

1 (Whereupon, said hearing was had
2 on the public record; to wit:)
3 (Whereupon, there was a change
4 of reporters.)

5 MR. KERN: Let me kind of go through what I
6 think the procedure is going to be for the rest
7 of the day and for tomorrow. We're going to go
8 to today until around 5:00 or 5:15 or a
9 convenient place, Tim, for you to quit. 5:00 or
10 5:15 is a good place for you to quit. We're
11 going to meet tomorrow at the Allegro Hotel. The
12 room is the Chicago Symphony. We will be
13 starting at 8:30.

14 MS. WEBER: Will we start off with AT&T again
15 if they have not finished by 5:15?

16 MR. KERN: To answer your question, yes, if
17 AT&T does not finish tonight, they will start
18 first thing in the morning.

19 MS. WEBER: What is the order tomorrow.

20 MR. KERN: AT&T, staff, McLeod -- not McLeod.
21 WorldCom, you're supposed to be first. I'll put
22 you third. TDS, McLeod, Forte did send an E mail

1 asking for about an hour to an hour and a half of
2 time. And then to the extent we have remaining
3 time, it will be open to other parties who have
4 questions or for additional time if a party did
5 not complete their questions in their allotted
6 time. It will be a full day tomorrow.

7 JUDGE MORAN: Because AT&T is asking so many
8 questions, maybe that will shorten the time for
9 other parties.

10 MR. KERN: One more thing. Because E&Y is not
11 available on Thursday, we may have to go a little
12 bit later tomorrow night to the extent people
13 want all their questions answered orally. So
14 those who are traveling, please make the
15 necessary arrangements.

16 Tim, I think you left off on question
17 42.

18 Brian, just to emphasize, don't tail off
19 at the end with your answers, please.

20

21

22

1 FURTHER CROSS-EXAMINATION

2 BY

3 MR. CONNELLY:

4 Q. Beginning with AT&T 42, please.

5 MR. BRIAN HORST: The DSS reporting code was
6 impacted by this issue.

7 In terms of the ERs, we've provided all
8 those in that list with a cross reference to the
9 specific items in the report.

10 Is that sufficient, or do you want to...

11 Q. If you could articulate it for me?

12 MR. BRIAN HORST: I don't have the ER number
13 for this particular issue. We'll track that
14 down, get it to you first thing in the morning.

15 Q. Thank you.

16 MR. BRIAN HORST: The system of record was
17 LASR.

18 Q. That term is one that's not used by Ernst
19 and Young?

20 MR. BRIAN HORST: Right.

21 Q. What we mean by system of record is that
22 system which provides the information necessary

1 to be reported by the measurement reporting
2 system.

3 MR. BRIAN HORST: Understood.

4 Q. That is LASR?

5 MR. BRIAN HORST: Yes.

6 Q. 43, please?

7 MR. BRIAN HORST: The issue was related to the
8 logic in the DSS reporting system. The
9 corrective action was also taken in the DSS
10 reporting system.

11 We'll get you the ER tomorrow morning.
12 The system of records was LASR.

13 Q. The DSS reporting system is -- on the
14 diagrams is within that shape called DSS?

15 MR. BRIAN HORST: Correct.

16 Q. It's not a separate -- there's no other
17 separate DSS reporting system that's not on the
18 diagram?

19 MR. KEVIN GRAY: It's all the same.

20 Q. That's what thought.

21 AT&T 44, please?

22 MR. BRIAN HORST: The company implemented new

1 reporting logic in DSS. Originally, this issue
2 which related to reporting issues in the MRDS.
3 However, DSS took over reporting responsibilities
4 and updated the reporting logic for these PMs.

5 Corrective action for PMs 5, 6, 7, 7.1,
6 8, 9, 10, 10.1, 10.2, 10.3, 10.4, 11, 11.1, 11.2,
7 95, and MI 2 was implemented with October 2002
8 results reported in November 2002.

9 Corrective action for PM 91, 93, and MI
10 9 was implemented November 2002 results reported
11 in December 2002.

12 ER 1406 addressed this issue.

13 Q. Did the MRDS system get retired, replaced
14 to your knowledge?

15 MR. AARON TERRY: There's a conversion
16 schedule. I think that -- I'd have to reference
17 that schedule to make sure if there's any PMs in
18 store for you. It is being scheduled. It is
19 being phased out.

20 Q. Its function is being subsumed by the DSS
21 system?

22 MR. AARON TERRY: That's correct.

1 Q. Is it the ICS/DSS system?

2 MR. AARON TERRY: That's correct.

3 Q. 45?

4 MR. BRIAN HORST: The question relates to why
5 no restatements were planned for March, April, or
6 May of 2000 results. We would ask that you refer
7 that question related to the restatement
8 decisions to the company.

9 Q. Sure, thanks.

10 46, please?

11 MR. BRIAN HORST: The three extensions were
12 processed through the MOR system. There were two
13 D disconnect orders and one C change order. All
14 three were wholesale UNE loop transactions.

15 The description of the issue and the MOR
16 order numbers were provided to SBC Ameritech to
17 research the issue. ER 950 relates to this
18 issue.

