



Docket No. 01-0662
Mark Cottrell Phase 2 Rebuttal Affidavit
Schedule MJC-2

MPSC Case No. U-12320

Draft Compliance Plan

For

Directory Listings &

Directory Assistance Database

Update Accuracy

February 13, 2003

Draft DL/DA Update Accuracy Compliance Plan

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1. Purpose

The purpose of this revised draft compliance plan is to describe the actions Michigan Bell Telephone Company (“SBC”) proposes to take to improve certain aspects of directory listings and directory assistance database (“DL/DA”) accuracy. SBC originally proposed a DL/DA compliance plan on October 30, 2002 (“October 30 Compliance Filing”). As directed by the Michigan Public Service Commission’s (“MPSC’s”) Order issued on January 13, 2003 (“January 13 Order”), in Case No. U-12320, this draft has been revised to further address the operational concerns with DL/DA accuracy identified in BearingPoint’s Report, and those discussed in the technical workshop and submitted in written comments. SBC recognizes that further modifications to this plan may be appropriate based on the collaborative session scheduled for March 4 – 5, 2003. As a result, SBC will submit a modified compliance plan to the MPSC by March 13, 2003. Subject to any further direction from the MPSC, SBC intends to retain BearingPoint to evaluate SBC’s implementation of the final compliance plan.

2. Issue Definition

BearingPoint (f/k/a KPMG Consulting) first raised this issue in Exception 52 as part of the Third Party Operations Support Systems (“OSS”) testing on March 21, 2002 stating that they have observed instances of incorrect updates to SBC’s directory assistance database. In this test, information contained within the directory listings and directory assistance database were evaluated for accuracy against field inputs from submitted Test CLEC orders, i.e., Local Service Requests (“LSRs”). In the course of evaluating this issue, BearingPoint retested DL/DA accuracy three times over a six-month period. On November 11, 2002, SBC requested that no further retesting be performed, and a final disposition report was issued on November 18, 2002. BearingPoint’s October 30, 2002 OSS Test Report found that test criteria for TVV4-1 was “not satisfied.”

In response to BearingPoint’s evaluation, SBC implemented system modifications and process improvements that improved tested performance from 57% to 91.2%; the MPSC found the difference between 91.2% and the 95% benchmark selected by BearingPoint was not indicative of discriminatory behavior¹. SBC believes that the remaining errors identified in the OSS test are either immaterial in terms of billing or provisioning, or are associated with product ordering scenarios not widely seen in the commercial environment.

3. Root Cause Analysis

The process for updating the directory assistance database begins when a CLEC submits a local service request (“LSR”) or a stand-alone directory service request (“DSR”) that requests an update to directory listing (“DL”) names, addresses or telephone numbers.

¹ MPSC Report, January 13, 2003, pg. 67 – “[T]he Commission does not believe that the amount by which the benchmark has been missed is of a level of significance to indicate discriminatory behavior on the part of SBC and failure of an opportunity to provide CLECs a reasonable opportunity to compete.”

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(An LNP-only request requires the CLEC to submit a separate DL service request.) During the process a directory listing is modified based on the information provided by the CLEC in the LSR or DSR.

In its analysis of the results provided by the BearingPoint test, SBC had determined that the primary cause of DL/DA update inaccuracies was intermittent errors on manually handled orders and generally associated with complex listings. In essence, the errors were caused by Service Representatives handling complex listings and orders flagged by automatic processes.

4. Actions

The compliance plan for DL/DA update accuracy proposed by SBC in its October 30 Compliance Filing was constructed to address the reliability and accuracy of manual service orders. The plan included systems modifications, manual process updates, and the development and delivery of a quality awareness training package to the hundreds of SBC service representatives that handle CLEC service orders. Additionally, it called for the implementation of a service order quality review process consisting of reviews of daily production service orders, corrections of identified errors, and coaching and/or process/system improvements based on data gathered from the review process.

The MPSC in its January 13 Order indicated that the DL/DA update accuracy compliance plan should be expanded, to the extent possible, to address the specific comments of AT&T. In reference to the DL/DA Update Accuracy Compliance Plan, AT&T made reference to: how the system enhancements address the issues at hand; when and where the system enhancements are from; the purpose of the manual work-around and how it is different from current practices, the limited nature of the long-term mechanism as it applies to one error type, as well as the same issues raised with the Customer Service Inquiry (“CSI”) Accuracy Compliance Plan (the content of the service representative training package, the period of the training, the scope of the quality improvement effort, a commitment by SBC to fix errors identified as part of its quality review, and the potential need for a performance measure²). SBC has addressed the requirements of the MPSC and responded to the comments of AT&T in the following enhanced plan.

