BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of	)	
Application by SBC Communications Inc.,	)	
Pacific Bell Telephone Company, and	)	
Pacific Bell Communications Services,	)	CC Docket No. _____
Inc. d/b/a Pacific Bell Long Distance for	)	
Provision of In-Region, InterLATA Services in	)	
California	)	

AFFIDAVIT OF RICHARD J. MOTTA

STATE OF CALIFORNIA)
)
COUNTY OF CONTRA COSTA)

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I, Richard J. Motta, being of lawful age and duly sworn upon my oath, do hereby depose and state as follows:

1. My name is Richard J. Motta. My business address is 2600 Camino Ramon, San Ramon, CA 94583. I am Vice President of Service Quality for Pacific Bell Telephone Company (Pacific Bell). I am responsible for ongoing service quality for all products and services provided by Pacific Bell. I am also responsible for 271 related issues including performance measures, performance remedies and performance assurance.

2. I have over 30 years experience in the telecommunications industry working for Pacific Bell. I have held numerous management line and staff positions at Pacific Bell, including positions in Network Services, Information Technology, Corporate Planning, Finance, Human Resources and Engineering.

3. I hold a Bachelor of Science degree in Engineering from the California State Polytechnic University and a Master's degree in Finance from the University of California - Berkeley.

A. PURPOSE OF AFFIDAVIT

4. The purpose of this affidavit is to discuss the Pacific Bell provisioning and maintenance processes, including an overview of the primary legacy systems supporting these processes. I will also discuss the specialized provisioning processes implemented to support CLEC needs and selected service improvement plans for service performance issues related to the provisioning and maintenance processes.

B. NETWORK PROVISIONING AND MAINTENANCE SYSTEMS

5. In support of its provisioning and maintenance processes, Pacific Bell utilizes a suite of provisioning and maintenance systems, including the following:

- **AMOS** (Access Mechanized Order System): Provides integrated work force administration for all HICAP and Special Services provisioning, design, dispatch and testing work groups. AMOS receives, assigns and loads all customer service orders to technicians; tracks provisioning status and sends order completion information to Service Order Retrieval and Distribution ("SORD"). AMOS will eventually be replaced by enhancements to the Work Force Administration (WFA) systems.
- **PBOD** (Pacific Bell Order Dispatch System): Provides automatic routing and scheduling of POTS service orders to outside technicians. This system also provides completion information to SORD for POTS orders. PBOD will eventually be replaced by enhancements to the WFA systems.
- **MPF** (Media Pulse/Force): A work load management system to track, prioritize, schedule, and load work assignments for central office personnel and outside field forces. Media Pulse/Force is being replaced by WFA systems.
- **WFA/DO*** (Work Force Administration / Dispatch Out): Loads, prioritizes, and schedules work assignments of outside POTS and Special Services installation and maintenance technicians, and provides on-line tracking and status of work requests and technicians.
- **WFA/DI*** (Work Force Administration / Dispatch In): Loads, prioritizes, and schedules work assignments of central office technicians, and provides on-line tracking and status of work requests and technicians.

- **WFA/C** (Work Force Administration / Control): Directs and tracks the flow of work items to WFA/DI and WFA/DO. WFA/C facilitates communication between the WFA systems and external systems. Provides functionality that allows the Plant Control Office ("PCO") to perform their oversight responsibilities.

  Note: The WFA suite of systems is currently being implemented for use by the WCC, LFO - Out, LFO-In in Pacific Bell.

- **LMOS** (Loop Maintenance Operating System): The system is used to log, track and dispatch POTS/POTS like trouble reports. It is utilized by the Customer Service Bureau ("CSB") and Local Operations Center ("LOC") to log/track open trouble reports from retail and CLEC customer. It is utilized by Service Operations-POTS ("WCC") to dispatch Installation and Maintenance ("I&M") technicians. The dispatch function will be replaced when WFA/DO is fully deployed.
- **TIRKS (**Trunk Integrated Records Keeping System): The system inventories and assigns facility and equipment components. It also facilitates the design and inventory of trunks and Special Services circuits.
- **SWITCH:** Operations system designed to inventory and assign central office switching equipment and related facilities.
- **FWS:** (Frame Work Station): The system used by central office frame technicians to pull, monitor and track the work assignments for tasks scheduled for main frame work.
- **LFACS** (Loop Facility Assignment and Control System): The system that performs loop plant and central office facility assignments or inventory functions.

