PROJECT NO. 24389

RULEMAKING PROCEEDING	§	
REGARDING CLEC-TO-CLEC	§	PUBLIC UTILITY
AND CLEC-TO-ILEC	§	COMMISSION
MIGRATION GUIDELINES	§	OF TEXAS

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

The Alliance for Telecommunications Industry Solutions ("ATIS")[1], on behalf of

its Ordering and Billing Forum ("OBF"), hereby files these comments with the Public

Utility Commission of Texas ("Commission") concerning Project #24389, a rulemaking

proceeding proposing CLEC-to-CLEC and CLEC-to-ILEC Migration Guidelines in

Texas. Specifically, ATIS OBF files these comments to address one of the

Commission's questions posed in its Proposal for Publication:[2] How do the (proposed

Texas) CLEC-to-CLEC and CLEC-to-ILEC Migration Guidelines differ from the Local

Service Ordering Guidelines (Issues 4-8) that have been developed in the ATIS-

sponsored Ordering and Billing Forum ("OBF").

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,

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[1] ATIS is a member company organization that is a leader for standards and operating procedures for the communications industry. More than 1,500 experts from over 400 telecommunications companies participate in ATIS' 17 committees, forums, and Incubator Solutions programs, where work focus includes network interconnection standards, number portability, improved data transmission, wireless communications, Internet telephony, E-9-1-1, VoIP, Security standards, and ordering and billing issues. Members of ATIS and committee participants include, but are not limited to, telecommunications service providers, manufacturers, software developers, resellers, enhanced service providers, and providers of operations support. For more information on ATIS, please see www.atis.org.

[2] Rulemaking Regarding CLEC-to-CLEC and CLEC-to-ILEC Migration Guidelines, Proposal for Publication of New **§**26.131 as Approved at the March 21, 2003 Open Meeting, Public Utility Commission of Texas, March 27, 2003.

other connectivity and related matters. The OBF consists of six standing committees: the

Billing Committee, the Local Services Ordering and Provisioning ("LSOP") Committee,

the Interconnection Services Ordering and Provisioning ("ISOP") Committee, the

Message Processing Committee, the Subscription Committee, and the SMS/800 Number

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

Workshop.[3]

       The LSOP Committee addresses and resolves issues related to the ordering and

provisioning[4] of local telecommunications services. The LSOP Committee has

responsibility for the development and maintenance of the ordering and provisioning

processes, as well as all associated documentation, including the Local Service Ordering

Guidelines ("LSOG"). The LSOG is a collection of best practices related to the ordering

and provisioning of local telephone service. The LSOG practices encompass the order

flows, definition of data elements and terms and their usage, required forms, and the

processes necessary to provide the end user customer telephone service, including

Directory Services. Included in the LSOG practices are the Customer Service

Information ("CSI") and Transitional Information ("TI") practices, which are necessary

for a smooth customer transition to the new Local Service Provider ("LSP").

       The LSOG is updated on a regular basis to include new processes and also to

enhance existing processes, as required by the industry.[5] The LSOG practices have been

enhanced to address the situation where one Competitive Local Exchange Carrier

("CLEC") has won the end user customer of another CLEC. Originally, these process

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

[4] Provisioning is inclusive of the design functions up through issuance of the installation work document.

[5] For instance, these updated processes may be the result of a new service offering or a new type of market entrant such as a Wireless Provider.

flows were developed in response to the Telecommunications Act of 1996, which

permitted CLECs to enter the local telecommunications markets of the Incumbent Local

Exchange Carriers ("ILECs"). Initially, since most CLECs did not own their own

switches or local loops to the end users' locations, the process flows were developed to

allow the CLECs to migrate the end user's telephone number and features "as is" using a

method called Total Service Resale ("TSR"). As the CLEC market presence grew, some

CLECs purchased their own switches, thus eliminating the need to use the ILEC switch

and features; however, the CLECs were still required to purchase the local loop from a

network service provider, usually the ILEC. Based on these various methods of

providing service and the fact that ILECs were required to market their service in an

unbundled fashion called Unbundled Network Elements ("UNEs"), ILECs offered two

more types of local service, UNE-Platform ("UNE-P"), their switch and its features, and

UNE-Loop, the local loop to the end user's location. The related migration guidelines are

outlined in Version 4 of the LSOG.

