

Decision 99-11-026 November 4, 1999

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the
Commission's Own Motion into Monitoring
Performance of Operations Support Systems.

Rulemaking 97-10-016
(Filed October 9, 1997)

Order Instituting Investigation on the
Commission's Own Motion into Monitoring
Performance of Operations Support Systems.

Investigation 97-10-017
(Filed October 9, 1997)

O P I N I O N**Summary**

By this decision, the Commission approves, with qualification, two uncontested Joint Settlement Agreements on the Interface Change Management Processes (JSAs) in the above-titled consolidated proceedings involving Pacific Bell (Pacific) and a number of competitive local exchange carriers (CLECs)¹ and GTE California Incorporated (GTEC) and the same CLECs (collectively, the Settling Parties). The JSAs² resolve outstanding issues among the respective Settling Parties regarding change management principles applicable to changes to the operations support systems (OSSs) offered by Pacific and GTEC to CLECs

¹ AT&T Communications of California, MCI Telecommunications Corporation, Sprint Communications Company L.P., Nextlink California, MediaOne Telecommunications of California, Inc., ICG Telecom Group, Inc., Northpoint Communications, Inc., Cox California Telecom, LLC, and Electric Lightwave, Inc.

² Hereafter, the individual JSAs including Pacific and GTEC shall be referred to as JSA-1 and JSA-2, respectively.

in California. Looking to the future, this decision establishes a procedure whereby Pacific, GTEC and interested CLECs may efficiently amend their respective Interface Change Management Processes.

Background

On October 9, 1997, the Commission instituted this formal rulemaking proceeding and investigation (the OSS OII) to accomplish several goals, one of which was to monitor the improvement in the performance of Pacific's and GTEC's OSSs. As part of that endeavor, we sought to establish guidelines to govern changes in the OSSs of these two incumbent local exchange carriers (ILECs).

Specifically, we asked the parties to submit comments on various issues, including: the applicability of industry guidelines to the development of and changes to Pacific's and GTEC's OSSs; the timing for notifications and changes to Pacific's and GTEC's OSSs; and the exchange of information and testing related to such development and changes. The parties filed their opening comments on November 20, 1997 and their reply comments on December 11, 1997.

In April 1998, the Commission commenced a series of workshops to address several issues raised in the parties' comments. As a result of the April 1998 workshops, we asked both Pacific and GTEC to host separate meetings with the CLEC community to discuss change management principles and report back with their findings.

Pacific's meeting took place on June 10-11, 1998 in San Francisco. Pacific held a further meeting in San Francisco on June 24-25. Subsequent to the June meetings, Pacific and the CLECs established a drafting subgroup to develop a "Change Management Process" document relating to Pacific's OSS from the notes taken in the June meetings. The drafting subgroup met at MCI's San Francisco Headquarters on July 23-24, finalized the Change Management

Process document on August 4, and presented this process in the Draft 271 collaborative workshop³ on August 6, 1998. Following the collaborative workshops, Pacific "committed to live within the parameters of the Change Management Process, even before the principles had been formally adopted." JSA-1 at 4. Pacific and the CLECs committed to meet again to address the issues of introduction of new interfaces and retirement of existing interfaces, and did so on September 24-25.

On October 22, 1998, Pacific notified all parties of record, pursuant to Commission Rule of Practice and Procedure (Rule) 51.1(b), of an October 29 settlement conference to discuss issues relating to change management principles. Following the Pacific-CLEC settlement conference, the Settling Parties entered into JSA-1. On July 22, 1999, the Settling Parties filed a joint motion⁴ to modify JSA-1. No responsive comments were filed.

GTEC held its meeting on May 14 - 15, 1998 in Thousand Oaks. It used the Pacific-CLEC "Change Management Process" draft document as a starting point in continuing discussions with the CLEC community. GTEC met again with the CLECs on August 5, September 2, and October 13, 1998 to finalize an agreed upon Change Management Process. On November 2, 1998, GTEC notified all record parties, pursuant to Rule 51.1(b), of a November 12 settlement conference to discuss issues relating to change management principles. Following the GTEC-CLEC settlement conference, the Settling Parties entered into JSA-2.

³ The Commission facilitated the workshop under consolidated dockets Rulemaking (R.) 93-04-003/Investigation (I.) 93-04-002/R.95-04-043/I.95-04-044 (the 271 proceeding).

⁴ *Joint Motion to Modify Settlement Agreement Pursuant to Article 13.5 of the Commission's Rules of Practice and Procedure.*

Scope and Summary of the Joint Settlement Agreements

The purpose of the Change Management Process is to allow CLEC input into Pacific's and GTEC's implementation of changes to OSS interfaces and "create an orderly structure under which the changes can be rolled out."⁵ The essential features of change management are: (1) deference to national standards; (2) a systematic method for notifying CLECs; (3) a mechanism for soliciting CLEC user input; (4) an opportunity for CLECs to formally vote on implementation of interfaces and (5) an orderly dispute resolution process.⁶

The Settling Parties declare that JSA-1 and JSA-2 resolve issues regarding changes to Pacific's OSS and GTEC's OSS, respectively. In addition, they note that the JSAs also resolve the processes for the introduction of new interfaces, and the retirement of existing interfaces. JSA-1 and JSA-2, attached to this decision as Appendices A and B, provide the details of the Change Management Process.

To facilitate their agreements, the Settling Parties ask the Commission to direct that the terms of the Change Management Process be incorporated into any existing and future CLEC interconnection agreements. Moreover, they seek to have the terms of the process replace any conflicting Change Management Process language currently contained in interconnection agreements. To effect that, the Settling Parties request that the Commission permit a CLEC to propose its own revision to its interconnection agreement with the ILECs incorporating

⁵ California Public Utilities Commission Telecommunications Division Final Staff Report on Pacific Bell (U 1001 C) and Pacific Bell Communications Notice of Intent to File Section 271 Application For InterLATA Authority in California (FSR) at 14 (October 5, 1998).

⁶ *Id.*

the Change Management Process or amended Change Management Process within 30 days of the effective date of this order.

The proposed revision will only identify changes to language currently contained within the interconnection agreement that conflicts with the Change Management Process. If the parties are unable to agree on the proposed revision, the Settling Parties urge us to permit either the CLEC or ILEC to file its proposed revision with the Commission for prompt resolution. In the event that a dispute arises about the Change Management Process or about any conflicting language in an existing interconnection agreement before the negotiation and approval of the amendment, the Settling Parties propose that the Change Management Process control.

