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Sent: Wednesday, June 11, 2008 3:10 PM
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Subject: Docket 000121A-TP
Attachments: 000121A-TP Responses to Staff June 11 2008.pdf

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- B. Docket No. 000121A-TP: In Re: Investigation into the Establishment of Operations Support Systems Permanent Incumbent Local Exchange Telecommunications Companies.
- C. BellSouth Telecommunications, Inc.
on behalf of Robert A. Culpepper
- D. 24 pages total in PDF format (includes letter, COS, Responses with attachments)
- E. BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Responses to Staff in follow-up to informal meetings on May 15, 2008

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June 11, 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"). Following that meeting, Staff requested additional information concerning issues addressed in the meetings. Accordingly, please find enclosed for filing AT&T's response to Staff's questions. A copy of the same is being provided to all parties of record.

Sincerely,

Robert A. Culpepper

Enclosures

cc: All parties of record
Jerry D. Hendrix
Matthew T. Davis

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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 11th of June, 2008 to the following:

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Robert A. Culpepper

(+) Signed Protective Agreement

AT&T Responses to May 22, 2008 Questions of FPSC Staff

1. Please explain planned changes to 9-State Operational Support Systems (OSS) and provide high level system flow charts. (copies of old charts provided)

There are three releases that have been planned for the Southeast region to implement, wherever possible, a consolidated and uniform suite of external and internal interfaces, tools, and processes to support pre-order and ordering of Local Wholesale services.

The goal of this plan is to provide:

- Single ordering and pre-ordering application-to-application interface
- Single web ordering and pre-ordering interface
- Single set of tools for AT&T centers personnel
- Common systems and processes for:
 - pre-ordering
 - order receipt
 - validation
 - notifications
 - tracking
 - analysis
- Improved IT and Wholesale Center efficiencies through mechanization and system consolidations
- Minimize impact to CLECs while providing common interface experience across the 22-States
- Facilitate continued Performance Measurement Compliance (SEEMs)

With the goals stated above, the planned changes to the 9-State OSS are targeted for a three phase release migration strategy, as described in Attachment A (Application Diagrams).

Phase 1

The April release introduced the Local Access Service Request System application (LASR) to replace the functionality provided by LEO (the Local Exchange Ordering tool), a non-CLEC interfacing, backend application which provided order management, tracking and exception handling for Local Service Requests (LSRs). All LEO functionality is included in the LASR application, except for work assignment, which is now handled by the Work Flow Management (WFM) system. Additionally, the 9-State Work Management System (WMS) was retired and the functionality migrated to WFM.

The April release also streamlined the number of tools used by AT&T center support personnel to facilitate CLEC service requests. Additionally, it enhanced the tools available to Southeast CLECs by adding the 13-State Verigate application, a browser-based application that provides preorder functionality, similar to Local Exchange Navigator Service (LENS).

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Phase 2

The second phase of the OSS plan will introduce two additional front end applications: Local Service Request Exchange System (LEX), a 13-State browser-based application for online creation, submission, and maintenance of LSRs; and XML Gateway, which supports submission of Firm Order Request (using XML standards), as well as Pre-Order and Firm Order Queries. With these new interfaces AT&T will be able to retire (1) LENS, which will be replaced by LEX; (2) Electronic Data Interface exchange (EDI), which will be replaced by XML Gateway; and (3) Direct XML, which will be replaced by XML Gateway.

Phase 3

During Phase 3, AT&T plans to retire LENS, EDI, and Direct XML applications. In accordance with the commitments AT&T made in connection with the April release, AT&T will provide CLECs with access to both the new and retiring systems for a period of at least 90 days, as described in Attachment B (5/15/08 Follow up Letter).

2. Please explain what teams were put in place to evaluate the OSS changes needed as a result of merger of BST and ATT. Explain team responsibilities, members of the team, goals of the team, evaluation process used and any work products produced.

AT&T employed an established and structured Merger Planning process to develop a best practices-based plan for the merged entities. This process utilized expertise from both AT&T and BellSouth (BLS) to review legacy BLS processes for comparison with like-processes in AT&T. At the time of the merger, AT&T's Local Wholesale OSS operated uniformly in all of AT&T's Southwest, Midwest, West and East regions for many of the same CLEC customers doing business in the former BLS region. Because AT&T's Local Wholesale OSS was already configured to be multi-regional, third party and volume tested, and very scalable, it was determined that the 13-State systems would produce the greatest efficiencies for the benefit of both AT&T and its customers throughout the 22-States.

Post-merger, when greater information-flow between the companies was permissible, more detailed planning began, inclusive of Southeast architects and other Southeast IT resources responsible for the existing BLS Local Wholesale OSS.

