

May 27, 2008

Ms. Ann Cole Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

> Re: Docket No. 000121A-TP

> > In Re: Investigation into the establishment of operations support systems permanent incumbent local exchange Telecommunications companies

Dear Ms. Cole:

On May 15, 2008, AT&T participated in two informal meetings with the Commission Staff wherein AT&T discussed issues surrounding the April 2008 22 State OSS Release and AT&T's plans for future 22 State Releases in the SouthEast region. The second meeting included participation by interested competitive local exchange carriers ("CLECs"). During the meetings, AT&T made numerous commitments in connection with future 22 State OSS Releases in the SouthEast region. At Staff's request, AT&T memorialized the commitments made during the May 15th meetings. Accordingly, please find enclosed for filing AT&T's commitments regarding future 22 State Releases in the SouthEast region. The enclosed outline contains both the commitments made by AT&T during the May 15th meetings, as well as some additional commitments AT&T is willing to make in response to certain requests made by the Staff and CLECs. A copy of the same is being provided to all parties of record.

Robert A. Culpepper

Enclosures

cc:

All parties of record Jerry D. Hendrix

712050

CERTIFICATE OF SERVICE Docket No. 000121A-TP

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail and U.S. Mail this 27th of May, 2008 to the following:

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(+) Signed Protective Agreement

FLORIDA COMMISSION DOCKET NO. 000121A-TP FOLLOW UP TO MAY 15, 2008 MEETINGS

As discussed during the meetings held on May 15, 2008, with the Commission Staff and interested competitive local exchange carriers ("CLECs"), AT&T remains committed to resolving the remaining issues associated with the April OSS Release. To address future 22 State Releases in the SouthEast "(SE") region, AT&T will provide the following:

- I. Temporarily suspend next three planned releases for implementing 22 State Pre-Order and Ordering capabilities into the SE region ("scheduled or future 22 State Releases") until:
 - o Resolve Severity 1 and Severity 2 defects in the SE region resulting from the April 2008 OSS release.
 - o Expand Pre Release, customer training and Post Release communications as outlined below.
 - o Develop an expanded Test Plan to address defect issues resulting from the April Release and include in future release testing.

II. April Release Defect Resolution

- Severity 1 defects identified as of our 5/15/08, with the exception of defect #183638 were fixed by 5/19/08 as committed. Defect #183638 was fixed on 5/21/08.
- o Fixes for Severity 1 and 2 defects in the SE region resulting from the April 2008 OSS release and in existence as of 5/19/08 will be in production by 6/21/08. If there is any change in this schedule, AT&T will notify Staff and CLECs.
- o The following status relates to the transmittal of Line Loss Notifications (LLN) and Billing Completion Notices (BCN):
 - LLNs All outstanding notifications were transmitted successfully on 5/16/08. Normal transmission resumed on 5/17/08.
 - BCNs Issues with the daily transmission of notifications were resolved on 5/16/08. Transmittal of outstanding notifications began on 5/20/08 using a metered approach; expect completion of the backlog by 6/2/08.

III. Expanded Communications

- Maintain recurring status calls with customers until the earlier of the resolution of Severity 1 and 2 defects resulting from the April OSS release or consensus that calls are no longer necessary.
- Continue to status plans for currently scheduled 22 State releases within existing monthly CMP/CCP Meetings. Enhance clarity of prerelease communications by providing a review of all systems and

customer interface changes included in future 22 State releases in advance of Accessible Letter communications. Use this input to improve the clarity of Accessible Letter information.

- Outline CLEC training plans and materials for future 22 State releases.
 Take into consideration customer input prior to finalization of such training. Release CLEC training materials in accordance with CMP/CCP timeframes.
- o In addition to standard communications, Post Release communications for scheduled 22 State releases will be expanded as follows:
 - Recorded messages will be made available during Release Implementation Weekends reporting on current status and "go/no go" readout.
 - A virtual "War Room" will be established during the initial three days after scheduled releases to update customers of any Post Release issues. Daily calls can be expanded/extended as necessary.
- Provide a single document that clearly describes roles/responsibilities/titles for the following AT&T personnel to assist with more effective customer contact and escalation points:
 - Wholesale Customer Support Managers
 - Information Services Call Center
 - Mechanized Customer Production Support Center (MCPSC)
- Perform internal documentation review to enhance clarity of the following communications:
 - Web-based Defect Reporting (EDR Report) Updated beginning 5/15 and ongoing.
 - XML Documentation Corrected for identified issue with reject reason field to restore to pre-release length of 5 characters.
 - Systems Outages Notifications
 - Will take into consideration comments received from customers to date and cover results with CLECs once completed.
- IV. Expanded Testing/Backout/Failure Management for scheduled 22 State releases
 - Utilize root cause analysis of release defects to expand Testing Plans with special focus in the area of delivering outbound transactions.
 Specific tests will be established for validating that outbound transactions such as FOCs, Clarifications, Completion Notices and

