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ATTACHMENT B

**AT&T Florida
FPSC Docket No. 000121A-TP
Request for Confidential Classification
Page 1 of 1
1/9/09**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF STAFF AUDIT
REGARDING AT&T'S APRIL 2008 OSS RELEASE IN
FLORIDA DOCKET NO. 000121A-TP**

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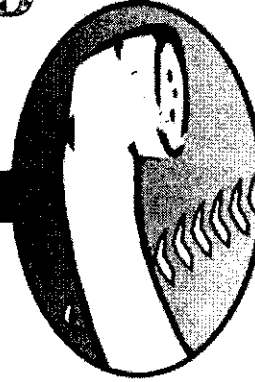
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REDACTED

DECEMBER 2008



REVIEW OF

AT&T's OSS
April 2008 Release
Analysis and Resolutions

By Authority of
The State of Florida
Public Service Commission
Division of Regulatory Compliance
Bureau of Performance Analysis

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Review of
**AT&T's OSS April 2008 Release
Analysis and Resolutions**

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December 2008

By Authority of
The State of Florida
Public Service Commission
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1.0 EXECUTIVE SUMMARY

1.0 Executive Summary

1.1 Introduction

Following the BellSouth and AT&T merger, AT&T began plans to consolidate the wholesale operations support systems (OSS) of the two companies. The OSS consolidation plans are known as the 22-State OSS Release. The 22-state reference refers to the merger of the 13-state AT&T region with the 9-state BellSouth region.¹ AT&T started the process of providing official notification to CLECs in 2007. The 22-State OSS Release plan involves a phased approach over several years. The first phase commenced with the April 19, 2008 release (April Release).

Numerous CLEC-impacting issues arose in connection with the April Release. As a result, on May 12, 2008 Cbeyond Communications, LLC, Time Warner Telecom, LP, and DeltaCom, Inc., jointly referred to as the petitioners, filed a complaint with the Commission requesting a third-party independent audit of the April Release.² The complaint also requested a stay of future 22-state OSS releases and issuance of a show cause order by the Commission. The proposed show cause would require AT&T to explain why it should not be penalized for its failure to appropriately implement the April Release.

On July 31, 2008 a conference call was held between staff and the parties exploring the possibility that the audit be conducted by Commission staff. After further discussion, on August 5, 2008, the parties agreed to the audit being conducted by Commission staff and entered into a stipulation. Per Commission Order No. PSC-08-0618-PAA-TP, filed in FPSC Docket 000121A-TP, the Commission approved the stipulation. The stipulation also states that the remaining portions of the petitioners' complaint will be held in abeyance pending a vote on Commission staff's recommendation addressing the final audit report.³

1.2 Scope and Objectives

The parties to the stipulation acknowledged and accepted that the audit shall encompass the following three objectives:

- ⊗ Documentation and assessment of AT&T's root cause analysis associated with the April Release.
- ⊗ Documentation and assessment of the software defect resolution process associated with the April Release.

¹ The 9-state legacy Bellsouth region includes the states of Florida, Georgia, Alabama, Tennessee, Mississippi, Louisiana, South Carolina, North Carolina, and Kentucky. The 13-state AT&T region refers to the pre-merger SBC Communications' region and includes the states of Texas, Kansas, Missouri, Illinois, Indiana, Michigan, Ohio, Wisconsin, California, Nevada, Arkansas, Oklahoma, and Connecticut.

² On September 26, 2008, Time Warner Telecom filed in Docket 000121A-TP a Notice of Withdrawal from participation in the complaint.

³ The remaining portions of the complaint are the delay of future 22-state OSS releases and the request for a show cause proceeding.

- 1 ⊗ Documentation and assessment of the pre-April Release and post-April Release
2 CLEC communications.⁴

1.3 Methodology

4 Commission staff's review was conducted from September 2008 to November 2008. The
5 information compiled in this report was gathered via company responses to document requests
6 on-site interviews with key personnel, and documents filed in FPSC Docket No. 000121A-TP
7 Established for Investigation into the Establishment of OSS Performance Measures for AT&T
8 Florida. Specific information collected includes:

- 9
10
11 ⊗ Key learnings associated with the April Release,
12 ⊗ Defects and resolutions resulting from the April Release,
13 ⊗ Update of AT&T Commitments made to the PSC, and
14 ⊗ Expanded Testing Plans resulting from the April Release.

1.4 Overall Recommendations and Opinion

16 Staff believes AT&T's April Release was a critical failure. Some CLECs describe this
17 April Release as the most significant competitively damaging OSS failure in the State of Florida
18 since enactment of the Telecommunications Act of 1996. There appeared to be general lack of
19 understanding of the magnitude and complexity of the conversion effort on the part of AT&T
20 management from the beginning. Failures were evident in AT&T's planning, organizing,
21 directing and control of this project.
22

23 It has now been over seven months since the April Release and many problems have
24 since been resolved. Two minor subsequent OSS releases were implemented in August and
25 November 2008 with fewer defects.⁵ However there are still many unknowns. Below are staff's
26 observations and opinions that summarize what went wrong and the remedial action AT&T
27 should take to prevent these problems from occurring in the future. Staff's conclusions and
28 recommendations summarized below address the three audit objectives defined above.

1.4.1 Assessment of AT&T's Root Cause Analysis

29 Over ■ key learnings were identified by AT&T following the April Release. Staff
30 believes the effort that AT&T has expended in its key learning process will go a long way in
31 resolving issues with the April Release and hopefully, prevent future occurrences. Only ■ of the
32

⁴ Improved CLEC communications are addressed within a list of 32 commitments that AT&T made to the CLECs and Commission. Staff's documentation and assessment of CLEC communications are addressed in its review of these 32 commitments, included in Chapter 5.

⁵ The scope and complexity of the August and November release are not comparable to the April Release. Staff believes these releases are not indicative of the management performance required for a 22-state release.

1 key learnings remain open at this time. Staff anticipates that most, if not all of these will be
2 resolved prior to the next 22-state release.
3

4 Staff is concerned that some of the key learnings were closed prematurely and without
5 sufficient implementation. Staff also saw no evidence that AT&T has performed any type of
6 follow-up to ensure that each recommendation was truly implemented, and has effectively
7 resolved the problem. Additionally, staff believes that the root cause analysis conducted on the
8 key learnings was weak and lacked formal process. A weak root cause analysis will result in not
9 all of the causal relationships being identified, which will possibly result in a flawed or
10 incomplete resolution. Staff is concerned that this may be the case for selected key learnings.
11

12 Staff further believes that AT&T missed an important opportunity to solicit input from
13 its clients, the CLEC community, in this key learning process. AT&T made little attempt to
14 gather lessons learned in the April Release from the CLEC community. Had it done so, valuable
15 input regarding the AT&T and CLEC communication process may have been received.
16

17 The following are staff's recommendations based on the assessment of AT&T's Root
18 Cause Analysis of the April Release:
19

- 20 ☞ AT&T should resolve the ■ open key learnings prior to implementing the next 22-
21 state release.
- 22
- 23 ☞ AT&T should perform an internal review to ensure that all recommendations were
24 completely and satisfactorily implemented and that each of the resolutions has
25 adequately corrected the specified issue.
- 26
- 27 ☞ AT&T should reevaluate its key learnings root cause analysis process and ensure that
28 the approach followed is adequate.
- 29
- 30 ☞ AT&T should reevaluate its root cause analysis for selected key learnings and ensure
31 that all causal relationships have been identified and the resolutions identified are
32 sufficient.
- 33
- 34 ☞ AT&T should reevaluate resolutions which have been identified as prematurely
35 closed, particularly those related to vendor coordination, and take appropriate action.
- 36
- 37 ☞ AT&T should consider incorporating input from its CLEC clients in its future key
38 learnings process.
39

40 **1.4.2 Assessment of the Defect Management Process**

41 Never before had AT&T ever encountered defect management problems such as those
42 resulting from the April Release. The scope of defects encountered overwhelmed its ability to
43 comprehensively respond in a timely manner and resource fatigue eventually became a problem
44 multiplier. The scope, volume and magnitude of ■ production defects exceeded AT&T's
45 experience, expectations, and ability to adequately respond. Problems with the defect
46 management process exacerbated the situation.

1
2 Defect tracking management, from methodology to remediation, was often
3 uncoordinated. Defects were captured in different applications that did not share common
4 architecture or an ability to communicate. Disparate systems delayed the full comprehension of
5 problems and subsequently hindered management response. Duplicative entries in two systems
6 led to varying but continuing levels of confusion about specific responsibilities. The inability of
7 various defect tracking systems to communicate or cross-populate denied management valuable
8 analysis tools with which to easily and efficiently discern pre-production and production defect
9 trends.

10
11 Prioritization of defects was impaired, allocation of resources was impacted and
12 remediation arguably delayed in some instances. Though AT&T stated that defect analysis tools
13 worked as designed in each region, some managers allowed that input errors and user oversights
14 precluded optimum performance. The number of defects resulting from the April Release,
15 particularly those of the most critical severity type, quickly outstripped AT&T's ability to
16 immediately respond in a proactive, comprehensive, and systematic manner. Staff believes the
17 company grossly underestimated the quantity, scope, and severity of defects that might be
18 encountered with this release.

19
20 AT&T has demonstrated interest in getting to the core of April Release problems.
21 Organizational structures and responsibilities for defect management have been adjusted. The
22 defect tracking systems to be used for pre-production and production defects have been clarified.
23 Training has increased in anticipation of future releases. Staff is concerned that it cannot fully
24 discern the actual effectiveness of AT&T's defect resolutions until future releases take place.
25 Additionally, staff is concerned with AT&T's defect root cause analysis, defect remediation
26 timeframes, and accuracy and adequacy of the defect and change management service quality
27 measures

28
29 The following are staff's recommendations based on the assessment of AT&T's defect
30 management processes:

- 31
- 32 ⇒ AT&T should review the April Release defects and the root causes identified for each
33 and ensure that a root cause has been identified and that appropriate action has been
34 taken to prevent future occurrences.
 - 35
 - 36 ⇒ AT&T should improve its emphasis on defect root cause analysis through written
37 policies and procedures, assignment of responsibilities and employee training.
 - 38
 - 39 ⇒ AT&T should continue to evaluate the consolidation of its defect management
40 process to ensure that defects are resolved in an expedient manner and are compliant
41 with the benchmarks established by the Florida Public Service Commission.
 - 42
 - 43 ⇒ AT&T should review the accuracy of data collection and reporting for all Change
44 Management Service Quality Measures and the Self-Effectuating Enforcement
45 Mechanism.
 - 46

- 1 ⊗ AT&T should reevaluate its use of the CLEC impacting classification and either
2 eliminate it, giving CLECs full visibility of defects, or have a clearly communicated
3 definition of when it is applicable.
4

5 **1.4.3 Assessment of CLEC Communications**

6 AT&T implemented numerous corrective actions to address the communication failures
7 that occurred pre- and post-April Release. Such corrective actions include having weekly status
8 calls with CLECs to discuss April Release defects, providing CLECs with customer service
9 contact information, implementing training guides, using the monthly Change Management
10 Process (CMP) meetings to communicate the status of future OSS releases, and holding
11 conference calls with CLECs after an OSS release.
12

13 While staff commends AT&T for taking necessary steps to improve communications
14 with CLECs, staff believes that AT&T's Change Management monthly meetings, the principal
15 outlet for communicating with CLECs, could be more effective. Staff further believes that
16 AT&T's commitments do not address possible deficiencies or improvements needed in this
17 Change Management Process, particularly the monthly Change Management calls, now that they
18 have been consolidated under a 22-state umbrella. Lastly, staff believes that AT&T should give
19 more indication or direction to the new Change Management meeting framework to evaluate and
20 address CLEC concerns, including AT&T's 22-state process for escalating CLEC issues raised
21 during the monthly meetings.
22

23 Staff is also concerned that AT&T's current Service Quality Measurement Plan (SQM)
24 and Self-Effectuating Enforcement Mechanism Plan (SEEM) may not be adequately designed to
25 capture failures of such magnitude as the April Release. AT&T's SQM and SEEM are designed
26 to capture and compare the quality of service delivered to CLECs. AT&T's failure to comply
27 with applicable SQM performance measurements will trigger SEEM remedy payments to
28 CLECs and/or the state of Florida. Furthermore, the SQM and SEEM Plans methodology is
29 based on the former BellSouth 9-state region. In some cases, system or process may have
30 changed to be in agreement with processes used in the 13-state region. These issues need to be
31 addressed.
32

33 The following is staff's recommendations based on the assessment of AT&T's pre- and
34 post-April Release CLEC Communications:
35

- 36 ⊗ AT&T should clearly define and document the monthly Change Management
37 meeting process.
38
39 ⊗ The Commission should commence an expedited review of AT&T's SQM and SEEM
40 Plans prior to implementation of 22-state releases scheduled in 2009.
41

42 **1.4.4 Assessment of AT&T's Commitment List**

43 AT&T agreed to suspend future planned 22-state OSS releases until a list of 32
44 commitments made to the Commission was met. Staff recognizes that AT&T has taken positive
45 steps to address these commitments and further believes action taken by AT&T should minimize

1 future disruptions. However, staff cannot validate that the changes that have been implemented
2 will prevent future problems.
3

4 Of the 32 commitments staff agrees with AT&T's assessment to close 25. Staff's
5 agreement is with the understanding that AT&T should be held accountable for upholding these
6 commitments upon implementation of future 22-state OSS releases. For the remaining seven
7 commitments, staff believes AT&T is closing these commitments prematurely. Staff contends
8 that further supporting documentation is needed or the processes to resolve the commitments
9 have yet to be fully addressed or implemented.
10

11 The following is staff's recommendations based on the assessment of AT&T's
12 implementation of its commitments:
13

- 14 ⊗ AT&T should reevaluate its closure of seven commitments (items 1, 6, 11, 13, 14, 25,
15 and 32 in Appendix F) and take necessary steps to assure the commitments have been
16 fully addressed.
17
- 18 ⊗ AT&T should prepare and provide staff with pre-production and production defect
19 status reports specific to each 22-state OSS release as they occur
20
- 21 ⊗ AT&T should provide staff with Expanded Test Plans for all future 22-state releases
22 as they become available, and continue to educate CLECs on future 22-state release
23 test plans.
24
- 25 ⊗ AT&T should continue to enhance the 22-state manual email ordering process to
26 include efficiencies that previously existed in the manual processing of orders in the
27 9-state region.
28
- 29 ⊗ AT&T should provide staff with an assessment on current call center activities and
30 staffing levels, and an assessment of call center activities based on future 22-state
31 releases.
32

33 **1.4.5 Conclusion**

34 Overall, staff is concerned that AT&T has made numerous statements in its April Release
35 key learning resolutions and commitments which promise future compliance with policies or
36 procedures, or improved future performance. With only such statements or promises,
37 Commission staff cannot fully opine as to whether all appropriate and adequate measures have
38 actually been undertaken to prevent CLEC-impacting issues with future releases. Because the
39 Commission cannot fully ascertain AT&T's readiness we are left in a position where we must
40 rely on AT&T attestation of readiness. The decision to move forward with the next 22-state
41 release must by its nature, reside with AT&T. Commission staff believes that the responsibility
42 of readiness rests solely with AT&T management. Because staff cannot truly opine on readiness
43 it believes that AT&T should be held accountable in a material manner for its decision to move
44 forward with the next 22-state release.
45
46

2.0 BACKGROUND AND PERSPECTIVE

2.0 Background and Perspective

2.1 AT&T's April Release Issues

On April 19, 2008, AT&T implemented its first phase of its OSS consolidation plan. This phase consisted of a software release which mainly affected systems in the 9-state former BellSouth region. As a result of the April Release, Southeast CLEC orders submitted to AT&T following the release were adversely affected. CLECs experienced a severe impact in their ability to interface with AT&T's OSS.⁶ Staff believes numerous orders were delayed significantly due to a backlog. Additionally CLECs did not receive notifications such as: order confirmations, requests for order clarifications, disconnection notices, rejection notices, and communications related to meetings at the customer premises for installations for a period of time following the release. Numerous defects in both the software and the user documentation were identified after the release.

At a May 7, 2008, AT&T Change Management Process meeting between AT&T and participating CLECs, AT&T admitted that problems occurred with the April Release. At the meeting, AT&T provided a detailed chronology of events that occurred the first two weeks after the April release. According to AT&T, during the first week after the April Release, the following three situations caused the greatest impact:

- ↳ Outbound transactions to CLECs were monitored and appeared to be working. However, AT&T later discovered that outgoing transactions in the form of firm order confirmations, clarifications, and rejections were not being delivered to CLECs.
- ↳ A backlog of CLEC orders were created due to outages and instability of the graphical user interface (GUI) system used by AT&T Local Carrier Service Center (LCSC).
- ↳ The new manual email ordering process introduced numerous errors into CLEC orders. In some cases, information contained on the Local Service Request (LSR) was being transposed when worked by AT&T service representatives, certain fields on the orders were being changed after orders were submitted, and manual orders were reflected in the OSS as electronic. AT&T required all of these previously submitted orders to be supplemented or suffer "fatal reject" status.

The details of the second week after the Release are as follows:

- ↳ Some outgoing transactions were still not being received by CLECs, specifically those CLECs who submit orders using the XML application.

A table in the April Release Local Access Service Request System (LASR) application that the LCSC uses to process incoming transactions ran out of free space causing new orders to back up in LASR.

⁶ CLEC's pre- and post-April Release ordering processes are described in Appendix A.

2.2 Auditing and Quality Assurance

On May 15, 2008, Commission staff initiated an informal workshop to discuss issues surrounding the April Release and AT&T's plans for future OSS releases in the Southeast region. At the workshop, AT&T acknowledged that a variety of CLEC-impacting issues arose in connection with the April Release. AT&T estimated that 71,000 CLEC orders in the 9-state region were negatively affected by the April Release. Of these orders, AT&T stated that 59,000 were electronic orders, and 11,000 were backlogged manual orders.

The CLECs participating in the workshop submitted a list of nine action items in priority order that CLECs needed from AT&T to restore or improve productivity lost in the April Release. The list included the following items:

- ⊗ Restore functions lost in the conversion to non-mechanized ordering via email.
- ⊗ All defects, all severity levels need to be closed in 14 days.
- ⊗ When editing orders, edit the complete LSR.
- ⊗ Adequate trained staff must be restored.
- ⊗ A new comprehensive approach to testing must be established.
- ⊗ Commingled orders should be mechanized.
- ⊗ Universal log-in and password for all OSS access.
- ⊗ Data integrity needs to be restored.
- ⊗ Remaining CLEC Best Practice Change Requests need to be accepted and scheduled.

At the workshop AT&T voluntarily committed to temporarily suspend future 22-state OSS Releases in the Southeast pending resolution of the April Release issues and to expand communications and testing of all future 22-state OSS Releases in the Southeast region. Upon Commission staff's request, AT&T memorialized and filed these commitments with the Commission on May 27, 2008. In the filing, AT&T also committed to resolve all April Release software defects, provide proactive support on the new email/manual ordering process, proactively process April Release billing adjustments, and review AT&T's call center and support team staffing levels to meet anticipated demand. AT&T's commitments and response to the CLECs action item list is discussed in detail in Chapter 5.

2.3 August 2008 Stipulation

On May 12, 2008, Cbeyond Communications, LLC (Cbeyond), Time Warner Telecom, LP (TWTC), and DeltaCom, Inc. (DeltaCom) filed a petition with the Commission requesting an audit of the April Release. The petition also requested a stay of CLEC-impacting OSS Releases and that the Commission show cause AT&T to explain in detail the circumstances surrounding the April Release and explain why AT&T should not be penalized for its failure to appropriately implement the April Release.

