



Date: April 17, 2003
To: BearingPoint
From: OSS Test Project Management Team
Subject: SBC Response to Exception # 186, version 2

SBC Ameritech has been unable to demonstrate that certain system of record and reporting system data have been retained consistent with regulatory requirements.

Version 2: April 8, 2003

BearingPoint has continued to receive and review technical documentation from SBC Ameritech. BearingPoint’s findings as of April 1, 2003, are outlined in Exhibits 3 and 4 below.

Exhibit 3 – Reporting System and System of Record Data Retention Results

System	Oldest Data Currently Retained	Current WI, IL, IN and OH Benchmark	Meeting WI, IL, IN and OH Benchmark? ¹	Current MI Benchmark	Meeting Current MI Benchmark? ²
ACIS ³	February 2002	October 2001	No	January 2001	No
ALPSS	May 2001	October 2001	Yes	January 2001	No
ARIS/EXACT	April 2002	October 2001	No	January 2001	No
CABS	May 2002	October 2001	No	January 2001	No
CAMPS	August 2002	October 2001	No	January 2001	No
CC MIS Wholesale Local Operations Center	March 2001	October 2001	Yes	January 2001	No
DUF Parity File ⁴	90 Days	October 2001	No	January 2001	No
ICS/DSS ⁵	October 2001	October 2001	In Retest	January 2001	No
Manual - COATS	May 2001	October 2001	Yes	January 2001	No
Manual – Directory Assistance Database Measures	October 2002	October 2001	No	January 2001	No

¹ Because the data retention requirements in WI, IN, OH and IL are not explicit regarding the type and length of retention, BearingPoint is using a benchmark of 18 months for retention of system of record and reporting system data. Data retention requirements stemming from the Indiana remedy plan, which was released in late October 2002, have not been incorporated into BearingPoint’s current analysis due to the fact that SBC Ameritech and IURC have not agreed on an implementation schedule for the plan.

² The data retention requirement in Michigan is as follows: “Data should be retained for a minimum of 24 months after the conclusion of the year in which the data was collected or 12 months after the issuance of the audit report, whichever is later.” (May 27, 1999 Order, p. 11)

³ The data is not retained in compliance with regulatory requirements for the following measure groups: Billing (13 months), Provisioning and Ordering (December 2001).

⁴ According to SBC Ameritech’s data retention policy, the DUF Parity File is retained for 90 days.

⁵The data was not retained in compliance with regulatory requirements for the following measure groups: Pre-Ordering, Ordering, Local Number Portability, Other Measures and Provisioning.

SBC Response to BearingPoint Exception (continued)

System	Oldest Data Currently Retained	Current WI, IL, IN and OH Benchmark	Meeting WI, IL, IN and OH Benchmark? ¹	Current MI Benchmark	Meeting Current MI Benchmark? ²
Manual – EBTA Clear Close	December 2001	October 2001	No	January 2001	No
NSDB	October 2001	October 2001	In Retest	January 2001	No
PAWS Website	December 2001	October 2001	No	January 2001	No
RBS	August 2001	October 2001	Yes	January 2001	No

As detailed in Exhibit 4, SBC Ameritech has demonstrated that it retained data from certain systems in compliance with requirements, based on a review of sample data.⁶

Exhibit 4 – Additional Reporting System and System of Record Data Retention Analysis Results

