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ATTACHMENT C

AT&T Florida
FPSC Docket No. 000121A-TP

Request for Confidential Classification

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**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF AT&T FLORIDA'S
COMMENTS REGARDING STAFF'S OSS AUDIT REPORT IN
FLORIDA DOCKET NO. 000121A-TP**

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Investigation into the Establishment)
of Operations Support System Permanent) Docket No. 000121A-TP
Performance Measures for Incumbent)
Local Exchange Telecommunications) Filed: January 9, 2009
Companies (BellSouth Track))

**AT&T FLORIDA'S COMMENTS REGARDING
THE COMMISSION'S STAFF'S APRIL OSS RELEASE REPORT**

BellSouth Telecommunications, Inc. d/b/a AT&T Florida (“AT&T Florida or “AT&T”) respectfully submits the following comments regarding the Florida Commission Staff’s report entitled “Review of AT&T’s OSS April 2008 Release Analysis and Resolutions” (“Report”). The Report is the end product of Staff’s investigation into AT&T’s April 2008 OSS Release (“April Release”); an investigation which involved, among other things, Staff’s review of thousands of pages of documents provided pursuant to six separate audit data requests and Staff’s interviews with numerous AT&T subject matter experts. AT&T commends Staff’s efforts in drafting and issuing the Report on an expedited basis. That said, it is AT&T’s position that certain aspects of the Report go above and beyond the agreed upon audit scope, or fail to accurately and fully convey the efforts and processes AT&T has in place (or has developed) to ensure that future 22-state OSS Releases are implemented with minimal impact on the operations of competitive local exchange carriers (“CLECs”). Accordingly, AT&T submits the following comments regarding the Report.

1.0 Executive Summary

As explained below, much of the Report paints an inaccurate and incomplete picture of AT&T's efforts in preparation for, execution of, and recovery from the April Release. Among other things, Staff: (1) failed to take into consideration the improvement AT&T applied to the two post-April OSS releases; (2) appears to have relied on misperceptions about the deployment of information technology, in particular that major software releases can be implemented without defects; and (3) failed to adequately recognize the extraordinary efforts AT&T has undertaken to meet the OSS needs of CLECs. Further, in many cases Staff's recommendations go well beyond the agreed upon audit scope. Such "out of scope" recommendations should not be adopted or approved by the Commission.

AT&T responded to the April Release issues with unprecedented levels of communication with both CLECs and Staff. It also engaged in rigorous self-examination processes. In addition to the formal Key Learnings Review (KLR) conducted by the Information Technology managers responsible for designing and implementing OSS changes, another less formal review was conducted by AT&T managers who work with CLECs on day-to-day business operations to determine what process improvement

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1 needed to be made to improve CLEC communications and service. One key result of the
2 KLR was the development of an enhanced test plan for future 22-state OSS Releases.
3 The enhanced test plan has already produced two nearly flawless OSS releases which
4 occurred in August and November of 2008. The account management review produced a
5 significant list of commitments designed to insure high quality OSS releases in the
6 future—the type of releases that AT&T has provided for over ten years and more recently
7 implemented in August and November.¹ The commitments also addressed improved
8 CLEC communications---which are working so well that AT&T and its CLEC customers
9 have returned to pre-April communications processes, enhanced and improved with the
10 helpful suggestions made by AT&T's wholesale customers.

11
12 Of necessity, the Report looks backwards and focuses on April Release issues.
13 But much has changed since the time frames covered by the Report and there are many
14 improvements, some of which Staff notes in its Report, that AT&T has made that in large
15 part obviate the need for many of the recommendations Staff has proposed in its Report.
16 In other cases, AT&T has already adopted the measures Staff advocates in its
17 Recommendations. In section 7.0 below, AT&T provides its response to each Staff
18 recommendation. Notwithstanding the critical language of the Report and AT&T's
19 Comments, the Recommendations Section demonstrates that AT&T is largely in
20 agreement with Staff in that it has either already adopted, or has committed to adopt, the
21 changes Staff has recommended. Moreover, this level of consensus demonstrates that
22 AT&T has fully recovered from the April Release and has positioned itself to provide
23 high quality releases -- such as the recent August and November releases -- on a going
24 forward basis.

25

26

27 **2.0 Background and Perspective**

28

29 AT&T has no comments regarding the Background and Perspective portion of the
30 Report.

31

32

33 **3.0 Key Learnings & Root Cause Analysis**

34

35

36 AT&T Information Technology (IT) engages in a formal root cause analysis
37 process, called the Key Learnings Review (KLR), after every release to review and assess
38 what went wrong, what went right and what can be improved upon before the next
39 software release. That well-documented and detailed process has lead AT&T through
40 three major releases a year since 2002 which assisted in the creation from whole cloth of
41 local wholesale OSSs, deemed by this commission, commissions in 21 other states and
42 the FCC, to satisfy the rigorous requirements of the Telecommunications of 1996.
43 Although relying on the KLR word-for-word in many places in its Report, Staff
44 incorrectly concludes that AT&T did not properly conduct its review of the April Release
and that the KLR process as employed did not sufficiently adhere to what Staff believes
are necessary formal principles of such an evaluation (Report at p. 18). Staff also

¹ AT&T's commitments were filed with the Commission on May 27, 2008, and are set forth in Appendix F of the Report.

1 questioned the adequacy of some KLR findings and the closing of a very small
2 percentage of the issues.