In the petition, the CLECs requested an independent audit be conducted that focuses on the cause of the OSS failures. In AT&T's response to the petition filed with the Commission on June 2, 2008, AT&T denies that an independent audit of the April Release is necessary. AT&T stated that it has provided, and will continue to provide, information and explanations regarding the April Release, and has fully supported CLEC requests for status, escalation, and assistance. AT&T also states that it will continue to respond to CLEC inquiries through individual customer support and weekly conference calls opened to all CLECs. AT&T asserts that its internal review and Expanded Test plan will include any necessary root cause analysis of the April Release issues.

A conference call was held between staff and the parties on July 31, 2008 exploring the possibility that the audit be conducted by Commission staff. After further discussions, on August 5, 2008, the parties entered into a stipulation and agreed to the audit being conducted by Commission staff. The scope of the audit would be to:

- ⊗ Document and assess AT&T's root cause analysis associated with the April Release.
- ⊗ Document and assess the software defect resolution process associated with the April Release.
- ⊗ Document and assess the pre-April Release and post-April Release CLEC communications.

The scope was approved by FPSC Order PSC-08-0618-PAA-TP on September 23, 2008. Per the stipulation, AT&T also agreed to refrain from implementing future 22-State OSS releases until the Commission's vote of staff's recommendation addressing the final audit report or a mutually agreeable timeframe. Additionally, the stipulation states that AT&T shall still be accountable for its commitments filed with the Commission on May 27, 2008. The stipulation anticipated that the final audit report or staff recommendation to the Commission will contain Commission staff's view as to whether appropriate and adequate measures have been undertaken to minimize CLEC-impacting issues with future scheduled 22 State OSS releases.

3.0 KEY LEARNINGS & ROOT CAUSE ANALYSIS

3.0 Key Learnings & Root Cause Analysis

3.1 Introduction

One of the primary objectives of this audit was to document and assess AT&T's root cause analysis of the April Release. In response to a request for AT&T's root cause analysis staff was provided with a spreadsheet listing all the key learnings which were identified during the April Release.

During every software release, AT&T employs a key learning process that allows employees to identify what went right and what went wrong with the processes, tools, and other release activities. In April 2008, this same process was followed. Key findings were compiled and categorized in two phases at the conclusion of the release. Phase one was obtaining key learnings from the IT organization and was completed on May 16, 2008. Phase two was to solicit key learnings from the AT&T Business unit. This was completed on June 27, 2008. Over ■ AT&T employees identified ■ key learnings.

Once the key learnings were identified, AT&T employees formed teams and held facilitated meetings to determine the root cause for each key learning. The teams also developed action plans and assigned owners to each action plan for implementation. Meeting participants included employees from AT&T, as well as the three vendors⁷ who participated in the April Release.

3.2 Key Learnings

AT&T provided staff with a list of the ■ key learnings on August 29, 2008. Staff obtained an updated status report on the key learnings on October 24, 2008. This listing was extracted from a database maintained for purposes of tracking lessons learned after each release. The information provided to staff included the date the key learning was reported, the key learning review finding, the employee who identified the key learning, the phase in which the key learning occurred, the category of the key learning, the root cause, the employee responsible for resolution, the status, the resolution date, and the resolution.

The ■ key learning findings can be further sorted by categories as follows in **Exhibit 1**.

⁷ The vendors participating in the April Release were Amdocs, Accenture and Telcordia.

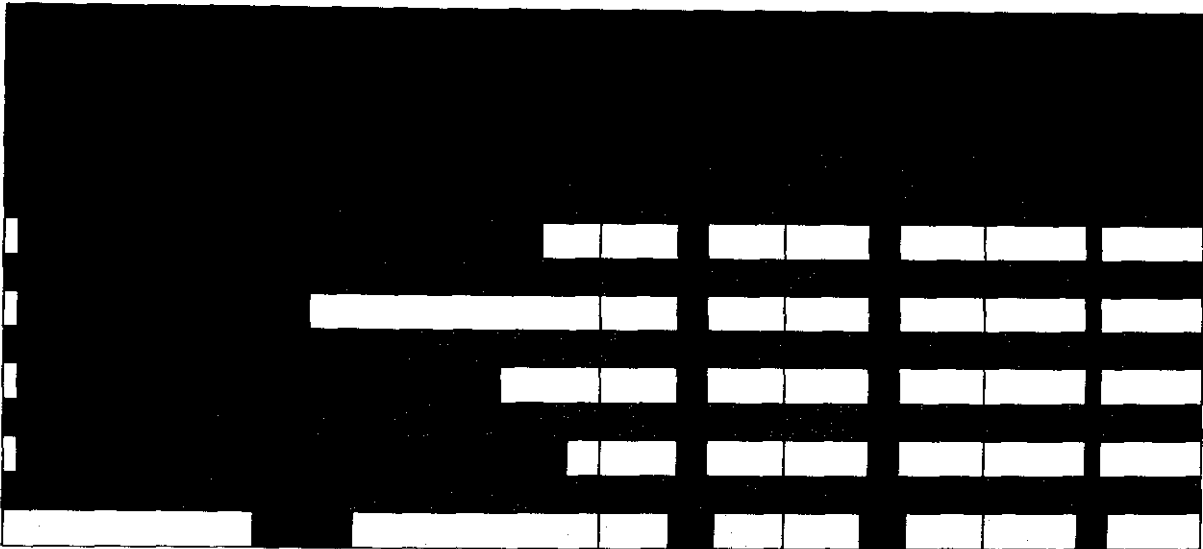


EXHIBIT 1

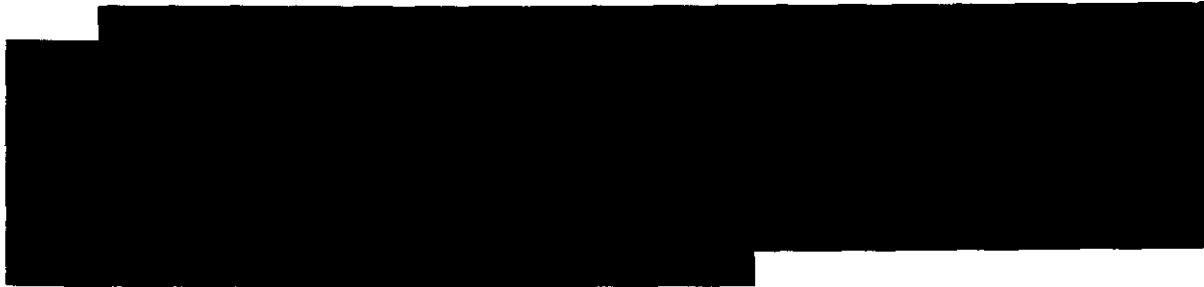
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3 While the majority of the key learnings focused on areas for improvement, the key
4 learnings listing also contained a type of finding classified as “what worked”. There were
5 “what worked” key learnings. These are policies, processes or procedures that AT&T employees
6 believe worked well during the release. Generally, the “what worked” key learnings for the
7 April Release fall into the following categories:

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⁸ This includes 91 key learnings that AT&T identified as duplications relating to the April Release.

⁹ Status as of October 22, 2008.

¹⁰ Order of Magnitude 179 or OOM 179 is the project name given to the April Release.

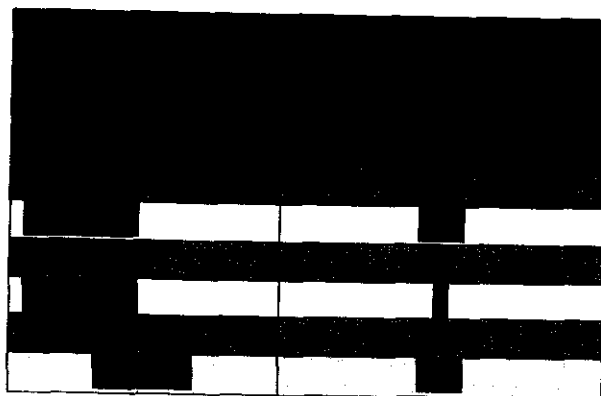


EXHIBIT 2 Source: Document Request 4-1

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3 Some of the more significant key learnings identified by AT&T were:
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20 Staff believes that the major issues experienced by AT&T include the

21
22 For detailed examples of key learnings see Appendix B.
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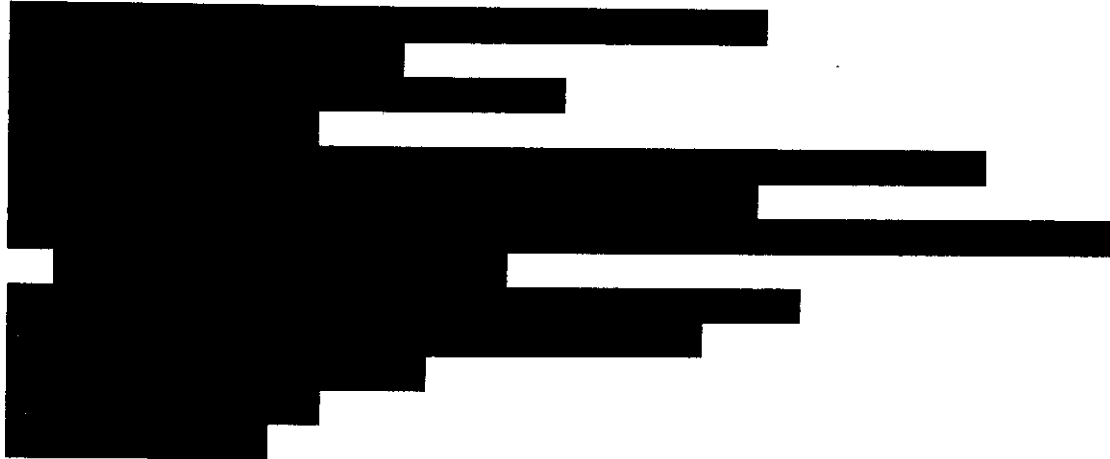
24 3.3 Root Cause Analysis

25 AT&T's root cause analysis identified several main themes or issues. Staff believes the
26 analysis revealed a major failure on the part of AT&T management to effectively plan, organize,
27 direct and control the April Release. This failure is evidenced by the following root causes
28 identified by AT&T:
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31
32

^{11 11} The number following the key learning is the key learning identification number.

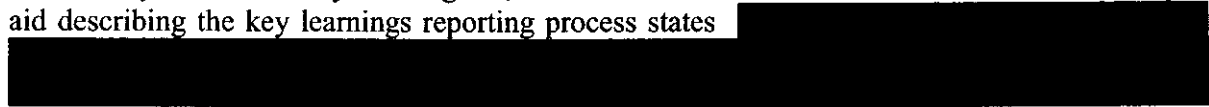
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Staff is concerned about the quality of the root cause analysis performed by AT&T. One of the purposes of this audit was to ensure that AT&T had conducted an appropriate root cause analysis to ensure the problems with the April Release are prevented in the future 22-state releases. Root cause analysis is a problem-solving method aimed at identifying the root cause of problems or events. The practice is predicated on the belief that problems are best solved by attempting to correct or eliminate root causes, as opposed to merely addressing the immediately obvious symptoms. By directing corrective measures at root causes, it is hoped that the likelihood of problem recurrence will be reduced. General principles of root cause analysis are:

- ⊗ Aiming performance improvement measures at root causes is more effective than treating the symptoms of a problem.
- ⊗ To be effective, root cause analysis must be performed systematically, with conclusions and causes backed up by documented evidence.
- ⊗ There is usually more than one root cause for any given problem.
- ⊗ To be effective the analysis must establish all known causal relationships between the root cause(s) and the defined problem.

Staff does not believe that AT&T adhered to such formal principles for evaluation of the issues associated with the April Release. AT&T response to staff's request for AT&T's root cause analysis was the key learning list, which included a column labeled "root cause". A job aid describing the key learnings reporting process states



Staff does not believe any formal root cause analysis was conducted. Instead, employees merely offered opinions that were not critically examined by management. The root causes listed on the key learning document were typically one sentence in length, as shown in the above examples. Staff is not certain that all causal relationships between the root cause and the key learning issue were identified. Additionally, no supporting documentation was provided.

1 A general process for performing and documenting a root cause analysis is defined
2 below:

- 3
- 4 1. Define the problem.
- 5 2. Gather data/evidence.
- 6 3. Ask "why" and identify and analyze the causal relationships associated with the
7 defined problem.
- 8 4. Identify which causes if removed or changed will prevent recurrence.
- 9 5. Identify effective solutions that prevent recurrence, are within your control, meet
10 your goals and objectives, and do not cause other problems.
- 11 6. Implement the recommended solutions.
- 12 7. Observe the recommended solutions to ensure effectiveness.
- 13

14 Staff does not believe that AT&T has adequately implemented a structured process such
15 as this, in its root cause analysis. While employees have worked together to identify the
16 resolutions to the key learnings, staff is concerned that AT&T has not adequately implemented
17 steps number three, six and seven of the process defined above. Many of these resolutions have
18 not been tested and observed to ensure effectiveness. Staff is concerned that the next 22-state
19 release will be the first test of some of these new and improved processes.

20
21 Staff also believes that there are at least [REDACTED] root causes which should be reevaluated by
22 AT&T.¹² In two cases, a root cause does not appear on the key learning log.¹³ In other cases,
23 staff believes the key learning root cause analysis was weak or insufficient and can be improved
24 by continuing to ask the question "why". For example [REDACTED]

25
26
27 Another example is [REDACTED]
28
29
30

31 [REDACTED] Staff does not believe this root cause analysis adequately
32 address the issue identified.
33

3.4 Resolution Analysis

34
35 AT&T employees identified many beneficial resolutions to the key learnings from the
36 April Release. Among the key resolutions identified by AT&T are:

37
38
39
40
41
12 [REDACTED]
13 [REDACTED]

14 The number following the resolution represents the number of key learnings resolved by this resolution.

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 These resolutions directly address what staff considers to be some of the major issues
8 during the April Release. Staff discussed most of these resolutions with AT&T during the audit
9 to validate existence and implementation. Staff confirmed that a Technical Oversight Team and
10 a Joint Architecture Team have been identified and that their roles and responsibilities' have
11 been defined. Staff also reviewed the Expanded Test Plan for the November 2008 release and
12 confirmed that the plan has been appropriately expanded. Staff also confirmed that AT&T has
13 identified an integrated defect management process for the 22-states by requiring the Southeast
14 to migrate to the defect system used in the 13-state region.
15

16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED] of the [REDACTED] open key
20 learnings are relating to [REDACTED] Staff confirmed that a procedure
21 requiring a communication plan has been put in place, however staff cannot confirm whether the
22 procedure is sufficient to address the issues raised in the key learnings.¹⁵ [REDACTED]
23 [REDACTED]
24 [REDACTED]
25

26 Staff is concerned that several of the key learnings resolutions are merely statements or
27 promises to do better in the future.¹⁶ Staff has no way of validating statements that promise
28 future adherence to a process. [REDACTED]
29 [REDACTED]

30 [REDACTED] Staff cannot validate the implementation
31 of this resolution. [REDACTED]

32 [REDACTED] Many of the key
33 learning resolutions to address these issues focus on [REDACTED]. While staff may be able
34 to validate [REDACTED], staff has no
35 way of validating [REDACTED] has adequately conveyed the needed information.
36 [REDACTED]

37 [REDACTED] Staff can validate
38 that the meetings are being held, however staff cannot guarantee that these meetings will resolve
39 the issues. Until another major 22-state release occurs, staff will not know whether these
40 resolutions have adequately resolved the concerns.
41

¹⁵ In the November 2008 Release AT&T posted information on it web-site as required by its communication plan. However, some of the information in the posting which was made for the CLEC benefit was erroneous.

¹⁶ [REDACTED]

3.5 Open Key Learnings

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2 [redacted] of the [redacted] key learnings still remain open as of October 22, 2008. Without complete
3 closure staff is concerned that the company is still at risk of future issues. [redacted]
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5 [redacted]
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9 [redacted]
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11 [redacted]
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14 [redacted]
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16 [redacted]
17 [redacted]
18 [redacted]
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30 [redacted]
31 [redacted]
32 [redacted]
33 [redacted]
34
35 [redacted]
36 [redacted]
37 [redacted]
38 [redacted]
39 [redacted]
40 [redacted]
41

¹⁷ [redacted]

¹⁸ The number following the description is the number assigned to the key learning.

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[REDACTED]

3.6 Prematurely Closed Key Learnings

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Staff believes there are several key learnings that may have been closed without complete implementation.¹⁹ [REDACTED]

¹⁹ [REDACTED]
²⁰ [REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3.7 Key Learnings & Root Cause Analysis Conclusions

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Over [REDACTED] key learnings were identified by AT&T employees. AT&T has invested a good deal of time and employee resources in identifying key learnings, root causes and resolutions from the April Release. Staff believes the effort that AT&T has expended will go a long way in resolving issues with the April Release.

Staff has several concerns regarding the key learning analysis as it relates to preventing future problems. First, there are [REDACTED] key learnings that remain open as of October 22, 2008. [REDACTED]

[REDACTED] Over seven months have elapsed since the April Release. Staff questions whether AT&T paid appropriate attention to prioritization of its issues and worked its highest priority issues first. Despite this, staff anticipates, that most, if not all, of these key learning resolutions will be implemented prior to the next 22-state release.

Secondly, staff is concerned that some of the key learnings may have been closed without sufficient implementation. Staff did not see evidence that AT&T performed any type of follow-up to ensure that these recommendations were truly implemented and had effectively resolved the identified problem. Staff recommends that AT&T conduct an internal review of the key learning resolutions and validate that resolutions have been adequately implemented and that the resolution have actually resolved the issue in question. Staff also requests that AT&T review all

1 key learnings to determine whether other key learnings, in addition to those identified by staff,
2 may have been prematurely closed.
3

4 Staff also believes that AT&T should reevaluate its root cause analysis for the key
5 learning identified by staff in Section 3.3, as having weak or insufficient root causes. A weak
6 root cause analysis will result in not all of the causal relationships being identified, which will
7 possibly result in a flawed or incomplete resolution. Staff is concerned that this may be the case
8 for selected key learnings. AT&T should reevaluate its key learnings root cause analysis process
9 and ensure that the approach followed is adequate.
10

11 Staff believes that AT&T missed an important opportunity to solicit input from its clients
12 in the CLEC community in this key learning process. AT&T made little attempt to gather
13 lessons learned in the April Release from the CLEC community. Had it done so, valuable input
14 regarding the AT&T and CLEC communication process may have been received.
15

16 Finally, staff is concerned that AT&T has made numerous statements in its key learnings
17 which promise future compliance with policies or procedures, or improved future performance.
18 With only such statements, commission staff cannot fully opine whether appropriate and
19 adequate measures have actually been undertaken to prevent issues with future releases.
20

21 In summary:

- 22
- 23 ☞ AT&T should resolve the ■ open key learnings prior to implementing the next 22-
24 state release.
- 25
- 26 ☞ AT&T should perform an internal review to ensure that all recommendations were
27 completely and satisfactorily implemented and that each of the resolutions has
28 adequately corrected the specified issue.
- 29
- 30 ☞ AT&T should reevaluate its key learnings root cause analysis process and ensure that
31 the approach followed is adequate.
- 32
- 33 ☞ AT&T should reevaluate its root cause analysis for selected key learnings and ensure
34 that all causal relationships have been identified and the resolutions identified are
35 sufficient.
- 36
- 37 ☞ AT&T should reevaluate resolutions which have been identified as prematurely
38 closed, particularly those related to vendor coordination, and take appropriate action.
- 39
- 40 ☞ AT&T should consider incorporating input from its CLEC clients in its future key
41 learnings process.
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4.0 DEFECT MANAGEMENT

4.0 Defect Management

4.1 Introduction

Documentation and assessment of the defect resolution process was identified as one of the three key objectives of this review. Staff reviewed both the pre-production and production defect management processes associated with the April Release. Sound defect tracking methodology is vital to correcting deficiencies in a software release and to improving internal processes.

