

October 29, 1999

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VIA HAND DELIVERY

Ms. Blanca S. Bayo', Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 981834-TP - In re: Petition of Competitive Telecommunications, Inc.'s service territory.
Docket No. 960786-TL - In re: Consideration of BellSouth Telecommunications, Inc.'s entry into interLATA services pursuant to Section 271 of the Federal Telecommunications Act of 1996

Dear Ms. Bayo',

Enclosed for filing on behalf of MCI WorldCom, Inc., are an original and fifteen copies of its Comments on Draft Master Test Plan in the above-referenced dockets. Also enclosed is a diskette with an electronic version of the comments.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance in this matter.

Sincerely,

Donna Canzano McNulty
Donna Canzano McNulty

- AFA *Honey*
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG *2*
- MAS *3*
- OPC _____
- PAI _____
- SEC *1*
- WAW _____
- OTH *Honey*

Enclosures
cc: Parties of Record

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Done 11/01/99

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Competitive)
Carriers for Commission action)
to support local competition in)
BellSouth Telecommunications,)
Inc.'s service territory.)
_____)

Docket No. 981834-TP

In re: Consideration of)
BellSouth Telecommunications,)
Inc.'s entry into interLATA)
services pursuant to Section 271)
of the Federal)
Telecommunications Act of 1996.)
_____)

Docket No. 960786-TL
Filed: October 29, 1999

COMMENTS OF MCI WORLDCOM ON DRAFT MASTER TEST PLAN

MCI WorldCom, Inc. ("MCI WorldCom") hereby files its comments on the Draft Master Test Plan ("MTP") prepared by KPMG.

I. INTRODUCTION

Third party testing of operations support systems ("OSS") is critical to entry into the local exchange market by alternative local exchange companies ("ALECs"). New York style third party testing has proved to be the only mechanism developed thus far that leads to the OSS improvement necessary to support statewide local market entry. Keys to the success of the New York process include participation by ALECs and a focus on solving problems rather than just detecting them. Gradually, Bell Atlantic's OSS has improved as third party testing has moved forward, although more work still remains to be done before commercial volumes can be sustained. Based on these improvements, the availability of the UNE platform and potentially profitable UNE pricing, MCI WorldCom began offering service to New York residential customers in December 1998. MCI WorldCom's local residential sales now total more than 200,000 and MCI WorldCom is

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submitting up to 5000 orders per week. MCI WorldCom's market launch in New York is the only one of its kind ongoing in the United States; it could not have happened without third party testing backed strongly by the public service commission.

MCI WorldCom wants to enter the Florida local residential market and to expand the entry it already has made in the Florida local business market. Those goals can be accomplished if BellSouth offers the UNE platform at cost-based prices and if BellSouth's OSS is improved so it can handle orders in commercial volumes. To bring BellSouth's OSS to that point, third party testing should be implemented that educates ALECs, BellSouth and the Commission about OSS functionality in a competitive environment; improves BellSouth's OSS so it will support local entry by ALECs; and provides objective evidence of whether BellSouth's OSS meets the Telecommunication Act's requirements.

The MTP submitted by KPMG provides a good foundation for the type of third party testing that will lead to local market entry. For example, the MTP (a) appears to provide for the testing of OSS 99, (b) includes end-to-end testing, (c) requires the Phase II test manager to build to interfaces, (d) requires xDSL to be tested, and (e) calls for the validation of performance measures. Moreover, it was clarified at the October 15, 1999 workshop that "military style" testing will be performed. Some changes and clarifications are needed in the MTP, however. In the comments below, MCI WorldCom requests that certain additional features be added to the MTP, and also notes a number of more specific recommendations and requested clarifications. In an effort to prioritize these comments, the more specific points are made in matrices at the end of each section.

With the requested modifications, MCI WorldCom is confident that the MTP will enable the Commission and parties to drive the changes necessary to improve BellSouth's OSS and support local competition. MCI WorldCom challenges BellSouth to come forward and agree to proceed with Phase II of the testing process and to bear the financial responsibility for completing the test, as Bell Atlantic has done in several of its states.