If a CLEC does not provide a proposed amendment to the ILEC within 30 days of the effective date of this order, the Settling Parties ask to have the terms of the Change Management Process or the amended Process deemed to be "constructively incorporated" into any existing CLEC interconnection agreement. Therefore, the terms of the Change Management Process or the amended Process will control if there is a conflict with pre-existing language. With constructive amendment, once the Commission adopts the Change Management Process in its order, neither party to an interconnection agreement need physically amend its interconnection agreement.

The Modification of JSA-1

At the January 27, 1999 California Quarterly Change Management Process meeting (CQCMP Meeting), the Settling Parties to JSA-1 and other participants discussed and agreed upon the need to change certain timelines by which Pacific will notify CLECs of changes to the OSS interfaces. These are known as "Category One" timelines, and changes include those "to gateway applications (such as DataGate, Electronic Data Interchange, and Resale Mechanized

Interface). It also includes Graphic User Interface (GUI) applications where the changes are driven by changes to a gateway interface and major technology changes to GUI applications." Joint Motion to Modify Settlement Agreement at 3.

During the January CQCMP Meeting, the JSA-1 Settling Parties and other participants appointed a core drafting team to formally adopt the "Category One" timeline changes within the Change Management Process itself. The drafting team informed all April CQCMP Meeting participants and the recipients of the Final Minutes of the April 28, 1999 CQCMP Meeting that they had completed and unanimously approved the modifications to JSA-1. In addition, they stated that they would file the modification⁷ with the Commission and serve it on all interested parties.

Procedural Foundation of the Joint Settlement Agreements

The Settling Parties maintain that the Change Management Process must be inherently flexible to allow OSS implementation to meet carriers' individual needs under discrete circumstances. They contend that they will use the same "open and cooperative" approach that produced these settlements at the

⁷ On August 23, 1999, Pacific requested that the Commission accept five pages inadvertently omitted from the modified JSA-1 filed by the Settling Parties. The five pages are timelines reflecting the narrative description of the control processes within the Change Management Process. In sequence, they are: (1) Appendix A-Interface Change Management Process: Timeline for Category One Changes to Existing Interfaces; (2) Appendix B- Interface Change Management Process: Timeline for Category Two Changes to Existing Interfaces; (3) Appendix C-Interface Change Management Process: Timeline for Introduction of New Category One Interfaces; (4) Appendix D - Interface Change Management Process: Timeline for Introduction of New Category Two Interfaces; and (5) Appendix E-Interface Change Management Process: Timeline for Retirement of Existing Interfaces-Group One, Group Two, Group Three. We accept the five pages.

quarterly meetings to monitor and evaluate the appropriateness of the Change Management Process.

Should an amendment of the Change Management Process become necessary, the Settling Parties propose that the party sponsoring the change be required to serve each party on the OSS OII service list with a copy of the recommended revision. If either ILEC and a majority of the parties present at the Change Management Process meeting at which a proposed amendment is considered agree to the proposed amendment, within ten days the amendment's sponsor would file the agreement and a copy of the amended Change Management Process with the Commission. The sponsor would concurrently serve the documents on the service list. The Settling Parties further propose that the amendment become effective as of the date of the agreement, unless the Commission ordered a stay of the change within five days of the date of filing⁸. A copy of the current Change Management Process, as it exists from time to time, may be obtained by any CLEC from its account representative.

The Settling Parties maintain that they would like to promote continuing widespread industry participation in the design and implementation of the Change Management Process. Thus, they contend that they will use the Commission's service list in this proceeding as a formal means of apprising interested parties of any developments concerning the Change Management Process. They suggest that any entity not currently on the service list that wishes to learn of the Change Management Process ask the Commission's Process Office to add it to the service list and send a copy of the request to all of the parties on

⁸ The Settling Parties assert that the five-day effective date tracks the five-day effective date for tariff filings by non-dominant interexchange carriers. JSA-1 and JSA-2 at 8.

the Commission's then-current service list. While addition to the service list in this manner does not make an entity a party under the Commission's Rules, the Settling Parties stipulate and agree to provide notice and copies of material relating to the Change Management Process to such an entity as if it were a party.

Standard of Review

Commission Rule 51.1(e) provides that, prior to approval, the Commission must find a settlement "reasonable in light of the whole record, consistent with the law, and in the public interest." In Decision (D.) 92-12-019, we refined our policy toward settlements by setting forth several criteria which would characterize an "all party settlement." Satisfying these criteria creates, in effect, a rebuttable presumption of the reasonableness of the settlement; however, we would still have to determine that the settlement is consistent with the law and in the public interest.

The criteria established in D.92-12-019 require: (1) the unanimous sponsorship of all active parties to the instant proceeding; (2) that the sponsoring parties are fairly reflective of the affected interests; (3) that no term of the settlement contravenes statutory provisions or prior Commission decisions; and (4) that the settlement conveys to the Commission sufficient information to permit us to discharge our regulatory obligations with respect to the parties and their interests. We apply these criteria to the settlements before us.

Discussion

As discussed below, with certain qualifications these settlements meet each of the criteria. The sponsors of the settlements are all active parties in this proceeding. No party has contested the settlements. The sponsors herein, the two largest ILECs and a group of large and small CLECs, are most likely to be

affected by the ways in which changes to the OSS interfaces are implemented. The settlements also supply enough information to permit us to discharge our regulatory obligations with respect to the parties and their interests. By providing precepts to govern changes in the OSSs of Pacific and GTEC, we find that the settlements establish in the public interest a structured process through which the primary access mechanism of local competition may be modified.

The overall terms of the JSAs appear to be consistent with the California Public Utilities Code, prior Commission decisions and General Orders, and the Telecommunications Act of 1996. To expedite review of Change Management Process amendments, the Settling Parties have requested that we permit a proposed amendment to become effective as of the date of the quarterly meeting at which a majority of parties present agree upon the amendment. The sponsoring party of the amendment would then file the agreement and a copy of the amended Change Management Process with the Commission, and serve a copy of the filing on the OSS OII service list within ten days of the agreement. The Settling Parties propose that we include ordering language that enables the Commission to stay any amendment within five days of the date of the amendment agreement's filing.

