15/02, Willard & Webber, pp. 35-37, ¶¶ 69-73; AT&T Comments filed on 12/19/02, DeYoung affidavit, pp. 23-26, ¶¶ 49-58

<sup>3</sup> AT&T Comments filed on 12/19/02. DeYoung affidavit, pp. 27-31, ¶¶ 59-67

<sup>4</sup> AT&T Comments filed on 12/19/02. DeYoung affidavit, p. 32, ¶¶ 70-71

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Additionally, SBC recognizes that CLECs may appreciate additional information about SBC's third party vendors and software being used by SBC Midwest. SBC will provide these details to the CLEC community to further augment current communication and understanding of SBC Midwest OSS that may impact CLECs.

### 4. Actions

SBC is committed to implementing the following action plans. The actions listed below are in addition to the existing notification and communication process within the 13-State CMP and are intended to address CLEC-impacting changes that are made outside of the normal quarterly release cycles.<sup>5</sup> For purposes of correcting defects, CLEC-impacting is defined as any change made by SBC to the interface that would cause a CLEC's previously accepted LSR to be rejected or a previously accepted pre-order transaction to fail.

#### a. New Edits for Existing Business Rules (Pre-Order and Order)

- SBC will notify the CLEC community via an Accessible Letter when *new edits* to existing business rules are developed and implemented for the pre-order and order interfaces.<sup>6</sup> For the purpose of this plan, SBC differentiates between types of new edits.
  - For *new edits initiated by SBC* ("proactive new edit") in support of an existing business rule, SBC will issue an Exception Request AL commensurate with the 13-State CMP. SBC proposes that the Accessible Letter will be distributed 5-7 days prior to SBC's implementation. SBC will hold a conference call to discuss the edit and the implementation date.
  - For *new edits in response to a CLEC-impacting defect*, SBC will issue an Exception Request AL with the turn around time commensurate with the severity

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<sup>5</sup> SBC will continue to follow 6.2 of the 13-state Change Management Plan for Severity-1 defects, which are defined as major software problems, production system failure or an interface failure, including significant production problems, the failure of scheduled release enhancements and the failure of pre-existing functionality.

<sup>6</sup> Per the MPSC approved business rules, the Exception Process is excluded from performance measure MI 15; thus, the changes delineated herein will not be subject to PMs. Any changes to performance measures should be addressed in the six month reviews.

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of the defect being corrected. SBC will host a conference call to discuss the edit and the implementation date.

- SBC will implement these changes effective April 21, 2003.

### **b. Modifications to Existing Edits for Existing Business Rules (Pre-Order and Order)**

- SBC will notify the CLEC community via the Defect Report when *modifications to existing edits and/or table updates* are required to correct an open defect in the pre-order and order interfaces. The Defect Report will be updated as CLEC-impacting defects are identified by either SBC or CLECs. Status will also be provided when the fixes have been implemented. This information will stay on the report for one week after the defect has been fixed. SBC will implement this change effective April 18, 2003.
- SBC will make the following enhancements to the current DR report for the Pre-Order and Order Interfaces only:
  - DR report will be updated and posted to CLEC On-line by 5pm Pacific each business day.
  - DR Report will now include details regarding fixes that require modifications to existing edits and/or table updates.
  - DR Report will list open CLEC-impacting DRs, a target date for a maintenance release once one is targeted for the specific DR, completed DRs, and identify which DRs were not completed in the maintenance release for which they were targeted.
- Beginning with the posting of the enhanced DR report on April 18, 2003, and then on each Monday thereafter through the end of May, 2003, SBC will issue an AL reminding CLECs to refer to the DR report for possible maintenance defects. The AL will indicate if new postings have been made to the DR report since the prior week's AL. The issue of how DR notifications will be handled will be discussed and agreed upon in the 13-state CMP meeting to be held on March 20, 2003.
- At each CMP meeting, SBC will update the CLECs on recent activity and progress of the defect requests impacting the pre-order and ordering interfaces.

### **c. EDI Mapping and CORBA IDL Changes**

SBC will send an Exception Request Accessible Letters for any EDI mapping or CORBA IDL structure changes that are identified as part of a defect.

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### **d. Third Party Information to be Provided by SBC to CLECs**

SBC will provide CLECs with a list of SBC's 3<sup>rd</sup> party vendors and software versions used by OSS that could impact CLEC connectivity. SBC will provide more detailed information in ALs to include when SBC changes a 3<sup>rd</sup> party vendor or when SBC changes to a newer version of the 3<sup>rd</sup> party software.

### **e. CLEC Profile**

SBC will continue to work with CLECs in the CLEC User Forum on additional improvements to the CLEC Profile process.

### **f. Current Defect Testing**

SBC's Information Technology testing for Maintenance releases consists of:

- Positive Testing - testing of the specific issue/defect that has been identified. Recreation of the events that led to defect are repeated to validate the fix has corrected the specific issues or problem identified.
- Regression Testing - testing performed to ensure the change/fix associated with a given defect has no adverse impact.

Accountability will be mandated for all staff and management that participate in the testing of fixes. The Industry Markets organization will review the IT testing process to ensure thorough testing is performed. SBC has begun to develop and enforce a more stringent audit trail for these changes. This audit trail will improve the comprehensive, accurate, and timely creation and maintenance of testing documentation. At a minimum, the following rigors will be implemented:

- Test plans, scenarios, and expected outcomes will be reviewed and approved by IT management.
- Testing results (including re-testing) as documented by the IT testing team will be reviewed by Industry Markets prior to implementation to production.
- SBC will reinforce the criticality of rigorous testing and also educate the OSS Application Support teams and Industry Markets on these accountability/audit requirements.