The migration guidelines in Version 4 of the LSOG were developed by the LSOP

based on a CLEC ordering local service from an ILEC. The migration guidelines in

LSOG 4 use the TSR method and migrated the end users entire service "as is", including

Directory Listings.[6] However, due to the growing number of CLECs and therefore

migrating customers, specific CLEC-to-CLEC migration flows were developed and first

implemented in Version 6 of the LSOG, and have been an ongoing part of the LSOG

since. Directory Services, as it relates to CLEC-to-CLEC migration, were introduced in

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[6] The *End User Migration Guidelines – CLEC to CLEC*, drafted and adopted by the state of New York is
based generally on Version 4 of the LSOG.

Version 8 of the LSOG, which is presently being developed by the industry and is scheduled for implementation late 2003.

Outlined below are the LSOG 6 through LSOG 8 process flows that were specifically developed to address CLEC-to-CLEC migrations. Where these process flows align with the process flows outlined in the proposed Texas CLEC-to-CLEC and CLEC-to-ILEC Migration Guidelines, the paragraph number from Version 8 of the LSOG is identified.[7] These flows are found in ATIS-OBF-LSR-070 (Practice 070 of the LSOG document).

The following scenario descriptions are currently limited to Plain Old Telephone Service ("POTS"), Integrated Services Digital Network Basic Rate ("ISDN BRI"), coin and Centrex services. Additional requirements may be necessary for other types of services (e.g., Direct Inward Dialing and Special Services). For analysis purposes, the migration scenarios will be categorized as bundled or unbundled serving arrangements. Bundled serving arrangements are resale or UNE-P serving arrangements where the network service provider furnishes all of the facilities. Unbundled serving arrangements are UNE-Loop and full facilities-based serving arrangements where the LSP furnishes some or all of the facilities. The scenario numbers listed for each migration relate to the sixteen scenarios listed in the chart below.

TYPES OF SCENARIOS

	Scenario Number	Initial State	End State
1	1	CLEC #1 via Resale	CLEC #2 via Resale
2	1	CLEC #1 via Resale	CLEC #2 via UNE-P
3	1	CLEC #1 via UNE-P	CLEC #2 via Resale

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[7] New flows are introduced periodically into the LSOG, therefore, the paragraph numbers may change from one LSOG version to another.

4	1	CLEC #1 via UNE-P	CLEC #2 via UNE-P
5	2-A	CLEC #1 via UNE-P	CLEC #2 via Loop
6	2-A	CLEC #1 via Resale	CLEC #2 via Loop
7	2-B	CLEC #1 via UNE-P	CLEC #2 via Facilities-Based
8	2-B	CLEC #1 via Resale	CLEC #2 via Facilities-Based
9	3-A	CLEC #1 via Facilities-Based	CLEC #2 via Resale
10	3-A	CLEC #1 via Facilities-Based	CLEC #2 via UNE-P
11	3-B	CLEC #1 via Loop	CLEC #2 via Resale
12	3-B	CLEC #1 via Loop	CLEC #2 via UNE-P
13	4-A, 4-B	CLEC #1 via Loop	CLEC #2 via Loop
14	4-C	CLEC #1 via Loop	CLEC #2 via Facilities-Based
15	4-D	CLEC #1 via Facilities-Based	CLEC #2 via Facilities-Based
16	4-E	CLEC #1 via Facilities-Based	CLEC #2 via Loop

1. Bundled to Bundled

This group of scenarios includes resale to resale, resale to platform (UNE-P), UNE-P to resale, and UNE-P to UNE-P migrations. All of the bundled to bundled scenarios can be migrated by using the same procedures. Consequently, for purposes of this section, the bundled to bundled migrations will be treated as one scenario. In the bundled migrations, the NSP remains unchanged throughout the migration.