- **SORD** (Service Order Retrieval and Distribution): The system that creates and distributes all service orders. All service order activity through completion is tracked through SORD. It provides service order completion information to downstream inventory systems for Maintenance, E911 and Directory Listings and Billing.
- **SOAC** (Service Order Analysis & Control): This system transfers service orders into assignment requests which are sent to LFACS for outside plant assignments and/or to SWITCH for central office assignments. This system formats the assignment responses from LFACS and SWITCH into assignments and passes them to SORD for distribution.

6. Except for PBOD, AMOS and SORD, Pacific Bell does not own these systems, but instead leases them from outside vendors. These systems have matured with the business and have served as the foundation for a uniform and systematic method of doing business. As new services have developed, such as those provided to CLECs, these systems continue to serve their intended purpose of providing a uniform and systematic method of provisioning and maintaining those services.

7. Any changes to the underlying program code on these systems must be negotiated with the external vendors and the internal information systems organization. This negotiation is the responsibility of a centralized staff. Pacific Bell uses a single version of each application, which handles CLEC and Pacific Bell retail service orders on a nondiscriminatory basis. The managers and technicians at Pacific Bell also use the systems in the same non-discriminatory manner, as defined in the training and documented in Pacific Bell methods and procedures.

C. PACIFIC BELL PROVISIONING FLOW

8. This section addresses only the portion of the provisioning flow beginning with the issuance of an order by the Local Service Center ("LSC") and ending when the provisioning work is completed. Information on the LSC processes that take place before and after provisioning can be found in the affidavit of Ginger Henry. The role of the LOC in provisioning and maintenance is discussed in the affidavit of David Ross Smith.

Non-Designed Services Process

9. The UNE provisioning processes begin when SOAC, the system used to route orders, receives an order from the service order system, SORD. SOAC routes the order to the Mechanized Loop Assignment Center ("MLAC") for processing. The MLAC, which is part of the Customer Service Center ("CSC"), is responsible for assigning the facilities required to provision the service. The MLAC uses LFACS to inventory and assign outside plant facilities and the telephone number administration and inventory system known as SWITCH to inventory and assign central office facilities.

10. Once facilities are assigned, the order distributes to the PBOD system. If the order requires fieldwork, it is passed to LMOS. LMOS is used by the I field forces to track the progress of orders throughout the field provisioning process. When the work on the order is complete, the technician completing the work posts the completion through an interface to the PBOD system, which then sends a completion notice to SORD. If the order requires central office work, the SWITCH system interfaces with FWS to provide assignment information so that the physical central office work can be completed. When the central office work is completed, FWS is statused accordingly. If a jeopardy

condition occurs prior to completion of the order, PBOD transmits the information back to the LSC for distribution to the appropriate CLEC.

11. The non-designed provisioning processes and systems described above are essentially the same for retail POTS and resale POTS. The only exception is that Pacific Bell does not send formal jeopardy notices to its retail customers, when a jeopardy condition is identified on an order.

Designed Services Process

12. The CLEC-ordered "Designed Services"[1] provisioning processes begins when SOAC receives an order from SORD. SOAC routes the order to the MLAC for processing. The MLAC uses LFACS to inventory and assign outside plant facilities and SWITCH to inventory and assign central office equipment.

13. After the MLAC completes the assignment function, SOAC routes the order to the Circuit Provisioning Center ("CPC") where TIRKS is used to design the services. This service design is then passed to the Central Office Operations forces and Business Services Operations I&M field forces to perform the actual provisioning. The Central Office Operations and the I&M work groups use the work document from TIRKS and the methods and procedures developed by the centralized staff to install the service. The WFA/DI system is used by the Central Office Operations forces to track the progress of orders throughout the provisioning process. The WFA/DO system is used by the I&M forces to track the progress of orders throughout the provisioning process.