The acceptable number of defects for a software release is generally considered dependent on the sensitivity relative to the field, enterprise, or business the software is designed to assist. For instance, air traffic control or military software would arguably have far smaller tolerances for defects than software updating a video game application. This rate should be established in the earliest stages of a scheduled software release, during the pre-design risk assessment phase, by the project development team. AT&T does not identify an acceptable number of defects in advance of a project or release. The company states its goal is zero defects.

Prior to initiation of the audit, AT&T had reported to the Commission that as of June 20, 2008 there were 229 production defects in the April Release.²¹ This information was not correct. Staff later discovered there were actually a total of [REDACTED] production defects. In addition, staff also learned there were [REDACTED] pre-production defects in the April Release.

4.2 Pre-Production Defect Management

Pre-production defects are those that are detected through software testing prior to implementation of the software on the release weekend. AT&T's objective is to ensure that all software testing defects are closed prior to the end of testing in accordance with system test exit criteria. AT&T manages pre-production defects in the application tool called Quality Center. The process begins with identification, validation and documentation of a defect. The process ends with validation of a code fix and the defect is then closed. Defect management can result in process improvement if adequate and sufficient data is captured and documented for each defect.

4.2.1 Pre-Production Defects

The April Release captured [REDACTED] total pre-production defects. The segregation by severity in **Exhibit 3** reveals:

²¹ AT&T's response to staff's data request was contained in PSC Order 08-0618-PAA-TP and stated there were 125 CLEC impacting defects and 104 non-CLEC impacting defects.

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Type	AT&T Classification	Number ²²
Severity 1	Critical	
Severity 3	Average	
TOTAL		

EXHIBIT 3

Source: Document Request 3

[REDACTED]

At the time of the pre-release final code freeze in April, [REDACTED] pre-production defects remained open.²⁴ AT&T stated that none were of the most critical type, Severity 1. AT&T further explained that each defect had a full workaround in place to allow normal operations until a permanent repair could be applied downstream, during a normally scheduled warranty or maintenance release.

²² [REDACTED]

²³ The number following the defect is the defect identification number.

²⁴ [REDACTED]

1 The eight pre-production defects still open at the time of the April Release were:
2

- 3 ⌘ Loop makeup inquiries, without data in some non-mandatory fields, resulted in the
4 inquiry incorrectly being returned in an error status. (██████████ Severity 3)
5
- 6 ⌘ The LASR GUI display did not display all required fields though a test case proved
7 the fields were addressed, and returned, in notifications. (██████ Severity 2)
8
- 9 ⌘ The LASR GUI was not recognizing certain field values. CLECs were instructed to
10 use the LSR remarks section to indicate a need for special handling of these particular
11 values, allowing LSC representatives to process the LSR manually. (██████, Severity
12 2)
13
- 14 ⌘ In LASR, duplicate error messages appeared on screen for service orders after a
15 review had already been performed once and the item resubmitted for review. (██████,
16 Severity 3)
17
- 18 ⌘ Firm Order Confirmations (FOC) and provider initiated notifications were being
19 adversely affected for email manual local service requests (LSRs). Local Service
20 Center (LSC) representatives could manually adjust in the LASR GUI. (██████,
21 Severity 2)
22
- 23 ⌘ LASR/EU FOC view screen was displaying erroneous order numbers. (██████,
24 Severity 2)
25
- 26 ⌘ There was no mechanism in place to ensure a line loss file was processed only once.
27 LEO would process one order per day. LASR could process multiple files but had no
28 means to ensure it didn't process the same file twice. This defect was noted in the log
29 as minimally impacting CLECs because only eight CLECs had elected to receive line
30 loss notices via EDI. (██████, Severity 2)
31
- 32 ⌘ Uncertainty whether a particular audit message appearing on pending service orders
33 was necessary with LASR processing the orders. (██████, Severity 3)
34

35 According to AT&T, the most problematic defect associated with the April Release was
36 lack of delivery of CLEC notifications. While this defect was not discovered until production,
37 arguably it should have been uncovered in pre-production. Pre-production notification testing
38 was not conducted end-to-end. AT&T admitted that, at least with respect to notifications,
39 everyone "just sort of missed it". This proved to be a critical miss.
40

41 **4.2.2 Pre-Production Defect Management Key Learnings**

42 April Release pre-production defect management tracking was conducted using both
43 Harvest and Quality Center, two defect management and tracking applications. Harvest was
44 used in the 9-state region while Quality Center was used by Amdocs for all LASR-related pre-
45 production defects. The employees in the 9-state region did not have access to Quality Center

1 during the April Release. This use of two defect tracking systems caused major problems for
2 AT&T and was the subject of several key learnings.

3
4 During the April Release, [REDACTED]
5 [REDACTED] Selected key learnings furnished insight into the prevalent pre-production
6 difficulties experienced by AT&T. A more detailed explanation of representative key learnings
7 can be found in **Appendix C**. The following is a sample of the pre-production defect-related
8 problems identified by AT&T to have been prevalent in the April Release.²⁵

9
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]
29 [REDACTED]
30 [REDACTED]
31 [REDACTED]

32
33 Several other pre-production management issues went unidentified by AT&T and
34 ultimately proved problematic before the April Release. Perhaps most importantly, the
35 individual responsible for pre-production defect management was replaced prior to the release
36 and production phase. Staff believes this caused a lack of defect management operational
37 continuity between pre-production and production environments and was a contributing factor to
38 problems experienced.

39
40 **4.2.3 Pre-Production Defect Management Resolutions**

41 Several improvements have been incorporated to the pre-production defect management
42 process since the April Release. In August 2008, AT&T began using Quality Center as the
43 primary application for pre-production defect management. Not only are the two regions'
44 processes now combined in a single reporting tool, but AT&T also asserts that communications
45 regarding defect management have been improved and streamlined. Efforts to educate

²⁵ The number following the statement is the key learning identification number.

1 employees and managers on the defect process have been increased. Stricter controls are now in
2 place for enforcement of the pre-production defect identification and tracking process.
3

4.3 Production Defect Management

4
5 Production defect management is the practice of managing defects found in software that
6 has been implemented and released to the CLECs for use. This implementation occurs over the
7 release weekend. The defect management process begins with the identification of a defect
8 either by AT&T or its vendor. Proper validation and documentation of the defect follows, each
9 an integral part of defect management. The process ends with validation of a code fix in the
10 production environment. The defect is then closed.
11

4.3.1 Production Defects

12
13 AT&T tracks the number of defects encountered over the release weekend. This result is
14 can compared to prior releases as a benchmark. Prior to the April Release, AT&T typically
15 averaged [REDACTED] defects on a release weekend. During the April Release, a total of [REDACTED] defects were
16 validated over implementation weekend, [REDACTED].
17

18 Following the April Release, a total of [REDACTED] production defects were reported as of
19 September 5, 2008. Staff notes this number is significantly higher than the 229 production
20 defects originally reported by AT&T to the Commission on June 30, 2008. Exhibit 4 depicts the
21 number of defects by CLEC impact and severity:
22
23

Production Defects				
	Severity 1 Critical	Severity 2 Major	Severity 3 Average	Total
CLEC Impacting	64	82	124	270
TOTAL				

24 EXHIBIT 4

Source: Document Request 3

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32 Staff analyzed the total production defects experienced during tri-annual releases for the
33 two-year period 2006-2007. Comparison were made of numbers and types of defects for the
34 entire years of 2006 and 2007, spread across three tri-annual releases each year, versus the

²⁶ CLEC impacting problems are cases where the interface is not working in accordance with the AT&T-SE baseline user requirements or the business rules that AT&T-SE has published or otherwise provided to the CLECs. These problems typically affect the CLEC's ability to exchange transactions with AT&T-SE and may include documentation that is in error, has missing information or is unclear in nature.

1 number and type of defects associated with only the April Release. This analysis demonstrates
2 the magnitude of the problems and their potential for disruption to the company and to wholesale
3 customers.
4

5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 AT&T OSS software releases have a specified warranty period. This usually takes the
11 form of a two-week period during which known defects are corrected through the execution of
12 four maintenance releases. The goal of these maintenance releases is to fix any defects found
13 with the software during and immediately after implementation. Because of the magnitude of
14 problems with the April Release, the warranty period was extended from two to four weeks and
15 defect reporting for this release continued until mid-August 2008.
16

17 Of the defects experienced during the extended warranty period for the April Release,
18 slightly over half were CLEC impacting. [REDACTED]
19 [REDACTED]
20 [REDACTED]

21 Exhibit 5 shows the warranty period defect by severity and CLEC impact.
22
23

Warranty Period Defects				
Defects	Severity 1 Critical	Severity 2 Major	Severity 3 Average	Total
CLEC Impacting	59	46	44	149
TOTAL				

24 EXHIBIT 5

Source: Document Request 5

25
26 **4.3.2 Production Defect Management Key Learnings**

27 During the April Release, there were [REDACTED] key learnings derived from production testing
28 defects. Studying a few representative examples from the key learnings provides insight into
29 some of the more prevalent, recurring difficulties. A more detailed explanation of some of the
30 production key learnings can be found in Appendix D. The following are among the most
31 problematic production defects during the April Release:²⁷
32
33 [REDACTED]
34 [REDACTED]
35 [REDACTED]
36 [REDACTED]
37 [REDACTED]
38 [REDACTED]

²⁷ The number following the statement is the key learning identification number.

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[REDACTED]

4.3.3 Production Defect Management Resolutions

Key improvements have been implemented to the production defect management process since the April Release. A 22-state, production defect management process is now in place using Vantive. AT&T states it believes that communication regarding production defect management has been improved. AT&T states it has also implemented stricter controls of the production defect determination and tracking process. Training has been conducted to ensure that employees adequately understand the defect process.

The company stated that both the number and scope of practice exercises prior to releases have been increased to heighten operator proficiency and awareness. All managers involved with defect tracking and analysis have undergone remedial training following the April Release. Though no firm number of sessions could be identified by AT&T, the company stated that as many as three such sessions have been held since April and included not only defect managers but vendor representatives as well. These sessions were generally conducted using a teleconference bridge with PowerPoint guides sent to all participants.

As discussed in the previous chapter, [REDACTED] key learning remains open in production testing and defects category. [REDACTED]

4.3.4 Production Defect Root Cause Analysis

The defect management data base has a field for designating a root cause for each defect. Staff reviewed the root causes for the April Release defects to ensure that AT&T was taking appropriate action to prevent future occurrences. Staff found that:

[REDACTED]



4.4 Defect Classifications

AT&T has two systems for classifying defects. Defects are classified by severity and by whether or not they are CLEC impacting. The manner in which the defect is classified has an impact on CLECs.

4.4.1 Severity Classification

During the April Release, AT&T did not employ a uniform severity methodology to classify defects. The 9-state and 13-state severity definitions were different, in the number of severity levels and the allowable number of days for remediation.

Defect Remediation Period by Severity		
Severity	9-state Days Allowed*	13-state Days Allowed**
1	No Information	0 to 5 days
3	Within 30 days	0 to 60 days

EXHIBIT 6

* Source: AT&T SE Change Control Process Guide 10/28/08

** Source: Document Request 4-11

Application of a severity code is a manual process, requiring the employee opening a defect to assign a numerical value for the degree of severity based on established criteria. The assigned severity value is then verified prior to permanent inclusion on the defect list.

Defects within the 9-state region are classified on a severity scale of 1 (critical) to 4 (cosmetic). Defects within the 13-state region are also ranked for severity but use a different ranking system, employing only three grades of severity. Details regarding differences in the ranking can be found in Appendix E. As shown in Exhibit 6 above, significant differences exist in the allowable timeframes for remediation.

AT&T stated that it recognized the disparity and has established a defect management process which includes a single severity coding protocol for future releases. Staff still has concerns regarding whether a single standard has been, or in fact, can be adopted. The AT&T website contains a newly-published Change Control Process Manual dated October 28, 2008.

1 This manual contains the same severity codes and remediation days as shown in **Exhibit 6** above
2 for the 9-state region. It does not appear that any changes have been made. In fact, staff believes
3 AT&T could not make changes to this manual without approval from the CLECs.²⁸
4

5 Additionally, staff believes changes to the remediation period would also require the
6 approval of the Florida Public Service Commission. A wholesale service quality measure titled
7 Percentage of Software Error Corrected in "x" Business Days (CM-6) ordered by the Florida
8 Public Service Commission requires AT&T to report defect correction timeliness. The "x"
9 specifically refers to the remediation period of 10, 30 and 45 days for Severity 2, 3 and 4 defects,
10 respectively. The benchmark is that 95 percent of the defects should be corrected in the allowed
11 timeframe.
12

13 Staff notes the CM-6 service quality measurement data report on the AT&T PMAP
14 website reveals that AT&T failed the metric sporadically for several months following the April
15 Release. AT&T reported that it failed the measure for Severity 2 defects for May, June, August,
16 and September 2008. It also reported that it failed the measure for Severity 3 defects for May,
17 July, August and September.²⁹ Despite these failures, AT&T calculated that it owed no penalties
18 for missing this measure under the Self-Effectuating Enforcement Mechanism (SEEM). AT&T
19 is supposed to pay \$1,000 for every defect that did not meet the 95% benchmark. While staff is
20 aware of differences between the SQM and SEEMs calculations, staff is very concerned
21 regarding the accuracy of the information being provided for the Change Management
22 measures.^{30 31} When specifically asked about Change Management SQM accuracy AT&T stated
23 that all information posted was accurate. Staff does not agree and believes further review is
24 needed by both AT&T and staff regarding accuracy of the Change Management measures.³²
25

26 If, in fact, the information is found to be accurate, staff has further concerns regarding the
27 adequacy of the measures which can be addressed in a future review of the SQM and SEEM plan
28 scheduled for 2009. At a minimum, staff believes the 95 percent benchmark needs to be
29 reviewed. Additionally, there may need to be a remediation requirement for Severity 1 defects.
30

31 **4.4.2 CLEC Impacting Classification**

32 AT&T defines CLEC impacting as those production defects which directly affect
33 CLECs' ability to do business. The AT&T-SE Change Control Process manual dated October
34 28, 2008 defines CLEC impacting as problems which typically affect the CLEC's ability to
35 exchange transactions with AT&T-SE and may include documentation that is in error, has
36 missing information or is unclear in nature.
37

²⁸ The Change Control Manual includes that statement: Jointly Developed by the Change Control Sub-team comprised of AT&T-SE and CLEC Representatives.

²⁹ No severity 4 defects were reported.

³⁰ AT&T's SQM website did not report any defects corrections for the month of April and June for Severity 2, and none for the month of April and July for Severity 3. However AT&T's Enhanced Defect Report for April 29, 2008, shows numerous severity 2 and 3 defects closed during April that should have been included in the metric. Additionally, there were at least 30 severity 2 defects closed in June according to the July 2, 2008 Enhanced Defect Report.

³¹ Staff's analysis of the defects reported in Document Request 1-4 also reveals AT&T would have failed the benchmark for both Severity 2 and 3 for May through September 2008.

³² Close or fix date was missing from the defect listing provided to staff. If this information is not populated in the data base staff questions what field is being used as input to the SQM and SEEM calculations analysis.

1 Staff is not sure how, when or by whom defects are classified as CLEC impacting or non-
2 CLEC impacting. This classification is not addressed in any of the AT&T defect manuals
3 reviewed by staff. A listing of defects, known as the Enhanced Defect Report, is published daily
4 on the AT&T website. However, the Defect Production Management Guide states that the report
5 is edited by Wholesale Business prior to posting. Staff questions why Wholesale Business
6 would be editing this report provided to CLECs. Perhaps this is when the decision regarding
7 CLEC impact is made.
8

9 If a defect is classified as non-CLEC impacting CLECs are never made aware that the
10 defect exists. The defect will not occur on the Enhanced Defect Report. Additionally staff
11 believes that AT&T is excluding non-CLEC impacting defects from the calculation of the defect-
12 related SQM and SEEM measures discussed above. Staff is concerned that AT&T may be
13 incorrectly applying the classification of non-CLEC impacting defects, and therefore a
14 substantial number of defects are not being reported to the CLECs. In the April Release, [REDACTED] of
15 the [REDACTED] defects were classified as non-CLEC impacting and were never seen by CLECs.
16

17 A review of the AT&T non-CLEC impacting reported defects revealed defects which appear to
18 be CLEC impacting. For example, [REDACTED]
19 [REDACTED] Jeopardizes and
20 FOCs are both notices sent to CLECs. Staff believes that missing order numbers and missing
21 information in fields of these notifications would be CLEC impacting. CLECs need to know that
22 this information is not available so they can plan accordingly. Staff believes that AT&T should
23 reevaluate its use of the CLEC impacting classification.
24

4.5 Defect Methodology and Organizational Changes

25
26 AT&T has indicated an understanding and appreciation of the difficulties with defect
27 management experienced in the April Release. As a result, the company has taken steps to
28 improve pre-production and production defect identification, tracking, and remediation.
29

30 Two changes stand out as the most critical going forward. First, defect tracking for all
31 future releases has been migrated to one manager and a single management team rather than
32 separate region-specific oversight. Secondly, AT&T states that as of August 16, 2008, the 9-
33 state region was incorporated into the 13-state defect management process.
34

35 AT&T states that a review of code-related defects resulting from the April Release was
36 undertaken as a result of the problems encountered. Resolutions for future releases include a
37 rejection of late business requirement changes, more frequent and comprehensive code walk-
38 troughs' within the LASR development team, and additional resources added to the LASR
39 development team.
40

41 Going forward, Quality Center will be the pre-production defect management application.
42 Production defect management will employ the Vantive application. Depending on when in the
43 release cycle a defect occurs, it will be initially recorded and tracked, from inception to closure,
44 using either Quality Center or Vantive for future releases.
45

1 AT&T has also published defect management resources to further clarify individual and
2 team responsibilities. These new publications will assist in the overall process of defect
3 management. The three major resource guides are:

- 4
- 5 ☞ Wholesale Production Defect Management Guide (January 2008)
- 6 ☞ IT Defect Production Management Guide (August 2008)
- 7 ☞ Wholesale Test Ordering Defect Management Guidelines (October 2008)
- 8

9 For pre-production, the defect organization has also undergone a comprehensive revision.
10 Defect management has been made more robust than the days preceding the April Release. The
11 company states that this is evidence of their resolve to detect defects early and devise
12 satisfactory, non-disruptive resolutions whenever possible prior to a release. Two Assistant Vice
13 Presidents (AVP) have now replaced the Executive Director. The AVPs are responsible,
14 respectively, for Consumer IT and Customer Care and Billing & IT Solutions.
15

16 **4.6 Defect Management Conclusion**

17 Never before had AT&T ever encountered defect management problems such as those
18 resulting from the April Release. The scope of defects encountered overwhelmed its ability to
19 comprehensively respond in a timely manner and resource fatigue eventually became a problem
20 multiplier. The scope, volume and magnitude of the [REDACTED] production defects exceeded AT&T's
21 experience, expectations, and ability to adequately respond.
22

23 Defect tracking management, from methodology to remediation, was often
24 uncoordinated. Defects were captured in different applications that did not share common
25 architecture or an ability to communicate. Disparate systems delayed the full comprehension of
26 problems and subsequently hindered management response. Duplicative entries in two systems
27 led to varying but continuing levels of confusion about specific responsibilities. The inability of
28 various defect tracking systems to communicate or cross-populate denied management valuable
29 analysis tools with which to efficiently discern pre-production and production defect trends.
30

31 Prioritization of defects was impaired, allocation of resources was impacted and
32 remediation arguably delayed in some instances. Though AT&T stated that defect analysis tools
33 worked as designed in each region, some managers allowed that input errors and user oversights
34 precluded optimum performance. The number of defects resulting from the April Release,
35 particularly those of the most critical severity type, quickly outstripped AT&T's ability to
36 immediately respond in a proactive, comprehensive, and systematic manner. Staff believes the
37 company grossly underestimated the quantity, scope, and severity of defects that might be
38 encountered with this release.
39

40 AT&T has demonstrated interest in getting to the core of April Release problems. As a
41 result, organizational structures and responsibilities for defect management have been adjusted.
42 The defect tracking system has been streamlined and rests in a single system. Training has
43 increased in anticipation of future releases. Despite these changes, staff has some concerns
44 regarding the overall effectiveness of the defect management at AT&T. Staff is particularly

1 concerned with defect root cause analysis, defect remediation timeframes and accuracy and
2 adequacy of the defect related change management service quality measures.
3

4 The following are staff recommendations regarding defect management:
5

6 ⌘ AT&T should review the April Release defects and the root causes identified for each
7 and ensure that a root cause has been identified and that appropriate action has been
8 taken to prevent future occurrences.
9

10 ⌘ AT&T should improve its emphasis on defect root cause analysis through written
11 policies and procedures, assignment of responsibilities and employee training.
12

13 ⌘ AT&T should continue to evaluate the consolidation of its defect management
14 process to ensure that defects are resolved in an expedient manner and are compliant
15 with the benchmarks established by the Florida Public Service Commission.
16

17 ⌘ AT&T should review the accuracy of data collection and reporting for all Change
18 Management Service Quality Measures and the Self-Effectuating Enforcement
19 Mechanism.
20

21 ⌘ AT&T should reevaluate its use of the CLEC impacting classification and either
22 eliminate it, giving CLECs full visibility of defects or have a clearly communicated
23 definition of when it is applicable.
24
25

5.0 COMMITMENTS & CLEC COMMUNICATIONS

5.0 Commitments & CLEC Communications

5.1 Commitment Objectives

As noted previously, on May 15, 2008, Commission staff held an informal workshop to discuss issues surrounding AT&T's April Release. At the workshop, AT&T agreed to suspend future planned 22-state OSS releases until the following objectives were met:

- ⊗ Resolve April Release defects
- ⊗ Expand CLEC communications
- ⊗ Develop an Expanded Test Plan
- ⊗ Provide proactive support on email manual ordering process
- ⊗ Provide proactive billing adjustments
- ⊗ Improve customer support team responsiveness

To satisfy these objectives, AT&T voluntarily made 32 commitments to the Commission. The list of commitments was memorialized in a subsequent filing with the Commission on May 26, 2008. During this audit, staff requested AT&T to provide updates of the implementation status of each commitment. AT&T provided supporting documentation or evidence of implementation for each commitment.

