



- Standards Committee T1
- Carrier Liaison Committee
- Telecommunications Industry Forum
- Ordering and Billing Forum
- Network Interconnection Interoperability Forum
- Industry Numbering Committee
- Protection Engineers Group
- Standards Committee O5
- Network Reliability Steering Committee
- Internetwork Interoperability Test Coordination Committee
- Telecommunications Fraud Prevention Committee
- Generic Requirements Users Group
- International Forum on ANSI-41 Standards Technology
- Interactive Voice Response Forum
- TTY Forum
- Administrative Council for Terminal Attachments
- IMSIS Oversight Council
- Emergency Services Interconnection Forum

July 10, 2002

VIA OVERNIGHT MAIL

James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building, 2<sup>nd</sup> Floor  
400 North Street  
Harrisburg, PA 17120

Re: Local Telephone Competition Collaboratives, Docket Nos.  
M-00011583, M-00011584, M-00011585 and M-00011586

Dear Secretary McNulty:

Enclosed are an original and three copies of comments, along with a diskette containing the comments in electronic format, on behalf of the Alliance for Telecommunications Industry Solutions' ("ATIS") Ordering and Billing Forum ("OBF") in the above-captioned dockets.

Please contact me at 202/434-8847 if you have any questions or comments.

Sincerely,

Megan L. Campbell  
General Counsel

Enclosures

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Collaborative to Develop Proposals for Regulations Relating to Procedures for Changing Local Service Providers</b>	)	<b>Docket No. M-00011583</b>
	)	
<b>Collaborative to Develop Proposals for Regulations Relating to Customer Information</b>	)	<b>Docket No. M-00011584</b>
	)	
<b>Collaborative to Develop Proposals for Regulations Relating to Quality of Service</b>	)	<b>Docket No. M-00011585</b>
	)	
<b>Collaborative to Develop Proposals for Regulations Relating to Local Service Provider Abandonment Process</b>	)	<b>Docket No. M-00011586</b>
	)	

**COMMENTS OF THE ALLIANCE FOR TELECOMMUNICATIONS INDUSTRY SOLUTIONS' ORDERING AND BILLING FORUM**

The Alliance for Telecommunications Industry Solutions ("ATIS"), on behalf of its sponsored Ordering and Billing Forum ("OBF"), hereby files these comments with the Pennsylvania Public Utility Commission ("Commission") concerning the Interim Guidelines adopted by the Commission establishing procedures for changing local service providers for jurisdictional telephone companies, and the establishment of local telephone competition regulations in Pennsylvania.

ATIS currently sponsors and provides support to eighteen (18) open industry committees and forums, as well as two (2) Incubators under its Incubator Solutions Program.<sup>1</sup> The primary

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<sup>1</sup> ATIS sponsors eighteen (18) open industry committees and forums. They are Committee T1, accredited by the American National Standards Institute ("ANSI"), which develops interconnection and interoperability standards, technical reports and technical requirements for the United States telecommunications networks; the Carrier Liaison Committee, which oversees the consensus resolution of "equal access" and network interconnection issues arising on an industry-wide basis; the Ordering and Billing Forum, which deals with issues of access ordering, provisioning, billing, carrier selection and subscription, directory services, and toll free Service Management System Number

purpose of ATIS is to promote the timely resolution of national and international issues involving telecommunications standards and the development of operational guidelines through the sponsorship and support of open industry forums. These open forums address such issues as network interconnection, interoperability testing, TTY compatibility and testing, network outage analysis, installation, testing and maintenance, ordering and billing, network services integration, telecommunications fraud prevention, electronic data interchange, and spectrum compatibility, among others.