[1] Not all designed services available for CLECs follow the design provisioning flow in total. For 5.5dB UNE Loops and 3B1Q IDSL UNE loops, once the design for these services is complete, the provisioning process follows the non-design process.

14. A transaction from TIRKS also creates the critical dates that are tracked by the PCO. The work steps are tracked in the PCO using WFA/C. Upon completion of the order by the Central Office Operations and Installation and Maintenance forces, WFA/DI and WFA/DO send a completion transaction to WFA/C. The PCO then works with the CLEC on acceptance testing and order closeout. Once closed, the order is posted to the various systems to complete the process. For most design services if a jeopardy condition were to occur, the PCO technician would immediately notify the impacted CLEC directly.

15. The designed provisioning processes and systems described above are essentially the same as the retail designed processes and systems. The only exception is that Pacific Bell does not send formal jeopardy notices to its retail customers, when a jeopardy condition is identified on an order.

D. SPECIALIZED PROVISIONING PROCESSES

Provisioning of Migration Orders (TBCC and FDT)

16. As discussed in the Affidavit of David Ross Smith, CLECs have the choice when and how an end user's service is migrated from the Pacific Bell network to a CLEC's network. The CLEC can choose a coordinated conversion process known as To Be Called Cut ("TBCC") or a scheduled conversion process known as Frame Due Time ("FDT"). If a CLEC requests the TBCC process, Pacific Bell will fully coordinate the activities of migration with the CLEC. Both the TBCC and FDT processes allow the CLEC to specify the time on the due date that the migration should take place. The FDT process, however, does not include any coordination activities during the cutover.

17. With the FDT process, Pacific Bell's provisioning work groups will be notified, from information provided on the order associated with CLEC's service request, of the date and time the service is to be transferred. Unlike the TBCC process, coordination will not occur with the CLEC during the provisioning of an FDT order. Instead, Pacific Bell's provisioning work groups will complete provisioning activities at the due time designated on the service order, including the transference of the physical circuit from Pacific Bell's switching equipment to the CLEC's collocation cage. Though this process does not include ongoing statusing of the order to the CLEC, it does provide, for the CLEC, a commitment of the time, on the due date, when the service will be transitioned. The provisioning work groups will perform the same provisioning activities (physical transference of the loop) as with the TBCC process, but without the periodic contacts with the CLEC. Pacific Bell works to complete all provisioning work within one hour of the FDT for nineteen lines or less.

18. Pacific Bell has just completed the development of a performance measurement that will assess the timeliness of completion for orders provisioned using the FDT process. The FDT performance measure will be implemented for the June service results reported in July. Preliminary data is available relative to this performance. (See Johnson affidavit.)

19. In the April through May 2001 time frame, Pacific Bell undertook a limited trial to improve both TBCC and FDT performance. Specifically, the trial was intended to validate that the correct CLEC dial tone was available on the assigned CLEC pair on the day before (due date minus one) a scheduled customer migration. The trial, which involved seven Pacific Bell central offices and four CLECs, required Pacific Bell central

office technicians to validate for every TBCC and FDT order, with a UNE loop, that the correct CLEC dial tone was ready one day prior to the due date. If dial tone was not present, a timely jeopardy was issued to the involved CLEC. Although the trial ended on May 31, 2001, work continues on analyzing the trial results. By the end of June 2001, a decision will be made regarding the next step.

Loop Testing with CLEC

20. For products such as ISDN and xDSL UNE Loops, the CLEC may request that a joint test be performed with Pacific Bell once provisioning has been completed on the loop. This is called the Acceptance Testing process. A CLEC may request this process be included as part of the provisioning when it submits a service request for these products. The service order, created from the CLEC's service request, will contain, in its "Remarks" section, a note that the CLEC has requested Acceptance testing. When provisioning of the loop is completed, the Pacific Bell technician will initiate the Acceptance Testing process before closing the order.

