Matilda Sanders

From:	Peg Griffin [pgriffin@moylelaw.com]
Sent:	Friday, October 20, 2006 10:56 AM
To:	Filings@psc.state.fl.us
Cc:	Vicki Gordon Kaufman; Adam Teitzman; Jerry Hallenstein; Lisa Harvey; David Rich; Tracy Hatch; James.meza@bellsouth.com; Nancy Sims; leigh.a.hyer@verizon.com; Peter Dunbar; Marva.johnson@supratelecom.com; Michael Gross; douglas.c.nelson@sprint.com; Susan Masterton; prubino@trinsic.com; jcanis@kelleydrye.com; summerlin@nettally.com; sbharvey@suzannesummerlinattorney.com; de.oroark@verizon.com; mfeil@mail.fdn.com; Bill.Bryant@akerman.com; gwatkins@covad.com; sberlin@nuvox.com; Jim.Falvey@xspedius.com; jerry.watts@itcdeltacom.com; SNOR22@aol.com
Subject:	E-filing - Docket No. 000121A
Attachments:	CLEC Response.pdf

ORIGINAL

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Docket No. and title: In Re: Performance Measurements for Telecommunications Interconnection, Unbundling and Resale   Docket No. 000121A

Filed on behalf of: CLEC Coalition

Number of pages: 9

Document attached: Responses to Items from October 12, 2006 Conference Call

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CMP _____
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10/20/2006

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

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October 20, 2006

Via E-mail

Ms. Blanca Bayo
Florida Public Service Commission
2450 Shumard Oak Boulevard
Tallahassee, FL 32399

Re: CLEC Response to Items from October 12, 2006 Conference Call
      Docket No. 000121A

Dear Ms. Bayo:

Attached please find the CLEC Coalition's responses to items from the October 12, 2006, conference call regarding the above-referenced docket.

Sincerely,

/sVicki Gordon Kaufman
Vicki Gordon Kaufman

VGK/pg
Enclosures

cc: Parties of Record

<u>CLEC responses to items from October 12 conference call with Staff</u>

1.   Please provide a response to BellSouth's response to the September 12, 2006 conference call regarding prioritization, implementation, and proposal for developing timeframes software releases as they relate to CM-11.

>1.   For CM-11, please explain the steps between prioritization and implementation for a change request. Please provide a number of days to complete each step based on change request magnitude.
>
>CLEC Response:
>
>CLECs do not dispute the current process steps described by BellSouth in its response. However, the CLECs believe that the timeframes associated with the Release Cycle Activity document (BellSouth's Attachment 1) are too lengthy, even for a large change request CLECs recommend that the task force described below review the attached change management timelines from Verizon and AT&T as part of its analysis. (Also see https://clec.att.com/clec_documents//unrestr/cmp// and http://www22.verizon.com/wholesale/)
>
>2.   For CM-11, please provide a proposal for developing timeframes for software releases based on the change request magnitude or complexity.
>
>CLEC Response:
>
>It is unclear from its response whether BellSouth is willing to address the development of timeframes based on magnitude or complexity. They did, however, indicate a willingness to work with the CLECs "to develop a release plan model that can shorten the overall time from prioritization to implementation". CLECs agree that the CCP forum is appropriate, and recommend the following approach:

- A task force will be formed of CCP members that operates in addition to the regular CCP schedule of meetings.

- A targeted completion date will be established.

- The purpose of the task force will be to establish timeframes and processes which vary by magnitude or complexity of the change request. CLECs believe that three categories of change requests should be defined and addressed by the task force; small, medium, and large.

- FPSC (and other state commission) staff attend task force meetings as much as possible.

3.   For CM-11, please provide the current timeframes for a software modification to BellSouth's retail operations for ordering, provisioning, and maintenance and repair systems based on magnitude of the change. As an example, provide the detailed timeframes from management acceptance to implementation for at least 5 modifications made to retail systems in the past six months.

CLEC Response:

It is the CLECs' opinion that the examples provided by BellSouth are of a level of magnitude and complexity that far exceeds any changes managed by the CCP. It is however, useful to note that despite these differences, BellSouth's timeframes are well below or near those offered to CLECs for the smallest software change. To get a better perspective on the differences, CLECs recommend that Staff ask BellSouth to provide the units, capacity, dollars, etc. required to implement those retail changes, and to provide the same information for changes implemented for the entire year of 2005 for the CLECs (or projected for 2006).

Additionally, it would be very useful for BellSouth to provide the timeframes associated with a change or changes made to its retail OSS that are of comparable size/resources etc. to changes made for CLECs through CCP.