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Administration; the Network Interconnection Interoperability Forum, which addresses issues including interconnection architecture, testing, installation and maintenance, network management, rating and routing; the Toll Fraud Prevention Committee, which has amongst its efforts the development of procedures for distribution of suspect telephone numbers, as well as exchange carrier guidelines for centrex clip-on fraud; the Telecommunications Industry Forum, which gives practical application to standards on electronic data interchange, bar coding, and standard coding language, as well as the development of implementation guidelines on electronic bonding for the telecommunications industry; the Protection Engineers Group, which develops contributions for submission to accredited standards committees on electrical protection; Standards Committee O5, an accredited standards committee for wood poles and other wood products used in the construction of electrical supply and communication lines; the Network Reliability Steering Committee, which analyzes network outage data, initiates corrective actions, as well as preparing Federal Communications Commission reports on these outages and serves as the industry's liaison to the Network Reliability and Interoperability Council; the Internetwork Interoperability Test Coordination Committee, which manages the cross industry testing program for network reliability, including local number portability testing and Year 2000 Testing; the Generic Requirements Users Group, whose objectives are to identify and recommend the implementation of process improvements targeted at enhancing the definition, development, maintenance and utility of generic requirements for the telecommunications industry; the TTY Forum, whose participants have undertaken the development of technically feasible solutions for TTY users to access 9-1-1 over digital wireless systems; the IVR Forum, whose goal is to make Voice Mail, audio text/IVR, automated attendant and similar services and platforms available to people with disabilities; IFAST, an open, international technical forum with the voluntary participation of wireless service providers, interested vendors, and associations that provide intersystem operations implementing the Advanced Mobile Phone Service (ANSI-41) family of standards; the Emergency Services Interconnection Forum (ESIF), jointly convened by ATIS and the National Emergency Number Association (NENA) to facilitate the identification and resolution of technical issues related to the interconnection of telephony and emergency services networks; and the IMSI Oversight Council, an open industry committee of telecommunications companies and other organizations with a direct interest in the management of IMSI codes. In addition, ATIS co-sponsors, along with the Telecommunications Industry Association (TIA) the Administrative Council for Terminal Attachments (ACTA), an open organization established to: (1) adopt technical criteria and to act as the clearing-house, publishing technical criteria for terminal equipment developed by ANSI-accredited standards development organizations; and (2) establish and maintain a registration database of equipment approved as compliant with the technical criteria. ATIS is also home to two incubators under its Incubator Solutions Program: the TTY Technical Implementation (TTSI) incubator and the Changes in Point Code Control and Ownership (PCCO) incubator. The TTSI incubator deals with TTY implementation issues and technical problem reports. The incubator put in place a process to investigate, route, and identify solutions to the issue and problem reports. The PCCO incubator is focused specifically on control and ownership issues of the Signaling System 7 (SS7) point code.

The ATIS membership includes companies from all segments of the industry, including local exchange carriers, interexchange carriers, manufacturers, competitive local exchange carriers, data local exchange carriers, wireless providers, cellular providers, broadband providers, software developers and internet service providers. Consumer groups also play an important role in several of the forums and committees. ATIS is not a traditional trade association and does not engage in lobbying for any one industry segment or interest group and is, therefore, a neutral environment for all industry segments to collaborate on, and work, industry issues.

ATIS and the OBF understand that collaboratives are meeting throughout June, July and August to discuss the four Interim Guidelines recently enacted by the Commission.<sup>2</sup> While companies may file comments, ATIS, as the sponsoring organization of the OBF, files these comments to provide an overview of the OBF and its processes, as well as a status report of issues worked, and issues currently being worked, by the OBF relating to the subject of multi-provider migration, an issue addressed in the Interim Guidelines. In addition, these comments outline a path forward that the OBF has adopted to address future related issues.

## **I. OVERVIEW OF THE OBF AND ITS PROCESSES**

Established in 1985, the OBF provides a forum for representatives from the telecommunications industry to identify, discuss and resolve national issues which affect ordering, billing, provisioning, and the exchange of information about access service, other connectivity and related matters. The OBF consists of six standing committees: the Billing Committee, the Local Services Ordering Guidelines Committee (LSOP), the Interconnection Service Ordering and Provisioning Committee (ISOP), the Message Processing Committee, the

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<sup>2</sup> These include the Procedures for Changing Local Service Providers, the Quality of Service Guidelines, the Customer Information Guidelines and the Local Service Provider Abandonment Process.

Subscription Committee, and the SMS/800 Number Administration Committee (SNAC). In addition, the OBF also sponsors the Wireless Workshop.<sup>3</sup>

The OBF operates according to the industry consensus process. The industry consensus process is an effective vehicle for resolving complex technical, operational, and business issues, and is an alternative or compliment to government regulation. The consensus process is a fair and open one and, therefore, gives legitimacy and authority to the work product.