19 Q. AT&T 47, please?

20 MR. BRIAN HORST: The two exceptions were
21 processed through the MOR system. There was one
22 R record change order and one C change order.

1 Both were wholesale orders. One was a resale
2 order and the other a UNE combo order.

3 The company issued an enhancement
4 request related to a process to join processing
5 tables to correct the issue, and we will provide
6 you that ER number.

7 Q. AT&T 48, please?

8 MR. BRIAN HORST: All five transactions were
9 wholesale LNP transactions processed through the
10 MOR system. The LSR exceptions are LNP product
11 from wholesale customers source from MOR and
12 reported by MRDS for the reported period. These
13 have since been converted to DSS.

14 The ER that affected this change is 987.

15 Q. AT&T 49, please?

16 MR. BRIAN HORST: All 17 transactions were
17 wholesale LNP orders processed through the MOR
18 system.

19 Q. Were they to establish number portability
20 in that database?

21 MR. AARON TERRY: I'd have to check.

22 MR. BRIAN HORST: Let us look into that.

1 Q. I'm wondering if it's to establish change
2 or remove the LNP status.

3 AT&T 50, please?

4 MR. BRIAN HORST: All 58 exceptions related to
5 wholesale transactions. Of the 58 wholesale
6 orders in question, 52 were D orders, disconnect,
7 11 were resale orders, 41 were UNE-P orders.

8 That's a breakdown of the 52 that were D orders.

9 Three were R orders, which are record
10 orders. Of those R orders, three were resale,
11 zero were UNE-P, and there were also three C
12 orders which are change orders. Three were
13 resale orders. Zero were UNE-P orders.

14 The service order information was
15 obtained from the SOSALES report which is a file
16 within the ASON system. The SOSALES report does
17 not identify if the transactions were processed
18 through MOR or LASR.

19 Q. 51, please?

20 MR. BRIAN HORST: The two resale orders were C
21 orders, change orders. The resale comparison for
22 both the resale and UNE-P submeasures includes

1 all retail service orders that go into 3 E status
2 within ASON. The SOSALES report does not
3 identify the product line.

4 Q. What was the OSS, reporting system, Brian,
5 did you say?

6 MR. BRIAN HORST: The SOSALES report does not
7 identify if the transactions were processed
8 through MOR or LASR, so we don't have that
9 information.

10 Q. So to correct the incorrect exclusion,
11 what had to transpire?

12 MR. JAMES DAVILA: My name is James Davila.

13 For this issue it was just the one date
14 that was in question, and that is why the
15 decision on the restatement has not been made.
16 For that one date, the transactions on that date
17 only represented less than one and a half percent
18 for the total month.

19 Q. So it's a data anomaly; is that how you
20 would characterize it?

21 MR. KEVIN GRAY: Was there a code change?

22 MR. JAMES DAVILA: The change that was put in

1 place was a control to ensure that now all the
2 cycle dates are captured.

3 Q. Are you on 51?

4 MR. JAMES DAVILA: Yes.

5 Q. Okay. I see. I'm sorry.

6 AT&T 52, please?

7 MR. BRIAN HORST: The field cycle date is the
8 date on which the order was updated from an error
9 condition status to a non-error condition status.
10 It also determines the month in which to report
11 the results.

12 MR. DANIEL DOLAN: E-r-r-o-r.

13 JUDGE MORAN: Here I thought this was a term I
14 understand.

15 MR. CONNELLY: Q AT&T 54, please?

16 MR. DANIEL DOLAN: 53, Tim, or 54?

17 MR. CONNELLY: When James answered, I thought
18 he answered 53 when he gave me the answer for 52.

19 MR. BRIAN HORST: 54. The enhancement request
20 is 1219. The following corrective action was
21 taken: MOR creates a file of the LSOG4/LSOG5
22 crossover line losses. This file has all the

1 information needed to publish the missing line
2 losses that were occurring since the
3 implementation of the plan of record in April
4 2002.

5 Q. So if one CLEC is operating on LSOG4
6 interface, is it required that that CLEC is the
7 one issuing the order to migrate the customer?

8 MR. AARON TERRY: Say that again.

9 Q. This problem arises because there's one of
10 the CLECs that's on LSOG4 and the other one is on
11 LSOG5; is that correct?

12 MR. AARON TERRY: Correct.

13 Q. Is it occasioned when the CLEC ordering
14 the migration or ordering the change of service
15 is on LSOG4 and the company that's losing the
16 customer is on LSOG5?

17 MR. AARON TERRY: It was my understanding
18 there were both scenarios. It would be if the
19 winning CLEC or the company that the CLEC that
20 was initiating ordered was on LSOG4, the losing
21 CLEC would have been on LSOG5; and also the
22 reciprocal where the winning CLEC was on LSOG5,

1 the losing CLEC was on LSOG4.

2 Q. So this table is two-directional?

3 MR. AARON TERRY: The report of results for
4 LSOG5, all of those results, there is a file
5 created for that. And there's a crossover file
6 for all the of ones -- the reporting for this is
7 through the SS.