This chapter discusses and provides staff's assessment of AT&T's efforts regarding the objectives listed above and the supporting commitments for each objective. **Appendix F** discusses staff's assessment of each of the 32 commitments.

Staff notes that AT&T's objective to Expand CLEC Communications directly relates to one of the three objectives of this audit. Commission staff has documented and assessed pre-April Release and post-April Release CLEC Communications in Section 5.3.

5.2 Resolve April Release Defects

Defects are problems that occur when the OSS interfaces are not working in accordance with AT&T's baseline user requirements or business rules. Defects are discovered by AT&T in the pre-production environment and discovered by both CLECs and AT&T in the production environment.

Before moving forward with implementation of future 22-state OSS releases, AT&T agreed to first resolve defects associated with the April Release. The following three commitments were established to achieve this objective:

1. Resolve all Severity 1 and 2 defects.
2. Provide status related to the transmittal of Line Loss Notifications.
3. Provide status related to the Billing Completion Notices.

AT&T contends that each of the above commitments has been satisfied, and as a result, the objective to resolve April Release defects has been met. However, staff notes that as of

1 September 5, 2008, eight Severity 2 defects remained open. Staff expects these eight defects to
2 be remedied prior to implementation of the next 22-state OSS release. Staff believes it is
3 premature to close the following commitment until AT&T provides supporting documentation
4 that addresses the closure of the open defects:
5

- 6 1. Resolve all Severity 1 and 2 defects.
7

8 **5.3 Expand CLEC Communications**

9 AT&T's primary vehicle for communicating issues to CLECs is through AT&T's
10 Change Management Process (CMP).³³ Monthly CMP meetings are used to discuss upcoming
11 changes to OSS interfaces, report on AT&T-initiated and CLEC-initiated Change Requests,³⁴
12 system outages, software documentation changes, and regulatory changes. Therefore, the CMP
13 process is of great importance to AT&T and CLECs. AT&T uses an Accessible Letters
14 notification process to provide CLECs with an advanced notice and agenda for the monthly CMP
15 meetings.
16

17 CLECs raised concerns with the adequacy of AT&T's CMP shortly after the merger of
18 AT&T and BellSouth. The development of change requests, issuance of change notifications,
19 and administration of CMP meetings changed as a result of the merger. CLECs that operate in
20 the former BellSouth 9-state region found that portions of the former Change Control Process
21 (CCP) procedures were no longer in place or documented. In response, AT&T acknowledged a
22 need for improved external communications with CLECs, particularly in connection with the
23 April Release. AT&T committed to expand and improve on communications with CLECs,
24 including the discussion of April Release issues, and to provide proactive communications for
25 future 22-state OSS Releases in the Southeast region. AT&T provided staff with a list of 11
26 commitments specific to CLEC communications:
27

- 28 4. Maintain recurring status calls with customers until the earlier of the resolution of
29 Severity 1 and 2 defects resulting from the April OSS release or consensus that calls
30 are no longer necessary.
- 31 5. Continue to status plans for currently scheduled 22-state releases within existing
32 monthly CMP Meetings. Enhance clarity of pre-release communications by
33 providing a review of all systems and customer interface changes included in future
34 22-state releases in advance of Accessible Letter communications. Use this input to
35 improve the clarity of Accessible Letter information.
- 36 6. Outline CLEC training plans and materials for future 22-state releases. Take into
37 consideration customer input prior to finalization of such training. Release CLEC
38 training materials in accordance with CMP/CCP timeframes.
- 39 7. Recorded messages will be made available during Release Implementation
40 Weekends reporting on current status and "go/no go" readout.
- 41 8. A virtual "War Room" will be established during the initial three days after
42 scheduled releases to update customers of any Post Release issues. Daily calls can
43 be expanded/extended as necessary.

³³ This was formerly known as the Change Control Process (CCP) in the BellSouth 9-state region.

³⁴ Change Requests are requests to modify OSS systems.

- 1 9. Provide a single document that clearly describes roles/responsibilities/titles for the
2 following AT&T personnel to assist with more effective customer contact and
3 escalation points: 1) Wholesale Customer Support Managers, 2) Information
4 Services Call Center, 3) Mechanized Customer Production Support Center.
- 5 10. Perform internal documentation review to enhance clarity of Web-based Defect
6 Reporting (EDR Report) – Updated beginning 5/15 and ongoing.
- 7 11. Perform internal documentation review to enhance clarity of XML Documentation.
- 8 12. Correct identified issue with reject reason field to restore to pre-release length of 5
9 characters.
- 10 13. Perform internal documentation review to enhance clarity of Systems Outages
11 Notifications.
- 12 14. Will take into consideration comments received from customers to date and cover
13 results with CLECs once completed.
- 14

15 AT&T contends that each of the above commitments has been satisfied, and as a result,
16 the objective to expand CLEC communications has been met. Staff agrees that AT&T has
17 satisfied seven of the 11 commitments. Details of staff's analysis of items 4 through 14 can be
18 found in **Appendix F**. Staff believes the following four commitments should remain open until
19 AT&T provides additional supporting documentation for staff to concur with closure of these
20 items:

- 21
- 22 6. Outline CLEC training plans and materials for future 22 State releases. Take into
23 consideration customer input prior to finalization of such training. Release CLEC
24 training materials in accordance with CMP/CCP timeframes.
- 25 11. Perform internal documentation review to enhance clarity of Web-based Defect
26 Reporting (EDR Report) – Updated beginning 5/15 and ongoing.
- 27 13. Perform internal documentation review to enhance clarity of XML Documentation.
- 28 14. Will take into consideration comments received from customers to date and cover
29 results with CLECs once completed.
- 30

31 **5.4 Develop an Expanded Test Plan**

32 The purpose of an application test plan is to coordinate all the individual efforts
33 associated with the application. Individual test plans are developed at the project level to ensure
34 new functionality is sufficiently designed, tested and validated. Pre-production tests are
35 designed to ensure that all systems will function acceptably when migrated from the test
36 environment to the production environment. Furthermore, the pre-production test environment is
37 comprised of multiple end-to-end testing to closely replicate the production environment. The
38 overall testing objectives include the following:

- 39
- 40 ☞ Ensure that the software satisfies documented requirements
- 41
- 42 ☞ Ensure that newly implemented features and defect fixes do not have a negative
43 impact on the current systems
- 44

1 ⊗ Ensure that each sub-system component processes the input data correctly whether
2 data is valid or invalid, and that the output data created can be correctly processed by
3 the next sub-system component

4
5 ⊗ Ensure that existing operations are not degraded from earlier releases

6
7 AT&T's April Release incurred defects that went undetected during AT&T's pre-
8 production testing process. Primarily, the errors impacted outbound transactions to CLECs such
9 as the accuracy and completeness of the firm order confirmations (FOCs) that are sent to CLECs
10 to acknowledge that AT&T has received and accepted a CLEC order. Specifically, AT&T failed
11 to read and return notifications sent via the EDI and XML front-end applications. The local
12 number porting process, disconnection process, as well as the supplemental ordering process,
13 also experienced significant delays after AT&T implemented the April Release.

14
15 According to AT&T, 16 CLECs participated in the April Release testing; however AT&T
16 acknowledged that additional emphasis should have been placed on end-to-end testing and
17 CLEC participation. End-to-end testing verifies system functionality by following a set of data
18 from its inception through all points where it is processed, including completion to billing.

19
20 AT&T also acknowledged that a larger set of regression tests should have been
21 performed and the cumulative impact of volume tests was not recognized during the short time
22 frame to implement the April Release. Regression testing ensures that new release changes and
23 enhancements function as expected with prior releases. Volume testing ensures that the release
24 operates effectively at specific volume levels.

25
26 In response to an inadequate Test Plan for the April Release, AT&T implemented a 22-
27 state Test Plan. The AT&T's 22-state Test Plan is an Expanded Test plan with the objective of
28 communicating the test approach and summarizing the project level test plans that are required to
29 accomplish successful pre-production testing of OSS releases. The 22-state Test Plan is focused
30 on Integrated System Testing and User Acceptance Guidelines.

31
32 The 22-state Test Plan will require completion of release milestone dates and tasks before
33 entering the pre-production test phase and before exiting the pre-production test phase. In other
34 words, actual start of testing may vary by project but testing must be completed by the "complete
35 date" in the Test Plan schedule. If criteria are not met or resolved within an acceptable or the
36 designated time frame, the issue will be escalated to the 22-state test lead coordinator.

37
38 The 22-state Test Plan entrance criteria require unit testing, assembly testing, and
39 connectivity/integration testing to be complete [REDACTED]. Exit criteria requires

40 [REDACTED]
41 [REDACTED]
42 [REDACTED]
43 [REDACTED]. Staff believes these test plan
44 enhancements will play a significant role in preventing future release issues.
45

1 AT&T provided six commitments specific to lessons learned from the April Release to
2 aid in the development of an Expanded Test Plan for future 22-state OSS releases.
3

- 4 15. Utilize root cause analysis of release defects to expand Testing Plans with special
5 focus in the area of delivering outbound transactions. Specific tests will be
6 established for validating that outbound transactions such as FOCs, Clarifications,
7 Completion Notices and Billing Completion Notices are delivered to their
8 destination point in a form compatible with existing standards and interface
9 agreements.
- 10 16. Encourage and support greater CLEC participation in cooperative testing for all
11 releases, utilizing existing CLEC test environments.
- 12 17. Evaluate manual process to determine what steps can be taken to test the process
13 and allow CLECs the opportunity to practice for new forms/templates.
- 14 18. Going forward, scheduled 22 State releases for the SE region will provide overlap
15 between the existing and new Customer Interfaces (EDI, XML and
16 Verigate/LEX/LENS), in order to allow customers to plan/test/develop individual
17 migration strategies to the new interfaces.
- 18 19. Testing to include appropriate back out plans for the implementation weekend.
- 19 20. Development of Emergency Plan with a focus on 1) Customer Notification and
20 Support. 2) Defect Resolution, 3) Expanded AT&T staffing requirements.
21

22 AT&T contends that each of the above commitments has been satisfied, and as a result,
23 the objective to develop an Expanded Test Plan has been met. Staff concurs with AT&T to
24 close each commitment with the understanding that AT&T will fully utilize the newly Expanded
25 Test Plan upon implementation of future OSS releases. Details of staff's analysis of items 15-20
26 can be found in **Appendix F**.
27

5.5 Provide Proactive Support to Email Manual Ordering Process

28
29 As part of the April Release, AT&T consolidated its 13-state region and Southeast region
30 manual ordering process for complex orders. The 22-state manual ordering consolidation
31 consisted of replacing the AT&T Southeast region manual facsimile ordering process with an
32 email ordering process currently used in the AT&T 13-state region.
33

34 The new email process requires CLECs to access and download a choice of
35 approximately 20 different manual LSR forms available on AT&T's CLEC Online website. The
36 new process replaces the customized WebForms that were previously downloaded from the
37 LENS interface used in the 9-state region. The change in this process reduced some of the
38 functionality previously available to CLECs in the 9-state region.
39

40 AT&T acknowledges that numerous issues arose with implementation of the manual
41 email ordering process in the Southeast region. Such issues include; CLECs' inability to get
42 manual orders through to AT&T, AT&T not returning acknowledgements (time, date, receipt of
43 orders) to the CLECs, incorrect manual ordering guidelines, and a 60 percent increase in CLEC
44 calls into AT&T's call centers.
45

1 In response to the issues raised with implementation of the new manual email ordering
2 process, AT&T committed to provide proactive CLEC support to facilitate user introduction to
3 the new process. AT&T made eight commitments specific to the manual email ordering process:
4

- 5 21. Provide Support/Education by providing continued proactive, individualized
6 customer support on Email/Manual Forms process for next 60 days to facilitate user
7 introduction. Including customer working sessions to assist in successful
8 submission of the Manual LSR Forms through use of the email process.
- 9 22. Lead a monthly Email/Manual Forms User Forum to provide common support and
10 address current manual process issues until all 22 State releases are completed.
- 11 23. Continue to work with all CLEC customers who request further assistance or
12 education on the manual LSR ordering process.
- 13 24. Assess CLEC concerns where all pages of a form are required whether or not all
14 pages contain data. Address customer concerns regarding the requirement of
15 additional data.
- 16 25. Review and assess the prioritized list of customer change requests for enhancements
17 to the 22 State Email LSR Process. Reevaluate merger related OSS Change
18 Requests previously submitted through the Change Management process.
- 19 26. Complete updates to the Local Ordering Handbook to reflect changes via the
20 Accessible Letter.
- 21 27. Proactive review and update of the 22-state manual LSR forms and email process
22 documentation to address customer feedback
- 23 28. Expand documentation quality control processes to ensure multiple layers of review
24 prior to release of documents to the customers.
25

26 AT&T contends that each of the above commitments has been satisfied, and as a result,
27 the objective to provide proactive support to the email manual ordering process has been met.
28 Staff agrees to close seven of the eight commitments. Details of staff's analysis for items 21-28
29 can be found in **Appendix F**. Staff believes the following commitment should remain open
30 until AT&T provides supporting documentation for staff to concur with closure of this item:
31

- 32 25. Review and assess the prioritized list of customer change requests for enhancements
33 to the 22 State Email LSR Process. Reevaluate merger related OSS Change
34 Requests previously submitted through the Change Management process.
35

36 **5.6 Proactive Billing Adjustments**

37 AT&T committed to respond to billing concerns that arose out of the April Release. On
38 the May 28, 2008 April Release defect status call, AT&T discussed the goal of identifying key
39 billing issues and proactively processing billing adjustments without the need for CLECs to file
40 billing disputes. AT&T specifically stated that CLEC monthly recurring and non-recurring
41 charges would be adjusted accordingly in order for bill credits to appear on either the June or
42 July 2008 CLEC bills. Below is AT&T's specific billing adjustment commitment:
43

- 44 29. Proactive Billing Adjustments, Claims Clean-Up Process for addressing exceptions,
45 Communication Plan

1
2 AT&T contends that the above commitments have been met to satisfy the objective to
3 provide proactive billing adjustments. Staff concurs with AT&T to close this item, and would
4 note that AT&T has 85 billing service representatives supporting the CLEC Southeast billing
5 activities. Of these, 10 were dedicated to April Release issues. [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]

9 **5.7 Center/Support Team Responsiveness**

10 AT&T committed to provide CLEC support and responsiveness to resolve April Release
11 issues. In response, AT&T provided staff with three specific commitments to handle the influx
12 of calls associated with the April Release:
13

- 14 30. Implement a temporary plan of action to handle calls by other service centers.
- 15 31. Continue to manage April Release related expedites for the processing of
16 acknowledgements for any individual situations if not addressed by the mechanized
17 transmittal efforts.
- 18 32. Continue to review staffing levels to meet anticipated demand for Wholesale
19 Customer Support and Centers.
20

21 AT&T contends that each of the above commitments have been met to satisfy the
22 objective to provide improved center/support team responsiveness. Details of staff's analysis of
23 items 30-32 can be found in **Appendix F**. Staff believes the following commitment should
24 remain open until AT&T provides additional supporting documentation for staff to concur with
25 closure of this item:
26

- 27 32. Continue to review staffing levels to meet anticipated demand for Wholesale
28 Customer Support and Centers.
29

30 **5.8 Commitments & Communications Conclusion**

31 Of the 32 commitments provided by AT&T, staff agrees that 25 can be closed with the
32 understanding that AT&T should be held accountable for upholding these commitments during
33 the implementation of all future 22-state OSS releases. Staff recognizes that AT&T has taken
34 positive steps to address these commitments and further believes action taken by AT&T should
35 minimize future disruptions. However, until the next 22-state release, staff cannot fully validate
36 that the changes that have been implemented will prevent future problems. Staff cannot attest to
37 the quality of the changes made, merely that changes have been implemented. For example, staff
38 confirmed the existence of the Expanded Test Plans for the November release, but staff can not
39 attest to AT&T's adherence to the Expanded Test Plan in future release and the adequacy of
40 AT&T's implementation of the plan.
41

42 Staff believes AT&T is closing the remaining seven commitments prematurely. Staff
43 contends that further supporting documentation is warranted or the processes to resolve the
44 commitments have yet to be fully addressed or implemented. For example, AT&T has not

1 provided documentation supporting the resolution of all April Release defects and the process of
2 consolidating pre-ordering and ordering business rules has not been fully implemented. Staff
3 recommends that AT&T reevaluate its closure of these seven commitments and take necessary
4 steps to assure the commitments have been fully addressed.
5

6 Below are staff's conclusions based on the assessments of the seven objectives AT&T
7 agreed to fulfill before implementing future 22-state OSS releases:
8

9 **5.8.1 Resolve April Release Defects**

10 AT&T agrees that reducing the number of software defects is beneficial to both AT&T
11 and CLECs and that OSS releases with numerous defects can inhibit a smooth transition between
12 releases. Unfortunately, the April Release had errors (i.e., software defects) that impacted the
13 CLECs ability to process orders.
14