### **g. Internal Training and Awareness Sessions**

- An internal informative document including the following items will be provided to the OSS Application teams:

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- Guidance regarding how to improve system change evaluations made between releases;
  - Review of the types of changes (i.e. modifications to existing edits) that must be posted online;
  - Introduction to the enhanced DR report, its new required details (as outlined above) and procedures for posting and maintaining the report;
  - Overview of the purpose of the Exception Process and when to invoke it;
  - Clarification that new edits to existing business rules are now subject to follow the Exception Process; and
  - Overview of the importance of adhering to the 13-State CMP when making changes to business rules and system requirements.
- This internal informative document further clarifies which system changes may impact the CLECs. The document will focus on improving the existing evaluation process for system changes between quarterly releases. SBC will communicate this document to the OSS Support and System Application teams (including: OSS Customer Support, OSS Design and Support, CLEC Forums and Regulatory Support, and Information Technology teams) who are responsible for the execution of this plan.
  - SBC recognizes that edits which change/modify an existing LSOR business rule should go through the 13-State CMP including the Exception Process. SBC will re-emphasize the importance of thorough analysis of the existing LSOR and LSPOR to minimize the times an edit change from one version is inadvertently carried over to other versions. The L100/L101 error (PIC/LPIC Change) cited by AT&T was the result of modifying an existing document business rule.<sup>7</sup>
  - SBC will reinforce the need to use proper outage notification process for situations where a system does not turn up as planned. The H325 error (More Telephone Numbers than on Account is the example) was a result of a system not coming up as planned.<sup>8</sup> In the future, these failed turn ups will be handled through the normal outage notification process. For planned outages, SBC will continue to communicate to the CLEC community using the existing maintenance window schedule process.

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<sup>7</sup> AT&T Comments filed on 12/19/02, DeYoung affidavit, pp. 27-31, ¶¶ 59-67

<sup>8</sup> AT&T Comments filed on 12/19/02, DeYoung affidavit, pp. 31-32, ¶¶ 68-69

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### h. Quality Assurance Review Program

SBC will develop and implement an internal quality assurance review program to verify completeness and accuracy of the implementation of the action plans. Specifically, SBC will implement the following items:

- SBC management has reviewed and approved the above described action plans so that the action plan elements are integrated into daily operations and management.
- SBC will design and conduct a quality assurance review to monitor adherence to the action plan objectives. A “Quality Assurance Review Program” will be documented. It will provide the detailed methods and procedures for conducting the quarterly quality reviews. The review program will include sampling procedures for each of the changes made between releases and action plans listed above.
- Reviews will be conducted on a quarterly basis for one year. The reviews will be performed according to the methods and procedures defined in the “Quality Assurance Review Program.” Work papers will be documented and maintained. At the completion of the review, the results will be documented and reported to business and executive management.
- Issues identified during quality assurance reviews will be documented, tracked and investigated. Corrective actions will be taken as warranted. All such issues will be reported to business and executive management.

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

Task	Begin Date	End Date	Status
SBC develops informative document <ul style="list-style-type: none"> <li>• Determine and assign lead</li> <li>• Create informative document</li> <li>• Determine communication method</li> <li>• Management reviews and approves document</li> </ul>	3/10/03	3/31/03	In progress
SBC communicates informative document to OSS Application teams.	4/1/03	4/18/03	-----
SBC implements plan details (as described above). <ul style="list-style-type: none"> <li>• New edits follow Exception Process</li> <li>• Edit modification are treated as DR</li> <li>• EDI mapping/CORBA DLI structure changes follow Exception Process</li> </ul>	4/21/03	4/21/03	-----
Enhanced DR Report is created and posted.	3/10/03	4/18/03	In progress
SBC develops M&Ps for rigorous testing	3/10/03	4/18/03	In progress

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including additional audit trail requirements.			
Documentation templates to be used for audit trail during testing are developed and approved by IT and Industry Markets.	3/13/03	4/18/03	In progress
SBC provides list of 3 <sup>rd</sup> party vendors and software versions (as detailed above).	2/3/03	3/20/03	In progress
SBC designs quarterly quality assurance review program.	3/13/03	4/18/03	-----
SBC executes daily oversight and enforcement by local managers.	3/13/03	On going	-----
SBC executes quarterly assurance reviews.	4/30/03 <sup>9</sup>	On going	-----
SBC performs root cause analysis (if deviations were identified in quality reviews) <ul style="list-style-type: none"> <li>• Develop tracking process</li> <li>• Determine and assign resource(s)</li> <li>• Adopt corrective actions</li> <li>• Report results to management</li> </ul>	4/30/03	Ongoing	-----

### 5. Status Reporting

SBC will file a quarterly report regarding its progress on this plan to the MPSC for its review starting on April 30, 2003 for one year; SBC will serve a copy on the parties of record for MPSC Case No. U-12320. Specifically, with respect to actions 4(a), 4(b), and 4(c) SBC will initially confirm that it has implemented the described procedures. SBC will also provide a DR Report and a list of exception requests that have been communicated to CLEC during the period under review. With respect to action 4(d), SBC will confirm that it has provided the additional information. With respect to actions 4(e) and 4(f), SBC will initially summarize the status of the described documentation and training. With respect to action 4(g), SBC will provide summarized results on the quarterly quality assurance review programs. Where applicable, details on deviations and corresponding corrective actions will be provided. The processes discussed above will be brought before all CLECs in the 13-State Change Management Process for further discussion as some of these processes could have the effect of slowing down the implementation of fixes. Any agreed upon modifications will be provided to the MPSC.

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<sup>9</sup> Reflects beginning of first period to be reviewed; review periods are between quarterly releases.