II. TEST FRAMEWORK

A. Military Style Testing

MCI WorldCom found in New York that military-style testing was critical because it required Bell Atlantic to fix problems that were detected and then to retest to ensure that the problems had been fixed and that the solutions had not caused other problems. Based on comments at the workshop there appears to be a consensus that military-style testing will be used. MCI WorldCom requests that the MTP be revised to provide expressly for military-style testing and to set out clearly what process will be employed.

MCI WorldCom submits that military-style testing must include an exception process that is followed when OSS flaws are detected. The exception process should (a) specify what kinds of problems will trigger the process; (b) call for issuance of an exception report by the tester to all parties; (c) rank exceptions in order of their severity; (d) permit input by all parties concerning the solution to the problem; (e) require the tester to re-test the problem once BellSouth asserts the problem has been corrected; (f) specify when the problem is deemed to have been corrected so the exception report can be closed; and (g) require that all exceptions be closed and defects corrected before the

test is deemed complete. ALEC participation in the exception process is particularly important because it is ALECs who will be served by BellSouth's OSS. Solutions that do not meet their needs will not support local market entry.

B. Open Process

An open third party testing process enables ALECs, as well as BellSouth and the Commission, to learn about BellSouth's OSS and how to overcome problems that are detected. It also enables ALECs to contribute their expertise and their knowledge of their business needs to the process. ALEC participation is one of the key reasons that third party testing in New York produced positive results. The Florida Commission has taken important, and appreciated, steps toward such an open process by initiating weekly calls on the third party test, and by holding the October 15 workshop. MCI WorldCom further notes KPMG's response to Question 24, in which it states that it expects "that the Phase II Test Manager will hold regular meetings with CLECs and provide information as the test proceeds." MCI WorldCom agrees with this approach and in addition would encourage the Commission to have monthly face-to-face meetings once testing begins.

An open process also involves disclosure to all parties of the documents and information provided to KPMG by BellSouth, including summaries of significant communications between the parties. For example, if KPMG receives guidance from BellSouth to help it interpret the documentation being used to build an interface, that guidance should be disclosed to the parties so they can build the interface themselves. Otherwise, KPMG might with BellSouth's assistance learn how to build interfaces using BellSouth documentation, but ALECs would not be able to duplicate KPMG's experience. BellSouth would receive a passing grade, but the goal of opening the local

market would not be advanced. Disclosure of such information will ensure that ALECs can benefit from KPMG's learning process.

MCI WorldCom recognizes that the Commission has expressed concern that too much participation by ALECs could delay the third party testing process. MCI WorldCom believes ALEC participation can be used in a constructive and productive way that will not delay the process and in fact will hasten the opening of Florida's local market. Toward that end, the following participation by ALECs should be permitted:

- Participation in regular meetings with the Phase II test manager, Staff and BellSouth;
- Participation in the exception process;
- Provision of comments concerning inadequacy or lack of OSS functions;
- Provision of comments concerning performance measurements;
- Provision of comments concerning changes to the MTP;
- Participation in side-by-side testing; and
- Provision of proposed test cases and scenarios.

C. Addressing Lack of OSS Functionality

The Commission's Order authorizing KPMG to proceed with Phase I of third party testing ("Third Party Testing Order") states that "if BellSouth's OSS systems pass the third-party testing in Florida, then BellSouth shall be considered to have remedied the OSS concerns that we identified in Order No. PSC-97-1459-FOF-TL for purposes of our recommendation to the FCC on any future application by BellSouth for interLATA authority in Florida." If the third party testing process is to be used as the forum for addressing all OSS issues, including those that have arisen since Order No. PSC-97-1459-FOF-TL, then parties must be able to raise concerns about missing OSS

functionality. As KPMG pointed out at the October 15 workshop, it cannot test a functionality that BellSouth does not provide.

For example, loop qualification for xDSL lines was identified at the October 15 workshop as an area where BellSouth does not provide a fully automated process. In response to Questions 2 and 3, KPMG acknowledged that loop qualification should be tested, and further stated that if important parts of the pre-ordering process relating to xDSL loops are inadequate, the inadequacies should be noted by the tester. Such comments by the tester may indeed provide helpful guidance to the Commission in determining what OSS functionality must be provided. MCI WorldCom would add that ALECs should be permitted to offer their comments on important functionalities that should be included within BellSouth's OSS. The tester could verify that BellSouth does not offer the functionality and advise the Commission concerning its significance.