3

4 The KLR Process

5 It appears that AT&T may not have helped Staff completely understand how the
6 KLR process works. AT&T's Key Learning tool is a robust and structured process that
7 has been successfully employed after every release. Based upon Staff's concern, AT&T
8 reviewed the Key Learning processes and output from the analysis of the April release
9 and determined that the process worked properly and as designed. The process is at once
10 both a very open process and also a tightly structured one; designed to insure that all
11 managers feel free to speak their minds, while those responsible for planning future
12 releases are given the task of evaluating the voluminous input and turning it into a
13 manageable action plan. The KLR is also, of necessity, a very time constrained process.
14 The highest priority findings must be identified, analyzed and acted upon, if at all
15 possible, before the next major release in order for the benefits of the process to be fully
16 realized and to go beyond a mere academic exercise.

17

18 The Report incorrectly concludes that no formal root cause analysis was
19 conducted, but rather, that employees merely offered opinions that were not critically
20 examined by management. This is not accurate. AT&T expended significant effort in
21 determining root cause of all issues identified. Not including extensive work done by
22 sub-teams, over 3,700 man hours were spent in management-facilitated meetings where
23 in-depth discussions were held and information gathered to determine root causes and
24 develop appropriate resolutions. The conclusions of all of these meetings were noted in
25 the Root Cause column of the on-line Key Learning tool. The findings then were used as
26 input to form improved plans for the nearly flawless August and November releases.
27 Clearly the process worked and worked well.

28

29 The process may not be elegant, but it is effective. Believing that all IT managers
30 are in a position to bring value to the process, AT&T permits and encourages every
31 manager, involved in every release, to submit comments on the release and to identify
32 what the managers believe to be areas which would benefit from improvement.
33 Managers need not have personal knowledge or expertise relevant to the item they
34 critique. As a result, not all findings are reliable or relevant. It is a bit like a suggestion
35 box in the IT foyer—all comments are welcome, but not all comments are ultimately
36 useful. As Staff notes in its Report, over 356 “learnings” were submitted by over 60
37 managers covering everything from design to communications. The entries were then
38 assigned to teams formed around key release functions/elements for analysis and action.
39 At this time only two KLR issues remain open and they will be closed by the
40 implementation of the March Release.

41
42

43 Specific Staff Findings

- 44 • **Prematurely closed issues-** Staff incorrectly concludes that 8 Key Learnings (or
45 less than 3% of the 356 KLRs) were closed prematurely. AT&T has reexamined
46 these eight items and determined that any necessary corrective action was taken.

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1 The confusion about whether some issues may have been prematurely closed can
2 be attributed to ministerial error. When the resolutions were originally developed,
3 the on-line tool was updated to indicate what corrective action was planned. After
4 those measures were implemented, the issue owners were responsible for
5 updating the tool to close their issues, but in some cases the wording they used
6 was unclear. These eight KLRs have since been updated to properly reflect action
7 taken.

- 8 • **Adequacy of some analysis** - AT&T reviewed the 16 key learnings that Staff
9 cited. These 16 items represent *less than 5%* of the total Key Learnings. While
10 AT&T agrees that the documentation on these KLRs could have been more
11 descriptive, even after re-evaluation it is clear that the tool adequately reflects the
12 cause and, more importantly, that proper corrective action has been taken.
- 13 • **Assignment of certain issues to vendors** - Because of the close working
14 relationship between AT&T and its vendors, and the expertise of those vendors,
15 AT&T assigned some issues to vendors where they were in the best position to
16 resolve an issue; in some cases a vendor was assigned along side an AT&T
17 employee to work an issue. In all cases, every issue was subject to AT&T
18 management oversight. Assignment of KLR issues to vendors was not an
19 abdication of responsibility; it was an appropriate use of resources.
- 20 • **Critique of the KLR process** - Part of Staff's concern results from confusion
21 about the purpose of KLR back up materials provided to Staff during the audit.
22 Staff cites to a KLR job aid that instructs "describe what you believe to be the
23 root cause of the key learning (the "why"). If you do not know you may leave
24 this field blank. Root causes for all key learnings will be entered into the online
25 tool by Release Management." The job aid is not a description of the KLR
26 process, but rather instructions for inputting a KLR finding into the online tool.
27 When an originator submits a finding, they may also provide their opinion as to
28 the root cause of the KLR. However, no KLR can be closed before the team
29 assigned to the KLR determines the actual root cause and corrective action is
30 taken.

31 4.0 Defect Management

32 In AT&T's view, the Report is unduly critical of AT&T's software defect
33 management process and it underestimates the complexity involved with implementing
34 software releases. As an initial matter, production defects are associated with every
35 software release. Accordingly, the mere fact that there were an increased number of pre-
36 production and post-production defects as compared to prior OSS releases does not
37 necessarily demonstrate that there were inordinate problems with AT&T's defect
38 management process. Indeed, AT&T's overall success with OSS releases since the
39 passage of the 1996 federal Telecommunications Act squarely supports the conclusion
40 that AT&T's defect management process is more than adequate and in no need of any
41 major modifications. In sum, AT&T has long considered defect analysis and correction
42 to be a priority. AT&T performs analysis on each defect that is identified and
43 implements the appropriate corrective action as quickly as it is practicable to do so.
44
45
46

1 AT&T strongly disagrees with Staff's belief that AT&T "grossly underestimated
2 the quantity, scope, and severity of defects that might me encountered with [the April]
3 release." (Report, at pp. 4 and 37). It is AT&T's view that unsupported and subjective
4 opinions or beliefs (such as the one quoted above) should not be included in an objective
5 investigation and analysis into the April Release.