The Settling Parties analogize the suggested timeline to the five-day effective date for tariff filings by non-dominant interexchange carriers (NDIECs). However, the Change Management Process appears to be more intricate than the NDIEC five-day effective date for tariffs⁹. The stated purpose of the Change

⁹ Specifically, the five-day effective date applies to existing services' uniform rate reductions, defined uniform rate increases for existing services, or minor advice letter filings that do not cause an increase in any rate or charge. Decision (D.) 90-08-032, as modified by D.91-12-013.

Management Process is twofold. First, it attempts to document the process by which the ILECs will notify CLECs of changes to the OSS interfaces and of the introduction of new interfaces and the retirement of specified interfaces.

Additionally, the process endeavors to provide for the identification and resolution of CLEC issues. While one aspect of the purpose suggests that a number of the Change Management Process's future amendments might be minor or ministerial, the other hints at the possibility of controversial future changes. Typically, the NDIEC five-day effective date for tariffs applies to routine, noncontroversial rate changes and minor text revisions.

The Settling Parties further distinguish this from NDIEC tariffs by proposing that the Change Management Process's amendment procedures allow for a Commission stay. Providing for the stay appears to acknowledge that, in the future, the Commission might need or want to give certain amendments further consideration or scrutiny. However, since the Commission alone has the authority to stay matters, a five-day period does not enable us to meet the statutory notice requirements under Pub. Util. Code § 311(g). While we see the importance of Change Management Process amendments becoming effective as promptly as possible, the Commission must have sufficient time to procedurally follow through on a stay should one be needed.

Generally, we would expect most controversial Change Management Process amendments to be put forward and resolved early in the course of events. The Settling Parties have structured the Change Management Process to be a consensus procedure. Going forward, the suggested procedure would first alert all parties on the OSS OII service list to the proposed amendment to the Change Management Process before the targeted quarterly meeting. Between the time of notice and the quarterly meeting, any opponents to the proposed amendment will likely make their objections known to the quarterly meeting

participants. The quarterly meeting participants will either agree with or defeat the proposal. Thus, a number of controversies should be resolved by the close of the quarterly meeting.

However, if public interest concerns arise that quarterly meeting participants do not address, or an interested entity does not receive adequate notice of a detrimental amendment, there must be a process by which the Commission can respond. Therefore, rather than adopt the suggested five-day effective date for amendments, we hold that amendments to the Change Management Process shall become effective as of the date of the agreement, unless the Commission orders a stay of the change within thirty (30) days of the filing date of the amendment agreement.

Further, any party, for good cause shown, may file a protest of a Change Management Process amendment no later than ten (10) days after the filing date of the amendment agreement. Since the Settling Parties have sought our sanction of the Change Management Process, we consider this timeline to be a reasonable balance between fulfilling our regulatory responsibility and declining to micromanage a detail of the competitive landscape. In their comments on the draft decision, none of the Settling Parties objected to these qualifications.

In its comments on the draft decision, the California Telecommunications Coalition¹⁰ (Coalition) notes that amendments to the instant Change Management Process are imminent. An eight-state Change Management Process with SBC that becomes effective after January 1, 2000 includes California. Moreover, the Coalition expects that, as a result of the October 6, 1999 Federal Communications Commission's approval of the SBC/Ameritech merger, the

¹⁰ Consisting of most of the Settling Party CLECs and some additional CLECs.

Change Management Process will be further amended by a thirteen-state Change Management Process.

In reply comments, Pacific and GTEC acknowledge that the next step will be the movement to a multi-state process; however, they insist that discussions are ongoing and the Coalition's apprehensions are premature. The Office of Ratepayer Advocates urges us to adopt JSA-1 as an interim process subject to adoption of a permanent process following subsequent investigation and comment. We recognize that the parties' approaching task will be to address, and reconcile if possible, the complexities of the ILECs' multi-state operations with this Change Management Process.

All the commenters emphasize that, at this juncture, these settlements represent the halfway point toward the Change Management Process yet to be. The Coalition, Pacific and GTEC indicate a desire to use this Process as the foundation for the additional collaborative work that they must accomplish. The specific issues surrounding the development of an appropriate multi-state Process are not yet before us; therefore, this Commission takes no action on these matters today. However, we await the parties' joint proposal on how best to bring these issues to the fore.

Finally, with the above changes and regarding each of the criteria in light of the whole record, we find the settlements to be reasonable. Thus, we approve, with qualification, JSA-1 as modified, and JSA-2 as submitted.

Comments on Draft Decision

The draft decision of Administrative Law Judge Jacqueline A. Reed was mailed to the parties in accordance with Pub. Util. Code § 311(g) and Rule 77.1 of the Rules of Practice and Procedure. Comments were filed on October 25, 1999, and reply comments were filed on November 1, 1999. We have taken the comments into consideration as appropriate in finalizing the decision.

Findings of Fact

1. Pacific and a group of participating large and small CLECs and GTEC and the same group of CLECs filed in these consolidated dockets two uncontested settlement agreements for approval, each entitled the "Joint Settlement Agreement", concerning the Interface Change Management Processes applicable to the respective OSS of Pacific and GTEC.

2. JSA-1 resolves outstanding issues among the Settling Parties regarding change management principles applicable to changes to the OSS offered by Pacific to CLECs in California.

3. JSA-1, as modified, includes changes to certain timelines by which Pacific will notify CLECs of changes to the OSS interfaces.

4. JSA-2 resolves outstanding issues among the Settling Parties regarding change management principles applicable to changes to the OSS offered by GTEC to CLECs in California.

5. The sponsors of JSA-1, as modified, and JSA-2 are all active parties in this proceeding.

6. No party has contested either JSA-1, as modified, or JSA-2.

7. The sponsors herein, the two largest ILECs and a group of large and small CLECs, are most likely to be affected by the ways in which changes to the OSS interfaces are implemented.

8. While one aspect of the purpose of the Change Management Process suggests that a number of future amendments might be minor or ministerial, the other hints at the possibility of controversial future changes.

9. Typically, the NDIEC five-day effective date for tariffs applies to routine, noncontroversial rate changes and minor text revisions.

10. A five-day period for a stay does not enable the Commission to meet its statutory notice requirements under Pub. Util. Code § 311(g).

11. In general, the terms of the settlements appear to be consistent with the California Public Utilities Code, prior Commission decisions and General Orders, and the Telecommunications Act of 1996.

