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June 1, 1999

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VIA FEDERAL EXPRESS

Mr. David Waddell
Executive Director
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

RE: Docket No. 99-00347 – Third Party Testing of BellSouth's Operational Support Systems

Dear Mr. Waddell:

Please find enclosed the original and fourteen (14) copies of the Comments of Sprint Communications Company L.P. in the above referenced matter.

An extra copy is also included which I would ask that you please date stamp and return to me for my files in the enclosed self-addressed, stamped envelope.

Thank you for your assistance in this matter. Should you have any questions, please feel free to contact me.

Sincerely,

Carolyn Tatum Roddy

Carolyn Tatum Roddy

CTR/de
Enclosures
cc: Parties of Record

REC'D TN
REGULATORY AUTH.
OFFICE OF THE
EXECUTIVE SECRETARY
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BEFORE THE
TENNESSEE REGULATORY AUTHORITY

Nashville, Tennessee

Petition for the Establishment of and)	
Independent Third Party Testing Program)	Docket No. 99-00347
of BellSouth's Operational Support Systems)	

**COMMENTS OF
SPRINT COMMUNICATIONS COMPANY L.P.**

Comes now Sprint Communications Company L.P. ("Sprint") and hereby comments on the AT&T Communications of the South Central States, Inc. ("AT&T") Petition for the Establishment of an Independent Third party Testing Program of BellSouth Telecommunications Inc. ("BellSouth") Operation Support Systems ("OSS").

INTRODUCTION

Sprint appreciates the opportunity to comment on the AT&T petition for independent third party testing of BellSouth OSS. The Telecommunications Act of 1996 ("Act") requires BellSouth to (1) provide nondiscriminatory access to its operations support systems ("OSS") on appropriate terms and conditions; (2) provide the documentation and support necessary for competitive local exchange carriers ("CLECs") to access and use these systems; and (3) demonstrate that BellSouth's systems are operationally ready and provide an appropriate level of performance. The ability of customers to switch smoothly between competitors in the local market will depend entirely on the adequacy of BellSouth's OSS

systems. A customer who has a bad experience in choosing to switch to a CLEC will likely be unwilling to do so again. Thus, the importance of adequate OSS systems to the development of local competition in Tennessee cannot be understated. Sprint agrees with AT&T that third party testing is necessary for the Tennessee Regulatory Authority ("TRA") to be sure customers will be able to switch local service easily and without service interruptions and urges the TRA to implement an independent third party test of BellSouth OSS. Further, Sprint urges the TRA to adopt the policies and procedures stated below in developing and implementing third party testing in the state.

I. THE TEST SCENARIOS SHOULD INCLUDE xDSL, UNE-P AND EEL LOOPS, and POTS

The independent third party test adopted by the TRA should include pre-ordering, ordering, provisioning, maintenance and repair, and billing of the unbundled network element platform ("UNE-P"), enhanced extended loops ("EELs") or Asymmetric Digital Subscriber Line ("ADSL") and HDSL loops, which BellSouth has deployed. Plain Old Telephone Service ("POTS") should be tested with all associated order activities, line features, error editing, directory listings/captions and products and services across multiple states. All test scenarios above should be tested for planned and unplanned change controls so that all areas of testing can be adequately covered. The AT&T Plan for Implementing Third Party Testing ("Plan") is a comprehensive proposal which should be read to incorporate these requirements. As noted in its Goal on page 4 of the Plan, AT&T proposes a detailed and specific test plan that will enable the

third party tester ("TPT") to test all BellSouth procedures, processes and systems offered by BellSouth for use by a CLEC entering the local market.

It should be noted, for example, that Sprint's CLEC Integrated On-Demand Network ("ION") offering will utilize ADSL and HDSL loops in the absence of other broadband access to consumers. It is, therefore, imperative that the test includes the testing of pre-ordering, ordering, provisioning, maintenance and repair, and billing of ADSL and HDSL loops. ADSL and HDSL loops must be available to Sprint at parity to what BellSouth offers its own customers. Appropriate testing of the pre-ordering, ordering, maintenance and repair of ADSL and HDSL loops is essential to determine if such parity exists.

Similarly, CLECs will depend on UNE-P and EELs in interconnecting with BellSouth in the provision of competitive local service. Thus, these arrangements are critical to the development of local competition in Tennessee. BellSouth should disclose the terms and conditions under which it will make ADSL, HDSL, UNE-P and EELs available to CLECs in Tennessee, and make it available for testing.

II. THE TEST SHOULD BE REPRESENTATIVE OF CLEC DEVELOPMENT EFFORTS

To simulate the developmental interface efforts of the CLEC it is critical that the testing systems replicate, as much as possible, the systems developmental process of the CLECs. To that end, the national standards body the Ordering and Billing Forum ("OBF") has developed standards for order and pre-order processing. CLECs providing services in multiple-RBOC regions will

typically build systems to the national OBF standard and then build a translator to account for any non-standard variance implemented by BellSouth. This real-world translation adds a layer of complexity and potential for error that cannot be tested under the currently proposed plan. This process of building to the national standard and then separately building a variance translator should be part of the independent third party test. In addition, Electronic Communications Implementation Committee ("ECIC") standards should be used for Trouble/Repair for application to application interface testing.

Although there may not appear to be much difference between OBE and BellSouth's actual implementation of OBF EDI, Sprint has found that the process of building the translator to be the most enlightening process of the interface design. Some very subtle design decisions reflected in BellSouth documentation can cause great havoc in Sprint interface design.