6
7 It is AT&T's position that the Report unfairly characterizes AT&T's defect
8 reporting as inaccurate (Report, at pp. 27, 28, 31). The reporting of defects is a priority to
9 AT&T, the Florida Commission, and to the CLEC community. As part of the process of
10 reporting defects, AT&T reports the defects in a manner that is based upon the impact to
11 the end user. As background, and in connection with its performance measurement plan
12 (SQM/SEEM Plan), AT&T publishes reports of Southeast CLEC affecting defects to the
13 Florida Commission.

14
15 Due to issues immediately following the implementation of the April Release,
16 many inquiries were made regarding infrastructure changes made to systems in the
17 Southeast and the defects associated with those changes. In response to Staff's inquiries,
18 AT&T reported on the number of CLEC impacting defects and later on the number of
19 non-CLEC impacting defects in the Southeast region. These figures did not include
20 defects associated with all of the systems in other regions that required coding changes to
21 provide services throughout AT&T's regions. These reported defect counts also did not
22 include any corrected pre-production defects, which do not have any effect on production
23 system functionality.

24
25 Following these initial requests, Staff began an audit of the April Release and
26 asked for numbers of all defects associated with the April Release and all defects that
27 were identified in the pre-production environment. Because Staff's audit-related request
28 was broader in scope, the defect numbers provided by AT&T were greater than those
29 previously reported to Staff.

30
31 As part of the defect management process, defects are identified in pre-production
32 and post-production phases. The goal of the pre-production phase is to capture and
33 prevent defects from going into production. The volume of corrected defects identified
34 during pre-production timeframes is not indicative of the success or failure of any
35 particular release. In fact, with the unprecedented number of test cases that were
36 executed with the implementation of new systems into the Southeast region, it was
37 reasonable to expect a significant increase in the number of pre-production issues
38 identified and resolved that were associated with the April Release.

39
40 Regarding the execution of test cases for the April Release, AT&T relied on its
41 extensive and successful experience within the former BellSouth region as well as the
42 cross-regional experience within the 13-state region to develop and execute what AT&T
43 reasonably believed were comprehensive test case scenarios to address functionality
44 concerns.

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1 Additionally, cooperative testing was offered to CLECs to provide these clients
2 with the functionality of the systems. Indeed, sixteen CLECs participated in the
3 cooperative testing process, and any issues that were identified during such process were
4 addressed and corrected prior to the April Release. Given such, AT&T was reasonably
5 confident that CLEC concerns had been identified and appropriately addressed prior to
6 the implementation of the April Release. In hindsight, given the issues that arose during
7 the weeks immediately following the release, AT&T has significantly enhanced its
8 testing capability as evidenced in the 22-state test plan as well as encouraging more
9 CLECs to actively participate in cooperative testing so as to effectively address this issue
10 for future releases.

11 The Report notes that there were eight open defects at the time of the April
12 Release (Report, at p. 29). Two of these defects were not CLEC impacting. The six
13 CLEC impacting defects, which were reported as going into production with the release
14 implementation, had work arounds and contingency plans to address each of them.
15

16 The Report notes that AT&T used two defect reporting tools for entering and
17 tracking pre-production defects associated with the April Release. (Report, at p. 30).
18 Issues that arose as a result of using two different reporting tools have been eliminated.
19 As part of AT&T's continued efforts to gain operational efficiencies with its merger with
20 BellSouth, all management of pre-production defects have been migrated to one tool,
21 Quality Center. This utilization of a single tool will allow more operational control and
22 management oversight in the pre-production defect management process. Indeed,
23 AT&T's plans to merge the local wholesale OSS across 22-states is to better provide and
24 sustain effective management of these important processes going forward.
25

26 Immediately following any software release, AT&T undertakes a sustained effort
27 to correct any defects that may be introduced with the implementation of new code. This
28 is typically done over a two week period following the release and is referred to as a
29 warranty period. Once this is completed, AT&T takes a more cautious approach and
30 applies defect resolution in a manner that attempts to balance the corrections needed with
31 the impacts to the client (or customer) implementing such corrections may create, as well
32 as, the possibility of creating more errors as defects are corrected.
33

34 With the implementation of the April Release, AT&T quickly identified issues
35 surrounding certain CLEC notifications. From these issues, defects were analyzed and
36 corrected, and all notifications were transmitted or retransmitted if there was question as
37 to the notification containing the appropriate Firm Order Confirmation (FOC) or Reject
38 information. A subsequent, proactive process was identified to send Billing Completion
39 notifications and, further, a proactive means was also developed to apply billing
40 adjustments to CLECs that had orders completed during the time immediately following
41 the April Release and which may not have received appropriate billing completion
42 notices. Because of the number of issues that arose from the April release, AT&T
43 significantly extended the warranty period following the release beyond the typical two
44 week period.
45

1 AT&T is constantly looking at methods to improve its processes. With the
2 migration to a unified defect reporting system, one management group has been assigned
3 responsibility for defect management. This reorganization has allowed a consolidation of
4 processes and a clearer coordination and accountability to standardize identification,
5 classification, and remediation of defects. The classification of defects includes both
6 standardization of CLEC vs. Non-CLEC impacting designations, as well as, the
7 application of appropriate standards based upon a specific region's existing or in effect
8 performance metrics.

9
10 From AT&T's perspective, it should be noted that following the April Release,
11 the issues with CLEC notifications did not prevent the provisioning processes from
12 working. The vast majority of CLEC requests were processed as expected. The CLEC
13 LSRs that were submitted had appropriate service orders created and were provisioned as
14 requested. Service to the CLEC end users was provisioned as would be expected, and
15 end users maintained continuity of service.