Conclusions of Law

1. The two settlements are reasonable in light of the whole record, consistent with the law, and in the public interest.

2. The Settling Parties motion to modify JSA-1 should be granted.

3. The two settlements should be approved with qualification.

4. The terms of the Change Management Process should be incorporated into any existing CLEC interconnection agreement as proposed by the Settling Parties.

5. The Change Management Process should be incorporated into any future interconnection agreements as proposed by the Settling Parties.

6. It is reasonable that a CLEC may provide the ILECs a proposed revision to their interconnection agreement to incorporate the Change Management Process or amended Change Management Process within 30 days of the effective date of this order on condition that:

- a. Such proposed amendment should only identify changes to language currently contained within the interconnection agreement which conflicts with the Change Management Process;
- b. If parties are unable to agree on such proposed amendment, either the CLEC or ILEC may file its proposed amendment as an application with the Commission;
- c. If there should be any dispute regarding the Change Management Process or any conflicting language in an existing interconnection agreement prior to the negotiation and approval of such an amendment, the Change Management Process should control;

- d. If a CLEC does not provide a proposed amendment to the ILECs within 30 days of the effective date of this order, the terms of the Change Management Process or amended Change Management Process should be deemed "constructively incorporated" into any existing CLEC agreement and should control if the terms conflict with pre-existing language.

7. It is reasonable that pursuant to the Change Management Process adopted today, "constructive amendment" will not obligate either party to an interconnection agreement to physically amend the interconnection agreement.

8. If an amendment of the Change Management Process becomes necessary, the Settling Parties' proposed procedure, as qualified, should be used.

9. Any CLEC should be able to obtain a copy of the most current terms of the Change Management Process from its account representative at the ILEC.

10. This order should be effective immediately so that the ILECs and CLECs can have a structured framework through which to communicate with each other regarding proposed changes to the ILECs' OSSs.

O R D E R

IT IS ORDERED that:

1. The "Joint Settlement Agreement"(JSA-1), as modified, between Pacific Bell (Pacific or ILEC) and AT&T Communications of California, MCI Telecommunications Corporation, Sprint Communications Company L.P., Nextlink California, MediaOne Telecommunications of California, Inc., ICG Telecom Group, Inc., Northpoint Communications, Inc., Cox California Telecom, LLC, and Electric Lightwave, Inc. (the Settling Competitive Local Exchange Carriers (CLECs)) and the "Joint Settlement Agreement" (JSA-2) between GTE California Incorporated (GTEC or ILEC) and the Settling CLECs concerning the

Interface Change Management Processes (CMPs) applicable to the respective Operation Support Systems (OSS) of Pacific and GTEC are approved, as provided below.

2. JSA-1, as modified, and JSA-2 constitute the terms of the CMP.
3. The terms of the CMP, which documents the process by which the ILECs will notify CLECs of changes to the OSS interfaces, the introduction of new interfaces and retirement of specified interfaces, and provides for the identification and resolution of CLEC issues, shall replace any conflicting Change Management Process language currently contained in the interconnection agreements (ICAs).
4. The CMP shall be incorporated into any future ICAs.
5. A CLEC may provide the ILEC a proposed revision to their ICA to incorporate the CMP or amended CMP within thirty (30) days of the effective date of this order, on condition that:
 - a. The proposed amendment shall only identify changes to language currently contained within the ICA which conflicts with the CMP;
 - b. In the event parties are unable to agree on such proposed amendment, either the CLEC or ILEC may file its proposed amendment as an application with the Commission which shall act as promptly as possible on such submission;
 - c. In the event that there is any dispute regarding the CMP or any conflicting language in an existing ICA prior to the negotiation and approval of such an amendment, the CMP shall control; and
 - d. In the event a CLEC does not provide a proposed amendment to the ILEC within thirty (30) days of the effective date of this order, then the terms of the CMP or amended CMP shall be deemed "constructively incorporated" into any existing CLEC ICA and will control if the terms conflict with pre-existing language. A

"constructive amendment" shall not obligate either party to an ICA to physically amend its ICA.

6. Any party sponsoring an amendment to the CMP shall serve each party on the Rulemaking 97-10-016/Investigation 97-10-017 (OSS OII) service list with a copy of the proposed amendment.

7. If the interested ILEC and a majority of those parties present at the quarterly meeting of the CMP at which a proposed amendment is considered agree to the proposed amendment, the sponsoring party shall file the agreement and a copy of the amended CMP with the California Public Utilities Commission (Commission), and serve a copy of the filing on the then-current OSS OII service list, within ten (10) days of the agreement.

8. The CMP amendment shall become effective as of the date of the agreement, unless the Commission orders a stay of the change within thirty (30) days of the filing date of the amendment agreement.

9. Any party, for good cause shown, may file a protest of a CMP amendment no later than ten (10) days after the filing date of the amendment agreement.

10. Any CLEC shall be able to obtain a copy of the most current terms of the CMP from its account representative at the ILEC.

11. Any entity not currently on the OSS OII service list that is interested in the CMP may ask the Commission's Process Office to add it to the service list. That entity shall send a copy of the request to all of the parties on the Commission's then-current service list. Entities added in this manner shall not be considered to be parties under the Commission's Rules of Practice and Procedure.

12. The Settling Parties shall provide notice and copies of material relating to the CMP to any entity that has notified the OSS OII service list of its interest in the CMP as if that entity were a party to the proceeding.

This order is effective today.

Dated November 4, 1999, at San Francisco, California.

RICHARD A. BILAS
President
HENRY M. DUQUE
JOSIAH L. NEEPER
JOEL Z. HYATT
CARL W. WOOD
Commissioners

APPENDIX A - MODIFIED
JSA - 1

Pacific Bell Competitive Local Exchange Carrier (CLEC)

Interface Change Management Process

(Language in red print and contained within parentheses denotes language Settling Parties agreed to delete from the 12/08/98 version of the CMP, originally filed with the 01/20/99 Joint Settlement Agreement)

Interface Change Management Process: Pacific Bell and Competitive Local Exchange Carrier (CLEC)

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Appendix A - Timeline for Category One Changes to Existing Interfaces
Appendix B - Timeline for Category Two Changes to Existing Interfaces
Appendix C - Timeline for Introduction of New Category One Interfaces
Appendix D - Timeline for Introduction of New Category Two Interfaces
Appendix E - Timeline for Retirement of Interfaces (Groups 1,2,3)

Purpose

This documents the process by which Pacific Bell (PACIFIC) will notify CLECs of changes to the OSS interfaces, introduction of new interfaces and retirement of interfaces detailed below and provides for the identification and resolution of CLEC issues (Change Management Process). The parties intend for the Change Management Process to be dynamic in nature, managed through regularly scheduled meetings and based on group consensus. Any agreed-upon modifications to the process will be included in this document.

