



**MPSC Case No. U-12320**

**Line Loss Notifier Communications Plan**

**April 2, 2003**

# Line Loss Notifier Communications Plan

## TABLE OF CONTENTS

1.	PURPOSE.....	1
2.	ISSUE.....	1
3.	ACTIONS .....	2
4.	STATUS REPORTING.....	4

## Line Loss Notifier 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 communications regarding line loss notifiers (“LLNs”). This plan was first filed 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 addressed the specific issues identified in the January 13 Order regarding the communication between SBC and CLECs regarding operational concerns with LLNs and monthly reporting to the MPSC regarding such line loss issues for a minimum period of six months. 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. Final modifications were made to this plan in compliance with the MPSC’s Order issued March 26, 2003.

Specifically, this plan details the communications process that will be used when SBC determines that an interruption of LLNs could affect more than one CLEC (though this scenario is also covered). It also describes the monthly report that SBC will provide to the MPSC for at least six months following approval of the plan by the MPSC.<sup>1</sup>

### 2. Issue

BearingPoint, Inc. (f/k/a KPMG Consulting) performed testing of line loss notification as part of the Third-Party Operations Support Systems (“OSS”) testing. Two types of tests were performed: one using Test CLEC transactions that tested the entire line loss process and transaction flow (Line Loss Timeliness), and a second test using a large sample of production orders to further confirm the logic used by SBC to generate line loss notifications (Line Loss Accuracy). Both of these tests initially resulted in the issuance of Exceptions (74 and 94), however each test was concluded satisfactorily through subsequent retesting by BearingPoint.

In its October 14, 2002 Disposition Report for Exception 74 regarding Test CLEC line loss testing, BearingPoint reported that, based on their testing associated with that Exception and the resulting 96.2% success rate, “the issues identified in this Exception Report have been addressed.” This finding, coupled with BearingPoint’s test results associated with Exception 94 for Line Loss Accuracy testing, confirm that the process improvements implemented by SBC during the period of the OSS Evaluation had the intended result, i.e., a reliable process for delivery of line loss notifications to CLECs. BearingPoint’s line loss test results are contained in its October 30, 2001 Michigan OSS Evaluation Project Report as TVV4-28 (accuracy) and TVV4-29 (timeliness) at pp. 935-936.

As a result of discussion with its CLEC customers, however, SBC determined that improvements in communication of status of the line loss notifier process could still be made. Consequently, in its October 30 Filing, SBC proposed a plan to improve that communication; the plan was based on discussions during the technical workshops held on October 14 - 18, 2003. Based on subsequent

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<sup>1</sup> This plan does not address any additional changes to Performance Measure MI 13. Modification to PM MI 13, and the creation of an additional measure MI 13.1, were approved by the MPSC on February 20, 2002 in Case No. U-11830 and will be implemented for March 2003 results, reported in April 2003.

## **Line Loss Notifier Communications Plan**

CLEC comments regarding that plan, the MPSC's direction in its January 13 Order, and the aforementioned Collaborative activity in March 2003, SBC has enhanced that plan.

### **3. Actions**

#### **A. Definition of Line Loss Notification Interruption**

A "line loss notification interruption" would require the issuance of an accessible letter to all CLECs in the Midwest region, if it affected more than one CLEC. The "line loss notification interruption", which includes any winback situations, would be included in the monthly report filed with the MPSC if it affected any CLEC. (See, paragraphs 3(B) and 3(C) below, respectively.) A "line loss notification interruption" includes any of the following:

- (i) Missing LLNs, which includes any delay in transmission of mechanized LLN by SBC for more than four (4) business days from completion of work. The determination of whether a LLN was sent shall be calculated as provided in the Performance Measure Business Rules, including all exclusions, for PM MI 13.1, "Average Delay Days for Mechanized Line Loss Notifications."
- (ii) Inaccurate line loss notifications, which includes LLNs that were transmitted but contained either inaccurate or missing required data, such as conversion dates or affected telephone numbers.
- (iii) Improperly formatted LLNs, which include LLNs transmitted in a format other than expected (e.g., missing fields).
- (iv) Systemic transmission of LLNs in a mode, either an EDI 836 transaction, LEX GUI, or fax, that does not match the LLN mode contained in the CLEC's profile for LLNs. This excludes LLNs manually generated proactively by SBC.

Note: Any issues arising from a mix up in LSOR versions will be accounted for within this process, but dependent upon the particular situation, may vary as to which of the above categories this issue fits into.

#### **B. LLN Accessible Letters**

In its October 30 Filing, SBC proposed a plan for line loss notifiers that proposed improvements in communications from SBC to CLECs should future incidents occur related to the delivery of line loss notifiers. The improvement in communication was based on the issuance of Accessible Letters ("ALs") to provide pertinent information to CLECs in a timely manner.