SBC is taking the following steps to improve the accuracy of DL/DA:

1. System and Process Enhancements

- SBC installed vendor software updates to allow automated daily transfers of Mechanized Order Receipt (“MOR”) files to the Advance Listing Products and Services System (“ALPSS”), in December 2002.³

² See AT&T’s comments filed 11/15/02, Connolly affidavit at pg. 23, ¶¶ 57-61. SBC does not believe that a separate performance measure is necessary. Performance measure changes are generally discussed in the performance measure six-month review; one of which is just concluding.

³ See AT&T’s comments filed 11/15/02, Connolly affidavit at p. 25, ¶ 57. SBC has provided detail on the vendor updates and the issues that it addresses.

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- This automated task replaces a manual process that was performed periodically throughout the day and occasionally executed prior to the MOR data being available, thus delaying the update.
- This enhancement will ensure an improvement in timely receipt of mechanized orders, as manual intervention will be minimized/eliminated.
- SBC implemented an interim manual work process in December 2002 to resolve ALPSS errors identified in the “Skipped Section Report” within three business days.⁴
 - This new daily work process will ensure the minimization of “Skipped Section Report” backlogs and in turn will improve the timely handling of errors identified by ALPSS. As a result, the DL/DA update accuracy will improve through better error handling.
- SBC will implement a long term mechanical process to route orders identified by the “Skipped Section Report” into the established ALPSS error handling process by March 1, 2003.⁵
 - While not replacing the “Skipped Section Report” manual work process, this enhancement will further automate the ALPSS error handling and minimize manual processes by better identifying errors that would otherwise be handled manually.

SBC is taking the following steps to improve the accuracy of DL/DA updates:

2. Service Representative Training

SBC developed for Local Service Center (“LSC”) Service Representatives a Service Order Quality informational package directed at improving service representative order accuracy. The package is similar in form to the Student Guides provided during the training of service representatives involved in producing ACIS service orders. This package provides information such as SBC management’s commitment to quality order processing, the importance of accurate orders, and the impacts of inaccurate orders on CLECs and end-users. The package includes service order examples and a listing of available on-line resources. This package was completed December 31, 2002.

- Starting in January 2003, service representatives will receive training using the Service Order Quality informational package.
 - The training is scheduled to be completed by May 31, 2003 with a majority of targeted Service Representatives trained by March 31, 2003.
 - The intended audience for training is service representatives that produce and process Resale and UNE-P service orders for the ACIS system.

⁴ See AT&T’s comments filed 11/15/02, Connolly affidavit at p. 26, ¶ 58. SBC has provided detail the issue being addressed by the interim manual process.

⁵ See AT&T’s comments filed 11/15/02, Connolly affidavit at p. 26, ¶ 59. SBC has provided detail what the long term mechanism addresses.

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- Review of the package is accomplished in mandatory training sessions facilitated by SBC's Training Department. Logs will be maintained to track attendance and manage attendance compliance.
- A General Manager, Area Manager or Line Manager will address each class with a list of Talk Points to emphasize management's commitment to this process.

3. DL/DA Quality Review

- SBC is designing a quality review process for DL/DA update accuracy. This review will rely on sampling UNE-P and Resale production service orders to monitor DL/DA update accuracy. This mechanism will enable SBC to monitor the effectiveness of its training and help identify potential corrective actions. These quality reviews will be conducted on a frequent, on-going basis. Initially, the reviews are intended to be conducted daily.
 - Samples of orders will be pulled based on information in a reporting system called the Local Service Center Decision Support System (DSS), which is a reporting system used by the LSC to track and capture information on order activity.
 - The criteria for sampling will include product type and status. Sampled orders will come from pending orders, i.e., orders not yet completed.
 - Quality Assurance ("QA") service representatives, experienced service representatives selected for this purpose, will conduct reviews using Methods and Procedures developed specifically for this process.
 - Potential order discrepancies will be reviewed to:
 - Verify that discrepancies are in fact errors;
 - Correct identified errors;
 - Identify root causes of errors;
 - Provide the basis for individual coaching of service representatives.
 - The service representatives will compare the CLEC LSR to the corresponding internal service order on a field by field basis. Corrections will be made as necessary prior to order completion.