2.   If the CLECs were to classify software changes as small, medium, and large, what methodology (i.e., how would you define?) could be applied for these classifications?

CLEC Response:

See response to Item 2 above.

3.   Please provide any industry standards regarding software design life cycles in support of 60 weeks not being a reasonable timeframe

CLEC Response:

There are no absolute standards due to differences in sizing, complexity, type of systems involved, and skill sets of personnel. There are however, differences in practice, for example, see the attached Verizon and AT&T release schedules.

Importantly, in its response to Item 1, BellSouth acknowledged that the cycle time of 60 weeks is not based on the magnitude or complexity of individual change requests, and appears to indicate that it takes 60 weeks because the release plan model calls for 60 weeks. (The task expanded to fill the time allotted)

Verizon West Notification Milestones

Documentation Release Dates

Documentation	February 13 2006	April 10 2006	June 12 2006	August 14 2006	October 16 2006	December 11 2006
Draft Business Rules (73 days)	12/02/2005	01/27/2006	03/31/2006	06/02/2006	08/04/2006	09/29/2006
Draft Technical Specifications (66 days)	12/09/2005	02/03/2006	04/07/2006	06/09/2006	08/11/2006	10/06/2006
Pre-Release Conference Call (53-55 days)	12/14/2005	N/A	04/19/2006	06/21/2006	08/23/2006	10/18/2006
Business Rules & Error Messages (45 days)	12/30/2005	02/24/2006	04/28/2006	06/30/2006	09/01/2006	10/27/2006
Technical Specifications (45 days)	12/30/2005	02/24/2006	04/28/2006	06/30/2006	09/01/2006	10/27/2006

Verizon East Notification Milestones

Documentation Release Dates

Documentation	February 19 2006	April 16 2006	June 18 2006	August 20 2006	October 22 2006	December 17 2006
Draft Business Rules (73 days)	12/08/2006	02/02/2006	04/06/2006	06/08/2006	08/10/2006	10/05/2006
Draft Technical Specifications (66 days)	12/15/2006	02/09/2006	04/13/2006	06/15/2006	08/17/2006	10/12/2006
Pre-Release Conference Call (53-55 days)	12/15/2006	N/A	04/26/2006	06/28/2006	08/30/2006	10/25/2006
Business Rules & Error Messages (45 days)	01/05/2006	03/02/2006	05/04/2006	07/06/2006	09/07/2006	11/02/2006
Technical Specifications (45 days)	01/05/2006	03/02/2006	05/04/2006	07/06/2006	09/07/2006	11/02/2006

AT&T 13-State 12-Month Development View
Document Published and Updated June 2, 2006

Release	Category	Interface	Retires on Release Date	Supported Versions on Release Date		Release Date	Documentation/Notices
				Old	Newest		
T R I 2 M N E D S T E R 2006	LSR Ordering APP to APP	EDI ALL REGIONS	LSOR 9.00	LSOR 9.01	LSOR 9.02	07/15/06	CLECALLS06-003 - Release Announcement CLECALLS06-018 - Initial Requirements CLECALLS06-004 - Final Requirements CLECALLS06-006 - Exception Request
	LSR Ordering GUI	WEBLEX ALL REGIONS	N/A	N/A	LSOR 9.02	07/15/06	CLECALLS06-036 - Initial Requirements CLECALLS06-038 - Final Requirements
	Pre-Ordering (App to App)	EDI/CORBA ALL REGIONS	LSPOR 9.00	LSPOR 9.01	LSPOR 9.02	07/15/06	CLECALLS06-003 - Release Announcement CLECALLS06-018 - Initial Requirements CLECALLS06-004 - Final Requirements CLECALLS06-006 - Exception Request
	Pre-Ordering GUI	ENHANCED VERIGATE ALL REGIONS	N/A	N/A	LSPOR 9.02	07/15/06	

Prepared by NaOra Horton   This Development View is not a binding document. CLECs should rely on Accessible Letters for actual release information.

