The Alliance for Telecommunications Industry Solutions ("ATIS")\(^1\), on behalf of its Ordering and Billing Forum ("OBF"), hereby files these comments with the Public Utility Commission of Texas ("Commission") concerning Project #24389, a rulemaking proceeding proposing CLEC-to-CLEC and CLEC-to-ILEC Migration Guidelines in Texas. Specifically, ATIS OBF files these comments to address one of the Commission’s questions posed in its Proposal for Publication:\(^2\) How do the (proposed Texas) CLEC-to-CLEC and CLEC-to-ILEC Migration Guidelines differ from the Local Service Ordering Guidelines (Issues 4-8) that have been developed in the ATIS-sponsored Ordering and Billing Forum ("OBF").

Established in 1985, the OBF provides a forum for representatives from the telecommunications industry to identify, discuss and resolve national issues which affect ordering, billing, provisioning, and the exchange of information about access service,

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

other connectivity and related matters. The OBF consists of six standing committees: the Billing Committee, the Local Services Ordering and Provisioning (“LSOP”) Committee, the Interconnection Services Ordering and Provisioning (“ISOP”) Committee, the Message Processing Committee, the Subscription Committee, and the SMS/800 Number Administration Committee (“SNAC”). In addition, the OBF also sponsors the Wireless Workshop.³

The LSOP Committee addresses and resolves issues related to the ordering and provisioning⁴ of local telecommunications services. The LSOP Committee has responsibility for the development and maintenance of the ordering and provisioning processes, as well as all associated documentation, including the Local Service Ordering Guidelines (“LSOG”). The LSOG is a collection of best practices related to the ordering and provisioning of local telephone service. The LSOG practices encompass the order flows, definition of data elements and terms and their usage, required forms, and the processes necessary to provide the end user customer telephone service, including Directory Services. Included in the LSOG practices are the Customer Service Information (“CSI”) and Transitional Information (“TI”) practices, which are necessary for a smooth customer transition to the new Local Service Provider (“LSP”).

The LSOG is updated on a regular basis to include new processes and also to enhance existing processes, as required by the industry.⁵ The LSOG practices have been enhanced to address the situation where one Competitive Local Exchange Carrier (“CLEC”) has won the end user customer of another CLEC. Originally, these process

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³ For more information on the scope and missions of each committee, see www.atis.org/obf.
⁴ Provisioning is inclusive of the design functions up through issuance of the installation work document.
⁵ For instance, these updated processes may be the result of a new service offering or a new type of market entrant such as a Wireless Provider.
flows were developed in response to the Telecommunications Act of 1996, which permitted CLECs to enter the local telecommunications markets of the Incumbent Local Exchange Carriers (“ILECs”). Initially, since most CLECs did not own their own switches or local loops to the end users’ locations, the process flows were developed to allow the CLECs to migrate the end user’s telephone number and features “as is” using a method called Total Service Resale (“TSR”). As the CLEC market presence grew, some CLECs purchased their own switches, thus eliminating the need to use the ILEC switch and features; however, the CLECs were still required to purchase the local loop from a network service provider, usually the ILEC. Based on these various methods of providing service and the fact that ILECs were required to market their service in an unbundled fashion called Unbundled Network Elements (“UNEs”), ILECs offered two more types of local service, UNE-Platform (“UNE-P”), their switch and its features, and UNE-Loop, the local loop to the end user’s location. The related migration guidelines are outlined in Version 4 of the LSOG.

The migration guidelines in Version 4 of the LSOG were developed by the LSOP based on a CLEC ordering local service from an ILEC. The migration guidelines in LSOG 4 use the TSR method and migrated the end users entire service “as is”, including Directory Listings.6 However, due to the growing number of CLECs and therefore migrating customers, specific CLEC-to-CLEC migration flows were developed and first implemented in Version 6 of the LSOG, and have been an ongoing part of the LSOG since. Directory Services, as it relates to CLEC-to-CLEC migration, were introduced in

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6 The End User Migration Guidelines – CLEC to CLEC, drafted and adopted by the state of New York is based generally on Version 4 of the LSOG.
Version 8 of the LSOG, which is presently being developed by the industry and is scheduled for implementation late 2003.