D. Reliance on Georgia Third Party Test

MCI WorldCom strongly recommends that the Florida third party test be kept independent of the Georgia third party test and that the Phase II test manager not rely on Georgia documentation. This is consistent with the directive from the Florida Commission. In its Third Party Testing Order, the Florida Commission expressly declined to rely on the Georgia third party test due to concerns about the independence of the test. The Commission thought it was more appropriate to use the New York and Pennsylvania processes as models because: (1) the state commission independently selects the third party tester and is the client; (2) the state commission and the third party tester jointly develop the master test plan; and (3) the commission staff plays a strong role in monitoring and controlling the test, which is vital to ensure independence and

objectivity. Moreover, the Commission specifically stated that "[i]n contrast, BellSouth selected the third party tester and serves as the client in the Georgia engagement. It also developed or guided the development of the master test plan." (Order at 7.)

In response to a question regarding the use of Georgia test materials, however, KPMG stated that "[i]f there are any results from the Georgia test that the Phase II Test Manager deems to be applicable to Florida, this could obviate the need for or reduce in size tests in Florida that address the same issues." (KPMG response to Question 8.) To maintain the independence and objectivity of the Florida test and to be consistent with the Commission's directive, it is essential that the Phase II test manager not rely on the results from the Georgia test or on Georgia documentation. In fact, MCI WorldCom withdrew from the Georgia test because it is an inherently flawed and closed process. To maintain the integrity and independence of the Florida third party test, it is imperative that this Commission require the Phase II manager to be objective without using results or documentation from Georgia.

E. Additional Comments and Clarifications

MCI WorldCom also notes the following more specific points:

Contents Header	Reference	Page	Comments and Clarifications
II. Introduction		5	◆ The MTP should clarify the BellSouth documentation and specifications being used to build the Certified Software Interface (CSI). The documentation and level of support provided to KPMG for the CSI should be the same as what is available for ALECs.
II. Introduction		5	◆ The MTP should specify that the transport function will be tested for each application-to-application system. For example, Local Pre-Order should test TCIF 98-006v2, the Interactive Agent specifications for "real time" EDI secured transport, and test Pre-Order with CORBA, both approved ATIS specifications agreed to by Bell South.
III. Test Plan Framework	Table III-2	17	◆ The MTP should specify the "other sources" used to determine Good Management Practices.

III. PERFORMANCE MEASUREMENTS

In its Third Party Testing Order, the Commission stated:

It is also important to us that we have some assurance that the performance measures currently being employed by BellSouth are adequate and that the results reported by BellSouth are accurate. Therefore, we believe that a comprehensive review of performance measures must be included in any testing done for Florida.

(Third Party Testing Order at 7-8.) The MTP states that to address the need for evaluating the adequacy of BellSouth's measures, "the Phase II Test Manager will make an assessment, based on its professional judgement, of whether there are any major gaps in the coverage of the BST-FL metrics." Further, the MTP lists as one of the global entrance criteria that the metrics to be used "must be agreed to and fully defined." The metrics also "must be fully functional, tested, and operationally ready." (MTP, p. 22.)

MCI WorldCom generally agrees with this approach. For third party testing to move forward soon, it will be necessary to adopt an interim performance measurement system that will be evaluated by the Phase II test manager and then used to assess the results of the third party test. Such an interim system should include clearly defined metrics, analogues and benchmarks, and a statistical methodology for comparing BellSouth and ALEC results. MCI WorldCom recommends that the interim performance measurement system be adopted by the Commission after the parties have had the opportunity to comment and the third party tester has provided its recommendation.¹

¹ It was suggested at the October 15 workshop that the results of the Louisiana workshop on performance measurements might be used as the basis for the measurements for the Florida test. The hearing in the Louisiana is not scheduled to take place until early May, however, so even if this approach were desirable, it would not be practical. MCI WorldCom recommends that parties address developments in the Louisiana workshop when they make their comments to this Commission.