Scope

This process pertains to all ordering, pre-ordering, provisioning and maintenance electronic interfaces,¹ including, but not limited to, DataGate, EDI, RMI, Verigate, LEX, Starwriter, PBSM, CESAR, Listings Gateway, 911 Gateway, Fax/Manual, PBOD, POS and Service Order Retrieval & Distribution (SORD). Notwithstanding the foregoing, this process does not pertain to EBI. The parties will discuss expansion of this process to billing processes and non-end user ordering functions during the quarterly meetings.

This document applies to PACIFIC and all CLECs operating in California.

Section I - Changes to Existing Interfaces

Types of Changes

The Change Management Process manages changes that affect CLECs by altering the production or test environments. Such changes may encompass:

¹ Currently specific to end-user ordering functions only.

- Operations changes to existing functionality that impact the CLEC interface(s) upon PACIFIC's release date for new interface software. For example:
 - adding/deleting/modifying fields required to access a function
 - changing the flow, or sequence, of interface operation
 - adding an edit to ensure a required field is entered
- Technology changes that require CLECs to meet new technical requirements upon PACIFIC's release date. For example:
 - eliminating a previously supported operating system software (e.g. Microsoft™ Windows™ 3.0), hardware or protocol
 - requiring a new software, hardware (e.g. 8Mb RAM), or protocol
- Additional functionality changes that may be used at the CLEC's option, on or after PACIFIC's release date for new interface software. For example:
 - adding a new field to access a new function, without other impacts
 - allowance for additional entries into existing fields
 - adding a new supported software, hardware or protocol
- Regulatory Mandates
 - those changes that may be mandated by regulatory bodies

Two Change Categories

This process divides changes into two categories: Category One (Gateway) and Category Two (GUI).

- Category One (Gateway) changes include changes to gateway applications (such as DataGate, EDI, and RMI). It also includes GUI applications where the changes are driven by changes to a gateway interface (e.g. a change to LEX that is LSOR driven) and major technology changes to GUI applications.
- Category Two (GUI) is solely for changes to GUIs where the change is specific to a GUI (e.g. enhancements to the print capability in LEX).

Category One (Gateway) Process

1. For interfaces based on industry guidelines, the parties presume that the guidelines developed at the industry forum (i.e. ATIS, OBF) will be the basis for managing change. PACIFIC anticipates using applicable OBF Guidelines; however the needs and constraints of PACIFIC's legacy systems may limit use of all such Guidelines; PACIFIC will identify any proposed variances from OBF Guidelines.² Therefore, as the industry guideline (e.g. LSOG) requirements are being determined at OBF, PACIFIC will review the requirements to determine compatibility with PACIFIC's systems. There may be other changes initiated by PACIFIC to gateway interfaces that are not a result of ATIS/OBF change drivers (e.g., changes to enhance order flow through).
2. Regardless of the change driver, PACIFIC will prepare a preliminary package of the required issue changes and share these plans at a Quarterly Change Management meeting nine (9) to twelve (12) months in advance of the target implementation date. PACIFIC will share its plans as part of its rolling 12-month Development View (see Managing the Change Management Process, below).
3. PACIFIC will detail the changes in a Release Announcement (Initial Notification) delivered to CLECs via an email Accessible Letter. The letter will contain a written summary of the change(s) in plain English, a target timeframe for implementation, any cross reference to industry documentation, and any known exceptions to industry guidelines.
4. If a CLEC identifies issues or requires clarification, the CLEC must send a written response (via email, fax or regular mail) to its Pacific Bell Account Manager. The CLEC response will specify the CLEC's questions, issues and any alternative recommendations for implementation. The CLEC response must be received by the Pacific Bell Account Manager no later than the (14th) 7th calendar day following the date of the Release Announcement.³

² This is in accordance with General Section 1.0, paragraph 1.4 of the practices in the OBF Local Service Ordering Guidelines (LSOG), which states that "Options described in this practice may not be applicable to individual provider's tariffs; therefore, use of either the field or valid entries within the field is based on the provider's tariffs/practices".

³ In all cases, the date of any Accessible Letter referenced in this Agreement will be the date on which PACIFIC emails the document to CLECs. PACIFIC will send the Accessible Letters to the point(s) of contact designated by the CLEC. It is each CLEC's responsibility to ensure that PACIFIC has a current contact list.

5. PACIFIC will review all CLEC responses.
6. Within ~~(14)~~ 7 calendar days of the end of the time period specified in Step 4 (~~(28th)~~ 14th calendar day following the date of the Release Announcement), PACIFIC will provide written answers to CLEC questions via Accessible Letter. PACIFIC's answers will be shared with all CLECs, unless any questions were specifically identified as "private" by any CLEC.
7. If PACIFIC announces any changes before applicable guidelines are finalized at the ATIS/OBF industry forums, PACIFIC will review the final guidelines when they are issued for any alterations that may be necessary for compliance with the finalized requirements.
8. No sooner than the last day of the period specified in Step 6, PACIFIC will send the Release Requirements to CLECs via another email Accessible Letter. The Release Requirements will contain the planned implementation date, Change Log, updated interface requirements (e.g., LSOR changes), exceptions to the EDI transactions set, industry cross reference and reporting impacts, if any. Generally, PACIFIC's planned implementation will fall within 152 to 172 calendar days from the date of the Release Requirements, unless PACIFIC invokes the use of the exception process.
9. If a CLEC identifies issues or requires clarification (including issues with the planned implementation date), the CLEC must send a written response (via email, fax or regular mail) to its Pacific Bell Account Manager. The CLEC response to the Release Requirements must be received by the Pacific Bell Account Manager not later than the 21st calendar day after the date of the Release Requirements.
10. PACIFIC will review all responses to the Release Requirements.