16
17 As noted in the Report, with the efficiencies gained in migrating to one OSS
18 platform, the production defect management process is now administered in one
19 application. This allows significant improvement in the communications between work
20 groups that are analyzing, correcting, and assessing impacts of defects across
21 applications. It also allows the administration of the defect management process to reside
22 within one manager group which inherently will provide a better coordination of efforts
23 and efficiencies in applying corrective strategies.

24
25 The Report suggests certain concerns and potential changes to AT&T's OSS-
26 related performance measurements that are contained in AT&T's performance plan (i.e.
27 SQM/SEEM Plan). (Report, at p. 35). As an initial matter, it is AT&T's position that
28 such concerns are outside the agreed upon audit scope and should not be included in the
29 Report. Rather, proposed revisions to the SQM/SEEM Plan should be proposed,
30 discussed, and debated in the context of the next periodic review of the current
31 SQM/SEEM Plan.

32
33 In any event, the accuracy of the SQM remains intact. As recently as August
34 2008, AT&T worked with a requesting CLEC to verify the accuracy of their specific
35 report and associated remedy calculations and the accuracy of the results were confirmed
36 by the inquiring CLEC. Additionally, during its investigation and report clarification
37 efforts associated with the Enhanced Defect Report (EDR), AT&T has taken steps to
38 investigate and provide additional assurances that the data being identified in the defect
39 process is properly collected and reported in the SQM measures and remedies are
40 accurately being calculated as appropriate.

41
42 AT&T has incentive to deploy flawless releases. Due to the performance issues
43 surrounding the timeliness in providing responses to CLEC requests, AT&T incurred
44 significant and substantial SEEM liability in the areas of FOC timeliness, Reject Interval,
45 and FOC and Reject Completeness. These SQM measures (and associated SEEM

1 remedies) were designed specifically to identify and remedy areas where AT&T does not
2 perform to a high level of performance as outlined in the SQM/SEEM plan.

3

4 5.0 Commitments & CLEC Communications

5

6 Communications

7 Staff's primary criticism of Communication focuses on two processes approved
8 by this Commission and by the FCC in connection with the AT&T ILECs' 271
9 applications: Change Management and SQM/SEEM. Both processes, which are subject to
10 periodic review and tweaks, are operating properly and require no out-of-process
11 modifications to account for a one-time event like the April Release.

12

13 Staff suggests that AT&T has not "provided a clear indication or direction of the
14 new change management meeting framework to evaluate and address CLEC concerns."
15 It is difficult for AT&T to respond to this assessment since it does not appear to be based
16 upon any audit documentation. From CMP and the communications in which AT&T has
17 participated, we know that it is pretty much impossible to please all CLECS, all the time.
18 The needs and objectives of AT&T's wholesale customers are not the same. And so
19 some process changes that are applauded by one segment of the market place are
20 criticized by others. AT&T strives, and believes that it is largely successful, in balancing
21 competing demands and in meeting the legitimate needs of its customers.

22

23 Staff's Report acknowledges that AT&T offers CLECs numerous avenues of
24 communications: formal processes via the CLEC User Forum (CUF), Change
25 Management (CMP) and accessible letters. But Staff fails to acknowledge equally
26 important and often more effective, the less formal processes via one-on-one
27 communications with account managers and Service Quality Managers dedicated to OSS
28 issues. AT&T sponsors many channels of communication not only to keep CLECs
29 informed, but also to solicit their input. Account teams have been staffed to assist clients
30 with identification of products and services available to CLECs. Local Service Center
31 (LSC) personnel are available to address individual concerns with CLEC orders and
32 Wholesale Customer Support Managers (WSMs) are in place to address operational
33 issues that may arise during the processing of day-to-day transactions. Moreover,
34 communication before, during and after major releases are well-defined and effective.
35 AT&T engages in extensive communications with its clients, including walk-throughs
36 and periodic status calls, in connection with every major release.

37

38 Staff also fails to give AT&T full credit for soliciting and accepting Staff and
39 CLEC input into areas where communications can be improved. The CUF was
40 established to provide an avenue for AT&T and its CLEC customers to identify and
41 resolve operational issues that arise in day-to-day business operations. After the
42 implementation of the April release, several CLECs advised AT&T of difficulties they
43 were having with the new manual processes. AT&T agreed to investigate the issue and
44 created a standing agenda item directly related to manual processes and the training and
45 accessible letters associated with these processes. AT&T went even further and

1 implemented a Manual Process Forum to discuss effectiveness and improvement to
2 processes.

3
4 AT&T responded to CLEC input received via CUF, CMP and informal
5 communications with account management, and implemented daily post-release status
6 calls to keep CLECs up-to-date on implementation issues. A more formal process was
7 created so that CLECs could provide input into OSS-release related accessible letters
8 before they are issued. Finally AT&T has made improvements to the EDR reporting
9 process to insure that CLECs have all the information they need in a timely manner about
10 defect status and resolution plans.

11
12 AT&T disagrees with Staff's statement that CMP needs to be better defined or
13 changed. The process, which was jointly developed and agreed upon by AT&T and
14 CLECs, has worked well for over ten years and already has, within its framework, a
15 process for making changes. There is a formal agenda for both CUF and CMP meetings,
16 which are closely followed and which provide necessary structure to these forums. CMP
17 is not limited to Florida. The same process is used every southeast states in which AT&T
18 operates as an incumbent local exchange carrier. In additional there is a similar process
19 in AT&T's 13-state region. There are many CLECs who participate in CMP who do not
20 provide service in Florida. To make Florida-specific changes would require AT&T to
21 manage one CMP for Florida alone, one for the other Southeast states and one for the 13-
22 state region. Such an approach would make it harder for multi-jurisdictional CLECs to do
23 business with AT&T and much harder for AT&T to meet the needs of its wholesale
24 customers. Rather than use this docket as a vehicle to instigate changes to CMP, AT&T
25 believes that the forum itself is the right place for such changes to be discussed and made,
26 if approved by participants from all regions.