8 Q. I said table, but I meant to say crossover
9 file, bridges in both directions LSOG4 to LSOG5
10 and LSOG5 to LSOG4?

11 MR. AARON TERRY: That's my understanding.

12 Q. That's ER 1219, Brian?

13 MR. BRIAN HORST: Yes.

14 Q. And AT&T 55, please?

15 MR. BRIAN HORST: Two separate issues. The
16 issue surrounding final electronic processing
17 time was not related to cases where the winning
18 CLEC originates the order through one ordering
19 system and the company sends the loss notifying
20 to the CLEC through a different ordering system.

21 The issue relates to the final
22 electronic time related to LSOG4 transactions

1 that were sent from MOR. These transactions
2 record an order message sent time when they left
3 the MOR database.

4 Once they leave the MOR database, these
5 transactions are then submitted to the EDI VAN
6 GEIS gateway. This gateway constantly sends
7 transactions out of the Ameritech network to the
8 CLECs. This is the final processing time that a
9 line loss notification leaves the Ameritech
10 network. This time was not being sent to MRDS
11 for final reporting.

12 Is this also 1219? We'll get back to
13 you with the ER number.

14 Q. So our suggestion that the two events or
15 these two error conditions are related is an
16 incorrect assumption?

17 A. That's correct.

18 Q. Two distinct activities?

19 A. Yes.

20 Q. And two separate corrections.

21 AT&T 56, please?

22 MR. BRIAN HORST: Can we get a clarification

1 of what you're looking for on 56, 57, and 58?

2 Q. Sure. What I'm trying to understand is
3 what the retail data is that's in the number of
4 transactions that you're testing here. The
5 provisioning profile indicates that there are 260
6 retail business and 260 retail residential and an
7 additional 20 retail business specials that were
8 added to the sample, and I'm wondering which of
9 those are in -- the which of the 1,081 records in
10 this sample are retail?

11 MR. BRIAN HORST: We will go back and pull
12 them for you. It won't be by tomorrow morning,
13 though, but we will get you that as soon as
14 possible.

15 Q. Okay. Let me ask a couple other questions
16 then.

17 It's my understanding of these PMs that
18 there shouldn't be any retail in them, so I'm
19 hoping that your answer is zero. When your
20 answer is zero, I don't understand how you get
21 1,081 transactions. When I look at the wholesale
22 pool, I only get 841 possible. So I'm trying to

1 square away on what is in the data that you're
2 testing for the measures that are listed in 56,
3 57, and 58?

4 MR. BRIAN HORST: I think I know. Let me talk
5 real quick and see if I can understand the
6 answer.

7 Tim, let us take a look at that and get
8 back to you.

9 Q. I'd like to be able to at least discuss
10 the wholesale data that's in this test tomorrow
11 because this is one where I spent a lot of time
12 trying to figure this out, and I'm hoping it's
13 something obvious because --

14 MR. BRIAN HORST: Okay.

15 Q. -- it's so perplexing to me. I'm hoping
16 that there's one answer for all of those PMs,
17 too.

18 MR. BRIAN HORST: I think there probably will
19 be.

20 Q. So that will be 56, 57, and 58.

21 If we could move to 59, please?

22 MR. BRIAN HORST: Appendix B to our

1 supplemental report includes the exceptions noted
2 at left, which is in your question, and
3 additional exceptions related to UNE, not resale,
4 unknown product issue.

5 The UNE unknown product issue was
6 corrected and restated on October 7th, 2002.

7 Ameritech updated the code used by RRS
8 in order to properly identify the products. The
9 CLECs could have LEX, EDI, TELIS, or fax to place
10 the order. The ERs for this correction are 928
11 and 1241.

12 Q. Great. 60, please?

13 MR. BRIAN HORST: The answer to 60 is no,
14 there were no discrepancies noted for missed
15 appointment codes for any cases other than
16 projects.

17 Q. 61?

18 MR. BRIAN HORST: The company added some
19 programming logic to identify project field
20 identifiers that identified a project.

21 Q. That was the May change?

22 MR. BRIAN HORST: Yes. For 74 and 75, my

1 understanding of this -- I need to go back and
2 check it for sure, but my understanding is in
3 March and April, they were excluding certain
4 projects if they had a missed appointment code
5 that identified it as a project.

6 In May they went in and said, let's
7 exclude all projects. And I think the point of
8 our finding is there's no business rule that
9 allows you to exclude projects.

10 Q. For either reason?

11 MR. BRIAN HORST: For either reason.

12 Q. So that May implementation was
13 inconsistent with the business rules also?

14 MR. BRIAN HORST: Yes.

15 Q. 62, please?

16 MR. BRIAN HORST: In 62 let us go back and
17 take a look at the numbers, and we'll get you a
18 revised schedule tomorrow. That may just be a
19 typo.

20 Q. Okay. Tomorrow is fine.

21 63, please?

22 MR. BRIAN HORST: In order to correct the

1 error, the company has changed the programming
2 code in the SAS system to include transactions
3 with a missed appointment code associated with
4 the project. ER 1284 was issued for this change.

5 I'm sorry. That response is not
6 correct. This is the one -- let us get back to
7 you with a revised response, but this should be
8 addressing the fact that they're no longer
9 excluding projects.