11. Not later than the 21st calendar day following the end of the period specified in Step 9, PACIFIC will provide written answers to CLEC questions via an email Accessible Letter. PACIFIC's answers will be shared with all CLECs, unless any questions were specifically identified as "private" by any CLEC. Any changes that may occur as a result of the answers will be distributed to all CLECs in the same Accessible Letter. This will constitute the Revised/Confirmed Release Requirements which will include a summary of changes from Step 8 above, indication of type of change (i.e. documentation change, business rule change, clarification change), changed requirements pages and release date. Generally, PACIFIC's planned implementation will fall within 110 to 130 calendar days from the date of the Revised/Confirmed Release Requirements, unless PACIFIC invokes the use of the exception process.
12. Should a CLEC elect to initiate the Outstanding Issue Solution (OIS) process described in this Change Management Process, the CLEC must send a written notice (via email, fax or regular-mail) to its Pacific Bell Account Manager. The CLEC's notice initiating the OIS process must be received by the Pacific Bell Account Manager within 7 calendar days from the date of the Revised/Confirmed Release Requirements.
13. Upon receipt of a CLEC OIS notice, PACIFIC will schedule an OIS conference call for noon Pacific Time, 7 calendar days after the due date for the OIS notices (14 calendar days after the date of the Revised/Confirmed Release Requirements).
14. If no OIS is initiated (or after successful conclusion of any OIS), testing will be conducted by PACIFIC and any interested CLEC until the agreed upon testing exit criteria have been satisfied, in accordance with the test plan, to the mutual satisfaction of the parties.
 - a) PACIFIC will make testing available beginning (60 calendar days from the Revised/Confirmed Release Requirements; provided, however, that all CLEC testing must commence no later than 30) 37 calendar days prior to the scheduled implementation date.
 - b) Testing must be scheduled to end at least (14) 7 calendar days prior to the scheduled implementation date, unless otherwise agreed between PACIFIC and a CLEC.

1. **CONDITIONAL:** If the parties cannot agree on whether the test criteria have been satisfied within the planned time frame, either PACIFIC or the CLEC may invoke a second OIS process, using the Category Two OIS timeline (for Changes to Existing Interfaces).
2. PACIFIC implements the new release or updates.

Category Two (GUI) Process

1. PACIFIC will share plans for changes to GUI interfaces at a Quarterly Change Management meetings, where known. PACIFIC will share its GUI plans, where known, as part of its rolling 12-month Development View (see Managing the Change Management Process, below).
2. PACIFIC will detail the changes in a Release Announcement (Initial Notification) delivered to CLECs via an email Accessible Letter. The letter will contain a written summary of the change(s) in plain English, a target timeframe for implementation, and any cross-reference to updated User Guide or revised User Guide pages.
3. If a CLEC identifies issues or requires clarification, the CLEC must send a written response (via email, fax or regular mail) to its Pacific Bell Account Manager. The CLEC response must be received by PACIFIC within 4 calendar days of the date of the Release Requirements. The response will specify the CLEC's questions, issues and any alternative recommendations for implementation.
4. PACIFIC will review all CLEC responses.

5. Within 3 calendar days of the end of the period specified in Step 3, PACIFIC will provide written answers to CLEC questions via email Accessible Letter. PACIFIC's answers will be shared with all CLECs, unless any questions were specifically identified as "private" by any CLEC. Any changes that may occur as a result of the responses will be distributed to all CLECs in the same Accessible Letter. This will constitute the Revised/Confirmed Release Requirements which will include a summary of changes from Step 2 above, indication of type of change (i.e. documentation change, business rule change, clarification change), changed requirements pages, and release date. Generally, PACIFIC's planned implementation date will be no sooner than the 14th calendar day from the date of the Revised/Confirmed Release Requirements, unless PACIFIC invokes the use of the exception process.
6. Should a CLEC elect to initiate the OIS process described in this Change Management Process, the CLEC must send a written notice (via email, fax, or regular mail) to its Pacific Bell Account Manager. This notice must be received by the Pacific Bell Account Manager within 2 business days of the date of the Revised/Confirmed Release Requirements.
7. Upon receipt of an OIS notice, PACIFIC will schedule a conference call to be held at noon Pacific Time, 2 business days after the due date for OIS initiation notices (4 business days after the Revised/Confirmed Release Requirements). NOTE: The OIS process does not apply to PACIFIC's retail systems as specified in the Outstanding Issue Process below.
8. NOTE: No provision for testing is included in the Category Two process.
9. If there is no OIS (or after successful resolution of the OIS), PACIFIC will implement the new release or updates.

Section II - Introduction of New Interfaces

Two Categories of New Interfaces⁴

This process divides the introduction of new interfaces into two categories: Category One (Gateway) and Category Two (GUI).

- Category One (Gateway) interfaces are all gateway applications.
- Category Two (GUI) interfaces are all GUI applications.

Category One (Gateway) Process

1. Approximately nine (9) months in advance of the target implementation date, PACIFIC will convene a Design and Development meeting with the CLEC community. PACIFIC will share preliminary plans for the new interface, including regional availability, proposed implementation timeline, PACIFIC constraints and exceptions to industry standards, etc. During the meeting, CLECs will provide feedback to PACIFIC, including interest in developing to the initial version of the interface. If available, PACIFIC will share draft Release Requirements.
2. If a CLEC identifies additional issues or feedback, the CLEC must send a written response (via email, fax or regular mail) to its Pacific Bell Account Manager. The CLEC response will specify the CLEC's questions, issues and any alternative recommendations for implementation. The CLEC response must be received by the Pacific Bell Account Manager no later than the 4th calendar day following the date of the Design and Development Meeting.⁵
3. PACIFIC will communicate its interface development plans, including how it has incorporated CLEC feedback (this can be combined with Step 4).

⁴ Even though the names "Category One" and "Category Two" are re-used in this section, their use is defined differently than in Section I, Changes to Existing Interfaces. See definition above.

⁵ In all cases, the date of any Accessible Letter referenced in this Agreement will be the date on which PACIFIC emails the document to CLECs. PACIFIC will send the Accessible Letters to the point(s) of contact designated by the CLEC. It is each CLEC's responsibility to ensure that PACIFIC has a current contact list.