Multiple sub-teams consisting of AT&T Wholesale and IT Subject Matter Experts (SMEs) (with both legacy AT&T and BLS background) were formed and met with focus in areas of:

- CLEC Change Management
- Release Management
- Customer Interfaces
- Pre-order processing for each Local product
- LSR processing for each Local product
- Service Order processing for each Local product
- Middleware services required to support Pre-order and Ordering

- Performance Measures
- Production reporting
- Center workload and desktop tools

These teams participated in data gathering sessions in which the system functionality of the pre-merger companies was carefully studied and compared. These sessions provided insight into the functionality of all of the impacted applications so that recommendations could be finalized. Lock down sessions held during the months of February and March 2007 served to further solidify the high level requirements and implementation strategy. These various meetings were attended by over 75 individuals with a range of experience in such areas as:

- Wholesale Process and Requirements
- Performance Measurements
- CLEC Change Management
- Testing
- Architectural Design
- Application Development
- Product Support
- Project Management
- Program Management
- Release Management

These participants relied on their over 200 years of combined experience to evaluate the process and technological changes necessary to implement the 22-State design. The finalized Implementation Strategy was approved in May of 2007.

With the Implementation Strategy in mind and with all of the information gained in the numerous meetings from which the Strategy was defined, high-level Business Requirements were finalized by AT&T Wholesale and IT. The culmination of all these efforts was a Solution Approach (SA) which became the blueprint for the final architecture and functional solution. The SA was crafted with input from SE and 13-State IT architects, as well as Wholesale and other IT resources, from each of the impacted application teams.

3. Please explain what improved functionality CLECs in the 9-State region will see as a result of the implementation of LASR, Verigate, LEX and XML and any other interfaces being implemented as a result of the merger.

The intent of the three-phased OSS plan was to provide 9-State CLECs with improved functionality via more uniform applications. Once implemented, AT&T 22-State will have a single suite of applications which will allow better utilization of employees and better deployment of support for all CLECs across the 22 states (reducing operating, training, software maintenance and software upgrade costs by not having to support multiple system interfaces). Since a large percentage of the CLECs operate in both the 9-

State and 13-State regions, this plan should assist multi-region CLECs as they do business with AT&T and help regional CLECs expand.

Specifically the three-phase OSS plan will provide:

- improved customer care
- improved mechanized customer support resources
- LASR functionality which provides:
 - Easier retrieval of CLEC Data, when needed
 - Consistent processing of LSRs
 - A higher probability of cleaner LSRs because of more robust editing provided on a more uniform basis
 - A central repository for all LSRs allowing easier tracking of the status of requests and associated service orders
 - Reflow capabilities enabling LSRs to be electronically placed in queue due to system down time/outages and subsequently processed without manual intervention
- Uniform error messages which provides:
 - the same error message for the same error conditions regardless of region
 - Simplified training due to uniform processes
 - Carries the 13 state error code format to 9 state so that all errors returned will follow the same formatting rules and indicate superfatal or fatal
- AT&T Toolbar which provides:
 - Common website for accessing OSS applications
 - Verigate, LEX, SE USOC Search Tool access
 - 22 State CLEC Profile which standardizes access to AT&T OSS systems
- Uniform applications for ordering (LEX) and pre-ordering (Verigate) which provides:
 - Reduction in CLEC issues and quicker resolution with common support personnel for both applications
 - Consistent updates to the applications
 - Benefits of real time operations of Verigate and LEX
 - LEX - LSR management which provides:
 - A database allowing CLECs to retrieve LSRs up to 24 month after issuance
 - Ability to create templates for LSR issuance
 - Issued LSRs are in real time mode and returned in format that easily identifies field and form edits for CLECs to correct
 - Notifications are returned to LEX and status LSRs are automatically updated
 - Full set of data reports allowing CLECs to query their database to provide report information on their LSRs
 - Comprehensive set of reference material and online help capability
 - LSRs flow mechanically into downstream OSS without manual intervention

- Maintaining the existing 9 state functionality for firm order processing creating a 22-State common Web application
 - Verigate which provides:
 - Consistent data display in a user friendly format with streamlined Inquiry and Response screens
 - Continued access to the Southeast NC/NCI and CSOTS websites
 - Comprehensive set of reference material and LOH
 - Use of improved Letter of Authorization process
 - Standardization of electronic ordering – using industry standards which provides:
 - Uniformity of business processes
 - Uniformity of Complex REQ Type Ordering, extending electronic ordering capability from 13 State to 9 State
 - A single 22-State gateway
 - XML implementation which provides:
 - A common 22-State ordering and pre-ordering gateway using industry standard Extensible Markup Language (XML) which replaces the non-standard 9-State pre-order XML version and facilitates a CLECs ability to use the code with other companies.
 - A flexible way to provide and create common informational formats and share the format and data with other companies.
 - Abundant XML development and test tools will facilitate better CLEC support
 - Uniform process for manual ordering of local service which provides:
 - Enhanced Forms for use 22-States in conjunction with local ordering guidelines (13-State LSOR, 9-State LOH) with:
 - Downloadable Word format LSR forms
 - Consistency in ordering based on industry standards and latest LOH/LSOR version.
 - Email process for manual submission of LSR forms
 - Eliminates outdated fax process, including receipt of faxed notifications thus reducing overhead cost i.e. paper, equipment, clerical functions and associated software costs.
 - Improves accuracy because LSR forms will arrive intact as entered by CLEC. Email, unlike faxed pages will not be lost or damaged during transmission.
 - Reduces cycle time for receipt of CLEC request and delivery of notifications (eliminating fax transmission times, busy signals, etc)
 - Secure/Standard email technology which provides flexibility:
 - Data input in MS Word forms can be saved in CLEC shared space, copied/changed, retrieved/sent from any CLEC location
 - Notification data provided via email allowing the CLEC to group data electronically in a repository (previously used paper files)
 - Allows transmittals of FOCs (firm order confirmations), Clarifications and Jeopardies
 - Additional notifications including CN (completion notices)/SOC (Service Order Completion) and BCN