15 Staff acknowledges AT&T's remedial actions to resolve issues surrounding the April
16 Release defects, including the consolidation of defect tracking management and revisions to the
17 defect reporting format. However, the sheer number of software defects that emerged from the
18 April Release is such a significant issue alone to substantiate staff's concerns with the CLECs
19 difficulty in effectively using AT&T's pre-ordering and ordering OSS capabilities. Staff cannot
20 fully discern the effectiveness of AT&T's defect resolutions or work-arounds and must rely on
21 AT&T's confidence in the defect management process in place for future 22-state OSS releases.
22 As a means of monitoring AT&T's defect management process, staff recommends that AT&T
23 prepare and provide staff with pre-production and production defect status reports specific for
24 each 22-state OSS release as they occur.
25

26 **5.8.2 Expand CLEC Communications**

27 AT&T implemented numerous corrective actions to address the communication failures
28 that occurred pre- and post-April Release. Such corrective actions include having weekly status
29 calls with CLECs to discuss April Release defects, providing CLECs with customer service
30 contact information, implementing training guides, using the monthly Change Management
31 Process (CMP) meetings to communicate the status of future OSS releases, and holding
32 conference calls with CLECs after an OSS release.
33

34 While staff commends AT&T for taken necessary steps to improve communications with
35 CLECs, staff still questions the overall effectiveness of AT&T's Change Management monthly
36 meetings, the principal outlet for communicating with CLECs. None of AT&T's commitments
37 address possible deficiencies or improvements needed in this Change Management Process,
38 particularly the monthly Change Management calls, now that they have been consolidated under
39 a 22-state umbrella. Staff believes that AT&T has not provided a clear indication or direction of
40 the new Change Management meeting framework to evaluate and address CLEC concerns. For
41 example, at times there were conflicts between what AT&T was saying was done and what
42 actually was done, such as the completion of the Local Ordering Handbook. Additionally,
43 CLECs have raise concerns that AT&T would not have the appropriate technical staff on the
44 Change Management conference call to address an issue on the agenda. Staff has seen repeated
45 evidence of this. Staff also notes that there remains an open item on the monthly Change
46 Management agenda to discuss the effectiveness of the Change Management process. However,

1 staff has yet to see any evidence of discussion on this topic. Staff recommends that AT&T
2 clearly define and document the monthly Change Management meeting process, including
3 AT&T's 22-state process for escalating CLEC issues, including AT&T's 22-state process for
4 escalating CLEC issues raised during the monthly meetings.
5

6 Staff also has a general concern that the current Service Quality Measurement Plan
7 (SQM) and Self-Effectuation Enforcement Mechanism Plan (SEEM) not be adequately designed
8 to capture failures of such magnitude as the April Release. AT&T's SQM and SEEM are
9 designed to capture and compare the quality of service delivered to CLECs. AT&T's failure to
10 comply with applicable SQM performance measurements will trigger SEEM remedy payments
11 to CLECs and/or the state of Florida. The SQM Plan includes performance measurements for
12 AT&T's Change Management Process. The measurements capture the timeliness of resolving
13 software defects and implementing changes to software documentation, but staff believes the
14 SQM does not capture the effectiveness of the defect resolution or revised documentation. In
15 other words, the defect or documentation may have been fixed in a timely manner, but the fixes
16 may not be acceptable by the CLEC community.
17

18 Furthermore, the SQM and SEEM Plans may incorporate processes used in the former
19 BellSouth 9-state region that have now changed. One example is the number of days established
20 to resolve software defects. The current SQM Plan uses the standards in accordance with 9-state
21 procedures, yet staff has learned that AT&T's 22-state practice may be to follow the standards in
22 accordance with the 13-state region's procedures.
23

24 Because of the possibility that the SQM and SEEM Plans do not capture several aspects
25 of a major OSS release, including the appropriate penalties to be imposed, staff believes the
26 Commission should commence an expedited review of AT&T's SQM and SEEM Plans prior to
27 implementation of 22-state releases scheduled in 2009.
28

29 **5.8.3 Develop an Expanded Test Plan**

30 AT&T acknowledges that adequate testing procedures for the April Release, including
31 end-to-end testing, could have prevented significant defects from going into production. A key
32 feature in AT&T's newly Expanded Test Plan is the focus on the delivery of outbound
33 transactions which was the primary issue that surrounded the April Release. AT&T is also
34 encouraging greater CLEC participation in cooperative testing and will provide overlap between
35 existing and new OSS interfaces to allow for CLECs to gradually transition to the new OSS
36 interfaces. Staff has yet to see Expanded Test Plans for future 22-state releases, since those
37 plans are necessarily unique to each release and are not finalized until shortly before release
38 implementation. AT&T has committed to providing staff with copies of the Test Plans when
39 they become available. Staff further recommends that AT&T continue to educate CLECs on
40 future 22-state release test plans.
41

42 **5.8.4 Provide Proactive Support to Email Manual Ordering Process**

43 AT&T made numerous commitments and has taken numerous steps to address and
44 correct errors associated with the implementation of the new 22-state manual email ordering
45 process. AT&T continues to provide CLECs with customer support and education on an as-
46 needed basis.

1
2 However, in staff's opinion, AT&T's new manual email ordering process is not equal to,
3 or at parity, to what BellSouth previously provided to its CLEC customers in the 9-state region.
4 While AT&T would argue that the new manual ordering process may provide the same
5 "functionality" that existed in the 9-state region, staff believes that the new 22-state process of
6 completing and submitting a manual LSR is more burdensome for CLECs.
7

8 Specifically, CLECs using the 9-state region manual fax ordering process would choose
9 the Manual LSR option from the LENS interface main menu. From there, a Graphical User
10 Interface (GUI) tool would allow for several LSR data entry fields to be auto-populated.
11 Additionally the GUI would perform several self-edit checks prior to the submission of the order.
12 The LSR would be completed by a CLEC representative and faxed to AT&T for processing.
13 AT&T, upon receipt would have to manually enter the order into the order process system. In
14 comparison, for the new 22-state manual email ordering process, CLECs must first launch
15 several pages from AT&T's CLEC Online website to get to the manual LSR forms. From there,
16 CLECs would choose from seven core product template forms and 17 different LSR manual
17 forms. An LSR form may require up to 10 pages of data entry to be performed by a CLEC
18 representative before submitting to AT&T for processing. There are no auto-population of fields
19 and no self-edit checks. Without this functionality there is a much greater CLEC risk of error in
20 placing an order.
21

22 Implementation of the new 22-state manual email ordering process was beneficial to
23 AT&T, because the company incurred back-end efficiencies in the processing of orders. Email
24 orders can be directly loaded into the order processing system without manual intervention on
25 the part of AT&T. However, the new manual processing changes have increased the likelihood
26 of increased order rejections and order processing time which will weaken the CLECs ability to
27 effectively compete. Staff recommends that AT&T continue to enhance the 22-state manual
28 email ordering process to include efficiencies, including auto population and edit checks, which
29 previously existed in the manual processing of orders in the 9-state region.
30

31 **5.8.5 Provide Proactive Billing Adjustments**

32 Staff concludes that AT&T adequately responded to billing concerns that resulted from
33 the April Release. AT&T took corrective action to prevent a backlog of CLEC billing disputes
34 by proactively processing billing adjustments. According to AT&T, all April Release billing
35 adjustments have been completed, and to the best of staff's knowledge, CLECs have yet to raise
36 concerns with regards to the adjustments. Staff believes AT&T's actions have remedied the
37 CLECs' concerns.
38

39 **5.8.6 Improve Customer Support Team Responsiveness**

40 Staff applauds AT&T for dedicating additional resources to resolve ordering processing
41 issues associated with the April Release. Furthermore, shortly after the April Release, AT&T
42 created an escalation process for CLECs to send orders that had not processed correctly or had
43 insufficient information. However, staff is concerned that AT&T's customer support
44 responsiveness may be short-lived.
45

1 AT&T acknowledges that CLEC April Release related calls had to be diverted to
2 additional call centers to handle the demand, but now that business is back to normal, CLEC
3 calls in the Southeast region are now solely handled by AT&T's Birmingham call center
4 operations. Given the impact of the April Release and the magnitude of future 22-state releases,
5 staff is concerned with the adequacy of resources to meet CLEC demands upon implementation
6 of future 22-state releases. AT&T stated that call center activity is continually reviewed based on
7 current and forecasted demand, yet staff was not provided with an assessment of current call
8 center activities and staffing levels, nor was an assessment provided based on future 22-state
9 releases. Staff recommends that AT&T provide staff with such assessments.

10
11 **5.8.7 Summary of Commitment and CLEC Communication**
12 **Recommendations**

13 In summary, staff recommends the following actions:

- 14
15 ☞ AT&T should reevaluate its closure of seven commitments (items 1, 6, 11, 13, 14, 25,
16 and 32) and take necessary steps to assure the commitments have been fully
17 addressed.
18
19 ☞ AT&T should clearly define and document the monthly Change Management
20 meeting process.
21
22 ☞ The Commission should commence an expedited review of AT&T's SQM and SEEM
23 Plans prior to implementation of 22-state releases scheduled in 2009.
24
25 ☞ AT&T should prepare and provide staff with pre-production and production defect
26 status reports specific to each 22-state OSS release as they occur
27
28 ☞ AT&T should provide staff with Expanded Test Plans for all future 22-state releases
29 as they become available, and continue to educate CLECs on future 22-state release
30 test plans.
31
32 ☞ AT&T should continue to enhance the 22-state manual email ordering process to
33 include efficiencies that previously existed in the manual processing of orders in the
34 9-state region.
35
36 ☞ AT&T should provide staff with an assessment on current call center activities and
37 staffing levels, and an assessment of call center activities based on future 22-state
38 releases.
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6.0 APPENDICES

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Appendix A Ordering Processes

CLECs' Pre-April Release Electronic Ordering Process

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Following the BellSouth and AT&T merger, AT&T began migrating and consolidating the former BellSouth 9-state southeast OSS platform into a single pre-ordering and ordering OSS platform for use across AT&T's 22-state region. At the time of the merger, AT&T's Local Wholesale OSS operated uniformly in all of AT&T's 13-state region for many of the same CLEC customers doing business in the former BellSouth 9-state region. AT&T determined that the 13-state OSS system would produce greater efficiencies for the benefit of both AT&T and its customers throughout the 22-state region.

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The former BellSouth 9-state southeast OSS process flow is shown in **Exhibit 7**. The exhibit depicts a high-level system flow for electronic pre-ordering and ordering processes prior to the April Release. Provisioning service for a new CLEC customer begins with the pre-order process. CLECs submit pre-order queries to AT&T through one of two available pre-ordering electronic interfaces; the Direct XML/Telecommunication Access Gateway (TAG)³⁵ or the Local Exchange Navigation System (LENS).³⁶ The pre-order process is used by CLECs to gather preliminary customer information, such as validating customer address, selecting telephone numbers, and obtaining service order due dates. In response to a pre-order query, AT&T returns either a valid pre-order response or an error message to the CLEC.

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The valid pre-order information is then used by the CLEC to begin the ordering process with the origination of a Local Service Request (LSR). A CLEC enters the LSR into AT&T's OSS via one of three available ordering interfaces: TAG, LENS, or Electronic Data Interchange (EDI).³⁷ The LSR then passes through AT&T's Service Gate Gateway (SGG)³⁸ and into AT&T's Local Exchange Ordering (LEO)³⁹ system to store and validate the format and content of the data. If the LSR is unreadable or does not contain accurate and complete information on all required and conditional fields, a reject or auto-clarification is returned to the CLEC. When the LSR is complete and accurate, the service order is then entered into AT&T's Local Service Order Generator (LESOG),⁴⁰ which coordinates downstream provisioning activity and monitors

³⁵ TAG/Direct XML interface allows CLECs to develop their own software applications to obtain information from AT&T's OSS. CLECs can incorporate various internal functions, such as downloading information directly to their own inventory/billing systems, creating their own customer databases, and generating internal reports.

³⁶ LENS is a graphical user interface (GUI) that connects directly via the Internet into AT&T's OSS and is based on the TAG architecture. This interface was developed to provide CLECs with an alternative method of connection to AT&T through the Internet.

³⁷ EDI is a batch-driven machine-to-machine interface, which uses industry standards as its foundation. Business files are exchanged between AT&T computer applications and CLEC computer applications that are encoded to comply with standard EDI transaction sets for data transmission.

³⁸ SGG is a routing and editing software application to help ensure the process of complete and error-free transactions.

³⁹ LEO stores information and is the interface for LSR processing. LEO provides first-level validation to ensure all appropriate fields of the LSR are populated.

⁴⁰ LESOG performs additional edits and flags orders with errors. LESOG validates LSRs based on AT&T's business rules. If an LSR does not adhere to the business rules, LESOG generates auto clarifications. If LESOG cannot determine the cause of a clarification, LESOG forwards the LSR to a service representative for manual review.

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AT&T's Electronic Pre-Ordering and Ordering Process Flow Pre-April Release

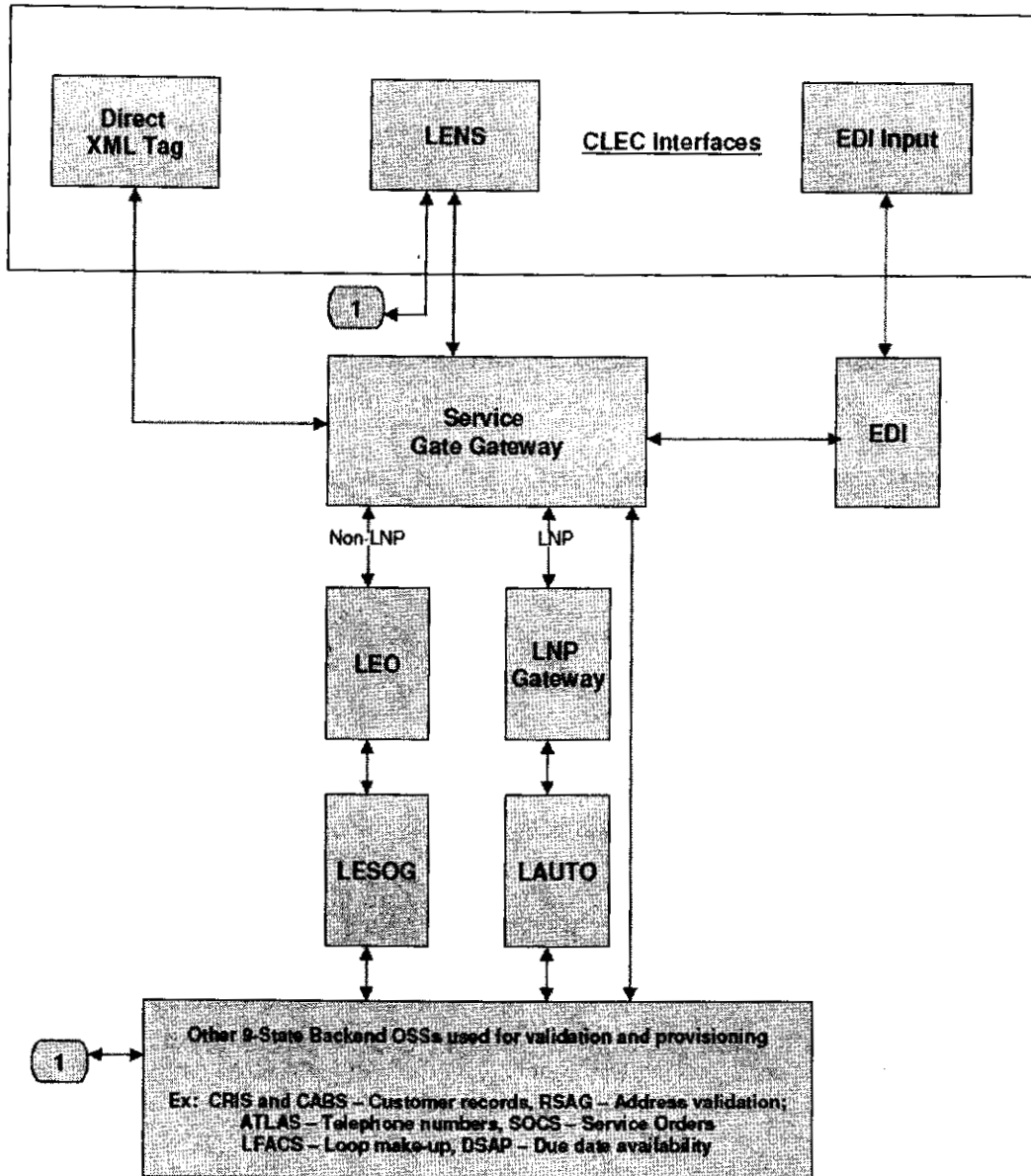


Exhibit 7

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1 the status of the order. LESOG begins the generation process for a Firm Order Confirmation
2 (FOC) response to be delivered to the CLEC. The FOC is confirmation that the LSR was
3 validated by AT&T, and contains a FOC due date, which is the date AT&T commits to
4 completing provisioning of the order.

5 **CLEC's Pre-April Release Manual Ordering Process**

6
7 In the former BellSouth 9-State region, LSRs for Complex and Resale orders are
8 submitted via facsimile or electronically. However, both entry modes require manual
9 intervention on the part of AT&T. All CLEC Complex and Resale orders are processed at one of
10 AT&T's Local Carrier Service Centers (LCSC). The 9-state LCSC locations were located in
11 Atlanta, Georgia, Fleming Island, Florida, and Birmingham, Alabama.

12 **Exhibit 8** provides the process flow for manual orders that are submitted via facsimile.
13 As shown, LSRs faxed by CLECs are received at an LCSC and automatically imaged, assigned
14 an image number, and stored in the LCSC's Local Ordering Imaging System (LOIS)⁴¹ server.
15 An AT&T clerk retrieves the LSR from the fax server, sorts and scans the LSR for legibility and
16 completion of required fields. The LSR is then logged in to the Local Order Number (LON)⁴²
17 tracking system on a first-in-first-out basis. Illegible or incomplete LSRs are rejected and sent
18 back to the CLEC via LON. The completed LSR is forwarded to an AT&T Work Assignment
19 Manager, who in turn, assigns it to an LCSC service representative for processing. The service
20 representative will request further clarification from the CLEC if needed, or process the order
21 and submit it to the Service Order Communication System (SOCS)⁴³ for order validation and
22 provisioning. Upon validation, a FOC is sent back to the CLEC's facsimile server via LON.