10 Q. So we'll scratch that answer?

11 MR. BRIAN HORST: Scratch that answer.

12 Q. 64, please?

13 MR. BRIAN HORST: None of the orders selected
14 for testing were included in the PM results for
15 PM 31. In addition, none of the orders met the
16 criteria to be included in PM 31.

17 E&Y judgmentally selected one
18 transaction included in PM 31 for testing and
19 determined it was properly included. The samples
20 were selected from MOR and LASER for wholesale
21 and ASON for retail.

22 Q. So the exclusions, the 1,080 exclusions,

1 are either of those two conditions cited in PM
2 31's business rules?

3 MR. KEVIN GRAY: Let us go back and look at
4 that. We will try to again get that answer back
5 to you tomorrow morning.

6 Q. Properly included means -- why don't you
7 tell me what properly included means so I can get
8 my thinking straight on this one?

9 MR. KEVIN GRAY: Properly included means that
10 the transaction was according to the business
11 rules properly included in the results.

12 Q. It doesn't ensure that it's represented in
13 the numerator or the denominator?

14 MR. KEVIN GRAY: Yes.

15 Q. It does?

16 MR. KEVIN GRAY: Yes. If it was properly
17 included, it's either properly included in the
18 numerator or the denominator or both.

19 MR. BRIAN HORST: Plus if it's a duration,
20 properly included means that it was properly
21 included and the duration was not done correctly.

22 Q. We'll come back on that part of 64

1 tomorrow.

2 Where did the sample come from for 31?

3 MR. BRIAN HORST: I'm sorry?

4 Q. The last part of our question 64, which of
5 the source systems were tapped for --

6 MR. BRIAN HORST: MOR and LASR for wholesale
7 and ASON for retail.

8 Q. LASR, L-A-S-R, MOR, and ASON for retail?

9 MR. KEVIN GRAY: Right.

10 Q. Okay. 65, please?

11 MR. BRIAN HORST: Three of the orders selected
12 for testing were improperly included in the PM
13 results for PM 99. These were CLEC caused
14 misses. PM 99 only measures Ameritech caused
15 misses. Samples were selected from MOR and LASR
16 for wholesale and ASON for retail.

17 Q. You said three were not excluded and they
18 should have been?

19 MR. BRIAN HORST: That's correct.

20 Q. There would still cause us to end up with
21 zero included?

22 MR. BRIAN HORST: That's because they're

1 listed as exceptions, an exception.

2 MR. KEVIN GRAY: It means they were included
3 improperly in the results.

4 MR. BRIAN HORST: Therefore, it's an
5 exception.

6 Q. So --

7 MR. KEVIN GRAY: So when we have zero there,
8 zero were properly included from our sample and
9 we got three exceptions in the exception column.

10 Q. So for all the LASR and MOR orders that
11 were sampled, there were none that had --

12 MR. KEVIN GRAY: That were properly included.

13 Q. Right. And none that were company misses,
14 company missed due dates?

15 MR. KEVIN GRAY: Right.

16 MR. BRIAN HORST: For stand-alone LNP orders.

17 Q. 66, please?

18 MR. BRIAN HORST: The data used to test this
19 measure was obtained from WFA C. The data was
20 obtained by sending the sample selection of 600
21 trouble reports, which was 300 ILEC and 300 CLEC,
22 to our client contact who returned the sample

1 with the requested data fields.

2 The key fields used for this testing
3 were the report number, received date, and
4 cleared date. The report number identifies the
5 specific trouble report that was received by
6 Ameritech. The received date is the date that
7 the trouble report was received by Ameritech
8 which starts the clock for this measure. The
9 cleared date is the date trouble has been
10 resolved and a report has been cleared which
11 stops the clock for this measure.

12 We selected an additional judgmental
13 sample of 80 trouble reports, 40 wholesale, 40
14 retail, for PM 76 to ensure that we obtained
15 appropriate coverage.

16 Q. The transactions from WFA, did you ask for
17 a sample of trunk trouble tickets?

18 MR. BRIAN HORST: In the judgmental sampling.

19 MR. KEVIN GRAY: Right, the judgmental sample
20 we did.

21 Q. Were there any in the original request,
22 the 520?

1 MR. KEVIN GRAY: No.

2 Q. That's why you needed the additional -- is
3 that why you asked for the additional 80?

4 MR. BRIAN HORST: Yes.

5 Q. Because you got no trunk trouble tickets
6 in the original sample?

7 MR. KEVIN GRAY: That's right.

8 Q. 67, please?

9 MR. BRIAN HORST: The loop maintenance
10 operating system, LMOS, was the source system
11 used to access the data records for PM MI 14.
12 The LMOS file was obtained directly from the IT
13 department for the evaluation period. E&Y chose
14 a random sample totaling 260 wholesale
15 transactions retail to perform the testing.

16 The data records were trouble tickets
17 that contained fields for ACNA, disposition
18 codes, trouble codes, product type code, received
19 date and restored date and class of service.

20 The business rules were then applied to
21 identify exclusions and inclusions. Submeasures
22 were also identified to determine electronic

1 manual transactions.