Description:
The new local service provider and the old local service provider provide service to the customer by leasing bundled services from a network service provider ("NSP").

Texas Scenarios	LSOG 6 through 8 Process Flow Description	*LSOG 8 Paragraph
CLEC #1 via Resale to CLEC #2 via Resale	Resale to Resale with same NSP	14.18.5
CLEC #1 via Resale to CLEC #2 via UNE-P	Resale to UNE-P	14.18.11
CLEC #1 via UNE-P to CLEC #2 via Resale	Resale to Resale with same NSP	14.18.5
CLEC #1 via UNE-P to CLEC #2 via UNE-P	Local Number Portability (TSR order flow)	14.15 Scenario 4

* LSOG 8 paragraph numbering subject to change with Final version.

2. Bundled to Unbundled

This group of scenarios includes: UNE-P to UNE-Loop, UNE-P to Full Facilities-Based Service, Resale to UNE-Loop, and Resale to Full Facilities-Based Service. In addition, there are some variations on these scenarios that are addressed, including: UNE-P to Loop with LNP and Resale to UNE-Loop with LNP.

2.A. UNE-P or Resale to UNE-Loop w/LNP
Description:
This migration involves reusing the loop facilities and retaining the customer's telephone number. The Old CLEC serves the customer via bundled services leased from a network

service provider. The New CLEC serves the customer via its own switch and an unbundled loop facility.

Texas Scenarios	LSOG 6 through 8 Process Flow Description	*LSOG 8 Paragraph
CLEC #1 via Resale to CLEC #2 via Loop	Resale to UNE-Loop with Number Portability	14.18.10
CLEC #1 via UNE-P to CLEC #2 via Loop	UNE-P to UNE-Loop with Number Portability	14.18.1

* LSOG 8 paragraph numbering subject to change with Final version.

2.B. UNE-P or Resale to Full Facilities w/LNP

Description:
The old local service provider serves the customer via bundled services leased from a network service provider. The new local service provider serves the customer via its own switch and loop facility. The End User retains the telephone number.

Texas Scenarios	LSOG 6 through 8 Process Flow Description	*LSOG 8 Paragraph
CLEC #1 via Resale to CLEC #2 via Facilities-Based	Resale to UNE-P with new NSP	14.18.13
CLEC #1 via UNE-P to CLEC #2 via Facilities-Based	UNE-P to Retail with Number Portability	14.18.7

*LSOG 8 paragraph numbering subject to change with Final version.

3. Unbundled to Bundled

This group of scenarios includes: Full Facilities Based to Resale or UNE-P, and UNE-Loop to Resale or UNE-P. All scenarios involve LNP.

3.A. Full Facilities-Based to Resale or UNE-P with LNP

Description:
The old local service provider serves the customer via its own switch and loop facility. The new local service provider serves the customer via bundled services leased from a new network service provider. The End User retains the telephone number.

Texas Scenarios	LSOG 6 through 8 Process Flow Description	*LSOG 8 Paragraph
CLEC #1 via Facilities-Based to CLEC #2 via Resale	Scenario 2A – Wholesale/ILEC to Reseller	14.6.1
CLEC #1 via Facilities-Based to CLEC #2 via UNE-P	Retail to UNE-P and Number Portability	14.18.9

*LSOG 8 paragraph numbering subject to change with Final version.

3.B. UNE-Loop to Resale or UNE-P with LNP

Description:
This migration involves reusing the existing Loop facilities and retaining the end user's telephone number. It will require a reverse hot cut. The old local service provider serves the end user via its own Switch and leases an unbundled Loop facility from a network service provider. The new local service provider serves the customer via bundled services leased from a network service provider reusing the existing Loop facility.

Texas Scenarios	LSOG 6 through 8 Process Flow Description	*LSOG 8 Paragraph
CLEC #1 via UNE-Loop to CLEC #2 via Resale	UNE-Loop to Resale and Number Portability– With Loop Reuse	14.18.3.
CLEC #1 via UNE-Loop to CLEC #2 via UNE-P	UNE-Loop to UNE-P	14.18.15

*LSOG 8 paragraph numbering subject to change with Final version.