(billing completion notices)/PTB (Post to Bill) can be emailed

- Provides CLECs with the ability to retrieve LSR status from a website (CSOTS and/or PMAP)

4. Please provide any studies done to explain the benefits of planned OSS's over the OSS's historically used in 9-State area.

Although the extensive efforts AT&T expended to study the attributes of the 13-State and 9-State systems required to develop the OSS Plan described in response to Question 1, were not reduced to formal study documents, AT&T began to study the potential benefits of the different systems as early as 2006, well before the merger closed. Based upon substantial merger experience which was gained in prior AT&T business ventures, merger planning teams asked specific questions of the most knowledgeable BellSouth managers to obtain detailed information about BellSouth's Wholesale Operations and systems. This information was then used to develop high-level OSS integration plans.

Following the merger close, multiple teams with representation from both legacy BLS and AT&T, met frequently to further develop these plans (as also described in response to Question 2). AT&T performed functional comparisons of the 9-State and 13-State capabilities for each of the wholesale products and processes. For example, when unbundled loops were compared, all of the different types of loops were reviewed (such as EELs, copper loops, DS1/DS3, digital loops, sub-loops, voice grade loops, etc.). This detailed analysis included a review of the documentation published in the Local Ordering Handbook (LOH) and CLEC Online, process flows, internal methods and procedures. Similarly, other aspects of OSS functionality and system hardware were closely evaluated to ensure that best-practices were incorporated in the proposed 22-State OSS, including:

- Pre-order processes were studied to identify the similarities and differences to assist in determining the post-merger system/interfaces.
- A detailed review of middleware was conducted which led to the decision to minimize cost and facilitate preservation of performance data gathering processes by integrating/re-using existing, already proven 9-State common data access components.

Based upon the review and analysis described above, and in response to Question 2, AT&T created technical business requirements to add AT&T-Southeast onto the 22-State platform while ensuring 9-State functionality was properly addressed. The benefits of this OSS transition are described in detail in response to Question 3.

5. Please provide results of any Third Party Testing done of LASR, LEX, Verigate and XML for purposes of proving nondiscrimination.

AT&T's OSS capability in all regions has undergone exhaustive testing -- including third-party testing and has been recognized by regulatory bodies across the nation, including the FCC as providing CLECs with nondiscriminatory access to OSS in a manner that satisfies the OSS requirements of the Telecommunications Act of 1996.

BearingPoint (which tested the legacy BellSouth OSS) and Ernst and Young performed 3rd party testing of AT&T's Midwest systems; while Telcordia evaluated the Southwest Region OSS. In the West, Cap Gemini performed the evaluation. These Third Party Auditors, with the extensive input of CLECs and regulatory personnel, conducted tests and evaluated results for pre-ordering, ordering, provisioning, maintenance/repair, billing, and infrastructure.

The FCC Report and Orders granting AT&T InterLATA relief acknowledged the sufficiency of these Third Party Tests.

6. Please provide responsibilities of Wholesale OSS Support Managers and Specialists, staffing numbers, locations of employees and specific CLECs assigned to each staff member.

There are 14 Wholesale Support Managers, Specialists and Team Leads. They serve as the primary contact for issues related to OSS connectivity, carrier testing, carrier-managed introduction and problem resolution. There are 7 managers in Alabama, 3 in Illinois, 2 in Texas, 1 in California and 1 in Connecticut. The Wholesale OSS Support Manager Account Assignment List was provided earlier.

7. Please explain the types of call centers available for CLEC support, the responsibilities of each center, the staffing levels and the average number of calls to each center and 3 months of relevant performance metrics use to gauge quality of customer support e.g. average call center answer time, number of dropped calls.

AT&T has a Local Service Center in Birmingham, Alabama with 223 managers and representatives to assist carrier customers with interconnection agreement transactions. In addition, AT&T's MCPSC Mechanized Customer Production Support Center (MCPSC), which handles Fatal Errors and Rejects issues, is staffed with an additional manager and 9 representatives. The IS Call Center, in St. Louis, Missouri, which handles questions on OSS connectivity, application availability, password resets and various applications questions, staffs a manager and 6 representatives.