The OBF develops non-binding operational guidelines and standards. Forum participants identify business problems facing the industry and introduce issues to the standing committees with the purpose of resolving the business problem. In order to be accepted by an OBF committee, an issue should be “national in scope.” To be “national in scope” an issue must cause impact to multiple participants, and involve at least one customer and provider. Additionally, “national in scope” may include cross border issues that impact companies doing business in other countries.

Once an issue is accepted, committee participants meet and discuss the issue until the committee reaches consensus and the issue is resolved. The OBF participants come together in General Session on a quarterly basis, with interim meetings scheduled on an as-needed basis to discuss and work issues. Resolution of issues in the OBF and its committees is by consensus. Consensus is established when substantial agreement has been reached among interest groups participating in the issue at hand.<sup>4</sup>

When an issue reaches resolution through consensus agreement, it is presented for “initial closure.” The OBF issue resolution process provides the industry an opportunity to review the resolution of an issue in “initial closure” prior to the issue being placed into “final closure.”

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<sup>3</sup> For more information on the scope and missions of each committee, see [www.atis.org/obf](http://www.atis.org/obf).

<sup>4</sup> Interest groups are those groups materially affected by the outcome of the result.

“Initial closure” gives official notification to the industry, via publication in the OBF meeting record, that the Committee(s) has completed its work and has reached an initial resolution of the issue.

Once an issue has been accepted for “initial closure,” the issue is then submitted for “final closure” at the committee meeting held during the next General Session, provided that forty-two calendar days have passed since the issue’s “initial closure” resolution notification was distributed. If no new information is received, or no modifications are requested during the “initial closure” stage, the issue goes to “final closure” after the forty-two day time period. “Final closure” serves as notification to the industry that consensus has been reached on the resolution of an issue. Participants are expected to consider resolutions in good faith and to consider implementation on a timely basis. Additionally, *any* company may implement an OBF resolution; the resolution is not solely for implementation by those companies participating in the OBF.

## **II. MULTI-PROVIDER MIGRATION ISSUES ADDRESSED BY THE OBF**

The OBF’s LSOP Committee addresses and resolves issues focused on the ordering and/or provisioning<sup>5</sup> of local telecommunications services using the Local Service Ordering Guidelines (“LSOG”). The LSOP Committee has responsibility for the development and maintenance of the ordering and provisioning processes, as well as the associated documentation. Additional responsibilities include the maintenance of certain documents to support those processes, including the LSOG.

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<sup>5</sup> Provisioning is inclusive of the design functions up through issuance of the installation work document.

The LSOP Committee has resolved, through the industry consensus process described herein, several issues related to the topic of multi-provider migration. Additionally, the LSOP Committee is actively working issues related to the subject as well. These issues are briefly outlined below.<sup>6</sup>

## **Resolved Issues**

<b>Issues</b>	<b>Titles</b>	<b>LSOG Release</b>	<b>Resolution</b>
1176	Local Exchange Competition Order Process Flow	LSOG 3	<ul style="list-style-type: none"> <li><input type="checkbox"/> This issue resolution is contained in Issue 1268.</li> </ul>
1268	FOC Transition Information	LSOG 3	<ul style="list-style-type: none"> <li><input type="checkbox"/> This issue resulted in the development of 11 process flows all reflecting different scenarios.</li> <li><input type="checkbox"/> These flows are being placed in the LSOG Overview.</li> <li><input type="checkbox"/> The following Issues are related to these flows:               <ul style="list-style-type: none"> <li><input type="checkbox"/> Issue 1269 - Cust Info</li> <li><input type="checkbox"/> Issue 1273 - Completion Notice</li> <li><input type="checkbox"/> Issue 1383 - Loss Notification.</li> </ul> </li> <li><input type="checkbox"/> This Issue also generated the issuance of:               <ul style="list-style-type: none"> <li><input type="checkbox"/> Issue 1525/O&amp;P - Transition Information</li> <li><input type="checkbox"/> Issue 1526/O&amp;P - Loss Alert</li> <li><input type="checkbox"/> Issue 1527/O&amp;P - Pre-Order Service Configuration.</li> </ul> </li> <li><input type="checkbox"/> This resolution also closes Issue 1176.</li> </ul>
1525	Transition Information	LSOG 4	<ul style="list-style-type: none"> <li><input type="checkbox"/> Developed new Practice to support Transition Information and Loss Alert in the LSOG. Updated the 070 Practice, see the attached pages. See Issue 1526 for the Loss Alert/Transition Information Form.</li> </ul>
1526	Loss Alert	LSOG 4	<ul style="list-style-type: none"> <li><input type="checkbox"/> Developed the Form to support the new Practice for Loss Alert/Transition Information in the LSOG. See Issue 1525 for the Loss Alert/Transition Information Practice.</li> </ul>
1527	Pre Order Service Configuration	LSOG 4	<ul style="list-style-type: none"> <li><input type="checkbox"/> Updated the Pre-Order Process Practice 120 with the new fields for Service Configuration. Updated the appropriate sections in the 070 Practice with the information for the Pre-Order Practice.</li> </ul>