SBC implemented enhanced communication procedures in November 2002 that include an initial notification upon identification and then a follow-up notification upon resolution for line loss issues that affect more than one CLEC. Accessible Letter CLECAM02-122 issued November 12, 2002, is an example of an initial notification to CLECs of a line loss notifier interruption. CLECAM02-123 issued November 13, 2002 was then issued to provide follow-up information regarding the same incident. This follow-up AL provided further information regarding the interruption as soon as it was available to SBC.

## **Line Loss Notifier Communications Plan**

In response to the January 13 Order and the comments of CLECs regarding the initial version of the plan, SBC will provide the following information to CLECs regarding line loss notice interruptions that could affect more than one CLEC:

- Within one business day<sup>2</sup> of SBC determining that a line loss notification interruption has occurred, as defined above in paragraph 3(A), that could affect more than one CLEC, SBC will issue an Accessible Letter (“AL”) to all CLECs in the Midwest region. The AL will include any details available at the time of issuance, that SBC has confirmed to be accurate and complete, concerning the cause, scope and duration of the LLN issue.
- Within 1 business day of SBC identifying the affected CLECs, SBC (Account Teams and/or OSS Managers) will contact those affected CLECs directly using the currently-designated customer contact maintained by the SBC OSS Support organization. Each situation varies in complexity and so the timeframe, as to when the affected CLECs will be identified, cannot be further defined.
- Because SBC will act as soon as there is a reasonable indication of a line loss issuance incident, the initial AL may not contain complete information. As soon as such information can be determined and confirmed, SBC will issue follow-up AL(s) and contact affected CLECs as needed with CLEC-specific information. Upon resolution of the issue, a final follow-up AL will be provided to all CLECs in the Midwest region.
- If SBC changes its line loss notifier procedures, including those contained in this plan, it shall immediately provide appropriate notification. Notification will be provided for any change to the procedures for delivering the actual line loss notification that would affect the format, data content, delivery method (other than normal changes via established processes, such as a new CLEC profile), or criteria for issuance of line loss notification transactions. Such notification will be provided in the manner defined by Change Management Process (“CMP”) guidelines, including the communications improvements noted in a separate plan filed simultaneously with this one. Where notification is appropriate but not covered by CMP, an AL will be issued.
- SBC commits to continuation of its cross-functional team that supports the “safety net” process for the review and evaluation of timely and accurate LLN issuance. SBC will evaluate the need for continuation at the end of the MPSC’s required reporting period and provide the MPSC with a 30-day notice of any discontinuance.

### **C. Monthly Reporting to the MPSC**

SBC will provide monthly reports to the MPSC regarding line loss issues for a minimum period of six months after the MPSC approves this plan. Reporting began with the activity for the calendar month of January 2003. The reports will be due by the 10th day of the following month.

The report will include information regarding line loss issues that have been identified by SBC during the reported calendar month; their cause, duration, scope of loss notifiers affected, number of LLNs affected by month (including both region-wide and state specific numbers where available), number of

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<sup>2</sup> The MPSC Order notes that these accessible letters should be sent “within 24 hours of determining that an interruption of line loss notification issuance has occurred ..” This plan proposes that such letter be sent within one business day to conform to SBC’s operational schedule and to be consistent with PM MI 13.

## Line Loss Notifier Communications Plan

providers affected, and actions taken to address the issues.<sup>3</sup> Providing a comparison to the total number of LLNs sent for the reporting month is not possible within the current stated reporting timeframe. The total numbers of all LLNs sent during the reporting month would not yet be available on the 10<sup>th</sup> of the next month. As a result, SBC will provide the total number of LLNs sent during each of the three months prior to the month of reporting, at both a regional and state level. These monthly LLN totals will be provided with every monthly report. This will allow the MPSC to compare the number of LLNs reported for that month, as a percentage of the total number of LLNs sent out by SBC on a monthly basis. Additionally, any referenced accessible letters will be provided with the report.

Further, if an identified issue has not reached resolution during the calendar month identified, it will be repeated in subsequent month(s) until resolved so that all required information is known and can be reported.

SBC will use the definition of line loss notification interruption provided in section 3(A) above when determining what should be included in the report.

The monthly report for February 2003 was filed on March 10, 2003; note the inclusion of information regarding cause, duration, scope of loss notifiers affected, number of CLECs affected, and actions taken to address the issues. The report for March 2003, as well as the updated reports for January 2003 and February 2003, to be filed on April 10, 2003, will provide the additional data, including monthly totals, as identified above.

## 4. Status Reporting

SBC will file its monthly line loss issues report with the MPSC on the 10<sup>th</sup> of the following month, for a minimum of six months following the MPSC approval of the plan, with service on the parties of record for MPSC Case No. U-12320.

SBC will file modified reports for January and February 2003 on April 10, 2003 to conform with the requirements of the MPSC in its Order of March 26, 2003. These modified reports will be also served on the parties of record for MPSC Case No. U-12320.

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<sup>3</sup> Per the January 13 Order, page 6.