The following is data illustrating performance for the various centers during February through April 2008:

LSC Call Center SOA Average Answer Time (SQM Data)

	Feb	Mar	Apr
ATT Numerator	28092635	26160585	14942191
ATT Volume	424867	361278	375913
ATT Metric	66.12	72.41	39.75
CLEC Numerator	804137	1452620	1275397
CLEC Volume	19267	15876	20475
CLEC Metric	41.74	91.5	62.29
Abandoned	1078	1171	1095
Equity	Yes	No	No

MCPSC SE Calls Answered within 120 Seconds / Calls Answered

February	39 / 39
March	127 / 127
April	168 / 168

IS Call Center Calls Received / Calls Answered*

February 4 th -March 2 nd	1,962 / 1,594
March 3 rd -April 6 th	2,342 / 1,888
April 7 th -May 4 th	3,184 / 2,293

* Although the data is reflected through early May, beginning May 5th weekly call volumes normalized to pre-release trend.

8. Please explain the effects the changes to OSS's have on data integrity needed for SQM and SEEM data collection.

It is important to note that the April Release did not change the methodology for the collection of SQM data. In addition to normal data integrity processes, AT&T has taken extra steps to insure that the data that it reports for SQM, and the resulting remedies payable under the SEEMs plan, are accurate. During the development and implementation of the recent release, appropriate tables and fields were identified for collection of data from the post-release OSS environment. These data fields were mapped with appropriate code so that the continued accuracy of the data could be maintained. Additional care was taken to assure that data integrity was also maintained. Any delays in return of proper notification were measured from the time the CLEC request was received to the time that an appropriate response was actually transmitted to the CLEC. Moreover, AT&T attempted to resolve all data measurement issues by interpreting the results to match the actual CLEC experience. For example, if multiple FOCs were issued in response to the identified reflows of a particular LSR, AT&T used the FOC providing the largest response time (i.e.: the response time least favorable to

AT&T) in the reported data. Accordingly, AT&T believes SEEMs results will reflect a very rigorous interpretation of AT&T's SQM and SEEMs responsibilities.

9. Please explain the general type of testing currently required to be done prior to a release.

Consistent with previous Major Releases, the April 2008 Wholesale Local Release followed the Corporate Process Framework/Software Development Life-cycle process. This process is a consistent, repeatable, and standardized methodology for developing and maintaining software products within IT. Corporate Process Framework is a single corporate wide process consisting of five phases, four decision gates, and several milestones (dependent on the project complexity). Testing for the major releases occurs during the Pre-Production Testing phase and Install & Production Readiness Testing phase. The typical pre-production testing requirements for a Major Release include Unit Testing, System Testing, Regression Testing, User Acceptance Testing, CLEC Testing, and Installation Weekend Testing.

Furthermore, as a result of the Wholesale Local Consolidation projects, a Joint System Test Coordinator was assigned to provide overall testing oversight between both classic companies. These responsibilities included developing and publishing a Joint System Testing (JST) Strategy for the Wholesale Local Consolidation Program. The JST identified all of the individual testing efforts associated with this program and ensured assignment of all the necessary areas of testing. In addition to the normal levels of testing, Assembly Testing, Parallel Testing, Integration Testing, and Performance/Volume Testing were performed. Even after the JST was defined, LEO to LASR Database Conversion testing needs were later identified and executed.

The test plan specific to the Wholesale Local Consolidation projects consisted of over 11,000 test cases and defect corrections; merger support resulted in additional test scenarios being executed.

10. Please provide any emergency plan currently in place to be used when OSS failures occur which are not caused by Force Majeure.

As a part of any major release, milestone checkpoints are put in place to determine under what circumstances release issues would require a back out of code for one or more applications, or for an entire release. The back out plan, which is tailored to each release, takes into consideration all dependencies between the affected applications. In the 22-State environment, a back out plan consists of a combination of activities related to all potentially impacted OSS applications, both 9-State and 13-State. Additionally, the plan is designed to provide adequate time to perform regression and positive testing in the case of a back out in order to ensure applications are functioning according to appropriate requirements.

As a part of ongoing activities to monitor the health of its OSS, AT&T has IT teams (such as defect and outage management teams, or hazardous materials teams, depending

on the situation) and processes in place to manage particular defect and outage situations. The processes outline the types of steps to be taken, based upon the particular circumstances. The applications management and development teams responsible for responding to failures, defects and outages use those processes to evaluate and respond to release issues. The steps these teams will perform include both internal and external issues communication, through the Enhanced Defect Report, for example. Additional tasks may also include evaluating the need to bring up diverse routing, bring new hardware on line or to identify and arrange for the assignment of specialized resources to address a particular defect or outage.

Based on the April release experience, AT&T has made plans to expand future back out and failure plans, as outlined in the May 15, 2008 commitments list.

