



- 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
- IMSI Oversight Council
- Emergency Services  
Interconnection Forum

July 10, 2002

VIA OVERNIGHT MAIL

Lawrence C. St. Blanc, Secretary  
Louisiana Public Service Commission  
One American Place, Suite 1630  
Baton Rouge, LA 70821

Re: Possible Amendments to the Louisiana Public Service  
Commission's Regulations for Competition in the Local  
Telecommunications Market, Section 801 (General Order Dated  
April 5, 2000), Docket No. R-26438

Dear Secretary St. Blanc:

Enclosed are an original and one copy 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 docket.

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

Sincerely,

Megan L. Campbell  
General Counsel

Enclosures

**BEFORE THE  
LOUISIANA PUBLIC SERVICE COMMISSION**

In the Matter of

Possible Amendments to the Louisiana	)	
Public Service Commission's	)	
Regulations For Competition in the Local	)	Docket No. R-26438
Telecommunications Market, Section 801	)	
(General Order dated April 5, 2000)	)	

**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 Louisiana Public Service Commission ("Commission") concerning Docket No. R-26438, and the Commission's inquiry "under what circumstances, if any, should a TSP be allowed to refuse to port a number to another TSP."<sup>1</sup> Specifically, ATIS, on behalf of the OBF, files these Comments to complement the Comments filed by AT&T in response to the Commission's inquiry.<sup>2</sup>

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>3</sup> The primary purpose of ATIS is to rapidly develop and promote technical and

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<sup>1</sup> *In the Matter of Possible Amendments to the Louisiana Public Service Commission's Regulations For Competition in the Local Telecommunications Market, Section 801 (General Order dated April 5, 2000)*, Docket No. R-26438, Official Bulletin #747, April 12, 2002.

<sup>2</sup> *In the Matter of Possible Amendments to the Louisiana Public Service Commission's Regulations For Competition in the Local Telecommunications Market, Section 801 (General Order dated April 5, 2000)*, Docket No. R-26438, Comments of AT&T, April 29, 2002.

<sup>3</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

operations standards for the communications and related information technologies industry worldwide. ATIS achieves this purpose, in part, 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

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“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 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.

integration, telecommunications fraud prevention, electronic data interchange, and spectrum compatibility, among others.

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 is accredited by the American National Standards Institute (“ANSI”).

ATIS, on behalf of the OBF, files these remarks to augment the Comments filed by AT&T in response to the Commission’s Official inquiry regarding “under what circumstances, if any, should a TSP be allowed to refuse to port a number to another TSP.” In their Comments, AT&T referenced and attached Comments that ATIS filed on behalf of the OBF in a proceeding in Texas concerning the establishment of CLEC to CLEC Conversion Guidelines.<sup>4</sup> The Comments filed today outline additional issues that the OBF has resolved, and is actively working, related to multi-provider migration. Also, these Comments outline a more specific path forward to address these issues within the

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<sup>4</sup> Comments of the Alliance for Telecommunications Industry Solutions’ Ordering and Billing Forum Concerning CLEC to CLEC Conversion Guidelines – Project No. 24389, Before the Public Utility Commission of Texas, March, 2002.

OBF. All other information in the Texas filing, including the information regarding the OBF and its processes, is current and therefore not addressed herein.

## I. MULTI-PROVIDER MIGRATION ISSUES ADDRESSED BY THE OBF

The OBF's Local Service Ordering and Provisioning ("LSOP") Committee<sup>5</sup> addresses and resolves issues focused on the ordering and/or provisioning<sup>6</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.

The LSOP Committee has resolved, through the industry consensus process, 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>7</sup>

### Resolved Issues

Issues	Titles	LSOG Release	Resolution
1176	Local Exchange Competition Order Process Flow	LSOG 3	<input type="checkbox"/> This issue resolution is contained in Issue 1268.

<sup>5</sup> The OBF consists of 6 standing committees: the Billing Committee, the LSOP Committee, the Interconnection Service Ordering and Provisioning (ISOP) Committee, the Message Processing Committee, the Subscription Committee, and the SMS/800 Number Administration (SNAC) Committee. In addition, the OBF also sponsors the Wireless Workshop. For more information on the OBF and its Committees, see <http://www.atis.org/atis/clc/obf/obfhom.htm>.

<sup>6</sup> Provisioning is inclusive of the design functions up through issuance of the installation work document.

<sup>7</sup> For more detailed information on each issue, as well as other OBF issues, please see the OBF web site at <http://www.atis.org/ATIS/CLC/OBF/obfiss.htm>.

Issues	Titles	LSOG Release	Resolution
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>
1792	ATN Replacement for Partial Migration	LSOG 6	<ul style="list-style-type: none"> <li><input type="checkbox"/> Developed the migration process flows to clarify the provider interactions necessary to migrate service between providers.</li> <li><input type="checkbox"/> These flows address specific migration scenarios using different service configurations.</li> <li><input type="checkbox"/> Developed the definitions for full and partial migrations.</li> <li><input type="checkbox"/> Added new data element "Migration Indicator" which specifically identifies full and partial migrations.</li> </ul>
2189	Refine Migration Process Flows in a Number Portability in a Multi-NSP Environment	LSOG 6	<ul style="list-style-type: none"> <li><input type="checkbox"/> Developed scenarios that clarified the roles and responsibilities of trading partners in a resale environment with number portability.</li> </ul>

Issues	Titles	LSOG Release <sup>1</sup>	Resolution
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

For more information on these, and other OBF Issues, please see the OBF web site at <http://www.atis.org/ATIS/CLC/OBF/obfiss.htm>.

## **II. 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.

As stated in our previous filing, ATIS reasons that it is fundamentally 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.

### III. CONCLUSION

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

Respectfully submitted,



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