21. To begin the Acceptance Testing process, the Pacific Bell field technician will notify the CLEC to commence the actual testing procedures. The CLEC will launch two tests: the first to detect a physical fault on the circuit; and the second to prove continuity of the loop from the CLEC's collocation cage to the Minimum Point of Entry ("MPOE") at the customer's location. If both tests are completed with successful results, testing will cease and the order will be completed. If either test fails, Pacific Bell will work cooperatively with the CLEC to identify and resolve any problems. With the use of the Acceptance Testing process, Pacific Bell and the CLEC work collaboratively to ensure that the

provisioned service is functioning satisfactorily before it is made available to the end user, reducing the number of reported troubles after installations and improving customer satisfaction. Pacific Bell also offers joint testing (cooperative test) on maintenance requests. Cooperative testing follows the same process as described above except that it is requested on a trouble report rather than a service order.

E. PACIFIC BELL MAINTENANCE FLOW

Non - Design Services

22. The maintenance process begins when the CLEC customer contacts the LOC via telephone or electronically submits a trouble report using Toolbar, Pacific Bell Service Manager ("PBSM") or Electronic Bonding ("EB").

23. For non-designed services, the LOC will track trouble tickets submitted by CLECs in LMOS. The LOC will analyze the trouble condition reported on the trouble ticket, test the circuit (if test access is available), and refer the trouble to the appropriate Pacific Bell maintenance personnel for resolution.

24. If the trouble has been isolated to outside plant facilities, it is referred to the Service Operations I&M forces via LMOS. When the I&M forces complete their work, they will contact the CLEC and close the trouble report in LMOS.

25. If the trouble has been isolated to the central office, the LOC technician will contact the appropriate central office and works jointly with the central office technician to resolve the trouble condition. Once the trouble ticket is closed, the LOC technician will contact the CLEC.

26. The non-designed ("POTS") retail maintenance processes and systems are essentially the same with those described above with one exception. For retail, the Customer Service Bureau ("CSB") functions like the LOC.

Design Services

27. For designed services, the LOC will track trouble tickets submitted by CLECs in the WFA/C. The LOC will not perform any analysis or testing functions on the impaired services. Instead, the LOC will transfer the trouble tickets to the Maintenance Control Office ("MCO"), which is part of the Business Services Operations department. The MCO will analyze the trouble condition reported by the CLEC and tests the circuits, as appropriate.

28. If the trouble is isolated to the central office, the ticket will be referred to the central office work group via MPF. If the trouble is isolated to outside plant facilities, the ticket will be referred to the Business Service Operations I&M work group via MPF.

29. Once the trouble is resolved, the MCO will notify the LOC via WFA/C and will contact the customer directly to close out the trouble ticket.

30. For all open CLEC trouble tickets, both non-design and design, the LOC will be the primary contact for the CLEC for statusing the trouble, including escalations.

31. The designed ("Specials") retail maintenance processes and systems are essentially the same as those detailed above with just one exception. For retail, the LOC functions of taking the trouble report from the customer, handling escalations and statusing the customer, are performed by the MCO.

F. SERVICE IMPROVEMENT PLANS

Basic UNE Loop Maintenance Improvement Plan

32. In early 2001, Pacific Bell performed an analytical study on trouble reports associated with basic UNE Loops. The study was initiated because of an out of parity condition for repeat trouble on these loops. The study was focused on trouble reports received for this product for the previous six months.

33. The root cause analysis of the study data suggested that a plan to reduce not only the repeat rate, but also overall customer trouble report rate, and mean time to repair was needed. One of the primary issues identified in this study was the need for a more robust testing process; one that would emulate the trouble isolation used for Pacific Bell service process. As a result, the Fault Isolation Test ("FIT") process was developed.