11. Please explain AT&T policy regarding required time frames for release notifications of changes to OSS.

AT&T uses the on-going Change Control Process (CCP) Meetings and CLEC User Forums to socialize system updates that are under consideration in advance of formal, documented Release announcements. Through these discussions, AT&T is able to determine areas that may require additional analysis. In addition to the informal interaction, AT&T's policy is to provide formal notifications in advance of a system release:

150 days prior to Release	CLEC Release Announcement
142 days prior to Release	Initial Requirements available
110 days prior to Release	Final Requirements available

12. Please explain what quality control processes are in place to ensure documentation released to CLECs is accurate.

In general, prior to an OSS release and the submission of the planned updates to CLECs, the existing documentation is reviewed to determine if it accurately reflects the expected post-release processes. This includes, but is not limited to reviewing the data with the Subject Matter Experts (SME), comparing the data to existing documentation/processes and compiling the data into one document. Any necessary changes are made prior to the release and communicated to CLEC via CUF, CMP and/or Accessible Letters. The modified documentation is then posted to CLEC OnLine. Similarly, if for any reason documentation does not concur in all material respects with the actual processes post-release, AT&T will make any necessary changes and convey the changes to CLECs via informal communications such as meetings and emails, as well as confirming those changes via Accessible Letter and an online posting of the revised documentation. The detailed processes currently used for releases affecting AT&T 9-State and the AT&T 13-State process, which will ultimately be used for 22-States, are described below.

LOH Quality Control Process-Release (Related-Related changes)

The following process was in place at the time of the April release and was then updated after the release was implemented to care for post-release issues.

In order to insure proper documentation for the planned LOH (Local Ordering Handbook) updates,

- AT&T Southeast deliverables were created into the WBS-Work Breakdown Schedule utilized by Release Management and develop each year by the Change Control Process (CCP).
- AT&T Southeast would web post a release related LOH (at least 15 weeks prior to the release date)
- AT&T Southeast would provide the CLECs a copy of the scheduled requirements, sometimes called features for the release (draft Requirements in 34 weeks and final Requirements 15 weeks prior to the release date)

The features for the release are developed as follows:

- The LOH Documenter compiles all of the features scheduled for the release.
- LOH Documenter reviews every Feature to determine LOH impacts.
- LOH Documenter forwards the future LOH changes (identifying the changes using highlighting) from the Feature for SME (Subject Matter Expert) review and concurrence.
- On a feature by feature basis, if the feature did not indicate LOH updates, the LOH Documenter sends a confirmation to the SME(s) indicating that no changes were identified to the LOH as a result of implementing feature. The SME(s) will either concur or indicate what changes are necessary in the LOH.
- The LOH Documentation Team makes the changes and a different member of the LOH DOC Team will review them for completeness and ensure that the LOH updates accurately reflected the features. If not, the SME will be included in the discussions for possible updates.
- An Initial Release-Related LOH Version is web posted 15 weeks prior to the Release Implementation Weekend; this LOH documentation will be effective upon the implementation of that Release.
- A *post* Initial Release-Related LOH Version will be web posted on the Friday of the Release Implementation Weekend, this LOH documentation will be effective upon the implementation of that Release.
- Once the LOH appeared on the web, the LOH Documenter will then ensure that the Users had the ability to view each new document.
- The LOH Documenter team will release an internal mass-email announcing the LOH web posting (provide the URLs) and indicate any last-minute web issues.

Post-April Release Process Changes

Following the April release, AT&T implemented additional internal quality control processes where data is checked manually multiple times prior to release to the CLECs. As previously mentioned, internal reviews occur prior to CLEC notification; which includes reviewing the data with SME, comparing the data to existing

documentation/processes and compiling the data into one document for manual comparisons. CLECs are notified via Accessible Letter of changes occurring within the LOH. Multiple reviews will occur prior to placing the data into an Accessible Letter as well as additional reviews prior to data being placed into the LOH. The Accessible Letter is reviewed during a walkthrough with the CLECs. If modifications are necessary, the updated data will be shared with the CLEC again via Accessible Letter. A subsequent walkthrough may or may not occur based on AT&T and CLEC concurrence to accept the updated data. The data is checked again prior to it being posted to the web to ensure that what was shared with the CLEC is accurately reflected in the LOH.

SE LSOR

An additional Local Service Ordering Requirements (LSOR) document is currently being developed specifically for AT&T Southeast. LOH data will be reformatted and streamlined so that CLECs will have one consolidated repository to view field level data (currently this data is in multiple sections within the LOH). This LSOR will benefit SMEs as well since they will be able to use processes and similarly formatted documentation to that currently existing in AT&T 13-State. A 22-State process, which has multiple layers of internal review, will be implemented within AT&T Southeast once the first LSOR (for the SE region) is issued in connection with the currently scheduled November 15, 2008 release. The preliminary LSOR document will be available for CLEC review in July 2008 so that CLECs will have the ability to view both the LOH and the LSOR concurrently. Modifications will be made using a phased-in approach, discussing each phase with the CLECs prior to implementation. The implementation of an AT&T Southeast LSOR was initially discussed with CLECs during the April 9, 2008 Change Management Meeting.