27
28 Similarly, AT&T does not believe this audit is the proper forum to discuss
29 changes, if any, to the SQM/SEEM Plan. As previously stated, such concerns are outside
30 the agreed upon audit scope and should not be included in the Report. Rather, proposed
31 revisions to the SQM/SEEM Plan should be proposed, discussed, and debated in the
32 context of the next periodic review of the current SQM/SEEM Plan.

33
34 **Commitments List**

35 Staff states that it cannot validate whether or not AT&T has made the changes
36 contemplated by the Commitments List and recommends that AT&T recheck the process
37 improvements it has made and also that AT&T reopen some issues. Staff's requested
38 actions are not necessary and should not be adopted.

39
40 The Commitments List is a summary of the commitments that AT&T voluntarily
41 made in response to its post-April Release self-examination, as well as at the requests of
42 CLECs. In most cases, the Company did not sit down and write up formal methods and
43 procedures, nor create extraneous documents listing every improvement; we simply
44 identified the problems, made the necessary changes and communicated those
45 improvements to our customers via CMP and accessible letters. AT&T suggests that the
46 "proof is in the pudding." Although Staff does not acknowledge it in their Report, AT&T

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1 has executed two nearly flawless releases since April. And although these releases were
2 not as large or far reaching as the April Release, the processes and personnel who
3 implemented those projects were the same ones involved in the April Release and the
4 same ones who will be responsible for future 22 state releases. The proof is not just in
5 the success of these more recent releases, but is also reflected in the detailed Test Plans
6 provided to Staff and CLECs. On September 11, 2008, AT&T provided Staff with a
7 copy of the enhanced test plan demonstrating every April Release and KLR-driven issue
8 and the corresponding improvements. Communications with CLECs are also a good
9 indication that AT&T's process improvements have worked. The daily and then weekly,
10 CLEC status calls to address April Release issues, have not been required since July 15,
11 2008. Monthly CMP meetings and other standard forms of communication show a return
12 to not only business as usual, but business improved.
13

14 AT&T committed to an enhanced 22-state test plan. The KLR process first
15 identified this need and informed the development process. This improved test plan
16 outlines methodology, responsibility, and accountability with more clarity and rigor than
17 had existed previously. The test plan also provides a channel and feedback mechanism to
18 improve communications between project managers, development and test teams, and
19 users and clients of the OSS systems. All facets of the project are reviewed and
20 consensus is developed to assure that a full test case suite is developed and implemented
21 prior to a release being deployed. The coordination of testing now resides with a 22-state
22 test manager who is responsible for the pre-deployment testing and communication of
23 testing results. AT&T has refined this role through the successful deployment of two
24 releases since April. The August 2008 and November 2008 releases were deployed
25 nearly flawlessly and the communications to the CLEC community worked as expected.
26 These indicators show that the processes AT&T has put in place will help provide a
27 greater confidence in deploying future 22-state releases.
28

29 AT&T voluntarily committed to introduce 32 improvements prior to the
30 implementation of the next 22-state release. Of those 32, Staff concurs that AT&T
31 properly closed all but seven. AT&T believes it has met all of the 32 commitments,
32 including the seven Staff questions. AT&T's specific responses to Staff comments on
33 those seven commitments are as follows:
34

35 **1. Resolve all Severity 1 and 2 defects.**

36 **Staff's assessment:** Staff believes that it is premature to close this item. AT&T has
37 satisfied the resolution of all Severity 1 defects; however, eight Severity 2 defects remain
38 open. Staff expects the remaining Severity 2 defects to be remedied prior to
39 implementation of the next 22-state OSS release.
40

41 **AT&T response:** AT&T believes there is no reason to keep this issue open. AT&T
42 committed that before the next 22-state release that it would resolve and close all of the
43 Severity 1 and 2 defects resulting from the April release, which were open as of May 15.
44 AT&T has gone beyond that commitment and has now closed *all* Severity 1 and 2 defects
45 associated with the April release.
46

1 **6. Provide an outline of CLEC training materials for future 22-state releases. Staff's**
2 **assessment:** Staff believes that it is premature to close this commitment. While staff
3 recognizes AT&T's efforts to develop guidelines for the next two OSS Releases, the
4 training guidelines and specific plans have yet to be provided to staff and discussed with
5 the CLECs.

6
7 **AT&T response:** AT&T believes there is no reason to keep this issue open. Verigate
8 training was implemented in November. On-line self-paced training was made available
9 on November 24 and a leader-led virtual presentation was made available December 1,
10 2008 – December 12, 2008. A number of CLECs attended the leader-led training.
11 Specific details regarding the training plans are provided on line. LEX training will be
12 offered one month prior to the planned release, now scheduled for November, 2009
13 (when the test environment will be available). The LEX training will be similar to the
14 Verigate training in terms of comprehensiveness of material and method of delivery.

15
16
17 **10. Perform internal documentation review to enhance clarity of web-based defect**
18 **reporting.**

19 **Staff's assessment:** Staff believes that it is premature to close this commitment. Staff
20 acknowledges that AT&T has developed internal documentation to enhance the clarity to
21 support the process for creating a defect report. However, staff is concerned that the
22 information provided on the web-based defect report does not adequately reflect enough
23 information for CLECs to discern the status and resolution of defects. This issue was
24 raised by the CLECs in the November 5, 2008 CMP meeting.

