

March 22, 2002

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

VIA OVERNIGHT MAIL

Central Records Filing Clerk
Public Utility Commission of Texas
1701 N. Congress Avenue
Austin, TX 78701

Re: CLEC-to-CLEC Conversion Guidelines, Project No. 24389

Dear Sir/Madame:

Enclosed are an original and eighteen copies of comments on behalf of the Alliance for Telecommunications Industry Solutions' ("ATIS") Ordering and Billing Forum ("OBF") in the above-captioned project.

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

Sincerely,



Megan L. Campbell
General Counsel

Enclosures

**COMMENTS CONCERNING
CLEC TO CLEC CONVERSION
GUIDELINES - PROJECT NO. 24389**

**BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS**

**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 Public Utility Commission of Texas ("Commission") concerning Project Number 24389 and the establishment of CLEC to CLEC Conversion Guidelines in Texas. The ATIS and the OBF file these comments to clarify and expand on remarks made during the February 20, 2002 workshop before the Commission.

ATIS sponsors and provides support to seventeen (17) open industry committees and forums, as well as two (2) Incubators under its Incubator Solutions Program.¹ The

¹ ATIS sponsors seventeen (17) 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 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,

primary 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.

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

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; 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.

industry segment or interest group and is, therefore, a neutral environment for all industry segments to collaborate on, and work, industry issues.

During the February 20, 2002 workshop regarding CLEC to CLEC Conversion Guidelines, the Commission requested information in the form of written comments from AT&T regarding the OBF and the forum's issues relating to CLEC to CLEC migration.² 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 CLEC to CLEC migration. In addition, these comments outline a path forward that the OBF has adopted to address future issues related to the subject of CLEC to CLEC migration.

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 Subscription Committee, and the SMS/800 Number

² Establishment of CLEC-to-CLEC Conversion Guidelines; Public Utility Commission of Texas, Telephonic Workshop, February 20, 2002, at 40-43. A representative from AT&T made several references to the OBF and its work product during the workshop, thereby prompting the Commission's request.

Administration Committee (SNAC). In addition, the OBF also sponsors the Wireless Workshop.³

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.⁴

When an issue reaches resolution through consensus agreement, it is presented for “initial closure”. The OBF issue resolution process provides the industry an opportunity

³ For more information on the scope and missions of each committee, see www.atis.org/obf.

⁴ Interest groups are those groups materially affected by the outcome of the result.

to review the resolution of an issue in “initial closure” prior to the issue being placed into “final closure”. “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. THE CLEC TO CLEC MIGRATION ISSUES ADDRESSED BY THE OBF

The OBF’s LSOP Committee addresses and resolves issues focused on the ordering and/or provisioning⁵ 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.

⁵ 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 CLEC to CLEC migration. Additionally, the LSOP Committee is actively working issues related to the subject as well. These issues are briefly outlined below.⁶

Issues Relating to the Subject of CLEC to CLEC Migration Resolved by the LSOP Committee:

Issue 1792: ATN Replacement for Partial Migration. This issue was closed and included in LSOG 6, the most recent version of the LSOG released by the LSOP Committee. The LSOP Committee developed the migration process flows to clarify the provider interactions necessary to migrate service between providers. These flows address specific migration scenarios using different service configurations. Additionally, the committee developed the definitions for full and partial migrations, and added a new data element, "Migration Indicator," which specifically identifies full and partial migrations.

Issue 2189: Refine Migration Process Flows in a Number Portability in a Multi-NSP Environment. This issue was closed and included in LSOG 6. The LSOP committee developed scenarios that clarified the roles and responsibilities of trading partners in a resale environment with number portability.

⁶ For more detailed information on each issue, as well as other OBF issues, please see the OBF web site at www.atis.org/obf.

Issue 2296: LSOG: CLEC to CLEC UNE Loop Conversions. This issue is in final closure, and will be included in LSOG 7. The committee developed and documented a national guideline and associated scenarios enabling CLEC to CLEC migrations reusing the loop.

Issues Relating to the Subject of CLEC to CLEC Migration Currently Being Worked by the LSOP Committee:

Issue 2190: Refine Migration Process Flows to Reflect the Ability to Migrate Listings with a Directory Order. This issue is targeted for inclusion in LSOG 7. It is expected that the outcome of this issue will update the multi service provider (CLEC to CLEC) flows to address the ability to migrate listings when the Directory Service Provider (DSP) remains the same.

Issue 2360: Add New Account Telephone Number Field to 121 Practice. This issue is targeted for inclusion in LSOG 7. The expected outcome is that the resolution to this issue will enhance the Provider Notification process to accommodate the need for providers to notify customers of a new ATN assignment.

Issue 2372: Clarify the Industry Intent for all Activity Fields. This resolution to this issue is expected to modify the definitions for conversion and migrations, and

to refine the use of ordering activity types to further support CLEC to CLEC migrations.

III. THE OBF'S PATH FORWARD FOR ADDRESSING CLEC TO CLEC ISSUES

The OBF's LSOP Committee has formed an informal working group to identify and discuss issues related to the subject of CLEC to CLEC migration. Additionally, this informal 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 the CLEC to CLEC migration issue.

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 CLEC to CLEC conversion and migration issues.

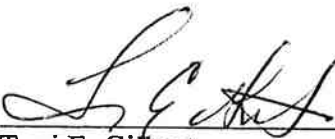
IV. CONCLUSION

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

Respectfully submitted,



Megan L. Campbell
General Counsel
Alliance for Telecommunications Industry
Solutions
1200 G Street, N.W., Suite 500
Washington, DC 20005
Phone: (202) 434-8847
Fax: (202) 393-5481



Toni E. Gilbert
Staff Attorney
Alliance for Telecommunications Industry
Solutions
1200 G Street, N.W., Suite 500
Washington, DC 20005
Phone: (202) 434-8830
Fax: (202) 393-5481