New 22-State Process

The table shown below depicts current AT&T 13-State processes which will be introduced after the implementation of the LSOR to the 9-State to create a single 22-State process. The current quality control process requires that certain tasks are completed by the documentation team prior to the release impacting the LSOR, Local Service Pre-Ordering Requirements (LSPOR) and LOH. The tasks are completed in accordance with the completion dates using calendar days.

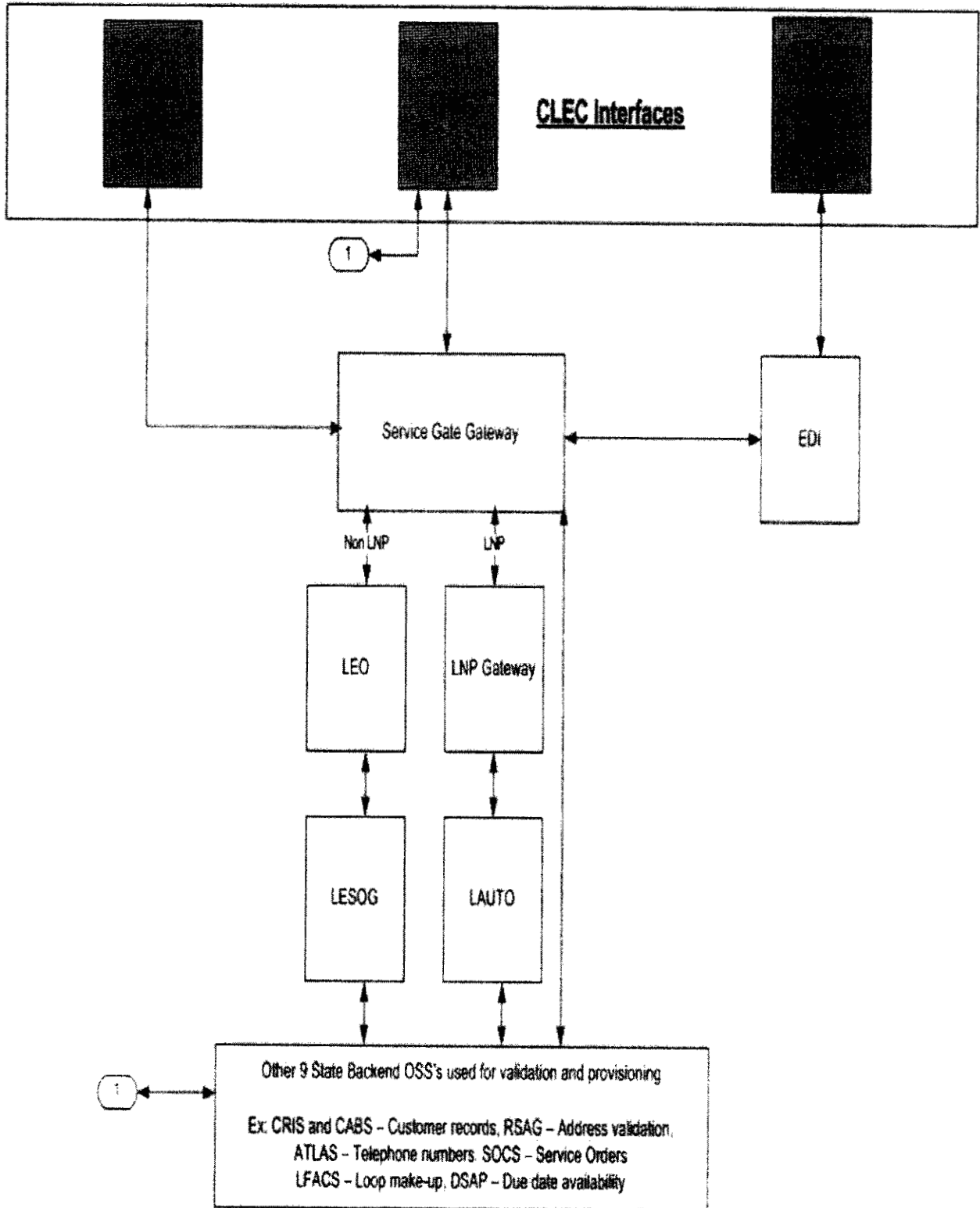
Documentation Task	# of Days Prior to the Release
Announce the Release to the CLECs via Accessible Letter	176 days
Approve the Initial Business Requirements for the Release	Ongoing
Update *Business Rules Repository with Committed Initial Requirements	169 Days
Document the Release Initial Requirements for the CLECs via Accessible Letter	162 Days
Conduct CLEC Walkthrough of the Initial Requirements Accessible Letter	143 Days
Approve the Final Business Requirements for the Release	Ongoing
Update *Business Rules Repository with Committed Final	127 Days