4. Corrective Actions

- SBC plans to address discrepancies identified during its quality reviews as described above in the following manner:
 - Review results will be documented in a new LSC database to track performance, identify trends, and provide reports for LSC management.
 - Information on the errors and root cause(s) identified will be analyzed using tracked data to ascertain if common issues or trends are apparent.

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- This information will be used to determine whether individual service representative coaching is needed, or if additional training, changes to processes, methods and procedures and/or systems are needed. SBC will implement appropriate corrective actions as warranted, including additional training and/or changes to processes or systems.

The following table provides the schedule for the actions discussed in this section:

Task	Begin	End	Status
System-Related Tasks			
1. Implement system changes to allow automated daily file transfers of MOR files to AAS/IT	10/28/02	12/31/02	Completed
A. Develop and test AAS/IT Interface software modification	10/28/02	11/01/02	Completed
B. Develop MOR Interface modification	10/28/02	11/01/02	Completed
C. Install MOR Interface modification	11/10/02	12/31/02	Completed
2. Implement interim manual work process for ALPSS errors identified in the "Skipped Section Report" within three business days	10/01/02	Ongoing	In progress
A. Review existing process to determine backlog avoidance	10/01/02	11/01/02	Completed
B. Implement interim manual work process	11/01/02	12/01/02	Completed
C. Managers report weekly backlog information (numbers, age, etc.)	12/01/02	Ongoing	In progress
D. Manager evaluates Skipped Section Report and takes action to ensure a backlog does not occur	12/01/02	Ongoing	In progress
3. Implement system changes to ALPSS error handling process to route orders identified by the "Skipped Section Report"	11/13/02	03/03/03	In progress
A. Receive ALPSS new software version from vendor	11/13/02	11/13/02	Completed
B. Perform testing	11/14/02	02/02/03	In progress
C. Installed in production	03/01/03	03/03/03	
Quality Assurance-Related Tasks			
4. Develop Service Order Quality informational package and provide training to all LSC UNE-P and Resale Service Representatives.	11/15/02	5/31/03	In progress
A. Determine and assign resource to lead "informational package" development effort	11/15/02	12/31/02	Complete
B. Produce "informational package"	12/01/02	12/31/02	Complete
C. Determine training deployment method	12/01/02	01/06/03	Complete
D. Create training schedule or plan	12/01/02	01/14/03	Complete

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Task	Begin	End	Status
E. Conduct training	01/15/03	05/31/03	In progress
5. Design and implement a quality review process for validating the accuracy of the ACIS DL/DA record updates, which includes both sampling and quality reviews Unbundled Network Elements – Platform (“UNE-P”) and Resale orders.	12/15/02	Ongoing	In progress
A. Design quality review process	12/15/02	1/31/03	Complete
B. Implement daily quality review of Resale and UNE-P Complex orders	02/03/03	Ongoing	In progress
6. Identify root causes of errors identified by quality review and sampling processes	12/15/02	Ongoing	In progress
A. Develop identification and tracking process	12/15/02	2/5/03	In progress
B. Identify training or other 'correcting' opportunities	02/03/03	Ongoing	In progress
C. Implement corrective actions	02/03/03	Ongoing	In progress

5. Third Party Examination Approach

Upon completion of the above described training program and after an appropriate period of internal quality review as determined by SBC, the accuracy of DL/DA updates is expected to improve when compared to BearingPoint’s test results of 91.2% accurate. SBC’s target is 95% accuracy. If the third party evaluation does not show the target has been achieved, any further required action will be determined by the MPSC. While the third party selected will design its own work program and parameters, SBC anticipates that the third party evaluation will address and include the following:

The third party will review accuracy of DL/DA updates by comparing updates with local service requests using a sample from commercial production. The sample design and the evaluation methodology will be reviewed with SBC and the Commission staff prior to its implementation.

The third party will affirm SBC’s implementations of the actions described in this compliance plan by reviewing documents, conducting interviews, and performing site visits. This evaluation will include a review of SBC's self-audit results.