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

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

**TYPES OF SCENARIOS**

<table>
<thead>
<tr>
<th>Scenario Number</th>
<th>Initial State</th>
<th>End State</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>CLEC #1 via Resale</td>
<td>CLEC #2 via Resale</td>
</tr>
<tr>
<td>2</td>
<td>CLEC #1 via Resale</td>
<td>CLEC #2 via UNE-P</td>
</tr>
<tr>
<td>3</td>
<td>CLEC #1 via UNE-P</td>
<td>CLEC #2 via Resale</td>
</tr>
</tbody>
</table>

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

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

**Description:**

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

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

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

### 2. Bundled to Unbundled

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

#### 2.A. UNE-P or Resale to UNE-Loop w/LNP

**Description:**

This migration involves reusing the loop facilities and retaining the customer’s telephone number. The Old CLEC serves the customer via bundled services leased from a network.
service provider. The New CLEC serves the customer via its own switch and an unbundled loop facility.

<table>
<thead>
<tr>
<th>Texas Scenarios</th>
<th>LSOG 6 through 8 Process Flow Description</th>
<th>*LSOG 8 Paragraph</th>
</tr>
</thead>
<tbody>
<tr>
<td>CLEC #1 via Resale to CLEC #2 via Loop</td>
<td>Resale to UNE-Loop with Number Portability</td>
<td>14.18.10</td>
</tr>
<tr>
<td>CLEC #1 via UNE-P to CLEC #2 via Loop</td>
<td>UNE-P to UNE-Loop with Number Portability</td>
<td>14.18.1</td>
</tr>
</tbody>
</table>

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

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

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

<table>
<thead>
<tr>
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<th>*LSOG 8 Paragraph</th>
</tr>
</thead>
<tbody>
<tr>
<td>CLEC #1 via Resale to CLEC #2 via</td>
<td>Resale to UNE-P with new NSP</td>
<td>14.18.13</td>
</tr>
<tr>
<td>Facilities-Based</td>
<td></td>
<td></td>
</tr>
<tr>
<td>CLEC #1 via UNE-P to CLEC #2 via Facilities-Based</td>
<td>UNE-P to Retail with Number Portability</td>
<td>14.18.7</td>
</tr>
</tbody>
</table>

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

3. Unbundled to Bundled

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

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

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

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

*LSOG 8 paragraph numbering subject to change with Final version.
3.B. UNE-Loop to Resale or UNE-P with LNP

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

<table>
<thead>
<tr>
<th>Texas Scenarios</th>
<th>LSOG 6 through 8 Process Flow Description</th>
<th>*LSOG 8 Paragraph</th>
</tr>
</thead>
<tbody>
<tr>
<td>CLEC #1 via UNE-Loop to CLEC #2 via Resale</td>
<td>UNE-Loop to Resale and Number Portability–With Loop Reuse</td>
<td>14.18.3.</td>
</tr>
<tr>
<td>CLEC #1 via UNE-Loop to CLEC #2 via UNE-P</td>
<td>UNE-Loop to UNE-P</td>
<td>14.18.15</td>
</tr>
</tbody>
</table>

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

4. Unbundled to Unbundled

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

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

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

<table>
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<tbody>
<tr>
<td>CLEC #1 via UNE-Loop to CLEC #2 via UNE-Loop with Loop reuse</td>
<td>UNE-Loop Reuse with Number Portability</td>
<td>14.18.17.</td>
</tr>
</tbody>
</table>

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

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

Description:
The old local service provider serves the end user via its own switch and an unbundled loop facility leased from the network service provider. The new local service provider serves the customer via its own switch and a new unbundled loop facility leased from the network service provider. The End User retains the telephone number.
**4.C. UNE-L to Full Facilities-Based with LNP**

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

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

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

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

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

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

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

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

ATIS appreciates the opportunity to provide these Comments in response to the Commission’s question: How do the (proposed Texas) CLEC-to-CLEC and CLEC-to-ILEC Migration Guidelines differ from the Local Service Ordering Guidelines (Issues 4-8) that have been developed in the ATIS-sponsored Ordering and Billing Forum (“OBF”).

Respectfully submitted,

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