34. The FIT process allows Pacific Bell technicians to interact directly with the CLEC, when the CLEC reports a trouble condition for one of its customers. This process allows for the creation of a complete description of the trouble; defining whether the trouble is inside the Pacific Bell central office in Pacific Bell's outside plant facilities, or inside the CLEC switching equipment. Pacific Bell's LOC notifies Pacific Bell's central office personnel to establish a temporary test point ("test shoe") on the customer's line. Utilizing this temporary test access, the LOC runs automated test from the cable head at the Pacific Bell central office back to the CLEC's switching equipment and out toward the customer's premise. This test emulates the testing capabilities available for a Pacific Bell retail voice grade service. If the trouble is found to be in the CLEC equipment, the ticket is referred back to the CLEC. This testing process is completed as quickly as possible

and in many cases, is concluded with results reported to the CLEC before the trouble reporting call has ended. This new process will result in a reduction of multiple trouble reports from CLECs on individual service problems.

35. The FIT process was presented at the March, 2001 CLEC User Forum. The process was discussed and accepted by the CLECs in attendance at the Forum meeting. The process was also communicated to the general CLEC community via an Accessible letter (CLEC CO1-044). A trial of the FIT process was conducted in April through May 2001 timeframe. As it showed improvement in the aforementioned performance measurements, it was implemented as a standard process for Pacific Bell in June 2001. (An Accessible Letter will be issued by the end of June 2001 to confirm implementation of the FIT process as standard for Pacific Bell.)

IDSL Provisioning and Maintenance Improvement Plan

36. As discussed in the affidavit of Gwen Johnson, performance issues associated with "percent due date met" and average installation intervals have been identified with the provisioning of IDSL services. The root cause of the performance shortfall for this service was found to be the need to design the IDSL circuits as a 3B1Q (design) instead of a 2B1Q (non-design) line coding format. This need generally was not determined until after the order for the CLEC IDSL service had entered the provisioning process and provisioning using 2B1Q line coding was not successful. The 3B1Q line coding format change requires that the circuit be referred to the CPC to design the loop to attach active electronics on the circuit. Typically, the design process resulted in an additional three to five business days to complete the order, causing the original due date to be missed.

37. A plan to improve IDSL provisioning performance was initiated during May 2001 and communicated to the CLEC community via an Accessible Letter (Loop Back - CLEC CO1-170). The new process is designed to perform acceptance testing with the CLEC on Plant Test Date (3 days before the due date) during the provisioning of an IDSL service, to determine the efficacy of the circuit. If the IDSL service has been provisioned using the 2B1Q line coding standard (non-design), but is found, during the acceptance test, not to satisfy the CLEC's requirements, a design to include 3B1Q line coding may be necessary. If the circuit needs to be designed, the design process is expedited to reduce the interval to one to two days. The original due date is not modified. As part of this new process, Pacific Bell also provides a Network Termination 1 ("NT1") Loop Back testing capability that allows the CLEC to verify their loop quality. Furthermore, IDSL orders are now being dispatched only to technicians who have IDSL capable test equipment. In anticipation of the increase in IDSL demand, Pacific Bell is procuring additional IDSL-capable test equipment to ensure the CLEC's success in providing this service to their customers.

38. The improvements made to the IDSL provisioning process will also result in improved maintenance results for this product. Overall report rate, installation reports and repeat reports will be reduced.

DS1 UNE Loop Provisioning Improvement Plan

39. Though DS1 UNE Loop Provisioning performance was at or above parity in northern California for the reporting period of February, March and April, 2001, issues have been identified in the Los Angeles and South regions for the specific sub measures relating to

on-time provisioning performance. The performance measures that assess on-time performance include Measure 8 (% Orders Completed Within Standard Interval), Measure 11 (% Due Dates Missed), and Measure 12 (% Due Dates Missed Due to Lack of Facilities). (See Johnson Affidavit for discussion of DS1 provisioning performance).

40. For both the Los Angeles and South regions, the main contributor to the performance shortfall for these measures was a breakdown in the due date management process. Although defective or lack of facilities caused the orders to be placed in jeopardy of missing their due dates, requiring additional processing to obtain facilities, the lack of effective management of critical dates ultimately caused the orders to be missed.