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AT&T 13-State 12-Month Development View
Document Published and Updated June 2, 2006

Release	Category	Interface	Retires on Release Date	Supported Versions on Release Date		Release Date	Documentation/Notices
				Old	Newest		
T R I 3 M R E D S T E R 2006	LSR Ordering APP to APP	EDI ALL REGIONS	LSOR 09.01	LSOR 9.02	LSOR 9.03	11/11/06	CLECALLS06-005 - Release Announcement
	LSR Ordering GUI	WEBLEX ALL REGIONS	N/A	N/A	LSOR 9.03	11/11/06	
	Pre-Ordering (App to App)	EDI/CORBA ALL REGIONS	LSPOR 9.01	LSPOR 9.02	LSPOR 9.03	11/11/06	
	Pre-Ordering GUI	ENHANCED VERIGATE ALL REGIONS	N/A	N/A	LSPOR 9.03	11/11/06	

Release	Category	Interface	Retires on Release Date	Supported Versions on Release Date		Release Date	Documentation/Notices
				Old	Newest		
T R I M E S T E R 2007	LSR Ordering APP to APP	EDI ALL REGIONS	LSOR 9.02	LSOR 09.03	LSOR 9.04	03/2007	
	LSR Ordering GUI	WEBLEX ALL REGIONS	N/A	N/A	LSOR 9.04	03/2007	
	Pre-Ordering (App to App)	EDI/CORBA ALL REGIONS	LSPOR 9.02	LSPOR 9.03	LSPOR 9.04	03/2007	
	Pre-Ordering GUI	ENHANCED VERIGATE ALL REGIONS	N/A	N/A	LSPOR 9.04	03/2007	

Prepared by NaOra Horton

This Development View is not a binding document. CLECs should rely on Accessible Letters for actual release information.
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Release	Category	Interface	Retires on Release Date	Supported Versions on Release Date		Release Date	Documentation/Notices
				Old	Newest		
2ND TRIMESTER 2007	LSR Ordering APP to APP	EDI ALL REGIONS	LSOR 9.03	LSOR 9.04	LSOR 9.05	07/2007	
	LSR Ordering GUI	WEBLEX ALL REGIONS	N/A	N/A	LSOR 9.05	07/2007	
	Pre-Ordering (App to App)	EDI/CORBA ALL REGIONS	LSPOR 09.03	LSPOR 9.04	LSPOR 9.05	07/2007	
	Pre-Ordering GUI	ENHANCED VERIGATE ALL REGIONS	N/A	N/A	LSPOR 9.05	07/2007	

ASR Release	ASR 33	ASR 34
Schedule	November 4, 2006	March 10, 2007

**NOTE: THIS DOCUMENT IS UPDATED THE MONTH PRIOR TO THE SCHEDULED TRI-ANNUAL RELEASE. CLECS SHOULD CHECK THE WEBSITE LOCATION FOR ADDITIONAL UPDATES THAT MAY HAVE BEEN POSTED AFTER THE PUBLICATION DATE OF THIS DOCUMENT LISTED ABOVE.

Time Lines from AT&T Change Management Process

ACTIVITY	Category One (Application-to-Application)	Category Two (GUI)
Release Announcement	150 – 176 Calendar Days prior to scheduled release	Plans shared at CMP meetings as part of 12-Month Development View
CLEC Responses to Release	7 Calendar Days after Release Announcement	N/A
AT&T Response to CLEC Comments	7 Calendar Days after CLEC response period	N/A
Initial Release Requirements	142 – 162 calendar days from implementation	21 days before the planned implementation
Initial Requirements Walk-Through	Between 14th and 19th day of CLEC's 21 Calendar Day comment cycle	Within 7 days of Initial Release Requirements if requested by CLEC(s)
CLEC Comments on Initial Requirements Due	21 days following the release of the Initial Requirements	4 Business Days after release of Initial Requirements
AT&T Response and Final Release Requirements	No later than 21 Calendar Days after CLEC comment period ends	3 Business Days after CLEC comment period ends
Final Requirements Walk-Through	Within 3 to 5 Business Days after distribution of Final Requirements, if changes	N/A
Start of Target to Implementation	110 Day Period from date of Final Release Requirements	Start of 14 Day Period from date of Final Release Requirements
CLEC can call for OIS on Final Requirements	7 Calendar Days after Final Release Requirements	2 Business Days after Final Release Requirements
OIS Voting Conference Call (If necessary)	7 Calendar Days after OIS is called	2 Business Days after OIS is called
****CLEC Comments	Due within 7 days of Initial Requirements	N/A
****AT&T Response and Final Requirements	Due no later than 67 days prior to release implementation	N/A
Begin Testing	5 weeks before Implementation Target Date	N/A
Freeze Code	1 week before scheduled Implementation Date	N/A
CLEC can call for OIS on Implementation	CLEC must notify AT&T CMPOC by Monday Noon CT the week prior to implementation	N/A
Implementation of the Release	One week after end of Testing	14 Calendar Days After Final Requirements are distributed