Requirements	
Document the Final Release Requirements for the CLECs via Accessible Letter	120 Days
Conduct CLEC Walkthrough of the Final Requirements Accessible Letter	115 Days
Approve any additional Final Business Requirements for the Release	Ongoing
If applicable, update *Business Rules Repository with any further Committed Final Requirements	52 Days
If applicable, document any further Release Final Requirements for the CLECs via an Exception Accessible Letter	45 Days
If applicable, conduct CLEC Walkthrough of the Final Requirements Exception Accessible Letter	40 Days
Release the LOH, LSOR and LSPOR documents to the CLECs	2 weeks

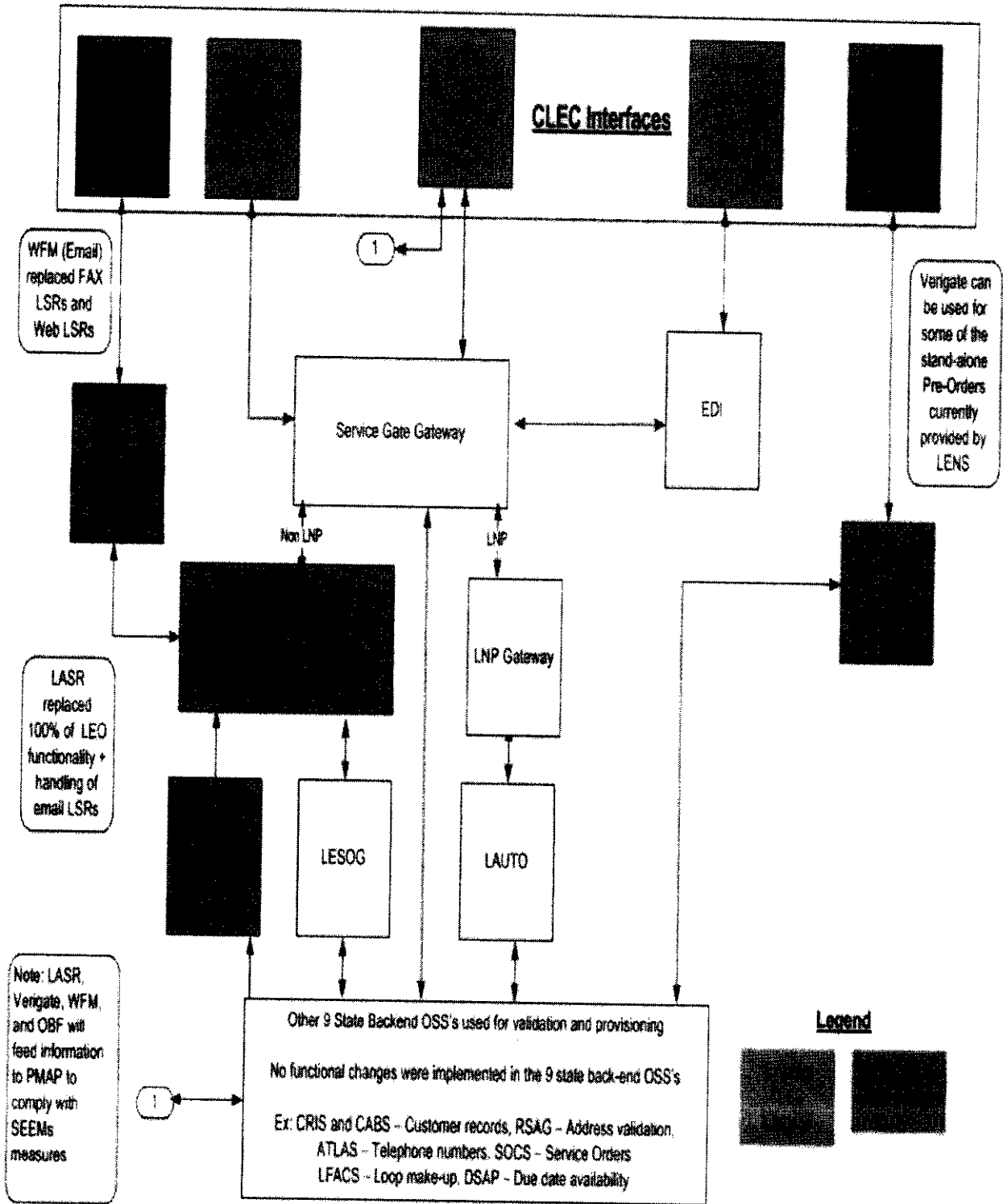
*Any reference to Business Rules Repository applies to the LSOR currently in use within AT&T 13-State. An AT&T-Southeast LSOR will be developed in November 2008, with a preliminary document in July 2008 for CLEC review. However, similar tasks are performed for the development of the LOH.