2 Q. 68, please?

3 MR. BRIAN HORST: The LMOS was the source
4 system used to access the data records for PM
5 Wisconsin two. The LMOS file was obtained
6 directly from Ameritech's IT department for the
7 evaluation period. E&Y chose a random sample
8 totaling 520 transactions, 260 retail, and 206
9 wholesale transactions to perform the testing.

10 The data records were trouble tickets
11 that contained fields for ACNA, disposition
12 codes, trouble codes, product type code, received
13 date and restored date and class of service,
14 UNE-P indicator, and a dispatch out indicator.

15 The business rules were then applied to
16 identify exclusions and inclusions. Submeasures
17 were also identified to determine electronic
18 manual transactions.

19 Q. 69, please?

20 MR. BRIAN HORST: E&Y obtained the monthly TSS
21 reports sent to Ameritech from a third party,
22 which was Intrado, for all 911 update requests

1 processed between March 1st through May 31st and
2 agreed the applicable information thereon to the
3 data reported on the CLEC web site for PM 102,
4 specifically the average time to clear AIT retail
5 customer errors.

6 Additionally, Ernst and Young utilized
7 the data contained in the TSS report to recompute
8 the results reported on the CLEC web site,
9 specifically the total errors, the average time
10 to clear CLEC errors, and the sum of the total
11 elapsed time to clear errors for the month.

12 In order to increase our assurance that
13 the monthly TSS Intrado report used to report
14 results is accurate, E&Y obtained a detailed log
15 from Intrado that support the summarized
16 information presented in the monthly TSS report.

17 E&Y was able to use this detail to
18 ensure completeness file of the TSS report by
19 agreeing the total number of errors as well as
20 recompute the mean days to clear all errors for
21 the period March through May 2002.

22 There are no exclusions for PM 102. E&Y

1 tested that all transactions from the TSS reports
2 were included in the reported results.

3 Q. The TSS report is a report from --
4 produced by what entity?

5 MR. KEVIN GRAY: Intrado. It's a third party.

6 Q. Does it contain the update errors or the
7 rejects?

8 MR. BRIAN HORST: Yes.

9 Q. And entries on there in addition to the --
10 was it the end user telephone number, order
11 number?

12 MR. KEVIN GRAY: Correct.

13 Q. Date that Intrado received the update
14 request date, if it rejected?

15 MR. KEVIN GRAY: Intrado was using the --
16 service orders go through Intrado. So where
17 Intrado -- all that information is always in
18 Intrado reports.

19 Q. Intrado gets the list of orders from SBC,
20 correct?

21 MR. KEVIN GRAY: Uh-huh.

22 Q. And where it has a problem trying to

1 update the 911 database, it prepares this TSS
2 report, prepares a report?

3 MR. KEVIN GRAY: Prepares a report.

4 Q. I'm assuming it's the TSS?

5 MR. KEVIN GRAY: From my understanding, yes.

6 Q. The amount of time it takes to correct the
7 error, to clear the error is time spent by SBC
8 correcting the data; is that correct?

9 MR. KEVIN GRAY: I believe so.

10 MR. BRIAN HORST: The person who did this work
11 is not on our panel today. Let us check with
12 them.

13 Q. Okay.

14 MR. BRIAN HORST: Let me make sure I
15 understand your question.

16 You're asking if the error time is the
17 time it takes SBC to correct a person's Intrade?

18 Q. Yes. What I'm curious about here is where
19 you get the start of the next cycle for the
20 correction. Because there's one cycle that is
21 reflected in the report from Intrade that says
22 the order was presented, the update is rejected,

1 and then the clock begins to turn on the update
2 cycle. And so that's the cycle I want to get a
3 fix on.

4 AT&T 70, please?

5 MR. BRIAN HORST: E&Y obtained the monthly TSS
6 reports sent to Ameritech from Intrado for all
7 911 update requests processed between March 1st
8 through May 31st and agreed the applicable
9 information thereon to the data reported on the
10 CLEC web site for PM 102.

11 Additionally, E&Y utilized the data
12 contained in the TSS report to recompute the
13 results reported on the CLEC web site,
14 specifically the total errors, the average time
15 to clear CLEC errors, and the sum of the total
16 elapsed time to clear errors for the month.

17 Tim, my understanding is that that
18 information is all coming off those reports. We
19 will verify that.

20 In order to increase our assurance that
21 the -- basically this statement is the same as
22 the one on the previous...

1 Q. I think you just recycled the response to
2 69.

3 MR. BRIAN HORST: Yes. I'm sorry. I was
4 still on 69, sorry.

5 Q. Turn to 70. That's all right.

6 MR. BRIAN HORST: 70. For the period March
7 through May 2002 there were no requests for
8 compare file from CLECs, i.e., no population
9 exists --

10 MR. KERN: Repeat your answer. I need you to
11 speak a little bit slower for the reporter,
12 please.

13 MR. BRIAN HORST: For the period March through
14 May 2002, there were no requests for compare
15 files from CLECs, i.e., no population exists for
16 this measurement.

17 E&Y obtained correspondence between the
18 911 manager and the PM manager stating as such.

19 However -- I think that's it.

20 Q. Sorry for that pause.

21 AT&T 71, please?

22 MR. BRIAN HORST: E&Y obtained the monthly SOI

1 reports, all updates and errors, sent to
2 Ameritech from Intrado for all 911 update
3 requests processed between March 1 through May
4 31st, 2002, and agreed the applicable information
5 thereon to the data reported on the CLEC web site
6 for PM 104, specifically the average time
7 required to update the 911 database for Ameritech
8 retail customers.