Because of the importance of performance measures, MCI WorldCom further recommends that the Commission commence proceedings in a separate docket to adopt a final performance measurement system. In such a docket the Commission could make a final determination regarding the appropriate metrics, analogues and benchmarks, and statistical methodology, and in addition could adopt a system of self-executing enforcement remedies. Experience with performance measures during the third party test may well provide a basis for adjustments made to derive the final performance measurement system.

It appears that the MTP calls for the Phase II test manager to evaluate the collection, storage, transfer and processing of performance data for ALECs as well as BellSouth's retail operations. This approach makes sense and should be expressly required by the MTP. Further, the tester should be required to take the additional step of verifying that the raw data collected for BellSouth's retail operations reflects the full capabilities of BellSouth's OSS, so that a true parity assessment can be made. For example, the tester should determine the types of orders that flow through for BellSouth's retail operations and the extent of the flow through. Such an evaluation is essential if a valid comparison between ALEC and BellSouth retail OSS capabilities is to be made.

Finally, KPMG noted in response to Question 101 that it intended to incorporate the requirements of the Common Carrier Bureau's letter to U S West dated September 27, 1999 (the "U S West letter"). MCI WorldCom agrees that the final draft should reflect those requirements. For example, the MTP should be revised to evaluate the accuracy of BellSouth's raw data by comparing BellSouth's raw data to independently collected data, or by some other equivalent means.

MCI WorldCom also notes the following more specific points:

Contents Header	Reference	Page	Comments and Clarifications
IV. Performance Metrics Review Test Section	Test Approach 1.6.1 Inputs 3.	24	◆ The term "other procedural and technical documentation" should be clarified.
IV. Performance Metrics Review Test Section	Test Approach 2.6.1 Inputs 3.	26	◆ The term "other procedural and technical documentation" should be clarified.
IV. Performance Metrics Review Test Section	Test Approach 3.6.1 Inputs 3.	27	◆ The term "other procedural and technical documentation" should be clarified.
IV. Performance Metrics Review Test Section	Test Approach 4.6.1 Inputs 3.	29	◆ The term "other procedural and technical documentation" should be clarified.
IV. Performance Metrics Review Test Section	5.1 Description	30	◆ The term "other procedural and technical documentation" should be clarified.
IV. Performance Metrics Review Test Section	Test Approach 5.6.1 Inputs 3	31	◆ The term "other procedural and technical documentation" should be clarified.
IV. Performance Metrics Review Test Section	Test Process	34	◆ The criteria used to determine and measure the reasonableness of change intervals should be specified.

IV. PROCESS AND PROCEDURES REVIEW

As MCI WorldCom noted at the October 15 workshop, change management is vital to OSS that can support local entry. Even if an ILEC develops adequate OSS, ALECs are taken out of business if a change is made to the ILEC's interfaces without sufficient notice to the ALEC community. Thus, the U S West letter states that the tester "should assess the BOC's change management processes and should include, but not be limited to, a review of the BOC's ability to implement at least one significant software release." In accordance with the U S West letter, KPMG stated in response to Question 69 that it "is KPMG's intent that a major software release be tracked from initiation through implementation." This requirement should be included in the revised MTP.

MCI WorldCom also notes the following more specific points:

Contents Header	Reference	Page	Comments and Clarifications
V. Processes And Procedures Review Test Section	5.6.1 Test Approach	43	<ul style="list-style-type: none"> ◆ Clarify the type of CLEC data to be provided as "input." ◆ CLECs should be interviewed under "Activities."
V. Processes And Procedures Review Test Section	Table V-9 Test Target Provisioning Process Parity	52	<ul style="list-style-type: none"> ◆ Under the column "Sub-Process," the item "Identify orders requiring coordination" requires clarification. Specifically, the criteria (e.g. fields on the LSR, manual versus flow through, etc.) should be identified that are being used to determine orders that require coordination.