4. PACIFIC will detail the new interface in a Release Announcement (Initial Notification) delivered to CLECs via an email Accessible Letter. The letter will contain a written summary of the new interface in plain English, a target timeframe for implementation, any cross reference to industry documentation and any known exceptions to industry guidelines.
5. If a CLEC identifies issues or requires clarification, the CLEC must send a written response (via email, fax or regular mail) to its Pacific Bell Account Manager. The CLEC response will specify the CLEC's questions, issues and any alternative recommendations for implementation. The CLEC response must be received by the Pacific Bell Account Manager no later than the (14th) 7th calendar day following the date of the Release Announcement.
6. CLECs who are interested in developing to the initial version of the interface within 6 months of PACIFIC'S planned implementation will document that intent via a ROU (Record of Understanding) with its initial response. ROUs can be modified or submitted through step 13 of the process.
7. PACIFIC will review all CLEC responses.
8. Within (14) 7 calendar days of the end of the time period specified in Step 5 ((28th) 14th calendar day following the date of the Release Announcement), PACIFIC will provide written answers to CLEC questions via Accessible Letter. PACIFIC's answers will be shared with all CLECs, unless any questions were specifically identified as "private" by any CLEC.
9. If PACIFIC announces a new interface before applicable guidelines are finalized at the ATIS/OBF industry forums, PACIFIC will review the final guidelines when they are issued for any alterations that may be necessary for compliance with the finalized requirements. PACIFIC will consider its system requirements and provide known exceptions to industry guidelines.

10. No sooner than the last day of the period specified in Step 8, PACIFIC will send the Release Requirements to CLECs via another Accessible Letter. The Release Requirements will contain the planned implementation date, interface requirements, exceptions to the EDI transaction set (if applicable), industry cross-reference and reporting impacts, if any. PACIFIC will also provide the finalized OSS charge applicable to the new interface. If PACIFIC plans to offer a temporary free trial period, it will make it known to CLECs at this step in the process. Generally, PACIFIC's planned implementation will fall within 152 to 172 calendar days from the date of the Release Requirements, unless PACIFIC invokes the use of the exception process.
11. If a CLEC identifies issues or requires clarification (including issues with the planned implementation date), the CLEC must send a written response (via email, fax or regular mail) to its Pacific Bell Account Manager. The CLEC response to the Release Requirements must be received no later than the 21st calendar day after the date of the Release Requirements.
12. PACIFIC will review all responses to the Release Requirements.
13. Not later than the 21st calendar day following the end of the period specified in Step 11, PACIFIC will provide written answers to CLEC questions via an email Accessible Letter. PACIFIC's answers will be shared with all CLECs, unless any questions were specifically identified as "private" by any CLEC. Any changes that may occur as a result of the answers will be distributed to all CLECs in the same Accessible Letter. This will constitute the Revised/Confirmed Release Requirements which will include a summary of the changes from Step 12 above, indication of type of change, (i.e., documentation change, business rule change, clarification change, etc.), changed requirements pages and release date. Generally, PACIFIC's planned implementation will fall within 110 to 130 calendar days from the date of the Revised/Confirmed Release Requirements, unless PACIFIC invokes the use of the Exception process.

14. Should a CLEC elect to initiate the Outstanding Issue Solution (OIS) process described in this Change Management Process, the CLEC must send a written notice (via email, fax or regular mail) to its Pacific Bell Account Manager. The CLEC's notice initiating the OIS process must be received within 7 calendar days from the date of the Revised/Confirmed Release Requirements.
15. Upon receipt of a CLEC OIS notice, PACIFIC will schedule an OIS conference call for noon Pacific Time, 7 calendar days after the due date for the OIS notices (14 calendar days after the date of the Revised/Confirmed Release Requirements).
16. If no OIS is initiated (or after successful conclusion of any OIS), testing will be conducted by PACIFIC and any interested CLEC, until the agreed upon testing exit criteria have been satisfied in accordance with the test plan to the mutual satisfaction of the parties.
 - a) (17.) PACIFIC will make testing available beginning 60 calendar days from the Revised/Confirmed Release Requirements; provided, however, that all CLEC testing must commence no later than 30) 37 calendar days prior to the scheduled implementation date.
 - b) Testing must be scheduled to end at least (14) 7 calendar days prior to the scheduled implementation date, unless otherwise agreed between PACIFIC and a CLEC.
1. (19.) CONDITIONAL: If the parties cannot agree on whether the test criteria have been satisfied within the planned time frame, either PACIFIC or the CLEC may invoke a second OIS process, using the Category Two OIS timeline.
2. (20.) PACIFIC implements the new interface.

Category Two (GUI) Process

1. Approximately 8 weeks in advance of the target implementation date, PACIFIC will share Design and Development information with the CLEC community (e.g., via a meeting, conference call or email Accessible Letter, etc.). PACIFIC will share preliminary plans for the new interface, including the estimated OSS charge including regional availability, proposed implementation timeline, PACIFIC's constraints and exceptions to industry standards, etc. CLECs will provide feedback to PACIFIC, including interest in implementing the initial version of the interface. If available, PACIFIC also will share draft Release Requirements.
2. If a CLEC identifies additional issues or feedback, the CLEC must send a written response (via email, fax or regular mail) to its Pacific Bell Account Manager. The CLEC response will specify the CLEC's questions, issues and any alternative recommendations for implementation. The CLEC response must be received by the Pacific Bell Account Manager no later than the 2nd calendar day following the date of the Release Announcement.
3. PACIFIC will communicate its interface development plans, including how it has incorporated CLEC feedback (this can be combined with Step 4).
4. PACIFIC will detail the new interface in a Release Announcement (Initial Notification) delivered to CLECs via an email Accessible Letter. The letter will contain a written summary of the new interface in plain English, a target timeframe for implementation, how and when the User Guide will be available and user training requirements. PACIFIC will also provide the finalized OSS charge applicable to the new interface. If PACIFIC plans to offer a temporary free trial period, it will make it known to CLECs at this step in the process.
5. If a CLEC identifies issues or requires clarification, the CLEC must send a written response (via email, fax, or regular mail) to its Pacific Bell Account Manager. The CLEC response must be received by PACIFIC no later than the 4th calendar day after the date of the Release Requirements. The response will specify the CLEC's question, issues and any alternative recommendations for implementation.
6. PACIFIC will review all CLEC responses.

