PROJECT NO. 26375

PUBLIC NOTICE OF WORKSHOP	§	
AND REQUEST FOR COMMENTS	§	PUBLIC UTILITY COMMISSION
ON THE ACTIVITIES OF THE	§	
ORDERING AND BILLING FORUM	§	OF TEXAS

COMMENTS OF THE ALLIANCE FOR TELECOMMUNICATIONS INDUSTRY SOLUTIONS' ORDERING AND BILLING FORUM

The Alliance for Telecommunications Industry Solutions ("ATIS"), on behalf of the Ordering and Billing Forum ("OBF"), hereby files these Comments with the Public Utility Commission of Texas ("Commission") concerning the Public Notice of Workshop and Request for Comments on the Activities of the Ordering and Billing Forum.[1] While companies may file comments individually, ATIS, as the sponsoring organization of the OBF, files these comments to provide answers to questions 3, 4 and 5 of the Commission's inquiry. These answers were developed with input from the OBF.

3. What standards has the OBF adopted related to local competition?

The OBF has six standing committees. These include the Billing Committee, the Local Service Ordering and Provisioning (LSOP) Committee, the Interconnection Service Ordering and Provisioning (ISOP) Committee, Message Processing Committee, SMS/800 Number Administration Committee (SNAC), and the Subscription Committee. The OBF also sponsors the Wireless Workshop and the DSL Workshop. In addition to working individual issues, each committee and workshop develops guidelines/documentation that

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[1] For a more thorough description of ATIS and the OBF, please see ATIS' previous filings before the Commission in Project No. 26131: PUC Rulemaking Proceeding to Address Notification Issues Arising from Changes in Preferred Telecommunications Utilities; and Project 24389: Establishment of CLEC-to-CLEC and CLEC-to-ILEC Migration Guidelines.

outline specific business processes. Many of the OBF Guidelines address aspects of local competition. The relevant documents are summarized below in general terms. In addition, several of the summaries are followed by more specific information regarding local competition aspects, as provided by the Committee responsible for the document.

(1)   **Access Service Ordering Guidelines (ASOG):** The ASOG describes the various ordering forms used for the purpose of requesting access service to be provided by Providers. These guidelines are equally applicable to manual (paper) and mechanized (electronic) forms of access ordering by Customers when placing an order for access service under the various Providers' Access Service Tariffs.

(2)   **ASR Mechanized Interface Specifications (MIS) Document:** The ASR MIS document describes the rules, which govern the mechanized transmission of data between entities ordering and providing access services. This document supports the ASOG, which describes the industry agreed-upon guidelines for the ordering of access services. The ASR Mechanized Interface Specifications contain file structures, rules for mechanized transmission and acceptance, and confirmation of data as necessitated by the ASOG. It also provides error conditions for systems which support the provisioning of Access Service.

(3)   **CABS Auxiliary Report Specifications (CARS) Document:** The CARS document represents the requirement to create a document of CABS Auxilliary Report Specifications (CARS) not associated with the CABS Billing Output Specifications (BOS). The CARS are guidelines for providing standard reports and/or standard mechanized file layouts, when appropriate. These standards will not be documented in the CABS BOS. The CARS document is not to be used for the development of industry standard report outputs for data, which can be derived from the bill or CSR.

A partial list of OBF Issues included in the CARS Document that address local competition intercarrier billing and bill validation is listed below:

- Issue 1548 - Billing Verification Process in an Unbundled Environment

(4)   **CABS PICC Dispute File Specifications (PDFS):** The CABS PDFS are guidelines for providing standard mechanized file layouts for line level or circuit level PICC Disputes. Implementation of PDFS outputs, such as timing and media (CD-ROM, Diskette, e-mail, etc.) used to provide this information is to be negotiated between the individual customers and providers.

(5)   **Customer Account Record Exchange/Industry Support Interface (CARE/ISI) Document:** The CARE/ISI document describes industry recommendations for a standardized exchange of customer account information

between and/or among telecommunications service providers. The document identifies data elements related to Equal Access Subscription, which can be shared and provides a consistent definition and data format for the exchange of common data elements.