9 Additionally E&Y utilized the data
10 contained in the SOI report in order to recompute
11 the results reported on the CLEC web site,
12 specifically the total number of files processed,
13 the average time required to update the 911
14 database, and the total duration of processing
15 time.

16 In order to increase our assurance that
17 the monthly SOI Intrado report used to report
18 results for in measure is accurate, E&Y obtained
19 the detailed log from Intrado that sports the
20 summarized information presented in the monthly
21 SOI report.

22 E&Y was able to use this detail to

1 ensure completeness of the SOI report by agreeing
2 the total number of errors records as well as the
3 total number of valid records for the period
4 March through May 2002.

5 There are no exclusions for PM 104. E&Y
6 tested that all transactions from the SOI reports
7 were included in the reporting.

8 Q. I think you indicated that you used the
9 same data for testing 102 -- PM 102 and for PM
10 104?

11 MR. BRIAN HORST: They're different reports.
12 One of them is called the SOI report, and the
13 other one is the TSS report.

14 Q. Do you know what SOI stands for?

15 MR. BRIAN HORST: Let us check with the person
16 who did this.

17 Q. You've been using a term that I think we
18 need to clarify on the record. You've been using
19 a verb of agree, and I'm wondering if you could
20 provide a definition of that so that it's clear
21 what you mean by the action you're taking?

22 MR. BRIAN HORST: What we're doing is we're

1 doing a comparison of one item to the other; and
2 if the two amounts are the same, we're saying
3 those are in agreement, they agree.

4 Q. When you agree two pieces of data, does
5 that action include the steps necessary to make
6 them the same? If you have a number of orders
7 that are included and you have an expectation of
8 a different number, when you agree those number,
9 do you bring your expectation and the result in
10 line?

11 MR. BRIAN HORST: The proper term for that
12 would be reconcile. In this situation, my
13 understanding is agreement meant you took one and
14 compared it to the other and the results were the
15 same without any additions or subtractions.

16 Q. AT&T 72, please?

17 MR. BRIAN HORST: E&Y obtained the monthly
18 unlock report from Intrade and compared it to the
19 DSS detail file utilized to restate the PM for
20 May 2002.

21 We noted approximately 30,000 unlock
22 record were received from Intrade and all but

1 5,920 were included in the reported results. To
2 test the accuracy of the May 2002 restatement,
3 E&Y selected 130 records from the approximately
4 24,000 records that were included and 130 records
5 from the 5,920 that were excluded.

6 Through further investigation, E&Y
7 discovered that the 130 records that were
8 excluded should have been included in reported
9 results, and thus this item is still reported as
10 an exception in our reported exceptions file.

11 Q. Did you find any cases where there were
12 orders in the MOR or LASR that should have been
13 reflected in the Intrado report but were not?

14 MR. BRIAN HORST: To my knowledge, we don't
15 have any errors of that nature. These are more
16 errors that were on the Intrado reports, and the
17 company goes through some matching logic to match
18 those up with the MOR orders. And some of them,
19 as a result of that matching logic, got excluded.
20 That was the reason, the nature of our error.
21 The company is still working on corrective action
22 in this area to correct those.

1 Q. Thanks. 73?

2 MR. BRIAN HORST: Company personnel were
3 issued updated procedures to stamp all requests
4 that come in with the date and time. There was
5 no ER issued associated with this. This was a
6 process change.

7 Q. Can you identify what attachment that you
8 provided in response to AT&T's request for
9 additional information about process changes
10 where this modification is reflected that would
11 have been in any of confidential A through M
12 attachments?

13 MR. BRIAN HORST: What we were asked by SBC's
14 attorneys, who I guess were in negotiations with
15 you, was to provide any documentation that we
16 looked at for section 4 of our report, and that's
17 what is provided. This particular issue is in
18 section 2.

19 Let me verify something.

20 Tim, I'm talking about the specific
21 section 4 item. You also asked for PMs generated
22 with manual processes, and this one did fall

1 under that category. And this would be
2 attachment I of what we provided to you.

3 Q. I was thinking that this one was Roman 4,
4 No. 7 in your report.

5 MR. BRIAN HORST: No. This one -- let me make
6 sure we're matching up here. In terms of
7 stamping requests that come in with a date and
8 time, that is 245.

9 MR. DANIEL DOLAN: Section 245.

10 MR. BRIAN HORST: Yes, section 245.

11 Q. All right. So in attachment I is where
12 we'll find that procedure?

13 MR. BRIAN HORST: Yes.

14 Q. Thanks. And 74, please?

15 MR. BRIAN HORST: Same answer as 73.

16 Q. 75?

17 MR. BRIAN HORST: This is one that's listed in
18 section 4 of the report, and no ER has been
19 submitted that we're aware of related to this
20 issue.