System	Oldest Data Currently Retained	Current WI, IL, IN and OH Benchmark	Meeting WI, IL, IN and OH Benchmark?	Current MI Benchmark	Meeting Current MI Benchmark?
114_115 Database	September 2000	October 2001	Yes	January 2001	Yes
ACIS ⁷	September 2000	October 2001	Yes	January 2001	Yes
ACT	September 2000	October 2001	Yes	January 2001	Yes
AEMS LSOG 1	January 2001	October 2001	Yes	January 2001	Yes
ALDIS Data Warehouse	September 2000	October 2001	Yes	January 2001	Yes
ALPSS	May 2001	October 2001	Yes	January 2001	No
ANSIRS/Volumes	September 2000	October 2001	Yes	January 2001	Yes
ARAF Spreadsheet ⁸	May 2002	October 2001	Yes	January 2001	Yes
BFR Database	September 2000	October 2001	Yes	January 2001	Yes
BFR Spreadsheet	September 2000	October 2001	Yes	January 2001	Yes
Broadcast Fax Log	September 2000	October 2001	Yes	January 2001	Yes
CANS Database	September 2000	October 2001	Yes	January 2001	Yes
CC MIS Repair Centers (CSBs)	September 2000	October 2001	Yes	January 2001	Yes
CC MIS Wholesale Local Operations Center	March 2001	October 2001	Yes	January 2001	No
CLEC Comparison Report ⁹	N/A	October 2001	Yes	January 2001	Yes

⁶ Exhibits 1 and 2 do not represent an exhaustive list of systems of record and reporting systems.

⁷ BearingPoint validated that ACIS data was retained for the Maintenance and Repair and Other measure groups consistent with regulatory requirements.

⁸ According to SBC Ameritech, this system was not involved in performance reporting before May 2002.

⁹ According to SBC Ameritech, no data has ever been generated for this system because SBC Ameritech has never had a request from a CLEC for this report.

SBC Response to BearingPoint Exception (continued)

System	Oldest Data Currently Retained	Current WI, IL, IN and OH Benchmark	Meeting WI, IL, IN and OH Benchmark?	Current MI Benchmark	Meeting Current MI Benchmark?
CLEC Online Website ¹⁰	March 2001	October 2001	Yes	January 2001	Yes
CLEC Reports, Electronic (IN only)	September 2000	October 2001	Yes	January 2001	Yes
Closed Ticket Disposition Analysis ¹¹	October 2001	October 2001	Yes	January 2001	Yes
CODES NRD Due Report Final (Weekly Code Activation Spreadsheet)	September 2000	October 2001	Yes	January 2001	Yes
Collocation Database	September 2000	October 2001	Yes	January 2001	Yes
CORAL	September 2000	October 2001	Yes	January 2001	Yes
Electronic Performance Reporting Spreadsheet	September 2000	October 2001	Yes	January 2001	Yes
Error Return Spreadsheet	September 2000	October 2001	Yes	January 2001	Yes
FMOD Database	September 2000	October 2001	Yes	January 2001	Yes
Gateway RT62 ¹²	April 2001	October 2001	Yes	January 2001	Yes
Genesys CTI Reports Application¹³	October 2002	October 2001	Yes	January 2001	Yes
ICS/DSS ¹⁴	April 2002	October 2001	Yes	January 2001	Yes
LASR ¹⁵	May 2002	October 2001	Yes	January 2001	Yes
LMOS	September 2000	October 2001	Yes	January 2001	Yes
LOC Scheduler	September 2000	October 2001	Yes	January 2001	Yes
LSMS	September 2000	October 2001	Yes	January 2001	Yes
Manual - AMA Critical Error Display Report	September 2000	October 2001	Yes	January 2001	Yes
Manual - Bill Timeliness	September 2000	October 2001	Yes	January 2001	Yes
Manual - COATS	May 2001	October 2001	Yes	January 2001	No
Manual - Completion Notification ¹⁶	October 2000	October 2001	Yes	January 2001	Yes

¹⁰ According to SBC Ameritech, this system was not involved in performance reporting before March 2001.

¹¹ According to SBC Ameritech, this system was not involved in performance reporting before October 2001.

¹² According to SBC Ameritech, this system was not involved in performance reporting before April 2001.

¹³ According to SBC Ameritech, this system was not involved in performance reporting before October 2002.

¹⁴ According to SBC Ameritech, the data is retained for three years for the following measure groups: Billing, Interconnection Trunks, Maintenance and Repair, and 911. According to SBC Ameritech, this system was not involved in performance reporting for these measure groups before April 2002.