V. TRANSACTION VERIFICATION AND VALIDATION

It appears from the MTP that its intention is to test OSS 99. This intention should be stated more clearly. OSS 99 is BellSouth's project to upgrade its ordering interfaces, which is now (after two postponements by BellSouth) scheduled for completion by January 2000. OSS 99 will be a major overhaul of BellSouth's current ordering interfaces and will bring BellSouth's systems more closely in line with national standards. OSS 99 has many functions that the current interfaces lack. Competitors will use the OSS 99 interfaces, not the current interfaces, when they enter the market on a broad scale after January 2000. Testing and improving the old interfaces simply makes no sense.

Likewise, the MTP should state expressly that certain other areas will be tested.

Such areas include the following:

- OSS support for xDSL, including loop qualification;
- Provision of parsed CSRs;
- The ability to integrate BellSouth's pre-ordering and ordering interfaces so that information obtained during pre-ordering is automatically populated in orders with no manual processing;
- Provision of EDI pre-ordering;

- The ability to perform coordinated loop cutovers;
- The ability to provision loop-transport combinations, with and without local number portability; and
- The ability to provide access billing data, reciprocal compensation billing data and meet point billing data.

At the October 15 workshop, BellSouth would not state what elements would be included in the UNE platform, and stated that such a determination only could be made after the FCC issues its revised Rule 319. In fact, however, the Commission has ruled the BellSouth's interconnection agreements with MCImetro and AT&T permit them to order combinations of the network elements specified in the contracts, which include all of the elements in the UNE platform. The MTP should include scenarios specifically testing UNE platform orders, i.e., orders for the NID, loop, port, switching, vertical features, transport, signaling and call-related databases, and operator services and directory assistance. BellSouth's OSS must be able to process full UNE platform orders if statewide local competition is to take root in Florida.

The MTP requires that volume testing be conducted, but does not specify whether volume testing will be done in a production environment. In response to Question 14, KPMG stated: "The precise manner in which the volume test will be carried out has yet to be worked out. This will be one of the responsibilities of the Phase II Test Manager. However, KPMG recommends that volume testing be done in the production environment." MCI WorldCom agrees with KPMG's recommendation that volume testing be done in a production environment rather than in a test environment controlled by BellSouth. That recommendation should be incorporated as a requirement in the MTP.

The MTP contemplates that BellSouth will prepare a test bed for the test transactions. To obtain a valid indication of how BellSouth's systems will perform in a live commercial environment, the test bed cannot be pre-scrubbed to ensure that orders populated with test bed data easily flow through BellSouth's systems. For example, there are many times that an ALEC will receive information about a customer that conflicts with or is different than the information in BellSouth's databases (e.g., the customer may say she lives on Main St., but the address listed in BellSouth's database is Main "Str.>"). To the extent BellSouth provides the Phase II test manager with a "clean" test bed, KPMG will not have the same experience as ALECs submitting orders in real world conditions. The tester must verify that test bed data reflects the kind of data ALECs are likely to obtain from customers so that the testing replicates real world conditions as closely as possible.

Based on its experience with third party testing in other states, MCI WorldCom has assembled a preliminary list of test scenarios that it recommends be added to the scenarios in the MTP. This preliminary list is attached as Exhibit A.

MCI WorldCom also notes the following more specific points:

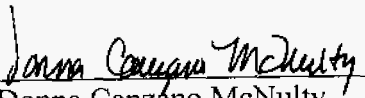
Contents Header	Reference	Page	Comments and Clarifications
VI. Transaction Verification and Validation Test Section	1.0 Test TVV1:POP Functional Evaluation 1.1 Description second paragraph	75	◆ The order types that will be submitted via the GUI should be listed in the MTP. Likewise, the order types that will be submitted via the machine-to-machine interfaces should be listed in the MTP.
VI. Transaction Verification and Validation Test Section	1.0 Test TVV1:POP Functional Evaluation 1.1 Description fourth paragraph	75	◆ The order types that will be submitted manually should be listed in the MTP.
VI. Transaction	1.0 Test	75	◆ The MTP should specify how will it be determined if a