- Billing Completion Notices are delivered to their destination point in a form compatible with existing standards and interface agreements.
- Encourage and support greater CLEC participation in cooperative testing for all releases, utilizing existing CLEC test environments.
- Evaluate manual process to determine what steps can be taken to test the process and allow CLECs the opportunity to practice for new forms/templates.
- o Going forward, scheduled 22 State releases for the SE region will provide overlap between the existing and new Customer Interfaces (EDI, XML and Verigate/LEX/LENS), in order to allow customers to plan/test/develop individual migration strategies to the new interfaces.
- Testing will include appropriate back out plans for the implementation weekend.
- Prior to next scheduled 22-State release outline post-release action plan to provide expedited response in the event of critical release failures (Emergency Plan), focused on:
 - Customer Notification and Support
 - Defect Resolution
 - Expanded AT&T Staffing requirements

V. Email/Manual Forms Process

Support/Education

- o Continue proactive, individualized customer support on Email/Manual Forms process for next 60 days to facilitate user introduction.
 - Including customer working sessions to assist in successful submission of the Manual LSR Forms through use of the email process.
- Lead a monthly Email/Manual Forms User Forum to provide common support and address current manual process issues until all 22 State releases are completed.
- Continue to work with all CLEC customers who request further assistance or education on the manual LSR ordering process.

Review of Manual Processes and CLEC Change Requests

- Assessed CLEC concerns where all pages of a form are required whether or not all pages contain data.
 - The manual ordering process only requires the customer to populate fields necessary for the product being ordered.
 - To address customer concerns regarding the requirement of additional data when submitting forms:
 - o Accessible Letter **CLECSE08-077** dated 05/21/08 provided additional information within the Manual Ordering

Guidelines and the Frequently Asked Questions (FAQ) documents.

 Will review and assess the prioritized list of customer change requests for enhancements to the 22 State Email LSR Process. In addition, will re-evaluate merger related OSS Change Requests previously submitted through the Change Management process.

Documentation

- Completed updates to the LOH to reflect all changes noticed through Accessible Letter issued as a result of the April 19, 2008 release. Will continue to review to ensure clarity, currency and completeness.
- Proactive review and update of the 22 State Manual LSR Forms and Email Process documentation was done to address customer feedback.
 Documentation posted to CLEC Website and available 05/21/08:
 - Enhanced 22 State Non-Mechanized Ordering Guide, now renamed as "Manual Ordering Guidelines".
 - Published Frequently Asked Questions (FAQ) document
- o Expand documentation quality control processes to ensure multiple layers of review prior to release of documents to the customer.

VI. Proactive Billing adjustments

A call has been scheduled for May 28, 2008 with CLEC customers to discuss the plan for providing generic bill adjustments and addressing billing issues related to the release. Plan entails three key steps: (1) Proactive Billing Adjustments, (2) Claims Clean-up Process for addressing and resolving any exceptions that are not addressed in the Proactive Approach and (3) Communication Plan for the CLECs. Key points regarding the Proactive Billing Adjustments part of the plan include:

- Billing Solution has been developed to identify areas were CLEC billing has been impacted by the Release issues and to proactively provide billing credits, where possible.
- Proactive billing credits will be triggered by the Billing Completion Notices that are currently being sent in batches starting on 5/20/08.
- Billing Solution is designed to address the most common CLEC concerns on both NRC and MRC billing resulting from the April Release.
- Target timeline will be to process these proactive adjustments within 45 business days after the sending of the Billing Completion Notice are sent, with a goal to process as many of these proactive adjustments as possible within the first 30 days.

VII. Center /Support Team Responsiveness

- All April Release related calls temporarily handled by other service centers outside of the SE Region, were moved back into the Birmingham LSC by May 19, 2008.
- As of the Close of Business on May 24, 2008, the Birmingham LSC is current with all order processing. Center is now processing orders within standard performance commitments.
- Continue to manage April Release related expedites for the processing of acknowledgements for any individual situations if not addressed by the mechanized transmittal efforts.
- o Continue to review staffing levels to meet anticipated demand, including:
 - Wholesale Customer Support Managers
 - Centers