<sup>6</sup> For more detailed information on each issue, as well as other OBF issues, please see the OBF web site at [www.atis.org/obf](http://www.atis.org/obf).

Issues	Titles	LSOG Release	Resolution
1792	ATN Replacement for Partial Migration	LSOG 6	<input type="checkbox"/> Developed the migration process flows to clarify the provider interactions necessary to migrate service between providers. <input type="checkbox"/> These flows address specific migration scenarios using different service configurations. <input type="checkbox"/> Developed the definitions for full and partial migrations. <input type="checkbox"/> Added new data element "Migration Indicator" which specifically identifies full and partial migrations.
2189	Refine Migration Process Flows in a Number Portability in a Multi-NSP Environment	LSOG 6	<input type="checkbox"/> Developed scenarios that clarified the roles and responsibilities of trading partners in a resale environment with number portability.
2296	LSOG: CLEC to CLEC UNE Loop Conversions	LSOG 7	<input type="checkbox"/> Developed and documented a National guideline and associated scenarios enabling CLEC to CLEC migrations reusing the loop.

<sup>1</sup> OBF Guidelines state that early adoption of resolutions is acceptable.

### Active Issues

Issues	Titles	Targeted LSOG Release	Expected Results
2360	Add New Account Telephone Number Field to 121 Practice	LSOG 7	<input type="checkbox"/> Enhance the Provider Notification process to accommodate the need for providers to notify customers of a new ATN assignment. <input type="checkbox"/> Initial Closure effective 05/10/02
2190	Refine Migration Process Flows to Reflect the Ability to Migrate Listings with a Directory Order	Future	<input type="checkbox"/> Update the multi service provider (CLEC – CLEC) flows to address the ability to migrate listings when the Directory Service Provider (DSP) remains the same.
2372	Clarify the Industry Intent for all Activity Fields	Future	<input type="checkbox"/> Modify the definitions for conversion and migrations. <input type="checkbox"/> Refine the use of ordering activity types to further support CLEC to CLEC migrations.
2404	LSOG: Ability to migrate TN(s) to an existing account (ATN/AN) and establish a new account number for the merged account	Future	<input type="checkbox"/> Introduced at OBF 78 May 6, 2002



### III. THE OBF'S PATH FORWARD FOR ADDRESSING MULTI-PROVIDER MIGRATION ISSUES

The OBF's LSOP Committee has formed an informal working group to identify and discuss issues related to the subject of multi-provider migration, the Multi-Provider Migration Discussion Group, which meets at least quarterly at each OBF General Session meeting. Additionally, this working group is monitoring related state activities, and outlining plans to educate and provide information to state public utilities commissions on the OBF and its work surrounding multi-provider migration issues.


Fundamentally, it is beneficial and more cost effective for companies when there is a single set of guidelines, or a standard, on a particular issue. This, in turn, benefits consumers as well. Therefore, ATIS and the OBF look forward to assisting the Commission to make this possible in the context of multi-provider migration issues.

### IV. CONCLUSION

ATIS and the OBF appreciate the opportunity to provide these comments.

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Respectfully submitted,



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Megary L. Campbell

General Counsel

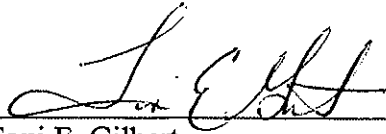
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