25
26 **AT&T response:** AT&T believes there is no reason to keep this issue open. The
27 Company provided revised documentation supporting the process for creating a daily
28 defect report. The documentation further clarifies defect descriptions and also includes
29 additional internal procedures, such as multiple peer-to-peer review prior to posting.
30 AT&T considers this item to be closed. AT&T also added a second EDR team member to
31 review the accuracy and clarity of the data posted for the EDR and SE CRs to ensure they
32 are in sync. In addition, the descriptions are reviewed daily to ensure that they are readily
33 understandable. Each business day, the EDR report is updated and placed on CLEC
34 Online. CLECs have been advised that this is the data source for defect reporting.
35 CLECs were briefed on the improved EDR process at the January CMP meeting.

36
37 In the event that any CLEC has questions about a particular defect, they can contact their
38 Wholesale Support Manager for further information and if such communications suggest
39 that additional information would be helpful, AT&T will update EDR to provide
40 additional clarity.

41
42 **11. Perform internal documentation review to enhance clarity of XML**
43 **documentation.**

44 **Staff's assessment:** Staff believes that it is premature to close this commitment. While
45 the process of consolidating the pre-ordering and ordering business rules has been
46 documented, the process itself has not been fully implemented. AT&T noted that the
47 AT&T Southeast LSOR will be available with the November OSS Release, while the

1 LSPOR is currently in development and will be available after implementation of the 22-
2 state XML application.

3
4 **AT&T response:** AT&T believes there is no reason to keep this issue open. AT&T's
5 LSOR is currently available on the CLEC Online website. Upon the request and
6 agreement of CLECs, the LSPOR will be available for the November 2009 OSS release if
7 XML is implemented in July.

8
9 **14. Take into consideration comments received from customers to date and cover**
10 **results with CLECs once completed.**

11 **Staff's assessment:** Staff believes that it is premature to close this item. Although staff
12 agrees with AT&T's process of using the Action Log to capture CLEC comments after
13 they have been accepted, AT&T did not elaborate on the company's current CMP
14 procedures and processes for escalating and denying CLEC action item requests.

15
16 **AT&T response:** AT&T believes there is no reason to keep this issue open. Unlike
17 CUF, the majority of CMP action items are generally questions that arise during a
18 meeting which need further clarification. The action items are researched and responses
19 provided, typically at the next CMP meeting. CLECs always have the option of
20 escalating any issue/response via the CMP chain of command, which is posted on the
21 CLEC Online website.

22
23 **24. Assess CLEC concerns where all pages of a form are required whether or not**
24 **all pages contain data. Address customer concerns regarding the requirement of**
25 **additional data.**

26 **Staff's assessment:** Staff concurs with AT&T to close this item with the understanding
27 that AT&T did address the CLECs concern regarding the requirements for additional data
28 to properly complete manual LSR forms. However, staff believes that issuance of one
29 Accessible Letter after another is not the appropriate means to provide corrections to
30 ordering processes. For example, below is a listing of 15 Accessible Letters addressing
31 the manual email ordering process alone. Staff believes that AT&T and the CLECs
32 should develop and pursue an alternative means of documenting and communicating
33 corrections and resolutions made to existing processes that are used in a production
34 environment.

35
36 **AT&T response:** While AT&T agrees with Staff that use of multiple accessible letters
37 to advise the CLEC community of the changes in the ordering process may have led to
38 some confusion, the Accessible Letter process should not, however, be replaced as the
39 primary method of communicating with CLECs; it is the standard means throughout
40 AT&T's 22-states of notifying wholesale customers of process changes. Moreover, it is a
41 process CLECs are familiar with and is the most efficient means of reaching the broadest
42 number of CLECs in the least amount of time. In addition, a number of ICAs require that
43 changes in process are to be communicated via Accessible Letters. To enhance
44 communication with the CLEC community, AT&T agreed in CUF meetings to provide a
45 walk through of all new forms and form changes with the CLECs via Live Meeting or
46 like medium, prior to the implementation/effective date of the form changes. The walk

1 through will occur approximately one month following the initial accessible
2 letter announcing the change.

3

4

5 **25. Review and assess the prioritized list of customer change requests for**
6 **enhancements to the 22-state email LSR process. Reevaluate merger related OSS**
7 **Change Requests previously submitted through the Change Management process.**

8 **Staff's assessment:** Staff believes that it is premature to close this item. It appears that
9 CUF Issue 08-008 may have been discussed and possibly resolved in the September 2008
10 Email Ordering Forum; however, no supporting documentation was provided to staff to
11 concur with closure of this item.

12

13 **AT&T response:** AT&T believes there is no reason to keep this issue open. Issue 08-
14 008 was closed at the September 2008 CUF meeting. From the current closed CCR log
15 posted on CLEC online: "AT&T stated that the Frequently Asked Questions document
16 and the Manual Ordering Guidelines were updated to include additional information and
17 clarification as well as requested examples. STS agreed to close this issue."

18

19 Regarding "Best Practices" provided to AT&T for consideration, AT&T has reviewed the
20 CLEC change requests to ensure that all Southeast functionality will be maintained or
21 enhanced with the implementation of 22-state LEX and XML. As discussed in the
22 CMP/CCP meetings, these change requests will be reevaluated after the implementation
23 of the 22-state release for any opportunities to further enhance AT&T's OSS capabilities
24 in compliance with CCP/CMP guidelines.