Specific Information regarding local competition:
The Subscription Committee has adopted and implemented Industry Standard information exchange processes via the process outlined in the CARE/ISI Document for the following activities as they relate to local competition:

- Local competition practices for exchanging critical information between the local provider(s) ("LECs") and the PIC'd carrier(s) ("IXCs") pertaining to:

    o Changing the PIC'd carrier in a Resale or UNE environment
    o Notification to the PIC'd carrier when the end user customer changes their Local Provider with or without a change in the PIC'd carrier for Resale and UNE environments
    o Practices for notification to the PIC'd Carrier(s) of activity pertaining to number portability
    o Practices to support a process for the IXC to request BNA information when the end user WTN is in a Resale or UNE environment
    o Practices pertaining to the acknowledgement and notification of Slamming allegations where notification is provided to the alleged Authorized and alleged Unauthorized Carriers
    o Practices to support a process for an IXC to request reconciliation/ verification information from the Local Provider in a Resale or UNE environment
    o Practices to include notification to the PIC'd carriers on local service suspension activities when the end user has a Resold or UNE line

(6)　**Design Layout Report (DLR):** The DLR is a report containing technical and administrative information that describes the Access Service provided by the Access Provider. The technical information is needed by the Access Customer to design the overall service and includes such items as cable makeup (gauge, loading, length, etc.), carrier channel bank type and system mileage, facility interfaces, etc. The DLR is sent to the designated Access Customer representative by the Access Provider.

(7)　**Dispute File Specifications Document:** The Dispute File Specifications document represents the requirement to create a document of dispute file specifications for disputes other than PICC. The Dispute File Specifications are guidelines for providing standard paper and mechanized file layouts for facility, usage, resale, UNE and other invoice disputes except for PICC, which follows the PICC Dispute File Specifications.

(8)　**Exchange Message Interface (EMI) Document:** The Exchange Message Interface (EMI) document is a message exchange guideline for the telecommunications industry. It is used as a standard method of interface among

companies providing various services. The EMI is used to support customer billing and various customer and company support functions needed by the industry (e.g., account summary and tracking analysis).

A partial list of OBF Issues included in the EMI Document that address local competition intercarrier billing record exchange is listed below:

- Issue 1667 - Exchange of Billing Information
- Issue 1921 - Unique Identification for EMI for Non-CIC Code Companies
- Issue 1932 - UNE-P Access Headers, Trailers, Detail and Summary Records
- Issue 2216 - For the Carrier Access Usage Record Change the Use of Record Section on the Record Description Page in the EMI Document to be Inclusive of all Services Utilizing the Records (e.g., Interconnection, etc.).

(9) **Local Service Ordering Guidelines (LSOG):** The LSOG describes the ordering guidelines for local service. These guidelines are equally applicable to manual (paper) and mechanized (electronic) forms of local service (Resale, Unbundled and Local Number Portability Services) ordering. These orders should be placed under the various provider's tariffs, contracts, and/or agreements.

A partial list of OBF Issues included in the LSOG (for current and future releases) that address multi-provider migration issues is listed below:
- Issue 2360 – Add New Account Telephone Number Field to 121 Practice (targeted for release in LSOG 7)
- Issue 2190 – Refine Migration Process Flows to Reflect the Ability to Migrate Listings with a Directory Order (targeted for a future release)
- Issue 2372 – Clarify the Industry Intent for all Activity Fields (targeted for a future release)
- Issue 2402 – LSOG: Ability to migrate TN(s) to an Existing Account and (ATN/AN) and Establish a New Account Number for the Merged Account (targeted for a future release)
- Issue 1176 – Local Exchange Competition Order Process Flow (LSOG 3)
- Issue 1268 – FOC Transition Information (LSOG 3)
- Issue 1525 – Transition Information (LSOG 4)
- Issue 1526 – Loss Alert (LSOG 4)
- Issue 1527 – Pre Order Service Configuration (LSOG 4)
- Issue 1792 – ATN Replacement for Partial Migration (LSOG 6)
- Issue 2189 – Refine Migration Process Flows in a Number Portability in a Multi-NSP Environment (LSOG 6)
- Issue 2296 – LSOG: CLEC-to-CLEC UNE Loop Conversions (LSOG 7)

