

February 14, 2002

BY HAND DELIVERY

Melinda Watts
Florida Public Service Commission
Division of Competitive Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 011581-TX

Dear Melinda,

This letter is submitted in response to your request for information dated February 8, 2002. Specifically, you have requested a detailed explanation regarding MCI's need for 180 days from the date BellSouth makes Local Service Freeze available for UNE-P orders.

Whenever, MCI implements a new technical functionality, it makes every effort to ensure that it will work properly. In the case of MCI's introduction of a Local PC Freeze, MCI must ensure that any customer that has asked for a Local PC Freeze is appropriately informed, that the request is verified by a third-party, and that the Freeze is recognized by the ILEC and all other ALECs. In fact, improper initiation of Local PC Freeze capability could lead to mistakes and customer aggravation – the very result that PC Freezes are designed to avoid. As explained below, there are several steps required to implement any new technical capability, and there are specific concerns that must be addressed in connection with instituting a Local PIC Freeze. Speeding up this process may lead to mistakes and an imperfect implementation.

Local PC Freeze implementation affects changes to over 10 MCI internal systems as well as our interface with BellSouth. Introducing a new capability like Local PC Freeze will require significant software development and testing to ensure:

- proper order collection at point of sale;
- displaying information correctly for customer service reps;
- storage of information for PC request to be sent to ILEC and used via internal MCI TPV process;
- storage of activation/disconnect date associated with customer account to trigger fulfillment and billing; and
- updates to invoice messages and other systems that communicate to customers like MCI.com

A typical MCI software release takes 6 months. Business analysts must review all details of how this change will be supported by the various systems. Business analysts also need to write detailed specifications for each of the systems and an overall integrated systems approach. Systems application groups then need to spend time analyzing these specifications and determine the types of new software coding and information exchange that is needed to meet the overall business, customer, and regulatory needs. After that, system applications groups begin their coding and internal testing. When completed, all systems need to be tested together to ensure all facets of the project will work as intended. During this time, test accounts and customer scenarios are populated and time is spent analyzing the results of the testing, making corrections, and refining overall system performance. It is estimated that all of these steps, up to and including the testing of the process in production, will take at least six months.

I believe this addresses your request for additional information regarding why MCI needs six months to make the Local PC Freeze available to its customers. If you have any questions, please contact me at your earliest convenience.

Sincerely,



Donna Canzano McNulty

cc: Parties of record