25

26 **26. Complete updates to the Local Ordering Handbook to reflect changes via the**
27 **Accessible Letter.**

28 **Staff's assessment:** Staff concurs with AT&T to close this item with the understanding
29 that AT&T did address the CLECs concern regarding the updates to the Local Ordering
30 Handbook. However, staff believes that issuance of one Accessible Letter after another
31 is not the appropriate means to provide corrections to ordering processes. Staff believes
32 that both AT&T and the CLECs should work together to develop and pursue an
33 alternative means of documenting and communicating corrections and resolutions made
34 to existing processes that are used in a production environment.

35

36 **AT&T response:** As with manual process form changes, the Accessible Letter should
37 not be replaced as the primary method of communicating with CLECs; it is the standard
38 means throughout AT&T's 22 states of notifying wholesale customers of process
39 changes. Moreover, it is a process CLECs are familiar with and it is the most efficient
40 means of reaching the broadest number of CLECs in the least amount of time. In
41 addition, a number of ICAs indicate that changes in process are to be communicated via
42 Accessible Letters.

43

44 **32. Continue to review staffing levels to meet anticipated demand for Wholesale**
45 **Customer Support and Centers.**

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1 **Staff's assessment:** Staff believes that it is premature to close this item. AT&T failed to
2 provide staff with any documentation in support of staff requirements. At a minimum,
3 staff expects to see an assessment of staffing levels based on current and forecasted
4 demand and the impact to staffing levels based on implementation of future 22-state OSS
5 releases.

6
7 **AT&T response:** AT&T believes there is no reason to keep this issue open. Appropriate
8 staffing levels are constantly monitored to insure quality service to CLECs. AT&T has a
9 proven history of effectively managing the balance of mechanization and force
10 requirements to meet its' customers demands.

11

12

13

Staff Recommendations

14

15 Staff's report contains 18 recommendations for additional actions AT&T should perform
16 to resolve any remaining April Release issues. In many cases AT&T concurs in Staff's
17 assessment and has already taken the recommended action.² In a few cases, AT&T
18 believes Staff's recommendation does not make good business sense and will not
19 improve service to CLECs. In these instances, AT&T opposes Staff's recommendation.
20 AT&T's position on each recommendation is addressed below.

21

KLR/Root Cause Analysis

22

- 23 • AT&T should resolve the 10 open key learnings prior to implementing the next
24 22- state release.

25

26 **AT&T position:** AT&T concurs. It has continued to resolve the open key learnings as
27 per normal processes. At this time, eight of the ten open items have been closed. The
28 two remaining open KLRs will be closed by the implementation of the March 2009
29 release.

30

- 31 • AT&T should perform an internal review to ensure that all recommendations
32 were completely and satisfactorily implemented and that each of the resolutions has
33 adequately corrected the specified issue.

34

35 **AT&T position:** AT&T has engaged in such a review. The process itself insures that
36 KLR recommendations are properly implemented. AT&T has reviewed selected
37 recommendations associated with the most significant findings and, coupled with the
38 successful August and November releases, is satisfied that all issues have been addressed
39 and appropriate corrective action taken.

40

- 41 • AT&T should reevaluate its key learnings root cause analysis process and ensure
42 that the approach followed is adequate.

43

² Staff qualifies its assessment in some places; AT&T concurs in Staff's qualifications with the exception of Commitments 24 and 26 which are addressed in the Commitments Section of these Comments.

1 **AT&T position:** The key learning process has served AT&T very well. As part of the
2 organizational changes made after the April release, a more uniform approach to the
3 process is being followed. This process is working well as indicated by two successful
4 releases implemented since April.

5

6 • AT&T should reevaluate its root cause analysis for selected key learnings and
7 ensure that all causal relationships have been identified and the resolutions identified are
8 sufficient.

9

10 **AT&T position:** AT&T has reviewed the key learnings identified in the audit report and
11 is satisfied that all causal issues have been identified and resolved.

12

13 • AT&T should reevaluate resolutions which have been identified as prematurely
14 closed, particularly those related to vendor coordination, and take appropriate action.

15

16 **AT&T position:** When the resolutions were originally developed, the on-line tool was
17 updated to indicate what action was planned. After correct measures were implemented,
18 the issue owners had the responsibility for updating the tool to mark the KLR closed, but
19 in some cases the wording they used did not properly reflect past tense—in other words
20 that the issue had been resolved, but not properly recorded. These KLRs have since been
21 updated to reflect the action that was taken.

22

23 • AT&T should consider incorporating input from its CLEC clients in its future key
24 learnings process.

25

26 **AT&T position:** Staff criticizes AT&T for not seeking CLEC input, when in fact the
27 ongoing dialog that AT&T has with its customers informally and via the CMP process
28 provides ample CLEC input. CLECs also have the opportunity to provide input to the
29 KLR process via post-release conference calls that AT&T holds following each release,
30 as well as by submitting comments to the CMP mailbox. Nevertheless, AT&T will begin
31 to more formally request input from the CLECs beginning with the March 2009 release.
32 During post-Release CLEC calls, AT&T will request that CLECs email any opportunities
33 for improvements, or to identify what worked well with the release to the CMP mailbox.
34 These “learnings” will then be included and managed with all of the internally generated
35 ones. Follow-up will be provided to the CLECs via email when action plans have been
36 developed and a target date assigned for resolution and again when the action plan has
37 been implemented.

38

39 **Defect Management**

40

41 • AT&T should review the April Release defects and the root causes identified for
42 each and ensure that a root cause has been identified and that appropriate action has been
43 taken to prevent future occurrences.

44

45 **AT&T position:** AT&T has carefully reviewed the root causes associated with defects.
46 The Company has consolidated defect management responsibilities into one work group

1 to better identify, classify and coordinate corrections and apply appropriate root cause to
2 each defect.