ATTACHMENT A

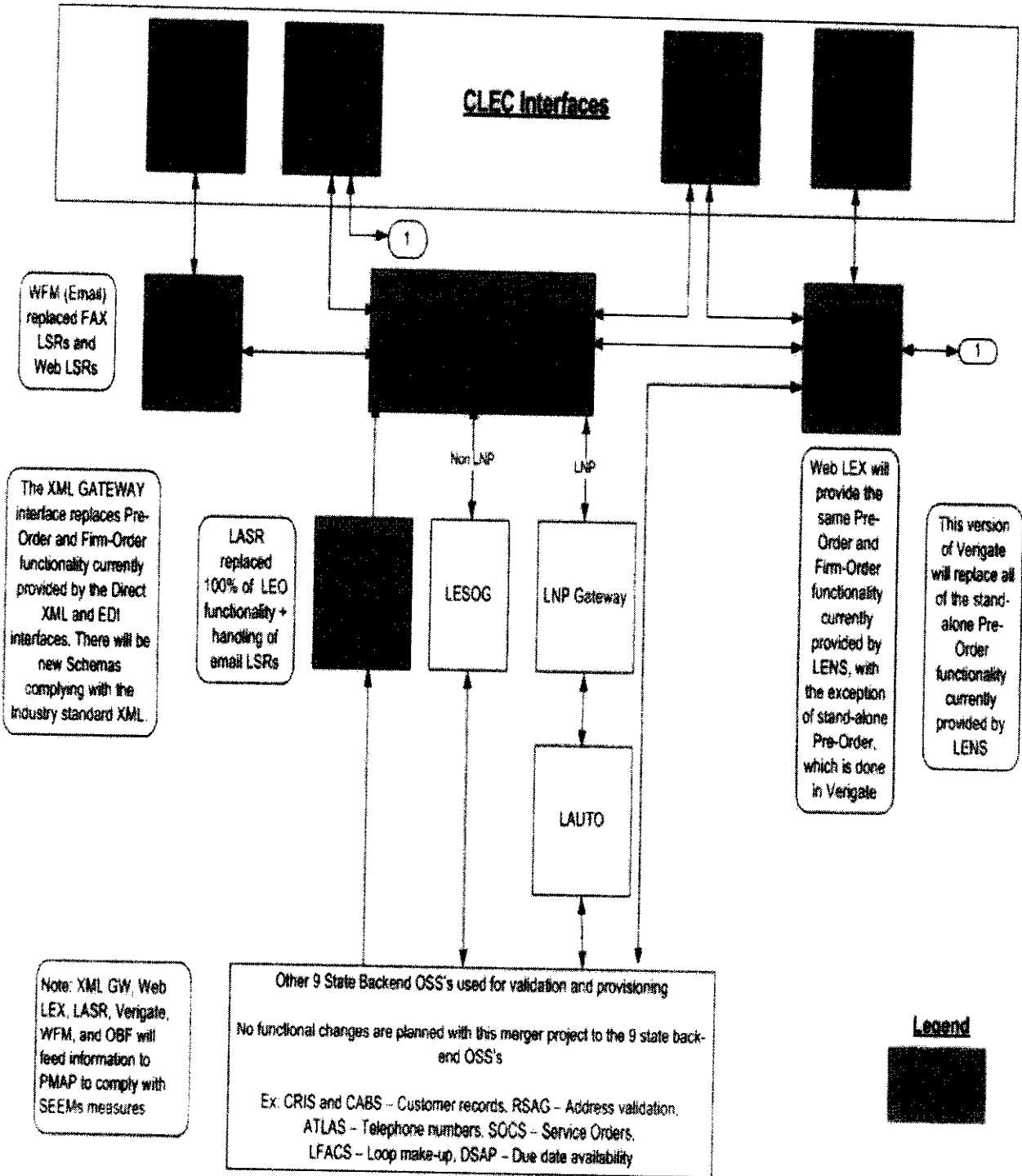
9 State Local Wholesale Applications – PRE April 19, 2008 Release



ATTACHMENT A
9 State Local Wholesale Applications - Current View



ATTACHMENT A
9 State Local Wholesale Applications – Long Term Phased Release Plan



The XML GATEWAY interface replaces Pre-Order and Firm-Order functionality currently provided by the Direct XML and EDI interfaces. There will be new Schemas complying with the industry standard XML.

LASR replaced 100% of LEO functionality + handling of email LSRs

Web LEX will provide the same Pre-Order and Firm-Order functionality currently provided by LENS, with the exception of stand-alone Pre-Order, which is done in Verigate

This version of Verigate will replace all of the stand-alone Pre-Order functionality currently provided by LENS

Note: XML GW, Web LEX, LASR, Verigate, WFM, and OBF will feed information to PMAP to comply with SEEMs measures

Other 9 State Backend OSS's used for validation and provisioning
 No functional changes are planned with this merger project to the 9 state back-end OSS's
 Ex: CRIS and CABS - Customer records, RSAG - Address validation, ATLAS - Telephone numbers, SOCS - Service Orders, LFACS - Loop make-up, DSAP - Due date availability

Legend

ATTACHMENT B
**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
 - o 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
 - o 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.
 - o Continue to status plans for currently scheduled 22-State releases within existing monthly CMP/CCP Meetings. Enhance clarity of pre-

release 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.
- 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.
- 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

- 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:
 - 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
- 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 where 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.
- Continue to review staffing levels to meet anticipated demand, including:
 - Wholesale Customer Support Managers
 - Centers