Verification and Validation Test Section	TVV1:POP Functional Evaluation 1.1 Description fifth paragraph		<p>pre-order transaction was successfully initiated and subsequently resulted in an "error free" order. For example, BellSouth's performance should not be deemed acceptable if its CSRs frequently produce invalid address information that must be corrected through address validation.</p> <ul style="list-style-type: none"> ◆ The order types that will be submitted through ASRs and LSRs should be listed in the MTP. ◆ The order types that will and will not go through the physical provisioning process should be specified.
VI. Transaction Verification and Validation Test Section	1.0 Test TVV1:POP Functional Evaluation 1.1 Description 1.4 Test Scope	77	<ul style="list-style-type: none"> ◆ The MTP should specify that directory listing orders will be tested "as is" and "as specified." In response to Question 13, KPMG stated that directory listing orders will accompany "some" of the migration test cases (both "as is" and "as specified"). The term "some" in this context needs to be defined so it is clear what types of orders the directory listing orders will accompany.
VI. Transaction Verification and Validation Test Section	1.0 Test TVV1:POP Functional Evaluation 1.1 Description 1.4 Test Scope	78	<ul style="list-style-type: none"> ◆ The MTP should list the order types stated by BellSouth to flow through its systems. ◆ The MTP should state how flow through testing will focus on discovering and fixing data inconsistencies for the same fields between OSS POP functions, particularly with respect to address and directory data fields.
VI. Transaction Verification and Validation Test Section	Table VI-1 POP Process	79	<ul style="list-style-type: none"> ◆ Under Pre-Ordering, a sub-process test for loop qualification should be included. ◆ Under "Ordering," the ordering SDM (i.e. Resale, UNE, UNE Combinations) should be specified.

VI. CONCLUSION

The draft MTP provides a good foundation for third party testing in Florida. With the modifications proposed above, MCI WorldCom believes implementation of Phase II of the MTP will lead to substantial improvement of BellSouth's OSS, which ultimately will benefit Florida consumers. MCI WorldCom strongly recommends that the Commission move forward with Phase II of third party testing as soon as possible.

RESPECTFULLY SUBMITTED this 29th day of October, 1999


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Scenario #	Inquiry Type & Activity	Order Scenarios		Test Case File Name
		Activity	Res	
Stand-alone Preorder				
<i>Address Validation</i>				
1	AA	Fielded Address.	X	X
2	AT	WTN	X	X
3	AA	Fielded address and detailed service address information (e.g., CUSTUNITTYP and UNITINFO, etc.).	X	X
4	AT	Address with a TN that is a "non-published" account.	X	X
5	AT	Address with a TN that is a "non-list" account	X	X
6	AA	Address with a TN for a published account	X	X
7	AA	Fielded service address for a multi-tenant customer	X	
8	AT	WTN for a multi-tenant customer	X	
9	AT	WTN for existing platform account	X	
10	AA	Fielded address – customer has 2 lines at a multi-tenant location	X	X
11	AA	Partial match within a multi-tenant customer location	X	X
12	AT	Service address contains a special character	X	X
<i>Telephone Number Inquiry</i>				
1	BE	Telephone number selection based upon a valid fielded address inquiry and requesting two (2) random telephone numbers. Reuse customer details from Test Case 1.	X	X
2	BU	Return two (2) telephone numbers from Scenario #1 Two transactions required.	X	X
3	BX	Exchange of one telephone number from test case #1	X	X
4	BE	Telephone number selection based upon a valid fielded address inquiry and requesting three (3) GOLD telephone numbers. Residential customer.	X	X
5	BU	Return three (3) telephone numbers from Scenario #4	X	X
6	BU	Telephone number request for a Vanity # using the REQNUM field	X	X
Customer Service Record (CSR) CRIS Inquiry				