3

4 • AT&T should improve its emphasis on defect root cause analysis through written
5 policies and procedures, assignment of responsibilities and employee training.

6

7 **AT&T position:** With the consolidation of the defect management responsibilities,
8 AT&T has provided more structure to the process and better control over defect
9 resolution. This includes the opportunity to provide better training and oversight leading
10 to improved remediation of root cause effects.

11

12 • AT&T should continue to evaluate the consolidation of its defect management
13 process to ensure that defects are resolved in an expedient manner and are compliant with
14 the benchmarks established by the Florida Public Service Commission.

15

16 **AT&T position:** As a part of the EDR review, AT&T has reviewed the processes
17 associated with the data collection and reporting of defects. This review has resulted in
18 the formulation of procedures and tracking which will insure that all defects are identified
19 and accurately reported. CLECs and Staff were briefed on the revised process during the
20 January 7, 2008 CMP call.

21

22 • AT&T should review the accuracy of data collection and reporting for all Change
23 Management Service Quality Measures and the Self-Effectuating Enforcement
24 Mechanism.

25

26 **AT&T position:** While not expressly within the scope of the audit, AT&T has, as part of
27 a review of the EDR, reviewed the processes and procedures associated with the data
28 collection and reporting of defects. This review has resulted in the formulation of
29 procedures and tracking done to assure that all appropriate defects are identified,
30 accurately reported and expeditiously resolved. CLECs and Staff were briefed on the
31 revised process during the January 7, 2008 CMP call.

32

33 • AT&T should reevaluate its use of the CLEC impacting classification and either
34 eliminate it, giving CLECs full visibility of defects, or have a clearly communicated
35 definition of when it is applicable.

36

37 **AT&T position:** AT&T has reexamined the processes of classifying defects as CLEC-
38 impacting and has documented that information. The definition of CLEC-impacting
39 defect is addressed in the SQM plan that is currently in effect in Florida.

40

41

42 **Communications and Commitments**

43

44 • AT&T should clearly define and document the monthly Change Management
45 meeting process.

46

1 **AT&T position:** The monthly meetings, which are governed by two sets of detailed
2 guidelines, are already well-defined in the Competitive Local Exchange Carrier OSS
3 Interface Change Management Process (Section 8.2) and the 9-state Change Control
4 Process guidelines, (Section 4, Part 2, Step 6). CMP meetings are divided into three
5 sections to accommodate all requirements: items affecting all regions, 13-state items, and
6 9-state items. The CMP/CCP agendas, is also divided into sections. The agendas, along
7 with action items, meeting minutes and other required documents are posted on the CMP
8 website.

9

- 10 • The Commission should commence an expedited review of AT&T's SQM and
11 SEEM Plans prior to implementation of 22-state releases scheduled in 2009.

12

13 **AT&T position:** Although outside the scope of the audit, the SQM/SEEM Plan is subject
14 to a periodic review process. When Staff commences such a review, AT&T will
15 participate in the review process along with the Staff and the CLEC community.

16

- 17 • AT&T should reevaluate its closure of seven commitments (items 1, 6, 11, 13, 14,
18 25, and 32 in Appendix F) and take necessary steps to assure the commitments have been
19 fully addressed.

20

21 **AT&T position:** As explained in the Commitments section above, AT&T has met all 32
22 voluntary commitments, including the seven cited by Staff.

23

- 24 • AT&T should prepare and provide Staff with pre-production and production
25 defect status reports specific to each 22-state OSS release as they occur

26

27 **AT&T position:** Staff is effectively asking AT&T to create a special defect report. This
28 is not necessary. AT&T has an on-line tool, the EDR, which identifies CLEC-impacting
29 defects. AT&T also provides status calls for CLECs, which Staff is welcome to attend,
30 which update affected parties on the pre-implementation and post-implementation
31 environment. To pull the resources involved in identifying, reporting on and correcting
32 defects to create Staff-specific reports does not seem necessary, or a wise use of
33 resources. No such processes were in place for the August and November releases and
34 no issues were encountered.

35

- 36 • AT&T should provide Staff with Expanded Test Plans for all future 22-state
37 releases as they become available, and continue to educate CLECs on future 22-state
38 release test plans.

39

40 **AT&T position:** AT&T will provide Staff with copies of test plans for 22-state test
41 plans for the scheduled 22-state releases.

42

- 43 • AT&T should continue to enhance the 22-state manual email ordering process to
44 include efficiencies that previously existed in the manual processing of orders in the 9-
45 state region.

46

1 **AT&T position:** AT&T has compared pre-release SE manual processes to the new e-
2 mail process and has also reviewed the CLEC change requests related to manual
3 processes to ensure that all Southeast functionality will be maintained with the
4 implementation of 22-state LEX and XML. As discussed in CMP/CCP meetings, these
5 change requests will be reevaluated after the implementation of future 22-state releases
6 for any opportunities to further enhance AT&T's OSS capabilities in compliance with
7 CCP/CMP guidelines.

- 9 • AT&T should provide staff with an assessment on current call center activities
10 and staffing levels, and an assessment of call center activities based on future 22-state
11 releases.

13 **AT&T position:** Appropriate staffing levels are constantly monitored to insure good
14 service to CLECs.

Conclusion

18 As stated herein, AT&T commends Staff's efforts in drafting and issuing the
19 Report. Further, AT&T is confident that AT&T has in place (or has developed) to ensure
20 that future 22-state OSS Releases are implemented with minimal impact on the
21 operations of CLECs.

Respectfully submitted this 9th day of January 2009.

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