4. Unbundled to Unbundled

This type of migration includes: UNE-Loop to UNE-Loop with or without reuse of loop facilities, UNE-Loop to Full Facilities-Based, Full Facilities-Based to Full Facilities-Based, and Full Facilities-Based to UNE-Loop. All scenarios involve LNP.

4.A. UNE-L to UNE-L with LNP

Description:
This migration reuses the loop facility and the end user retains the telephone number. The old local service provider serves the end user via its own Switch and an unbundled loop facility leased from the network service provider. The new local service provider serves the customer via its own Switch and an unbundled loop facility leased from the network service provider. In addition, this migration requires a coordinated hot cut where the Loop must be disconnected from one company's cage/switch and connected to another company's cage/switch

Texas Scenarios	LSOG 6 through 8 Process Flow Description	*LSOG 8 Paragraph
CLEC #1 via UNE-Loop to CLEC #2 via UNE-Loop with Loop reuse	UNE-Loop Reuse with Number Portability	14.18.17.

*LSOG 8 paragraph numbering subject to change with Final version.

4.B. UNE-L to UNE-L with LNP (Loop facilities will not be reused.)

Description:
The old local service provider serves the end user via its own switch and an unbundled loop facility leased from the network service provider. The new local service provider serves the customer via its own switch and a new unbundled loop facility leased from the network service provider. The End User retains the telephone number.

Texas Scenarios	LSOG 6 through 8 Process Flow Description	*LSOG 8 Paragraph
CLEC #1 via UNE-Loop to CLEC #2 via UNE-Loop with new Loop	UNE-Loop to Number Portability and UNE-Loop OR CLEC –to-CLEC Number Portability with New Unbundled Loop(s)	14.18.3 or 14.18.19

*LSOG 8 paragraph numbering subject to change with Final version.

4.C. UNE-L to Full Facilities-Based with LNP

Description:

This migration does not involve the reuse of existing loop facilities. The old local service provider serves the end user via its own switch and an unbundled loop facility leased from a network service provider. The new local service provider serves the customer via its own Switch and Loop facilities. The End User retains the telephone number.

Texas Scenarios	LSOG 6 through 8 Process Flow Description	*LSOG 8 Paragraph
CLEC #1 via UNE-Loop to CLEC #2 via Facilities Based Service	UNE-Loop to Retail with Number Portability	14.18.6

*LSOG 8 paragraph numbering subject to change with Final version.

4.D. CLEC Full Facilities-Based to CLEC Full Facilities-Based with LNP

Description:

The old local service provider serves the end user via its own Switch and Loop facility. The new local service provider serves the end user via its own Switch and Loop facility. The End User retains the telephone number.

Texas Scenarios	LSOG 6 through 8 Process Flow Description	*LSOG 8 Paragraph
CLEC #1 via Facilities Based to CLEC #2 via Facilities Based	Local Number Portability (TSR order flow)	14.15 scenario 4

*LSOG 8 paragraph numbering subject to change with Final version.

4.E. Full Facilities-Based to UNE-L with LNP

Description:

The old local service provider serves the end user via its own Switch and Loop facility. The new local service provider serves the end user via its own Switch and an unbundled loop facility leased from a new network service provider. The End User retains the telephone number.

Texas Scenarios	LSOG 6 through 8 Process Flow Description	*LSOG 8 Paragraph
CLEC #1 via Facilities Based to CLEC #2 via UNE-Loop	Retail to UNE-Loop and Number Portability	14.18.8

* LSOG 8 paragraph numbering subject to change with Final version.

CONCLUSION

ATIS appreciates the opportunity to provide these Comments in response to the

Commission's question: How do the (proposed Texas) CLEC-to-CLEC and CLEC-to-

ILEC Migration Guidelines differ from the Local Service Ordering Guidelines (Issues 4-

8) that have been developed in the ATIS-sponsored Ordering and Billing Forum

("OBF").

Respectfully submitted,

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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

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Toni G. Haddix
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