41. In both the Los Angeles and South regions, the Business Services Operations department has reinforced the existing Critical Date Management process with its technicians. The Critical Date Management process is designed to assign "critical dates" to various steps in the provisioning process of an order to ensure the order is completed on time. The Critical Date Management process is generally for complex service orders, such as those for DS1 service. The assigned critical dates are used as deadliness for each essential work activity of the provisioning process. Integral to this process is the requirement that each department is held accountable for its particular activity and that each critical provisioning activity is completed on time. Any missed critical date should place the order in jeopardy and trigger immediate focused attention to resolve the jeopardy situation.

Frame Due Time ("FDT") Improvement Plan

42. As outlined in the affidavit of Gwen Johnson, two issues have been identified as impacting performance on UNE loop orders (with or without LNP) that are provisioned using the FDT process. The first relates to the process used by Pacific Bell frame technicians for completing FDT orders in the FWS. Prior to a recent process change, frame technicians would finish the wiring on several FDT service orders and then "batch complete" those orders in FWS, instead of posting each completed FDT order as it was worked. Since FWS did not allow the actual "work complete" time to be posted, the completion time on the order would be the time it was marked complete in FWS. This process caused some FDT orders to miss the one-hour provisioning interval, even though the physical work was completed on time. As of June 11, 2001, this process was changed so that when the wiring work is complete in the central office frames, the order will be posted in FWS immediately.

43. The second issue relates to scheduling of FDT conversions associated with UNE Loops. Data has been tracked for March and April 2001, for FDT orders to determine how many FDT orders are scheduled with the same due time. For UNE Loops with LNP, over 90% were scheduled for cutover at 8 a.m. in this time frame.[2] The potential to miss an FDT commitment is an issue because the FDT workload distribution is not effectively managed. Pacific Bell is currently reviewing the more effective scheduling of these cutovers to ensure that there are enough resources available to perform the work that absolutely must be completed during the 8 a.m. cutover period.

[2] 98.56% of these orders in March and 90.88% in April were scheduled for cutover at 8 a.m.

G. LMOS - UPDATES TO CLEC LINE RECORDS

44. LMOS is a database system utilized in the processing of trouble tickets on Pacific Bell retail POTS (e.g., non-special services) lines, CLEC resale POTS lines, Basic UNE loops, UNE-P, ISDN/xDSL loops, and High Frequency Portion of the Loop (HFPL) line sharing services. LMOS line records are updated nightly during the business week to reflect completed service order activity, including any transfer of service from one local provider to another. LMOS records are updated within 24 to 48 hours of completion of the service orders in SORD.

45. On conversion of an end user from one provider to another, multiple service orders are created to provision the conversion. LMOS updates on such conversions are designed to follow a "remove, then insert" sequence. For example, on the migration of an end user from Pacific Bell retail to a CLEC providing service via UNE-P, the LMOS update is taken from the completed disconnect ("D") order in the SORD system (removing Pacific Bell as the service provider) and the completed change ("C") order in SORD (inserting the CLEC as the service provider). Conversion orders are sequenced by the PBOD system for SORD processing of D orders before C orders. SORD completes the D orders before completing the C orders, which ensures that LMOS will receive all completed D orders in a cycle along with, and ahead of, the corresponding completed C orders. With this process, service order activity updates LMOS line records in the correct sequence.

H. CONCLUSION

46. Pacific Bell's provisioning and maintenance processes provide service delivery and support for CLECs in substantially the same time and manner as provided for Pacific Bell's own retail customers. Pacific Bell personnel utilize the same back-end legacy systems and the same basic processes to provision and maintain services for CLECs as it uses for its own customers. In certain circumstances, Pacific Bell has developed and implemented additional, specialized processes to more efficiently manage CLECs' requests for service and to more efficiently resolve service troubles reported by CLECs.

47. On a monthly basis, Pacific Bell tracks its service performance to CLECs by reporting results on several hundred performance measurement items. When the reported data have indicated that improvement in a service level is necessary, Pacific Bell has developed and implemented service improvement plans focused on the operational process that requires remediation. Pacific Bell's continuous attention to the service being provided to CLECs has resulted in CLECs receiving service levels from Pacific Bell that allow them to compete effectively in the competitive marketplace.

48. This concludes my affidavit.