(10)   **Multiple Exchange Carrier Access Billing (MECAB) Document:** The MECAB document contains the recommended guidelines for the billing of access services provided to a customer by two or more providers or by one provider in two or more states within a single LATA. These guidelines apply to Usage-Sensitive Access (which may include subscribed toll), Flat-Rated Access and may include intraLATA non-subscribed toll and local services.

A partial list of OBF Issues included in the MECAB Document that address local competition intercarrier billing, record exchange, notification and bill validation is listed below:

- Issue 1548 - Billing Verification Process in an Unbundled Environment
- Issue 1667 - Exchange of Billing Information
- Issue 1690 - Notification of Interconnecting Billing Information to the ULEC
- Issue 2056 - For Facility-Based LECs/CLECs & CMRS, Enhance the Meetpoint/Meetpoint-like Record Exchange to be Consistent with Unbundled Processes
- Issue 2138 - Redefine and Evaluate the Need for Existing MECAB Data Elements
- Issue 2162 - Eliminate Pass Through Meet-Point Billing Options in MECAB

(11)   **Multiple Exchange Carrier Ordering and Design (MECOD) Document:** The MECOD describes the ordering and design guidelines for establishing an access service that transverses multiple Exchange Carriers within a LATA. The MECOD describes the coordination functions and responsibilities of the Access Provider (AP) performing the Access Service Coordination.

(12)   **Small Exchange Carrier Access Billing (SECAB) Guidelines Document:** The SECAB Guidelines document has been created to support those providers, or their vendors, who currently do not conform to the CABS Billing Output Specifications (BOS). This document is intended to provide guidelines for producing complete and verifiable access bills for the customers. These guidelines do not increase the complexity of providing an access bill to the level that the provider can no longer produce its own bill. SECAB is neither a replacement for, nor substitution of, the CABS BOS, and cannot establish new requirements for CABS BOS or change existing ones.

SECAB identifies the information which small providers should provide in order to meet customer criteria for complete and verifiable access bills. These guidelines also include customer preference and conditional data elements. These guidelines address billing requirements for Interstate, Intrastate, and Local.

A partial list of OBF Issues included in the SECAB Document that address local competition intercarrier billing and bill validation is listed below:

- Issue 1548 - Billing Verification Process in an Unbundled Environment
- Issue 2056 – For Facility-Based LECs/CLECs & CMRS, Enhance the Meetpoint/Meetpoint-like Record Exchange to be Consistent with Unbundled Processes
- Issue 2138 – Redefine and Evaluate the Need for Existing MECAB Data Elements
- Issue 2162 – Eliminate Pass Through Meet-Point Billing Options in MECAB

(13) **Telecommunications Service Priority (TSP) Guidelines:** The TSP document provides guidelines for administrative procedures for the priority provisioning and restoration of Interconnection and Local Service(s), provided to Telecommunications Service Customers by Telecommunications Service Providers relative to the National Security Emergency Preparedness (NSEP) Telecommunications Service Priority (TSP) System. The TSP System for NSEP has been developed to provide priority treatment to our nation's most important telecommunications services. Under the provisions of the TSP System, telecommunication service vendors are both authorized and required, when necessary, to provision and restore those telecommunication services with TSP assignments before services without such assignments.

Only services that qualify as NSEP are eligible for TSP assignments. The FCC defines NSEP services as those telecommunication services which are used to maintain a state of readiness or to respond to and manage any event or crisis (local, national, or international), which causes or could cause injury or harm to the population, damage to or loss of property, or degrades or threatens the NSEP posture of the United States. This document refers to such services as "TSP services."