¹⁵ According to SBC Ameritech, this system was not involved in performance reporting before May 2002.

¹⁶ According to SBC Ameritech, this system was not involved in performance reporting before October 2000.

SBC Response to BearingPoint Exception (continued)

System	Oldest Data Currently Retained	Current WI, IL, IN and OH Benchmark	Meeting WI, IL, IN and OH Benchmark?	Current MI Benchmark	Meeting Current MI Benchmark?
Manual - Directory Assistance Database Measures ¹⁷	September 2000	October 2001	Yes	January 2001	Yes
Manual - Electronic Completions	September 2000	October 2001	Yes	January 2001	Yes
Manual - EOI Network Database ¹⁸	August 2001	October 2001	Yes	January 2001	Yes
Manual - Excluded Blocked Calls Report ¹⁹	February 2001	October 2001	Yes	January 2001	Yes
Manual - Interface Outage Notification	September 2000	October 2001	Yes	January 2001	Yes
Manual - Printed Bill Retention	September 2000	October 2001	Yes	January 2001	Yes
Manual - Resend Spreadsheet	December 2000	October 2001	Yes	January 2001	Yes
Manual - Service Feature Availability Information	December 2000	October 2001	Yes	January 2001	Yes
Manual - Statistical Sampling Log	September 2000	October 2001	Yes	January 2001	Yes
Manual Coordinated Conversions	September 2000	October 2001	Yes	January 2001	Yes
Manual Update Information (excluding IN)	September 2000	October 2001	Yes	January 2001	Yes
Manual Update Information (IN only)	September 2000	October 2001	Yes	January 2001	Yes
Mentor	September 2000	October 2001	Yes	January 2001	Yes
MIHR	September 2000	October 2001	Yes	January 2001	Yes
MOR/Tel	September 2000	October 2001	Yes	January 2001	Yes
MPS Browser	September 2000	October 2001	Yes	January 2001	Yes
MTAS	September 2000	October 2001	Yes	January 2001	Yes
Nortel Meridian Max (BCS-ACD)	September 2000	October 2001	Yes	January 2001	Yes
Nortel Meridian Max (LSC-ACD)	September 2000	October 2001	Yes	January 2001	Yes
ORACLE (Website DB)	September 2000	October 2001	Yes	January 2001	Yes
PRS	September 2000	October 2001	Yes	January 2001	Yes

¹⁷ BearingPoint validated that Manual – Directory Assistance Database Measures data was retained for the Other measure group consistent with regulatory requirements.

¹⁸ According to SBC Ameritech, this system was not involved in performance reporting before August 2001.

¹⁹ According to SBC Ameritech, this system was not involved in performance reporting before February 2001.

SBC Response to BearingPoint Exception (continued)

System	Oldest Data Currently Retained	Current WI, IL, IN and OH Benchmark	Meeting WI, IL, IN and OH Benchmark?	Current MI Benchmark	Meeting Current MI Benchmark?
PRS+	September 2000	October 2001	Yes	January 2001	Yes
QMIS	September 2000	October 2001	Yes	January 2001	Yes
RAD (CCC ACD)	September 2000	October 2001	Yes	January 2001	Yes
RBS	August 2001	October 2001	Yes	January 2001	No
Reseller Report TSS tab	September 2000	October 2001	Yes	January 2001	Yes
Results Summary for Stats	September 2000	October 2001	Yes	January 2001	Yes
Returned Weekly Spreadsheet	September 2000	October 2001	Yes	January 2001	Yes
RRS	September 2000	October 2001	Yes	January 2001	Yes
SAS	September 2000	October 2001	Yes	January 2001	Yes
SOA	September 2000	October 2001	Yes	January 2001	Yes
TIRKS	September 2000	October 2001	Yes	January 2001	Yes
TNDS	September 2000	October 2001	Yes	January 2001	Yes
User Center Admin Database	September 2000	October 2001	Yes	January 2001	Yes
Vantive	October 2000	October 2001	Yes	January 2001	Yes
WebLex ²⁰	April 2001	October 2001	Yes	January 2001	Yes
WFA/C ²¹	November 2000	October 2001	Yes	January 2001	Yes
WFA/DI	September 2000	October 2001	Yes	January 2001	Yes
WFA/DO	September 2000	October 2001	Yes	January 2001	Yes
Work Force Manager (WFM) ²²	May 2002	October 2001	Yes	January 2001	Yes