21 Q. That's 4, Roman 4, No. 7, correct?

22 MR. BRIAN HORST: Correct, yes.

1 Q. AT&T 76, please, Brian?

2 MR. BRIAN HORST: This was a judgmental
3 selection of one week during our testing period.

4 Q. Five consecutive days?

5 MR. KEVIN GRAY: Yes.

6 Q. AT&T 77, please?

7 MR. BRIAN HORST: E&Y obtained the raw data
8 reports generated by the ACD systems. The call
9 data is summarized by the queue that the calls
10 were routed through and by day.

11 Information provided includes the total
12 calls answered, the total calls answered within
13 20 seconds, and the total number of seconds the
14 calls were on hold on the specified days that
15 were routed through the specified queue. These
16 reports were generated by the switch, or the
17 automatic call distributor.

18 Q. Do you know how the queue counts are
19 performed? What causes one of the queues to be
20 incremented by one? What event drives that?

21 MR. BRIAN HORST: This is another person we
22 don't have with us today. We will get back to

1 you in writing, though, in terms of -- the
2 question again was what causes the queues or how
3 are the queues --

4 Q. What causes the queues? What causes a
5 queue to get populated?

6 What I'm trying to understand is
7 disaggregation for this measure deals with
8 resale, UNEs, and -- just a second, I'll pull it
9 out for sure -- resale, UNE, and DSL. And I'm
10 wondering where a call into the LSC that's on the
11 subject of UNE-P would get routed? What queue
12 would it go into, if it would go into a queue at
13 all.

14 78, please -- excuse me. One follow-up
15 question on 77.

16 Did you do any testing of -- by placing
17 calls into the LSC?

18 MR. KEVIN GRAY: No.

19 Q. 78, please?

20 MR. BRIAN HORST: Same answer as 77.

21 Q. Great. 79, please?

22 MR. BRIAN HORST: Ameritech was improperly

1 excluding billing and collection centers from the
2 wholesale calculation for this measure. ERs 885
3 and 885R address this issue, and results were
4 reinstated from October 2001 through May 2002.

5 The vendor center was incorrectly being
6 included in both the numerator and denominator
7 for April data, and the vendor center was
8 incorrectly included in the denominator for May
9 results. The impact of this was less than 5
10 percent on the results and thus was not restated.

11 Q. Did you say the vendor center?

12 MR. BRIAN HORST: Let us get back to you. One
13 of the reasons we haven't passed out all the
14 questions is we haven't had a chance to go
15 through and look at all the responses. So let us
16 go back and look at that particular answer, and
17 we will get back to you on what the vendor center
18 is, which I assume is your follow-up question.

19 Q. It's a term I haven't heard.

20 MR. BRIAN HORST: We will get you a revised
21 answer on 79.

22 Q. In your testing of the these grade of

1 service measures, which is 21, 22, 24.1, and 25,
2 your test report says that you've tested a
3 hundred percent of the transactions.

4 Is that a hundred percent of the ACD
5 reports?

6 MR. BRIAN HORST: Yes.

7 Q. And are those daily reports?

8 MR. KEVIN GRAY: Either daily or weekly.

9 MR. BRIAN HORST: Not sure.

10 Q. Great. I'll understand better if you
11 could tell me what the centers are.

12 MR. BRIAN HORST: Let us get back to you.
13 We'll talk to the person who's done the work.
14 We'll get the understanding, make it clear.

15 Q. I'm not familiar with what part of the
16 wholesale operation involves the billing center.
17 That was part of your earlier answer. I thought
18 that was on the wholesale side. And the retail
19 side looks like it's the consumer center, retail
20 business center, and customer service bureau. So
21 that's -- I just need to understand those pool of
22 work centers that provide the wholesale side and

1 retail side.

2 Is AT&T 81 one that you'd like to come
3 back on?

4 MR. BRIAN HORST: Yeah, 80, 81 as well.

5 Q. AT&T 82?

6 MS. ANDREA AUGUST: E&Y pulled a population of
7 FDT transactions from the local operations center
8 scheduler for the month of September. E&Y
9 performed transaction testing on a random sample
10 of 10 of these FDT transactions to verify that
11 WFA DI was calculating the actual start time by
12 subtracting time worked from end time.

13 E&Y compared the time worked and the end
14 time fields to faxed copies of WFA DI screen
15 prints. E&Y verified that the denominator
16 calculated agreed to the results reported on the
17 CLEC web site reported for September 2002 for
18 each state. No exceptions were noted.

19 Q. When you said no exceptions were noted,
20 it's on -- in section Roman 3 in your report?

21 MR. BRIAN HORST: That was in response to the
22 corrective action question.

1 Q. Okay. All right.

2 So from the original audit finding
3 report which brought that noncompliance to the
4 surface, it's 247, not Roman 3?

5 MR. BRIAN HORST: That's correct.

6 (Whereupon, there was a change
7 of reporters.)

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1 BY MR. CONNOLLY:

2 Q. So I have that.

3 When you -- this was one of the process
4 changes that's reflected in the Attachment K you
5 provided to us; is that right?