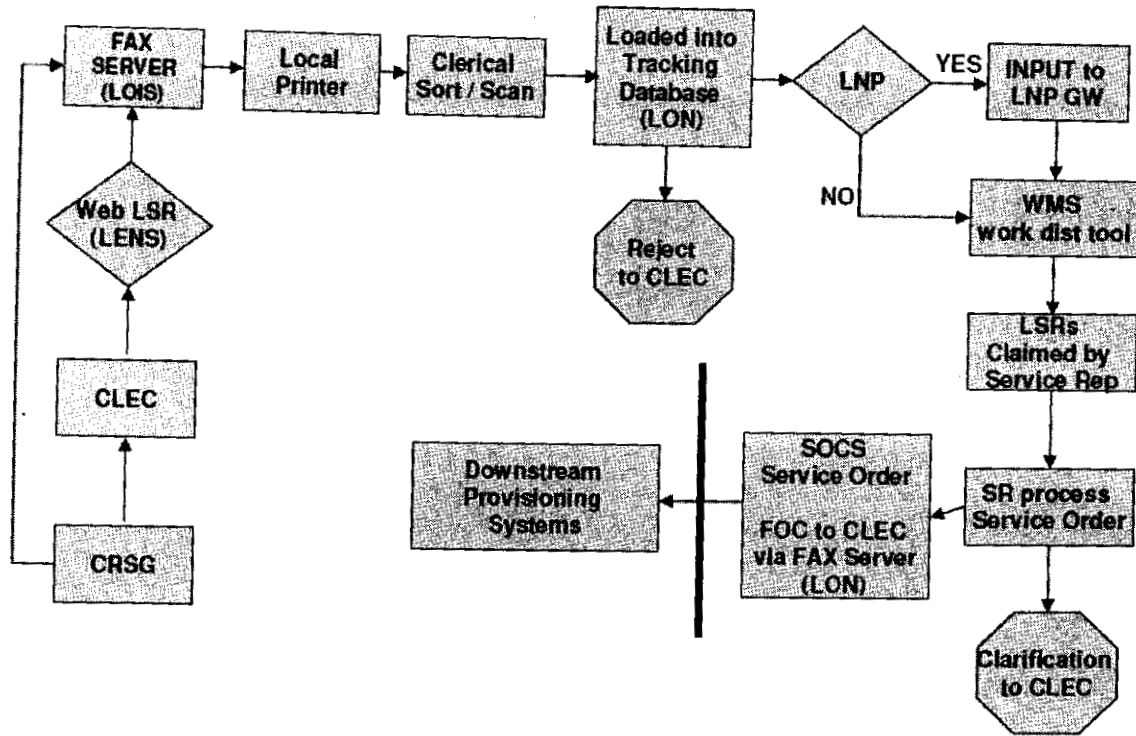
23 **Exhibit 9** depicts the process flow for Complex and Resale orders submitted
24 electronically that require manual intervention (commonly referred to as partially mechanized
25 orders). Partially mechanized orders are submitted using one of the order entry interfaces
26 (LENS, EDI, or TAG). The order flows into the AT&T's LEO and LESOG systems to perform
27 edit check and then stored in LEO for manual processing. LCSC service representatives retrieve
28 the LSR from LEO and process in a similar manner as orders received via facsimile. However,
29 upon validation, the FOC notice is returned to the CLEC via the same interface through which
30 the order was received.

31
⁴¹ LOIS is a fax server that provides automated imaging of LSRs. The image is assigned an image number and is stored in LOIS until further processing.

⁴² LON is an inventory-based system responsible for tracking the processing status of LSRs.

⁴³ SOCS is responsible for the collection, storage, and distribution of service orders. SOCS performs the final validation based on AT&T's business rules to ensure that service orders can be built correctly. This is the beginning of the provisioning process.

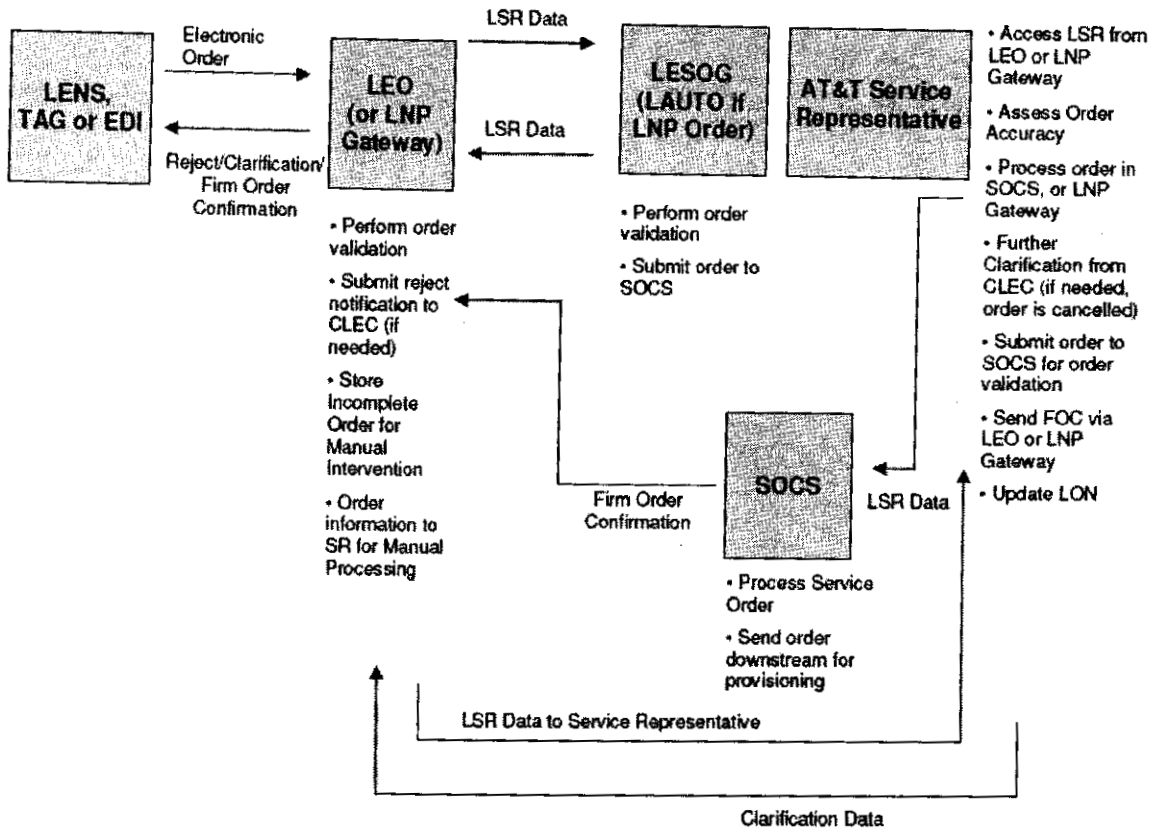
AT&T's Manual Order Facsimile Process Flow Pre-April Release



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AT&T's Partially Mechanized Order Process Flow Pre-April Release



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Exhibit 9

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AT&T's April Release and Future 22-State OSS Releases

Part of AT&T's merger objectives is to implement a consolidated suite of external and internal interfaces, tools, and processes to support pre-order and ordering of Wholesale Local services. The 22-state consolidated OSS process flow is shown in **Exhibit 10**. The eventual goal of consolidating OSS interfaces is the retirement of three existing 9-state front-end applications; LENS, EDI, and Direct XML/Tag. To achieve this goal, AT&T's consolidated OSS Release plan consists of the following five-step phased-in strategies:

Phase 1 (April 2008 Release)

AT&T initiated the first phase of its OSS Release plan (Release 27.1) on April 19, 2008. This phase, commonly referred to as the April Release, primarily consisted of implementing the following key features and changes:

- ⊗ Replaced the 9-state LEO application with Local Access Service Request (LASR) application used in AT&T's 13-state region.
- ⊗ Replaced the 9-state Work Assignment Management System (WMS) with Work Flow Management (WFM) system used in AT&T's 13-state region.
- ⊗ Introduced the new 22-state pre-order Verigate pre-ordering web-based application into the 9-state region.
- ⊗ Replaced the 9-state manual facsimile ordering process with the 13-state manual email process.

Both LEO with LASR are AT&T backend applications (non-CLEC interface) that provide order management, tracking and exception handling for LSRs. According to AT&T, implementation of the LASR application would include the same functions that were available in LEO, with the exception of the processing of work assignments.

Work Assignments would now be handled by the WFM system which replaces the 9-state WMS. WFM is a software application that coordinates tasks, resources and data to ensure that service representatives receive the necessary work assignments to process LSRs.

The April Release also streamlined the number of tools used by AT&T center support personnel to facilitate CLEC service requests. This included adding AT&T's 13-state web-based application (Verigate) that provides preorder functionality, similar to the Local Exchange Navigator Service (LENS) used in the former BellSouth 9-state region. Additionally, with the April Release, the facsimile process CLECs use to submit manual orders in the 9-state region was replaced with a new email based manual process. The new manual email ordering process flow is depicted in **Exhibit 11**.

1 **Phase 2**

2 AT&T's Phase 2 will consists of enhancements to the Verigate pre-ordering browser
3 application implemented with the April Release. Additional functionality will be added
4 including CLECs having the ability to request an unparsed (i.e., raw data) customer service
5 record by account number, and obtain estimated due dates. It should be noted that the former
6 BellSouth LENS application currently being used by CLECs for pre-ordering activities in the 9-
7 state region will still be available for use until retirement in early 2010.
8

9 **Phase 3**

10 The next phase of AT&T's OSS strategy is to introduce and implement the new 22-state
11 XML Gateway application. XML Gateway is a front-end application and will support pre-order
12 and ordering transactions. XML Gateway will eventually replace EDI and Direct XML/TAG
13 systems currently being used in the 9-state region. EDI and Direct XML/Tag retirements are
14 targeted for late 2009 or early 2010.
15

16 **Phase 4**

17 AT&T plans to introduce a second front-end application, Local Service Request
18 Exchange System (LEX). LEX is a web-based application for online creation, submittal, and
19 maintenance of LSRs. LEX will replace the LENS interface currently being used in the 9-state
20 region.
21

22 **Phase 5**

23 AT&T's final phase consists of retiring the LENS, EDI, and XML front-end interfaces
24 currently used in the 9-state region. AT&T anticipates retiring these systems in 2010. AT&T
25 will also retire the 9-state SGG back-end application at the same time. The routing and editing
26 functions performed by SGG will be implemented into the new 22-state LASR application,
27 released in April 2008.
28

AT&T's 22-State Consolidated OSS Release Plan

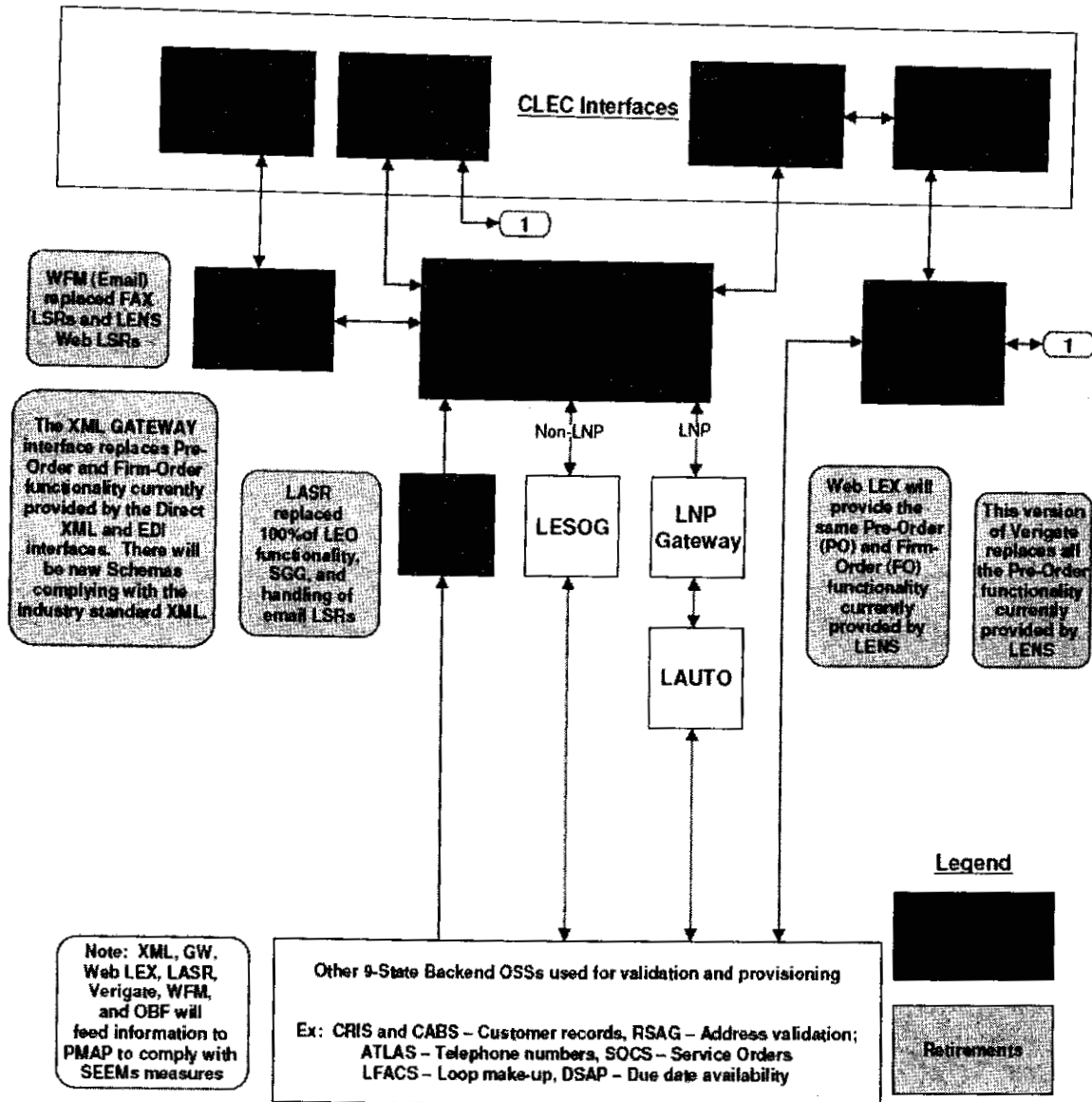


Exhibit 10

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AT&T's Manual Order Email Process Flow Post-April Release

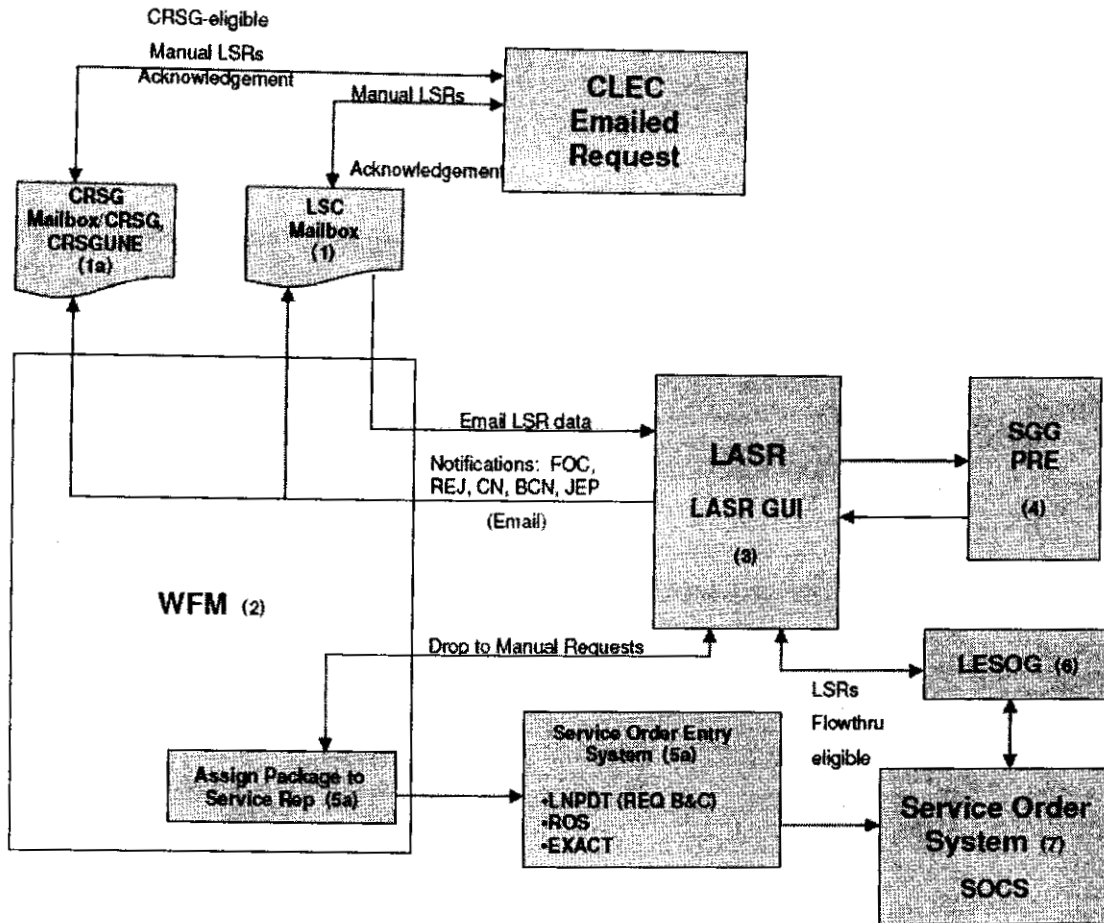


Exhibit 11

1 **Appendix B**
2 **Sample of Key Learnings by Category**
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4 The following is a sample of some of the issues, root causes and resolutions found in
5 each of the categories above:
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7 **Conversion and OOM 179**

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39 **Project Management and Release Management**

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Requirements

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Implementation Weekend Testing (IWT) and Warranty Process

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Pre-Production Testing and Defects

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Production Testing Monitoring and Defects

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Process Issues

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Resource Management and Vendor Coordination

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Appendix C Pre-Production Defect Management Key Learnings



Selected Pre-Production Defect Management Key Learnings			
KLR	Finding	Root Cause	Resolution
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]	[Redacted]

Selected Pre-Production Defect Management Key Learnings			
KLR	Finding	Root Cause	Resolution
	[REDACTED]	[REDACTED]	[REDACTED]
■	[REDACTED]	[REDACTED]	[REDACTED]
■	[REDACTED]	[REDACTED]	[REDACTED]

Selected Pre-Production Defect Management Key Learnings			
KLR	Finding	Root Cause	Resolution
			[REDACTED]
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Source: Document Request 1

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Appendix D Production Defect Management Key Learnings



Selected Production Defect Management Key Learnings			
KLR	Finding	Root Cause	Resolution
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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Selected Production Defect Management Key Learnings			
KLR	Finding	Root Cause	Resolution

Source: Document Request 1

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Appendix E Regional Severity Comparison

During the April Release, different regional severity classification methods existed between AT&T's 13-state operations and those of the 9-state legacy BellSouth system. A side-by-side comparison is insightful, providing insight into problems experienced during the release.