SBC Response to Exception 186, version 2:

In version 2, BearingPoint provided status on the re-testing efforts of Exception 186. In this updated analysis the following modifications from the original version were provided:

- 3 additional source systems were noted as having adequate data retention,
- 2 systems (originally identified in Exhibit 1 of Exception 186) were listed as currently in retest
- 4 systems (originally identified in Exhibit 1 of Exception 186) had modifications regarding the oldest date data is being retained
- 2 additional systems were identified that had historically, since January 2001, not been retaining all metric source data

Below provides further detail regarding the four types of updates made within version 2 of this exception.

²⁰ According to SBC Ameritech, this system was not involved in performance reporting before April 2001.

²¹ According to SBC Ameritech, this system was not involved in performance reporting before November 2000.

²² According to SBC Ameritech, this system was not involved in performance reporting before May 2002.

SBC Response to BearingPoint Exception (continued)

Additional Source Systems with Adequate Retention:

BearingPoint concluded that 3 systems (AEMS LSOG1, CANS Database, Genesys CTI Reports Application), not previously identified in version 1 of this exception report, had retained all source system data consistent with BearingPoint and/or regulatory requirements. No additional action is required on the part of SBC Midwest.

Retesting to Confirm Compliance:

BearingPoint also identified 2 systems (ICS/DSS and NSDB) as “in retest” for four of the five states (Wisconsin, Illinois, Indiana and Ohio). SBC understands that BearingPoint will again review the retained measurement date for each system and assess if enough time has lapsed such that the system is now meeting the retention standard. SBC reiterates its position that the NSDB system is not a source or reporting system, but instead an intermediary system, and therefore BearingPoint’s expectations for retaining measurement data do not apply regardless of the retesting outcome.

Revised Oldest Date Data Retained

Within this updated version BearingPoint also modified the oldest date data was retained for 4 systems (ACIS, CABS, DUF and Manual DADB). These were updated with new dates as a result of BearingPoint’s re-assessment of previous SBC data deliveries. SBC reiterates its position that the DUF system is an intermediary system and therefore, similar to NSDB, BearingPoint’s expectations for retaining measurement data do not apply.

Additional Systems with Historical Retention Concerns

This updated version also includes 2 systems (Manual – COATS and PAWS website) that were added as a result of recent analysis. There are 2 files for each system that had not historically met all retention standards. BearingPoint’s exception report does clarify that the Manual – COATS system is meeting retention benchmarks in four of the five states and has been retaining metric data for over a year and a half. BearingPoint also notes that the PAWS website has been retaining data since December 2001. To confirm SBC’s prospective retention for these two systems meets regulatory requirements BearingPoint was provided associated retention policies for these systems, each stating a 3 year retention practice, and has deemed these as accurate²³.

SBC reiterates its request that this exception be closed as satisfied for all source systems other than the 12 noted by BearingPoint. With respect to these 12 systems, SBC requests this exception be closed as “indeterminate” to be verified by future performance audits.

²³ On April 10, 2003 BearingPoint provided status to the five State Commission staffs and SBC concerning their review of SBC’s retention policy documentation (SRPs). Within this status report, BearingPoint confirmed the accuracy of SBC’s Data Retention Policies for the measures impacted by the PAWS website and the Manual – COATS system.