An effective test plan needs to mimic the 'real world' environment to the greatest extent possible. The fact that the testing tool will simply generate orders in the EDI format does not meet this critical requirement. CLECs will be required to translate the OBF EDI standard into a BellSouth EDI format. The test generator system or front-end graphical user interface (GUI) should be designed in this same manner. Multiple Industry Standard Local Service Ordering Guideline (LSOG) software versions should be in place to mimic the real CLECs interface solutions.

III. THE TEST SHOULD SPECIFY PROCEDURES FOR CLEC INVOLVEMENT

The TRA should specify the procedures for providing notice to CLECs so that they will have an opportunity to observe and participate in the testing and evaluation process. Specifically, the TRA should indicate when or how such input will be solicited, or the details of CLEC participation. These details should be clarified so that CLECs will have an opportunity to prepare for, and participate in the test. As AT&T noted on pages 9 and 12 of its Petition, CLECs should be given the opportunity to comment on the plan to ensure that the entire spectrum of OSS functions and business processes are tested and should be involved in verifying what is being tested. CLECs, with practical experience in negotiating BellSouth's OSS, should be used as a resource to ensure that the test is thorough and complete.

IV. THE TEST SHOULD INCLUDE MULTIPLE SWITCHES AND CITIES

The test call matrix should include all call types, product mixes and usage from multiple switches and multiple cities. In addition, multiple switch locations and cities should be specified. Different switches and cities have different call volumes and different peak and off-peak periods. Multiple switch locations and large, medium and small cities should be included in the test so that the test is accurate and representative of actual conditions. Also, the test should be designed to accommodate the validation of multi-state processing because the same OSS processes used in Tennessee will also be used throughout the BellSouth region.

V. THE TEST SHOULD DEPICT RANDOM VOLUMES OF MULTIPLE CARRIERS OVER AT LEAST TWO BILLING CYCLES

The test should depict random volumes of multiple carriers, as simultaneous input, in full rollout of local services during a period of several months over at least two billing cycles. The TRA should specify the number of billing cycles that the test will span. The TRA should also specify the duration of the test, including the dates on which the test will begin and end.

VI. ORDERS SHOULD BE SUBMITTED BOTH ELECTRONICALLY AND MANUALLY DURING THE TEST

As noted in the AT&T Plan for Implementing Third Party Testing, orders should be submitted manually to BellSouth just as they are in the real world. Unless BellSouth can commit that it can and will efficiently process orders without the use of manual procedures, then orders should be submitted both electronically and manually during the test.

VII. THE LCUG PERFORMANCE MEASUREMENTS SHOULD BE USED

As AT&T Plan for Implementing Third Party Testing stated on page 10, the starting point should be the measures, standards, and disaggregation levels required by the Local Competition User's Group ("LCUG"). Sprint urges the TRA to require that the test incorporate and utilize the LGUG service quality measurements. The LCUG service quality measures should be utilized in the test because they 1) permit direct comparisons of the CLEC and CLEC industry experience to that of the ILEC through recognized statistical procedures, 2) account for potential performance variations due to differences in service and

activity mix, and 3) produce results which demonstrate the nondiscriminatory access to OSS functionality is being delivered across all interfaces and a broad range of resold services and unbundled elements.

It is essential that CLECs be able to determine that they are receiving at least equal treatment to what ILECs provide to their own retail operations or their local service affiliates. Benchmarks and performance standards should clearly demonstrate that CLECs are receiving nondiscriminatory treatment. For example, to test OSS parity, the LCUG measurements compare both the average (mean) result and the variance of the measurement result for the ILEC and the CLEC to establish that the CLEC result is no worse than the ILEC's result.

Also, reporting should include, for each measure, a representation of the dispersion around the average (mean) of the measured results for the reporting period (e.g., percent of 1-4 lines installed in the 1st day, 2nd day, 3rd day, and >10 days, etc.). In addition to providing these detailed results, BellSouth should also supply, to each interested CLEC, a report showing its performance for each measure in comparison to both CLEC industry in aggregate and the performance delivered to any affiliate(s) of the ILEC.

VIII. GEOGRAPHIC REPORTING

Measurement data should be reported on a natural geographic area that allows prudent operational management decisions to be made and does not obscure actual performance levels. The detail of reporting may vary from levels as discrete as individual exchanges (Central Office) to as aggregated as the

region level. Sprint supports LCUG's recommended default level of reporting to the MSA, although further detail should be required where it improves the ability to make meaningful comparisons.

IX. VERIFICATION AND AUDITING

An audit of the data collecting, computing and reporting processes should be permitted. The test should also allow for an individual CLEC to audit or examine its own results.

CONCLUSION

Sprint, therefore, requests that the Tennessee Regulatory Authority grant AT&T's Petition for establishment of an independent third party testing program of BellSouth's Operation Support Systems. Test parameters should reflect the policy stated in Sprint's Comments above.

This 1st day of June, 1999.

Respectfully submitted,

Carolyn Tatum Roddy

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CERTIFICATION OF SERVICE

I hereby certify that I have this day served a true and exact copy of the within and foregoing Comments of Sprint Communications Company L.P. in Docket No. 99-00347, via United States mail, postage paid and properly addressed to the following:

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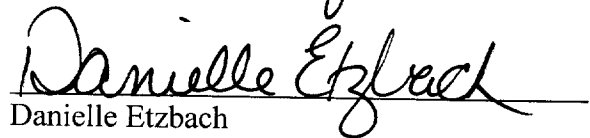
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This the 1st day of June, 1999.


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