(14) **Vertical Services Ordering Guidelines (VSOG):** The VSOG describes the ordering process used for the purpose of requesting vertical service. Vertical Services are optional services, as defined in the provider's state tariff, that may be added to an end user's basic dial tone service. The VSOG Issue 1 provides the industry-developed guidelines for two ordering forms used for the vertical services process, and sample forms. Each form is supported by a practice containing the guidelines for use of the form and definitions for field entries.

4. a. What OBF standards has the commission already adopted?

The following is not an exhaustive list of OBF Guidelines and standards that have been incorporated into state regulation. Rather, it is meant to serve as an example, prepared by the OBF's Subscription Committee during their meeting the week of August 19, 2002.

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The Subscription Committee has adopted and implemented industry standard information exchange processes via the process outlined in the CARE/ISI Document ("CARE Process") for the Equal Access (Interlata and Intralata PIC processes) and Local Competition as outlined below. These guidelines were identified and adopted into the CARE Process based on the needs of the telecommunications industry participants and are directly related to Federal (FCC) and State Regulatory activities.

- Guideline practices for exchanging critical information between the Local Provider(s) (LECs) and the PIC'd Carrier(s) (IXCs) pertaining to:
  - CPNI (Customer Proprietary Network Information) data exchange
  - Equal Access (PIC) activities for Interlata and Intralata competition and the exchange of critical end user account maintenance information
  - Local Competition guidelines for equal access activities and the exchange of critical end user account maintenance information when the end user's Local Provider is a Resale or UNE CLEC
  - Number Portability information exchange guidelines
  - Slamming allegation information notification guidelines
  - Sale of Exchange guidelines
  - Merger and Acquisition guidelines
  - BNA (Billing Name and Address) information request guidelines
  - PIC Freeze identification guidelines for Toll lines
  - De-PIC process guidelines
  - PICC (Primary Interexchange Carrier Charge) data exchange guidelines
  - Reconciliation/Verification guidelines
  - Number Pooling as it relates to provisioning PIC orders for end users

Additionally, the Subscription Committee has adopted and implemented practices to address specific State PUC/PSC rulings/regulations where, at the time, a national business need did not exist. These State specific practices were adopted and implemented into the CARE process according to the State specific rule with capabilities to expand the guideline to a national focus should the need arise. Examples of some of these activities are as follows:

- California Identification of Toll Resellers by Utility number
- Ohio & Texas De-PIC Process
- Several State rulings pertaining to Toll Block & Local Service Suspensions data exchange

4. b. What OBF standards is the commission currently addressing in another proceeding?

The Texas Public Utilities Commission has opened at least two proceedings, in which OBF guidelines and standards are relevant. ATIS, on behalf of the OBF, has filed Comments with the Commission in these two proceedings:

Project No. 24389 – Establishment of CLEC-to-CLEC and CLEC-to-ILEC Migration Guidelines

Project No. 26131 – PUC Rulemaking Proceeding to Address Notification Issues Arising from Changes in Preferred Telecommunications Utilities

5. Are there any issues or problems before the OBF that the commission should also address? If so, please provide a detailed description of the issue and how the commission should address the issue.

The OBF exists to solve industry problems on a national level outside of the regulatory arena. The industry has found the OBF to be an extremely successful venue for resolving issues related to the ordering, billing and provisioning of telecommunications services. In fact, the OBF was created in 1985 at the suggestion of the Federal Communications Commission due to a need for these issues to be addressed at a national level.

ATIS and the OBF stand ready to provide assistance, information and expertise to both state and federal regulatory bodies. It is beneficial and more cost effective for

companies when there is a single set of guidelines, or a standard, on a particular issue. This, in turn, benefits consumers as well.

ATIS appreciates the opportunity to provide these Comments.

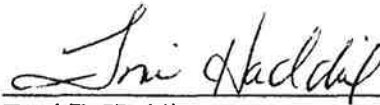Respectfully submitted,

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