

ISSUE 1: APPLICATION VERSIONING

“Versioning” is a way to program a computer so that, when a change is made and a new “version” of software is implemented, the computer can still understand (and process) a request submitted in a previous version or versions. HEPO, at 19. The HEPO orders Ameritech Illinois to implement versioning for its pre-ordering and ordering interfaces in March of 2001, at the same time it implements version 4 of the Local Service Ordering Guide. *Id.* at 22.^{4/} From that time forward, Ameritech Illinois’ pre-order and order interfaces will understand CLEC inputs in the modified format (LSOG 4), and in the previous version. *Id.* at 19. This will give CLECs additional time, above and beyond the 120 days provided in the change management process, to implement LSOG 4 (and any future Amcritech Illinois changes) on their end of the interfacce. *Id.*

Staff (at 2) “commends the Hearing Examiner for the well-reasoned analysis contained in the HEPO and strongly supports the conclusions contained therein as pro-competitive, good public policy and consistent with the record developed in this case.” The Joint Small CLECs (at 7), however, criticize the HEPO’s findings as “unjustified.” They ask the Commission to order that versioning be implemented “by the end of the year” (Jt. Small CLEC Exc. at 7) or alternatively “at the soonest date practicable after the date of issuance of the order” (*id.* at 8).

^{4/} Ameritech Illinois did not implement version 3 of the Local Services Ordering Guide; thus, in March 2001, it will be converting from LSOG 2 to LSOG 4. The Joint Small CLECs criticize Ameritech Illinois for its “dilatatory efforts to comply with Commission mandates.” Jt. Small CLEC Exc. at 8. This CLECs’ criticism is inaccurate (because there was never a “Commission mandate” that Ameritech Illinois implement LSOG 3), irrelevant (because the issue here is how to implement future OSS changes, not whether Ameritech Illinois should have implemented other changes in the past) and misleading. The principal changes in LSOG 3 were the addition of certain products, such as Centrex, that Ameritech Illinois already offered under LSOG 2, and CLECs did not request that Ameritech Illinois implement LSOG 3 (understandably, as it would have required them to change their own systems to conform to that change). Am. Ill. Ex. 27, issue 1.

The CLECs do not even attempt to show any need for versioning before March, or any competitive benefit from early implementation. Nor could they. Versioning is intended to give CLECs more time to implement a system change, by letting them stay on the "old" version when a change takes place. There are no system changes scheduled between now and the March implementation of LSOG 4. (The last system change before March was implemented on December 2.^{5/} Am. Ill. Ex. 27, issue 1.) Thus, it would benefit no one to have versioning in place during that period. Tr. 424. The only thing the CLEC proposal would accomplish would be to divert Ameritech Illinois resources from efforts that do have a real competitive payoff, namely, the March 2001 OSS improvements (which will come complete with versioning).^{6/} The HEPO correctly concluded, based on "the record, including the position of our Staff, that the March 2001 implementation date is appropriate." HEPO, at 22.

^{5/} An OSS change that does not affect CLEC requirements is scheduled for December 16. Clearly, however, versioning could not be in place before then, nor would it be helpful as the change does not affect CLEC input or output.

^{6/} Indeed, at the hearing Ameritech Illinois witness Ms. Baker testified that Ameritech Illinois would not be able to implement the March 2001 releases on time if it were forced to implement versioning before March 2001. Tr. 414. The Joint Small CLECs (at 7) criticize Ms. Baker's testimony as an "unsubstantiated threat" and "nothing but a strawman." The record belies their reading, as Ms. Baker (who is a member of the team responsible for the March 2001 releases) testified at length as to Ameritech Illinois's plans for implementing those releases, and the reasons why the CLEC proposal to accelerate versioning would jeopardize those plans. Tr. 407-14. It is for the Hearing Examiner, not the CLECs, to weigh the credibility of that testimony.