6 MS. AUGUST: Yes.

7 Q. AT&T 83 please.

8 MS. AUGUST: E&Y noted that business rules for
9 Performance Measure states that the Company can
10 combine the two small orders and count them as
11 one larger order and have two hours to complete
12 them if they are for the same date, same
13 end-user, from the same CO and from the same
14 CLEC. However, the Company was also combining
15 the orders for the calculation of PMs 114, 115,
16 115.2, which is not allowed under the business
17 rules.

18 Previously the same data was used to
19 calculate 114.1 as for PMs 114, 115 and 115.2.
20 This was stored under a table titled March Data
21 unscore table and April Data underscore table.
22 In order to correct this error, beginning in May

1 2000, an exact replication of the May data table
2 was titled May Data table not 114 1. The records
3 in the May Data table combined as in previous
4 months and used to calculate results of 114.1.

5 E&Y obtained the CHC/FDT database and
6 reviewed the tables discussed above to ensure
7 that orders are not aggregated for PM 114 and
8 115.

9 E&Y reviewed the correction in September
10 of 2000 data during field work at the beginning
11 of November 2002.

12 Q. September and November is what you said?

13 MS. ANDREA AUGUST: September data. I am
14 sorry. September data.

15 Q. In October and November?

16 MS. ANDREA AUGUST: At the beginning of
17 November we reviewed the correction for September
18 2002 data.

19 Q. In November?

20 MS. ANDREA AUGUST: Right.

21 Q. AT&T 84 please.

22 MS. ANDREA AUGUST: E&Y recalculated the PM

1 114 and 115 results using the guidelines set
2 forth by the business rules. Not according --

3 Q. And not according to SBC's preferred mode?

4 MS. ANDREA AUGUST: Right.

5 Q. So the results calculations that are in
6 your supplemental report reflect just your
7 reading of the business rules, correct?

8 MS. ANDREA AUGUST: In the Illinois report?

9 Correct.

10 Q. There's a difference between the business
11 rules -- strike that.

12 Never mind. I understand.

13 AT&T 85 please.

14 MR. KEVIN GRAY: E&Y examined the trouble
15 tickets with CLEC affecting outages from Vantive
16 in order to test the measures. These were
17 requested from and provided by SBC. The
18 information contained in each of these records
19 includes the ticket number, start date and time,
20 end date and time, component/interface name,
21 clock minutes, percent impact, down minutes and
22 description of outage.

1 Q. Did you ask for all the trouble tickets on
2 OSS interfaces?

3 MR. KEVIN GRAY: Yes.

4 Q. What process did you use to narrow those
5 to trouble tickets involving CLEC outages?

6 MR. KEVIN GRAY: We'll have to get back to you
7 on that.

8 Q. AT&T 86 please.

9 MR. KEVIN GRAY: The Supplemental Report
10 Appendix B indicates that 18 not 13 submeasures
11 were evaluated. They were: OSS Interface
12 Availability-TCNET, OSS Interface Availability
13 AEMS, OSS Interface Availability EDI, OSS
14 Interface Availability EB/TA, OSS Interface
15 Availability EB/TA-GUI, OSS Interface
16 Availability ARIS, OSS Interface Availability
17 BOP-GUI, OSS Interface Availability Web Verigate,
18 OSS Interface Availability Web LEX, OSS Interface
19 Availability EDI LSOG 4, OSS Interface
20 Availability EDI Protocol (Van), OSS Interface
21 Availability EDI Protocol (SSL3), OSS Interface
22 Availability EDI Protocol (NDM), OSS Interface

1 Availability Web Toolbar, OSS Interface
2 Availability ARAF, OSS Interface Availability EDI
3 Preorder, OSS Interface Availability CORBA
4 Preorder, OSS Interface Availability AEMS LSOG 4.

5 Q. Thanks, Kevin.

6 87 please.

7 MR. KEVIN GRAY: This measure is manually
8 reported. SBC has included an initial
9 notification indicator on the "Broadcast Fax Log"
10 file that contains the source data PM MI 11. The
11 performance measurement manager now only includes
12 notifications that are marked as initial
13 notifications in the reporting for this measure.

14 Q. The initial notification is on the
15 accessible letter, did you say?

16 MS. AUGUST: "Broadcast Fax Logs".

17 MR. KEVIN GRAY: Right. It's for the
18 reporting of the performance measures
19 specifically.

20 Q. Okay. Thanks.

21 88 please.

22 MS. ANDREA AUGUST: 88, the performance

1 measurement manager compiling the data for this
2 measure is now performing an additional step to
3 check the times recorded by problem managers in
4 the Broadcast Fax Log by reconciling them to the
5 paging log in Vantive and the timestamps on the
6 e-mail notifications.

7 Q. Vantive, V-a-n-t-i-v-e?

8 MS. ANDREA AUGUST: Uh-huh.

9 MR. CONNOLLY: I think this would be a place.
10 I think there is going to be some clarifying
11 questions in --

12 MR. KERN: Change of management?

13 WITNESS CONNELLY: Yes.

14 MR. KERN: Thanks, Tim.

15 If that's okay, 8:30 tomorrow at the
16 Allegro in the Chicago Symphony Room.

17 Thanks, everybody.

18 (Whereupon, the hearing in the
19 above matter was continued to
20 February 12, 2003, at 8:30 a.m.
21 at the Allegro Hotel, Chicago
22 Symphony Room.)