Wholesale Order and Pre-Order Production Severity Levels Comparison of 9-state and 13-state Regions			
		9-state*	13-state**
Severity 1	Description	<p>Critical Problem results in a complete system outage and/or is detrimental to the majority of the development and/or testing efforts.</p> <p>(Note: Severity 1 defects that are discovered in "Production" will be classified as a Type I System outage)</p>	<p>Extreme System Problem This applies to any problem which may impact the CLEC/LSC, has no manageable workaround, and also meets at least one of the following criteria:</p> <p>Blocks execution of all or a majority of implementation weekend test conditions or production order/preorder functions,</p> <p>More than 50% of multiple CLEC transactions or orders are impacted</p> <p>Extreme LSC impact (500 orders per week falling out)</p> <ul style="list-style-type: none"> • Major 271 compliance • Executive or presidential complaint • High profile customer • High volume customer
	Fix Time	No information.	<p style="text-align: center;">0 to 5 Days</p> <p>Fix and recover as soon as possible. Expectation is that issue will be resolved as quickly as possible. All necessary development testing, SCRMM and implementation resources moved to resolve the issue. Severity 1 defects are exempt from CMP, warranty, and maintenance release processes. However, they are reviewed for Accessible Letter impacts. If necessary, an information</p>

Wholesale Order and Pre-Order Production Severity Levels Comparison of 9-state and 13-state Regions			
		9-state*	13-state**
Severity 2	Description	<p>Serious System functionality is degraded with serious impact to the users and there is not an effective Work-around.</p>	<p>Major Production Problem Any defect production problem, may impact the CLEC/LSC, has NO manageable workaround, and also meets at least one of the following criteria: Blocks execution of several test conditions during Implementation Weekend Testing or production order/preorder functions. More than 20% of multiple CLEC orders impacted.</p>
	Fix Time	<p>Within 10 business days following the date upon which AT&T SE's defect validation process is scheduled to complete.</p>	<p>LSC impacted by 50 to 499 orders per week. Performance measures missed; more than \$20,000 and less than \$100,000 monthly fines levied A combination of the following severe business impact considerations: <ul style="list-style-type: none"> • Major 271 compliance • Executive or presidential complaint • High profile customer • High volume customer </p> <p>0 to 45 Days For defects found during the tri-annual release warranty period that do not require an Accessible Letter, fix immediately for installation in a warranty release. For defects found after the tri-annual release warranty period, development is required to provide root cause and fix description within seven calendar days. Implementation of fix required within 60 calendar days. Fix time is directly dependent on CMP, the defect position on the prioritized maintenance release packaging list, and the number of defects in queue.</p>
	Description	<p>Moderate System functionality is Degraded with a Moderate adverse impact to the users and there is an effective work-around.</p>	<p>Average For defects found during the tri-annual release warranty period that do not require an Accessible Letter, fix immediately for installation in a warranty release. For defects found after the tri-annual release warranty period, development is required to provide root cause and</p>

Wholesale Order and Pre-Order Production Severity Levels Comparison of 9-state and 13-state Regions			
		9-state*	13-state**
Severity 3			prioritized maintenance release packaging list, and the number of defects in queue.
	Fix Time	Within 30 business days following the date upon which AT&T SE's defect validation process is scheduled to complete.	0 to 60 days
Severity 4	Description	Cosmetic There is no immediate adverse impact to the users.	N/A
	Fix Time	Within 45 business days following the date upon which AT&T SE's defect validation process is scheduled to complete.	N/A

*Source: AT&T SE Change Control Process Guide

**Source: Document Request 4

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Appendix F

Staff's Analysis of AT&T's Commitments

AT&T provided a list of forty commitments specific to lessons learned from the April Release and development of future 22-state OSS releases. The commitments, current status, and staff's assessment of each are discussed below:

1. Resolve all Severity 1 and 2 defects.

Defects are problems discovered in pre-production and production versions of an application interface. The problems occur when the OSS interfaces are not working in accordance with AT&T's baseline user requirements or the business rules that AT&T has established. Pre-production defects are identified and initiated by AT&T application test teams prior to an application being released into production. Production defects are identified and initiated by CLECs or AT&T through AT&T's Change Management/Control Process (CMP) after an application is released into production. CMP is the method by which AT&T manages requested changes (e.g., software, hardware, regulatory) to existing interfaces and the introduction of new interfaces.

Upon identification, defects are assigned one of four severity levels for the purpose of prioritizing the development of software correction. According to AT&T's Southeast CMP Process Guide, a Severity 1 defect is one that is *critical* and results in a complete system outage or is detrimental to the majority of the development or testing efforts. A Severity 2 is one that is *serious* and results in severe degradation of system functionality and there is not an effective work-around. A Severity 3 defect is *moderate* and results in system degradation, but there is an effective workaround. A Severity 4 defect is *cosmetic*, meaning that there is no adverse impact to the users.

AT&T further delineates defects as either CLEC-impacting and non CLEC-impacting. CLEC-impacting defects have a direct impact on the CLEC's ability to exchange transactions with AT&T and may include documentation that is in error, has missing information or is unclear in nature. Non CLEC-impacting defects impact AT&T backend interfaces and CLEC orders are not affected. The definitions of non-CLEC and CLEC impacting defects have been the subject of much debate over numerous years.

AT&T specifically committed to resolve Severity 1 and Severity 2 defects opened in the Southeast region that resulted from the April Release. AT&T identified [REDACTED] Severity 1 April Release production defects. Of these [REDACTED] defects, 64 were CLEC-impacting and [REDACTED] were non-CLEC impacting. The [REDACTED] Severity 1 defects were resolved and closed as of September 5, 2008. AT&T further identified [REDACTED] Severity 2 defects. Of these [REDACTED] defects, 82 were CLEC-impacting and [REDACTED] were non-CLEC impacting. As of September 5, 2008, eight Severity 2 defects remain open, of which six are CLEC impacting.⁴⁴

⁴⁴ [REDACTED]

1 **Staff's assessment:** Staff believes that it is premature to close this item. AT&T has
2 satisfied the resolution of all Severity 1 defects; however, █████ Severity 2 defects remain open.
3 Staff expects the remaining Severity 2 defects to be remedied prior to implementation of the next
4 22-state OSS release.
5
6

7 **2. Provide status related to transmittal of Line Loss Notifications.**

8 The April Release resulted in Severity 1 defects associated with the flow of status reports,
9 such as CLEC Line Loss Notifications. According to AT&T, all outstanding defects associated
10 with Line Loss Notifications have been fixed and all outstanding Notifications were transmitted
11 successfully on May 16, 2008. AT&T resumed normal transmission of Line Loss Notifications
12 on May 17, 2008. AT&T considers this item to be closed.
13

14 **Staff's assessment:** Staff concurs with AT&T to close this item.
15
16

17 **3. Provide status related to the Billing Completion Notices (BCN).**

18 Similar to the issue regarding Line Loss Notifications, Severity 1 defects were opened
19 that impacted CLECs receipt of Billing Completion Notifications. According to AT&T, system
20 issues impacting Billing Completion Notifications were resolved on May 20, 2008. By June 9,
21 2008, AT&T completed transmission of all delayed Billing Completion Notifications. AT&T
22 considers this item to be closed.
23

24 **Staff's assessment:** Staff concurs with AT&T to close this item.
25
26

27 **4. Maintain recurring status calls to discuss resolution of Severity 1 and**
28 **Severity 2 April Release defects.**
29

30 Beginning on May 12, 2008 AT&T held weekly status calls opened to all CLECs to
31 discuss the resolution of the April Release Severity 1 and 2 defects. Notification of the calls was
32 communicated to CLECs via AT&T's Accessible Letter notification process. On the July 15,
33 2008 call, the CLECs agreed that it was no longer necessary to continue with the weekly calls to
34 discuss the April Release defects. AT&T now considers this item to be closed.
35

36 **Staff's assessment:** Staff concurs with AT&T to close this item.
37
38

39 **5. Continue to status plans for currently scheduled 22-State releases within**
40 **existing monthly CMP/CCP Meetings. Enhance clarity of pre-release**
41 **communications by providing a review of all systems and customer interface**
42 **changes included in future 22 State releases in advance of Accessible Letter**
43 **communications. Use this input to improve the clarity of Accessible Letter**
44 **information.**
45

1 AT&T uses the monthly Change Management Process (CMP) meetings to communicate
2 the status of future OSS releases and customer interface changes. According to AT&T, the
3 Change Management team will review each system related Accessible Letter to ensure that it
4 accurately reflects release information to the CLEC community. The CLEC input gained from
5 the monthly meetings will also be used to improve the clarity of future Accessible Letters.
6 AT&T further added a standing agenda item to the CMP meetings to review Accessible Letter
7 clarity. AT&T considers this item to be closed.

8
9 **Staff's assessment:** Staff concurs with AT&T to close this item with the understanding
10 that AT&T will continue to provide the status of future OSS releases via the Change
11 Management and Accessible Letter processes. AT&T has demonstrated that the Accessible
12 Letter format has improved and the Change Management Process agenda includes discussion of
13 the status of all OSS releases or changes to existing OSS.

14
15
16 **6. Provide an outline of CLEC training materials for future 22-state releases.**

17
18 AT&T is developing CLEC training plans for future 22-state releases and the plans have
19 been verbally shared with CLECs at CMP meetings to date. AT&T will further provide online
20 leader led training sessions for the November 2008 and March 2009 Releases. In support of this
21 commitment, AT&T provided staff with outlines of the available training, including training
22 enrollment procedures and a timeline for the November 2008 and March 2009 Releases. The
23 training plans will be on the agenda for the November CMP meeting. AT&T considers this item
24 to be closed.

25
26 **Staff's assessment:** Staff believes that it is premature to close this commitment. While
27 staff recognizes AT&T's efforts to develop guidelines for the next two OSS Releases, the
28 training guidelines and specific plans have yet to be provided to staff and discussed with the
29 CLECs.

30
31
32 **7. Make available to CLECs a recorded message that reports the status of**
33 **releases during implementation weekends.**

34
35 The CLECs agreed with AT&T to provide the status of releases during implementation
36 weekends via AT&T's CLEC Online website. According to AT&T, the release status will be
37 updated and posted twice each day over the implementation weekends. AT&T considers this
38 item to be closed.

39
40 **Staff's assessment:** Staff concurs with AT&T to close this item. Staff agrees that
41 AT&T has implemented a process of reporting the status of releases during implementation
42 weekends.

43
44
45 **8. Establish a virtual "War Room" during the initial three days after scheduled**
46 **releases to update CLECs of any post-release issues.**

1
2 In response to this commitment, AT&T stated that it will issue an Accessible Letter one
3 week prior to each future 22-state OSS release providing conference bridge information to the
4 CLECs. A conference call will be held each day for three days following each scheduled release
5 to discuss any post-release issues. AT&T also advised the Commission staff that AT&T will
6 create and post on its CLEC online website a release status document which will be updated
7 twice daily during a release weekend. This was announced to the CLEC community via an
8 Accessible Letter on August 8, 2008. AT&T further noted that beginning with the November
9 2008 Release and for all 22-state release thereafter, AT&T will provide a brief update of the
10 issues covered on the daily war room calls. AT&T considers this item to be closed.

11
12 **Staff's assessment:** Staff concurs with AT&T to close this item. Staff believes AT&T
13 has developed a procedure that adequately documented the virtual "War Room" process which
14 will be implemented in future 22-state OSS releases.

15
16
17 **9. Provide a single documentation that clearly describes the roles and**
18 **responsibilities of AT&T's; 1) Wholesale Customer Support Managers, 2)**
19 **Information Services Call Center, and 3) Mechanized Customer Production**
20 **Center.**

21
22 AT&T provided documentation describing the general understanding of the roles,
23 responsibilities, and functions of AT&T's customer service contacts listed below. The
24 documentation was provided as an attachment to AT&T's June 12, 2008 Accessible Letter and
25 posted to AT&T's CLEC Online website. AT&T considers this item to be closed.

- 26
27 ⊗ Information Services Call Center
28 ⊗ Mechanized Customer Production Support Center
29 ⊗ Senior Carrier Account Manager
30 ⊗ Wholesale Support Manger
31 ⊗ Local Service Center

32
33 **Staff's assessment:** Staff concurs with AT&T to close this item.

34
35
36 **10. Perform internal documentation review to enhance clarity of web-based defect**
37 **reporting.**

38
39 AT&T provided revised documentation supporting the process for creating a daily defect
40 report. The documentation further clarifies defect descriptions and also includes additional
41 internal procedures, such as multiple peer-to-peer review prior to posting. AT&T considers this
42 item to be closed.

43
44 **Staff's assessment:** Staff believes that it is premature to close this commitment. Staff
45 acknowledges that AT&T has developed internal documentation to enhance the clarity to support
46 the process for creating a defect report. However, staff is concerned that the information

1 provided on the web-based defect report does not adequately reflect enough information for
2 CLECs to discern the status and resolution of defects. This issue was raised by the CLECs in the
3 November 5, 2008 CMP meeting.
4
5

6 **11. Perform internal documentation review to enhance clarity of XML**
7 **documentation.**
8

9 AT&T provided documentation outlining the methods and procedures for developing one
10 consolidated repository to view the business rule requirements for pre-ordering and ordering.
11 Via AT&T's CLEC Online website, CLECs have the ability to view the Local Ordering
12 Handbook (LOH), Local Service Pre-Ordering Requirements (LSPOR), and Local Service
13 Ordering Requirements (LSOR). According to AT&T, modifications will be made to each using
14 a phased-in approach by discussing each phase (OSS Release) with the CLEC prior to
15 implementation. AT&T considers this item to be closed.
16

17 **Staff's assessment:** Staff believes that it is premature to close this commitment. While
18 the process of consolidating the pre-ordering and ordering business rules has been documented,
19 the process itself has not been fully implemented. AT&T noted that the AT&T Southeast LSOR
20 will be available with the November OSS Release, while the LSPOR is currently in development
21 and will be available after implementation of the 22-state XML application.
22
23

24 **12. Correct identified issue with reject reason field to restore to pre-release length**
25 **of 5 characters.**
26

27 With implementation of the April Release, LSR reject messages and codes were modified
28 to conform to the new 22-state email ordering process. The reject codes were flawed.
29 As a result, AT&T subsequently reset the LSR reject codes to the conditions used prior to the
30 April Release. AT&T issued an Accessible Letter on May 13, 2008, advising the CLECs of the
31 revised manual LSR reject code to be reset at a length of 5 characters. The list of the revised
32 reject messages and codes were included as an attachment to the Accessible Letter. AT&T
33 considers this item to be closed.
34

35 **Staff's assessment:** Staff concurs with AT&T to close this item.
36
37

38 **13. Perform internal documentation review to enhance clarity of Systems Outages**
39 **Notifications.**
40

41 System outage notifications are currently accessible via a CLEC link posted on AT&T's
42 CLEC Online website. The outages are sorted by interface type (e.g., LENS, EDI, and TAG)
43 and further broken down by time of occurrence and reason for the outage. In response to the
44 CLECs concerns regarding the clarity of the system outage notifications, AT&T states, "The
45 system outage notification process has not changed, however organizationally, we have realigned
46 (completed as of March 10, 2008) in such a way that the outage notifications are now

1 communicated across all regions of AT&T by the Information Services Call Center (ISCC). The
2 ISCC, based upon the concerns raised following the April Release, has improved the detail and
3 clarity of the communications.” Both the pre- and post-merger processes are to send the CLECs
4 an email within 15 minutes that verifies the existence of an outage.
5

6 AT&T further reviewed several months of the SQM and SEEM reports as well as the
7 corresponding pre- and post-outage reports to determine if changes should be applied to AT&T’s
8 wholesale SQM and SEEM plans. According to AT&T, the data matches correctly and no
9 changes are warranted.
10

11 Staff also notes that on June 12, 2008, AT&T gave a presentation to Commission staff on
12 the overview of the April Release impacts to its wholesale Performance Measurement Analysis
13 Platform (PMAP) and SEEM plans. An additional discussion on this topic was provided to the
14 CLEC community on June 24, 2008, as part of an OSS status update call. AT&T assured staff
15 and the CLECs that testing was done to ensure continued receipt of appropriate data required to
16 produce SQM and SEEM measures and calculate remedies. AT&T considers this item to be
17 closed.
18

19 **Staff’s assessment:** Staff concurs with AT&T to close this item as it relates to system
20 outage notifications. However, staff notes that it will soon be initiating a review of AT&T’s
21 wholesale Performance Assessment Plan.
22
23

24 **14. Take into consideration comments received from customers to date and cover**
25 **results with CLECs once completed.**
26

27 In response to this commitment, AT&T noted that CLEC comments are captured and
28 addressed within the CMP Action Logs. The Action Log contains the initiator (CLEC name) of
29 the comment, the date comment was received, a summary of the comment, the current status, and
30 AT&T’s reply. The results of the Action Log are discussed with the CLECs once completed.
31 AT&T considers this item to be closed.
32

33 **Staff’s assessment:** Staff believes that it is premature to close this item. Although staff
34 agrees with AT&T’s process of using the Action Log to capture CLEC comments after they
35 have been accepted, AT&T did not elaborate on the company’s current CMP procedures and
36 processes for escalating and denying CLEC action item requests.
37
38

39 **15. Utilize root cause analysis of release defects to expand Testing Plans with**
40 **special focus on the area of delivering outbound transactions.**
41

42 AT&T will expand testing plans with special focus in the area of delivering outbound
43 transactions. Specific tests will be established for validating that outbound transactions such as
44 firm order confirmations, clarifications, completion notices, and billing completion notices
45 delivered to their destination point in a form compatible with existing standards and interface

1 agreements. AT&T noted that relevant key learnings from the root cause analysis will be
2 incorporated into future test plans. AT&T considers this item to be closed.
3

4 **Staff's Assessment:** Staff concurs with AT&T to close this item with the understanding
5 that AT&T would fully utilize the newly expanded Test Plan upon implementation of future OSS
6 releases. Staff notes that AT&T's expanded 22-state Test Plan incorporates end-to-end testing to
7 include cooperative testing with CLECs and simulations to test outbound notifications.
8 Furthermore, the scheduling of individual project test plans will be determined in alignment with
9 the overall milestone dates for each OSS release.
10

11
12 **16. Encourage and support greater CLEC participation in cooperative testing for**
13 **all releases, utilizing existing CLEC test environments.**
14

15 In response to this commitment AT&T noted that efforts have been made to encourage
16 greater CLEC participation in pre-release testing via CMP meeting and Accessible Letters.
17 AT&T provided an extract from the minutes of the September 10, 2008 CLEC User Forum
18 meeting where AT&T noted acceptable CLEC testing associated with email acknowledgements
19 for CLEC placed orders. AT&T considers this item to be closed.
20

21 **Staff's assessment:** Staff concurs with AT&T to close this item with the understanding
22 that AT&T will continue to encourage CLEC cooperative testing for future OSS releases.
23

24
25 **17. Evaluate manual process to determine what steps can be taken to test the**
26 **process and allow CLECs the opportunity to practice for new forms/templates.**
27

28 To satisfy this commitment AT&T offered online sessions with interested CLECs to walk
29 through the changes to LSR forms used for manual ordering. Sessions were scheduled and
30 announced via the CLEC Users Forum. For any implementation of new forms, AT&T will hold
31 sessions within 30 days of the implementation date. AT&T considers this item to be closed.
32

33 **Staff's assessment:** Staff concurs with AT&T to close this item with the understanding
34 that AT&T will continue working in the same manner to support any individual CLECs that may
35 raise issues with regards to the completion and processing of LSR forms used in the manual
36 email ordering process.
37

38
39 **18. Going forward, schedule 22-state releases for the SE region will provide**
40 **overlap between the existing and new customer interfaces (EDI, XML, and**
41 **Verigate/LEX/LENS), in order to allow customers to plan/test/develop**
42 **individual migration strategies to the new interfaces.**
43

44 AT&T's current OSS release plans associated with implementation of new functionality
45 and implementation of 22-state platforms will have overlap built into it. In support of this
46 commitment, AT&T provided to staff an October 10, 2008 Accessible Letter that served as a

12/17/2008

1 notice for retirement of AT&T's Southeast region interfaces in late 2009. In the letter, AT&T
2 further noted that AT&T's Southeast region interfaces will continue to be available upon
3 introduction of new 22-state releases, such as the XML Gateway. AT&T considers this item to
4 be closed

5
6 **Staff's assessment:** Staff concurs with AT&T to close this item.

7
8
9 **19. Testing to include appropriate back out plans for the implementation**
10 **weekend.**

11
12 According to AT&T, future 22-state OSS release back out plans are still in the production
13 stage and noted that back out scripts are pre-written and approved at least a week prior to the
14 release weekend. In response to this commitment AT&T provided a boiler-plate Back Out Plan
15 that includes provisions for:

- 16
17
 - 18 Ⓢ Identifying impacted applications
 - 19 Ⓢ Identifying fixes that are not feasible
 - 20 Ⓢ Communicating with executive teams
 - 21 Ⓢ Communicating with CLECs to review back-out options.
 - 22 Ⓢ Stopping production
 - 23 Ⓢ Removing production code and reverting to the previous version

24 **Staff's assessment:** Staff concurs with AT&T to close this item with the understanding
25 that AT&T will develop and implement back out plans, if needed, specific to each future 22-state
26 OSS release.

27
28
29 **20. Development of Emergency Plan with a focus on 1) Customer Notification and**
30 **Support, 2) Defect Resolution, 3) Expanded AT&T staffing requirements.**

31
32 AT&T has documented an Emergency Communication Plan that addresses defect
33 identification, defect resolution, weekend release staffing, and customer notification,. The Plan
34 further outlines communication steps to be followed within defined intervals if a back out
35 decision is made.