Exhibit A-MCIW Test Scenarios to the BST-FL MTP
10/29/99

Scenario #	Inquiry Type & Activity	Order Scenarios		Test Case File Name
		Activity	Res	
1	E	Non-parsed format	X	X
2	E	Parsed format .	X	X
3	E	Parsed format – multiline		X
4	E	Non-parsed format - SA & LA contain equal values.	X	
	E	Parsed format	X	
5	E	Non-parsed format – Different SA & LA values.	X	
6	E	Parsed format –customer has additional listings.	X	
7	E	Specific ATN but lacking the correct Agency Authorization Indicator.	X	
8	E	Parsed format for a Non-Pub account	X	
<i>Due Date Availability</i>				
1	DA	Inquiry.	X	X
2	DA	Inquiry and one (1) year in advance..		X
<i>Directory Listing Inquiry</i>				
1	TA	Straight line listing.	X	X
2	TA	“Non-list”.	X	X
3	TA	Caption Listing .		X
4	TA	All 1 st Level Sub-Caption Listings		X
<i>Installation Status Inquiry</i>				
1	IA	POTS request. (Will require FOC prior to submitting an inquiry)	X	
2	IA	ISDN.	X	X
3	IA	Special Telephone Number format.		X
<i>Feature and Service Availability Inquiry</i>				
1	CA	Specific Features and Services to be determined.	X	X
<i>Loop Qualification Inquiry</i>				
1	QA	Re-grade of an existing account.	X	X
2	QR	Re-grade of an existing account with a reservation request.	X	X

Exhibit A-MCIW Test Scenarios to the BST-FL MTP
10/29/99

Scenario #	Inquiry Type & Activity	Order Scenarios		Test Case File Name		
		Activity	Res.		Bus	
3	PA	Extended loop qualification for premium link service.	X	X		
4	PR	Extended loop qualification and reservation for premium link service.	X	X		
		<i>Access Billing Customer Service Record (CSR) Inquiry</i>				
1	R	Request designating a specific month and entire details.	X	X		
2	R	Request with no month specified and specific section.	X	X		
3	R	Request designating a specific month, section, and feature.	X	X		
		Service Order from SOP Inquiry				
1	SA	Using a BST-FL service order identification.	X	X		
2	SA	Using a BST-FL BTN.	X	X		
3	SA	Using an MCI PON.	X	X		
4	SA	Using a BST-FL circuit identification.	X	X		
5	SA	Using a BST-FL customer name.	X	X		
		Resale				
Scenario #	Inquiry Type & Activity	Activity	Res	Bus		Test Case File Name
1		Change customer PIC	X	X		
2		Change customer LPIC	X	X		
3		Add a new Directory Listing on Existing Account	X	X		
4		Migration with Directory Listing Change	X	X		
5		Migration of an account that has existing BST-FL Company Initiated Blocking	X	X		
6		Migration of an account that has an existing BST-FL order pending	X	X		
7		Migration of an account with distinctive ringing features, e.g. (Ringmate) .	X	X		
8		Migration of an account that has an existing service contract		X		
9		Migration of some, but not all, of a multi-line account		X		
10		Migration of an account where more than one DA listing exists	X	X		
11		Establish new CLEC end user account with request for Vanity #.				
Scenario #	Inquiry Type & Activity	Activity	Res	Bus	Test Case File Name	
		UNE-p				

Exhibit A-MCIW Test Scenarios to the BST-FL MTP
10/29/99

Scenario #	Inquiry Type & Activity	Order Scenarios		Test Case File Name	
		Activity	Res		Bus
1		Convert line to xDSL		X	
2		Add and Changes for a wide selection of features	X	X	
3		As is with a Directory Listing Change	X	X	
4		Add a new Directory Listing on existing account			
5		Add and Changes to DID service		X	
6		Migration of an account that has BST-FL Company Initiated Blocking		X	
7		Migration of an account that has a pending BST-FL order		X	
8		Migration of some but not all lines of a multi-line account		X	
9		Migration of an account that has an existing BST-FL term/volume contract		X	
10		Establish new CLEC end user account with request for Vanity #.	X	X	
		UNE			
Scenario #	Inquiry Type & Activity	Activity	Res	Bus	Test Case File Name
1		Standalone Directory Request	X	X	
2		Full and Partial Migration w/Directory Listing	X	X	
3		Add new xDSL Loop	X	X	
4		Add new xDSL Loop with shared line voice and data capability	X	X	
5		Standalone Number Portability	X	X	
6		Establish new CLEC end user account with request for Vanity #.	X	X	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail or Hand Delivery (*) this 29th day of October, 1999.

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