36
37 **Staff's assessment:** Staff concurs with AT&T to close this item; however, staff believes
38 that AT&T's Communication Plan can be improved. The Plan appears to have not been
39 thoroughly developed and thought-out in detail. Additionally, it is unclear to staff how the Plan
40 is communicated with AT&T personnel and incorporated into company policies and procedures.

41
42
43 **21. Provide continuing education, individualized customer support, and customer**
44 **working sessions to assist in successful submission of the manual LSR forms**
45 **through use of the email process.**
46

1 AT&T created an internal process of pulling together members of its Wholesale Support
2 Management team to assist CLECs in working sessions scheduled by AT&T Account Managers.
3 The Wholesale Support team would be able to identify the specific issue or related product
4 information to allow the right resource to assist on the CLEC call. AT&T implemented the
5 following steps for resolving the email process issues and now considers this item to be closed:
6

- 7 ⊗ Obtaining pertinent information from CLEC concerning specific issue
- 8
- 9 ⊗ Referring to manual email ordering documentation on CLEC Online to determine
10 if it addresses the issue
- 11
- 12 ⊗ Obtaining additional assistance from manual email ordering from AT&T's subject
13 matter experts (SMEs)
- 14
- 15 ⊗ After resolution, AT&T will provide information to the CLEC via email or phone
- 16
- 17 ⊗ Escalating issues with significant difficulty to manual email ordering subject
18 matter experts to arrange for an on-line overview training session
- 19

20 **Staff's assessment:** Staff concurs with AT&T to close this item with the understanding
21 that AT&T's enhanced internal process to proactively support and resolve manual email ordering
22 issues remains intact.
23

24

25 **22. Lead a monthly email/manual forms user forum to provide common support**
26 **and address current manual process issues until all 22 state releases are**
27 **completed.**
28

29 AT&T created an email manual ordering forum as a standing segment to the monthly
30 CLEC User Forum (CUF) agenda. The meeting is opened to all CLECs. In response to the
31 commitment, AT&T provided the Accessible Letters announcing the June, July and August 2008
32 CLEC User Forum monthly meetings to discuss issues surrounding the manual email ordering
33 process. AT&T considers this item to be closed.
34

35 **Staff's assessment:** Staff concurs with AT&T to close this item with the understanding
36 that any manual email ordering issues that may occur in the future can be addressed via the
37 CLEC User Forum, if necessary.
38

39

40 **23. Continue to work with all CLEC customers who request further assistance or**
41 **education on the manual LSR ordering process.**
42

43 In response to this commitment, AT&T provided a listing of 23 CLEC customers who
44 requested further assistance in resolving manual email ordering issues. AT&T noted that CLEC
45 working sessions are held when requested. AT&T considers this item to be closed.
46

1 **Staff's assessment:** Staff concurs with AT&T to close this item with the understanding
2 that AT&T will continue working in the same manner to support any individual CLECs that may
3 raise issues with regards to the manual email ordering process.
4
5

6 **24. Assess CLEC concerns where all pages of a form are required whether or not**
7 **all pages contain data. Address customer concerns regarding the requirement**
8 **of additional data.**
9

10 AT&T provided a May 30, 2008 Accessible Letter submitted to CLECs to be used as
11 assistance in preparation of the manual LSR forms. In the letter, AT&T provides details of
12 some of necessary inputs to complete the LSR form correctly, reasons for errors, and updates
13 made to the Manual Ordering Guidelines and Local Ordering Handbook. AT&T considers this
14 item to be closed.
15

16 **Staff's assessment:** Staff concurs with AT&T to close this item with the understanding
17 that AT&T did address the CLECs concern regarding the requirements for additional data to
18 properly complete manual LSR forms. However, staff believes that issuance of one Accessible
19 Letter after another is not the appropriate means to provide corrections to ordering processes. For
20 example, below is a listing of 15 Accessible Letters addressing the manual email ordering
21 process alone. Staff believes that AT&T and the CLECs should develop and pursue an
22 alternative means of documenting and communicating corrections and resolutions made to
23 existing processes that are used in a production environment.
24

- 25 ⌘ Accessible Letter - CLECSE08-054, April 25, 2008, re: Manual LSR Remarks -LOAs
26 and Commingle EELs - Special Handling (All Carriers)
- 27
- 28 ⌘ Accessible Letter - CLECSE08-055, April 25, 2008, re: Manual LSR Update for the
29 DDD-Desired Due Date and D/TSENT - Date and Time Sent fields (All Carriers)
- 30
- 31 ⌘ Accessible Letter - CLECSE08-059, May 2, 2008, re: Updated for Manual LSR
32 Update or the DDD-Desired Due Date and D/TSENT - Date and Time Sent fields
33 (All Carriers)
- 34
- 35 ⌘ Accessible Letter - CLECSE08-060, May 2, 2008, re: Use INIT EMAIL Field On
36 The LSR Manual Form As Alternative Email Address For Receipt Of Notifications
- 37
- 38 ⌘ Accessible Letter - CLECSE08-061, May 2, 2008, re: SUPER FATAL AND
39 MANUAL REJECT MESSAGES ASSOCIATED WITH 22-STATE MANUAL
40 EMAIL FOR (ALL CARRIERS)
- 41
- 42 ⌘ Accessible Letter - CLECSE08-067, May 8, 2008, re: MANUAL LSR UPDATE
43 FOR THE PORTED NBR (PORTED NUMBER) FIELD ON THE LOOP SERVICE
44 W/NUMBER PORTABILITY AND NUMBER PORTABILITY FORMS (ALL
45 CARRIERS)
- 46

- 1 ⊗ Accessible Letter - CLECSE08-068, May 8, 2008, re: Manual LSR Update for the
2 PORTED NBR (Ported Number) field on the Loop Service w/Number Portability and
3 Number Portability forms (All Carriers)
4
5 ⊗ Accessible Letter - CLECSE08-070, May 13, 2008, Replacement for CLECSE08 and
6 CLECSE08-068 - Manual LSR Update for the PORTED NBR (Ported Number) field
7 on the Loop Service w/Number Portability and Number Portability forms (All
8 Carriers)
9
10 ⊗ Accessible Letter - CLECSE08-071, May 13, 2008, Update to Manual Reject
11 Messages (All Carriers)
12
13 ⊗ Accessible Letter - CLECSE08-072, May 14, 2008, Address Corrections for
14 REQTYP A (All Carriers)
15
16 ⊗ Accessible Letter - CLECSE08-075, May 20, 2008, Complex Product Ordering
17 Responsibility Changes (All Carriers)
18
19 ⊗ Accessible Letter - CLECSES08-030, May 20, 2008, Billing Completion
20 Notifications Backlog Transmission to CLECs
21
22 ⊗ Accessible Letter - CLECSE08-077, May 21, 2008, LSR Manual Ordering
23 Guidelines Updated and a New Frequently Asked Questions Document (All Carriers)
24
25 ⊗ Accessible Letter - CLECSE08-086, May 30, 2008 Updated the Manual Ordering
26 Guidelines, New Frequently Asked Questions Document and the 27.1 LOH (22-State)
27 (All Carriers)
28
29

30 **25. Review and assess the prioritized list of customer change requests for**
31 **enhancements to the 22-state email LSR process. Reevaluate merger related**
32 **OSS Change Requests previously submitted through the Change Management**
33 **process.**
34

35 CLEC change requests for enhancements to the manual email ordering process are
36 submitted to AT&T via the CLEC User Forum Issue Submission Form. AT&T then assigns and
37 prioritizes the change requests internally. In response to this commitment, AT&T provided three
38 specific change requests that address the email manual ordering process:
39

- 40 ⊗ CUF Issue 08-006, May 26, 2008 re: acknowledgements not being returned to CLECs
41 on manual orders.
42
43 ⊗ CUF Issue 08-008, May 27, 2008 re: updating of Manual Ordering Guidelines.
44
45 ⊗ CUF Issue 08-009, May 27, 2008 re: LSC Manual ordering Process Flow.
46

1 ATT states that two of the three change requests have been resolved. The third, CUF
2 Issue 08-009, is noted as “in progress” with a targeted review for discussion in the September
3 2008 AT&T/CLEC Email Ordering Forum. AT&T considers this item to be closed.
4

5 **Staff’s assessment:** Staff believes that it is premature to close this item. It appears that
6 CUF Issue 08-008 may have been discussed and possibly resolved in the September 2008 Email
7 Ordering Forum; however, no supporting documentation was provided to staff to concur with
8 closure of this item.
9

10 As part of this commitment AT&T also stated that it will re-evaluate merger related OSS
11 Change Requests previously submitted through the Change Management process. AT&T did not
12 provide any documentation in support of the re-evaluation. Staff would point to the CLECs
13 “Best Practices” provided to AT&T for consideration when implementing the new 22-state OSS
14 releases. At the May 2008 staff workshop, the CLECs argued that AT&T failed to adequately
15 address and respond to the Best Practices.
16
17

18 **26. Complete updates to the Local Ordering Handbook to reflect changes via the**
19 **Accessible Letter.**
20

21 This commitment addresses the issue regarding incorrect manual ordering guidelines.
22 According to AT&T, the updates to the manual ordering guideline, also known as the Local
23 Ordering Handbook (LOH), have been completed. The updates and changes are reflected in the
24 Accessible Letters issued subsequent to the April Release. Staff notes that item 4 above identifies
25 the specific Accessible Letters. AT&T considers this item to be closed.
26

27 **Staff’s assessment:** Staff concurs with AT&T to close this item with the understanding
28 that AT&T did address the CLECs concern regarding the updates to the Local Ordering
29 Handbook. However, staff believes that issuance of one Accessible Letter after another is not
30 the appropriate means to provide corrections to ordering processes. Staff believes that both
31 AT&T and the CLECs should work together to develop and pursue an alternative means of
32 documenting and communicating corrections and resolutions made to existing processes that are
33 used in a production environment.
34
35

36 **27. Proactive review and update of the 22-state manual LSR forms and email**
37 **process documentation to address customer feedback.**
38

39 In response to this commitment, AT&T provided staff with a May 21, 2008 Accessible
40 Letter denoting that updated manual ordering documentation supporting the 22-state manual
41 LSR forms and the email process. AT&T provided a link for viewing of the manual ordering
42 guidelines. In the Accessible Letter, AT&T further states that a Frequently Asked Questions
43 document has been developed to provide additional detail concerning form usage, the email
44 process, error conditions and helpful references. AT&T considers this item to be closed.
45

46 **Staff’s assessment:** Staff concurs with AT&T to close this item.

1
2
3 **28. Expand documentation quality control processes to ensure multiple layers of**
4 **review prior to release of documents to the customer.**
5

6 According to AT&T, the existing CLEC documentation quality process has been
7 expanded to include additional layers of review for updates to the Local Ordering Handbook
8 (LOH). In addition, a Southeast Local Service Order Requirement (LSOR) will be implemented
9 for the November 2008 release which was developed using the quality review process. The
10 LSOR will be available on AT&T's CLEC online website for the November Release. AT&T
11 considers this item to be closed.
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13 **Staff's assessment:** Staff concurs with AT&T to close this item.
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16 **29. Proactive billing adjustments, claims clean-up process for addressing**
17 **exceptions that are not addressed in the proactive approach, and**
18 **communication plan for the CLECs.**
19

20 AT&T provided staff with an August 14, 2008 Accessible Letter discussing the
21 resolution of the billing adjustments. The letter indicates that bill credits will appear on bill
22 periods starting July 25, 2008 through September 30, 2008. Furthermore, support of the credits
23 will be posted to AT&T wholesale Performance Measurement and Analysis Platform (PMAP).
24 AT&T provided staff with an update of this commitment on October 23, 2008, wherein AT&T
25 stated that all bill adjustments have been completed. [REDACTED]
26 [REDACTED]

27 [REDACTED] AT&T considers this item to be closed.
28

29 **Staff's assessment:** Staff concurs with AT&T to close this item.
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32 **30. Implement a temporary plan of action to handle calls by other service centers.**
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34 In March 2008, AT&T consolidated the former BellSouth Jacksonville, Florida and
35 Birmingham, Alabama call centers, also known as Local Carrier Service Centers (LCSC) into
36 one center located in Birmingham. As a result of the consolidation, the average speed of answer
37 time more than doubled from February 2008 to March 2008 (41.74 seconds to 91.5 seconds).
38 The average answer time remained high, at 62.29 seconds, in April 2008, due to the increased
39 number of CLEC calls for orders that were backlogged by the April Release. In response, AT&T
40 assigned call centers outside of the Southeast region to receive and expedite the processing of
41 CLEC orders. In May, times returned to pre March levels, at 38.11 seconds. All April Release
42 related calls temporarily handled by other service centers out of the Southeast region were
43 moved back into AT&T's Birmingham LCSC by May 19, 2008. AT&T considers this item to be
44 closed.
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46 **Staff's assessment:** Staff concurs with AT&T to close this item.

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31. Continue to manage April Release related expedites for the processing of acknowledgements for any individual situations if not addressed by the mechanized transmittal efforts.

In May 2008, AT&T implemented an escalation process for any CLEC orders that may still be missing notifications after the April Release defects appeared to be resolved. The escalation process begins with the CLEC order being assigned to AT&T's Wholesale Support Manger, who in turn, can escalate the order up to the Director of the Local Carrier Service Center (LCSC). AT&T considers this item to be closed.

Staff's assessment: Staff concurs with AT&T to close this item.

32. Continue to review staffing levels to meet anticipated demand for Wholesale Customer Support and Centers.

In response to this commitment, AT&T stated that its Local Carrier Service Centers (LCSC) continually reviews staffing requirements based on current and forecasted demand. AT&T considers this item to be closed.

Staff's assessment: Staff believes that it is premature to close this item. AT&T failed to provide staff with any documentation in support of staff requirements. At a minimum, staff expects to see an assessment of staffing levels based on current and forecasted demand and the impact to staffing levels based on implementation of future 22-state OSS releases.

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Appendix G

Glossary of Acronyms and Terms

Term or Acronym	Definition
9-state	This is the legacy BellSouth region and includes the states of Florida, Georgia, Alabama, Tennessee, Mississippi, Louisiana, South Carolina, North Carolina, and Kentucky.
13-state	This is the legacy SBC Communications' region and includes the states of Texas, Kansas, Missouri, Illinois, Indiana, Michigan, Ohio, Wisconsin, California, Nevada, Arkansas, Oklahoma, Connecticut.
ADSL	Asymmetrical Digital Subscriber Line – A transmission technology that allows the use of one existing local twisted-pair to provide high-bandwidth data and voice services simultaneously.
AVP	Assistant Vice President
CCP	Change Control Process
CLEC	Competitive Local Exchange Company – An AT&T wholesale customer who competes with the Incumbent Local Exchange Carrier (ILEC) and other carriers in providing local service.
CMP	Change Management Process
CRIS	Customer Record Information System – The AT&T proprietary corporate database and billing system for non-access customers and/or services.
DSL	Digital Subscriber Line – Allows customers to provide simultaneous two-way transmission of digital signals at speeds of 256 kbps via a two-wire local channel.
EDI	Electronic Data Interchange – The computer-to-computer exchange of inter and/or intra-company business documents in a public standard format.
EDR	Enhanced Defect Report
EPE	Experienced Process Expert – Individual identified as process expert during implementation and use of Express One, and later as the IT Unified Process (IT UP) across 22-state region.
ETE (or ETET)	End-to-End Test is a test that verifies system functionality by following a set of data from its inception through all points where it is processed. ETET crosses multiple systems and Development Management/Test groups. Test cases are designed at a high level to prove connectivity between applications are up and working properly.
Express One	The IT standard Software Development Life Cycle management process used by the 13-states prior to the introduction of IT UP.
FOC	Firm Order Confirmation
FPSC	Florida Public Service Commission
GUI	Graphical User Interface
ISDN	Integrated Services Digital Network – An integrated digital network in which the same time-division switches and digital transmission paths are used to establish connections for different services. ISDN services include telephone, data, electronic mail, and facsimile.

Term or Acronym	Definition
IT UP	IT Unified Process – A Software Development Life Cycle process introduced in late third quarter 2008 as the new 22-state standard that combines the Wireless Unified Process and Express One.
IWT	Implementation Weekend Testing is the User Acceptance testing of code in production.
KLR	Key Learnings Resolutions
LASR	Local Access Service Request System – System used by 22-state region to track and process Local Service Requests from CLECs
LAUTO	The automatic processor in LNP Gateway that validates LSRs and issues service orders.
LCSC	Local Carrier Service Center – The AT&T center which is dedicated to handling CLEC LSRs and preordering transactions, along with associated expedite requests and escalations.
Legacy System	Term used to refer to BellSouth Operations Support Systems
LENS	Local Exchange Navigation System – The BellSouth application developed to provide both preordering and ordering electronic interface functions for CLECs.
LEO	Local Exchange Ordering – The BellSouth system which accepts the output of CLEAC interfaces and provides first-level validation to ensure all appropriate fields are populated.
LESOG	Local Service Order Generation – A BellSouth system which accepts the service order output of LEO and enters the service order into the Service Order Control System using terminal emulation technology.
LEX	Local Service Request Exchange System – Interface used in 13-state region for LSR input
LNP	Local Number Portability – In the context of this document, the capability for a subscriber to retain their current telephone number as they transfer to a different local service provider.
LOIS	A fax server that provides automated imaging of LSRs.
LON	An inventory-based system responsible for tracking the processing status of LSRs.
LSC	Local Service Center
LSR	Local Service Request – A request from a CLEC for local resale service or unbundled network elements.
O&WS	Ordering & Wholesale Solutions is an organization within Customer Care and Billing (CC&B).
OmegaMan	Third party software product for monitoring systems/queues on mainframes.
OOM179	Order of Magnitude 179 is a reference to the first estimating point of the AT&T/BellSouth Wholesale Local Merger Program. It has become the reference name for this merger program.
OSS	Operations Support Systems – Multiple support systems and databases which are used to mechanize the flow and performance of work. The term is used to refer to overall system consisting of complex hardware, computer operating system(s), and applications which are used to provide

Term or Acronym	Definition
	the support functions.
OWS PMO	Ordering & Wholesale Solutions Project Management office
PGM	Program Manager
PMAP	Performance Measurement Analysis Platform – Provides delivery of performance reports via the web and facilitates analysis of the summary level data.
PMO	Project Management Organization
PRISM	Primary Repository for Information Systems Management is the graphical user interface and database that supports the IT Unified Process (IT UP).
QC	Quality Center
SCRM	Software Configuration Release Management team manages the code delivery from one environment to the next.
SEEM	Self-Effectuating Enforcement Mechanism – A tiered remedy structure in which payments are made either to the CLEC and/or state regulatory agency, depending on the type and level of parity/benchmark miss that occurs.
SGG	A routing and editing software application to help ensure the process of complete and error-free transactions.
SLA	A Service Level Agreement is an established or agreed upon commitment time frame and level of service for a given deliverable.
SOCS	System responsible for the collection, storage, and distribution of service orders.
SQM	Service Quality Measurements
ST2	System Test 2 is one of the 9 state test environments used to conduct system tests.
TechM	Tech Mahindra – Subcontractor for Amdocs performing some testing functions during the April Release.
UAT	User Acceptance Testing is performed to validate the system of program t the User Requirements.
Vantive	The primary tool used to manage post production defects.
WBS	Work Breakdown Structure – Steps outlining a project plan for project management purposes.
WFM	Work Force Management
WMS	Work Assignment Management System.
WIT	Wholesale Integration Tests in the Amdocs system testing team.
XML	eXtensible Markup Language – An internal standards-based data formatting option designed for information exchange on network systems.

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