7. No later than the 3rd calendar day after the end of the period specified in Step 5, PACIFIC will provide written answers to CLEC questions via email Accessible Letter. PACIFIC's answers will be shared with all CLECs unless any questions were specifically identified as "private" by any CLEC. Any changes that may occur as a result of the answers will be distributed to all CLECs in the same Accessible Letter. This will constitute the Revised/Confirmed Release Requirements which will include a summary of the changes from Step 4 above, indication of type of change, (i.e., documentation change, business rule change, clarification change, etc.), changed requirements pages and release date. Generally, PACIFIC's planned implementation will be no sooner than the 14th calendar day from the date of the Revised/Confirmed Release Requirements, unless PACIFIC invokes the use of the Exception process.
8. Should a CLEC elect to initiate the Outstanding Issue Solution (OIS) process described in this Change Management Process, the CLEC must send a written notice (via email, fax or regular mail) to its Pacific Bell Account Manager. This notice must be received by the Pacific Bell Account Manager within 2 business days of the date of the Revised/Confirmed Release Requirements.
9. Upon receipt of a CLEC OIS notice, PACIFIC will schedule an OIS conference call for noon Pacific Time, 2 business days after the due date for the OIS notices (4 business days after the date of the Revised/Confirmed Release Requirements). NOTE: The OIS process does not apply to PACIFIC's retail systems, as specified in the Outstanding Issue Solution process, below.
10. CLECs may negotiate through their Pacific Bell Account Manager the ability to pass a limited number of orders, designated as "test orders." This would only be available after the interface is in a production mode and at the CLEC's initial turn up of the interface.
11. If no OIS is initiated (or after successful conclusion of any OIS), PACIFIC will implement the new interface.

Section III - Retirement of Existing Interfaces

Retirement Groups

This process divides the retirement of all interfaces in the scope of this document into three groups, Group One, Group Two and Group Three.

- Group One: retail interfaces (PACIFIC retail systems made available to CLECs), including, but not limited to, Starwriter, SORD, PBOD and PBSM.
- Group Two: CLEO, CESAR, RMI, MS Gateway (for E911) and Listings Gateway. No additional interfaces can be added to this group.
- Group Three: all other current and future interfaces (non-retail and not listed in Group Two). These include, but are not limited to, EDI Ordering, DataGate, EDI Preorder (when available), Verigate, LEX and POS.

Interface Retirement Process

1. PACIFIC will detail the retirement of the interface in a Retirement Notice delivered to CLECs via an email Accessible Letter. The letter will contain a written summary of the retirement plans in plain English, a target timeframe for retirement, the grandfather date (last date which new CLECs may begin use of the interface) and where comparable functionality currently exists. For retirement of interfaces, PACIFIC will provide the following notice (broken out by Interface Group) from the time of the Retirement Notice to the retirement of the interface, unless PACIFIC invokes the use of the Exception process.

Group One	-	12 months
Group Two	-	18 months
Group Three	-	24 months

Prior to sending a retirement notice, PACIFIC will share its initial plans for retirement of existing interfaces at a Quarterly Change Management meeting nine (9) to twelve (12) months in advance of the proposed retirement date. PACIFIC will share a target date for the retirement notice as part of its rolling 12-month Development View (see Managing the Change Management Process, below). During such quarterly meeting, PACIFIC will explain the rationale for retiring the interface, where the replacement functionality resides or where it will exist at the time the Retirement Notice is sent, and its plans to grandfather the interface.

2. If a CLEC identifies issues or requires clarification, the CLEC must send a written response (via email, fax or regular mail) to its Pacific Bell Account Manager. The CLEC response will specify the CLEC's questions, issues and any alternative recommendations. The CLEC response must be received by the Pacific Bell Account Manager no later than the 21st calendar day following the date of the Retirement Announcement.
3. PACIFIC will review all CLEC responses.
4. Not later than the 21st calendar day following the end of the period specified in Step 3, PACIFIC will provide written answers to CLEC questions via an email Accessible Letter. PACIFIC's answers will be shared with all CLECs, unless any questions were specifically identified as "private" by any CLEC. Any changes that may occur as a result of the answers will be distributed to all CLECs in the same Accessible Letter. This will constitute the Revised/Confirmed Retirement Notice which will include a summary of changes from Step 2 above, indication of type of change, (documentation change, business rule change, clarification change, etc.), and retirement date.

5. With respect to retirement of Group Three interfaces only, a CLEC may elect to use the OIS process.⁶ Should a CLEC elect to initiate the OIS process described in this Change Management Process, the CLEC must send a written notice (via email, fax or regular mail) to its Pacific Bell Account Manager. The CLEC's notice initiating the OIS process must be received by the Pacific Bell Account Manager within 7 calendar days from the date of the Revised/Confirmed Retirement Notice (step 5 above).
6. Upon receipt of a CLEC OIS notice, PACIFIC will schedule an OIS conference call for noon Pacific Time, 7 calendar days after the due date of the OIS notices (14 calendar days after the date of the Revised/Confirmed Retirement Notice).
7. If no OIS is initiated, (or after successful conclusion of any OIS), PACIFIC will retire the interface on the retirement date announced.

Section IV - Other Items

Emergency Situations

Emergency releases or emergency implementation date changes will be handled as special cases.

Emergency releases are releases that address major software problems, production system failure or an interface failure. These also include releases that address significant production problems and the failure of scheduled release enhancements.

The notification process interval will be handled on a case by case basis and will depend on the type and extent of the emergency. Notification to the CLECs will be sent as soon as reasonably practicable after the emergency is recognized. The emergency notification need not be in the form of an Accessible Letter, and may be sent via other expedited means (e.g., broadcast fax).

In emergency situations, mutual testing and problem resolution will be conducted through the OSS contacts for all companies involved.

⁶ The OIS process does not apply to Group One and Two interfaces.

Exceptions

Above and beyond the need to handle emergency situations, the parties recognize the need to occasionally allow for other exceptions to the Change Management Processes described herein. However, because it will be difficult for PACIFIC or other CLECs to accurately assess the impact of PACIFIC's proposed change on any given CLEC's current or future development, any agreement to deviate from the normal Change Management Process shall be agreed to unanimously.

Steps in the Exceptions Process:

1. If PACIFIC wishes to propose that a specified change, introduction of a new interface or retirement of an interface be handled on an exception basis, it will issue a Release (or Retirement) Requirements Exception Accessible Letter which indicates that it seeks an expedited due date following the conclusion of a reply and comment cycle.
2. In CLEC responses, due within the applicable timeframe documented in the process, CLECs will raise questions and issues. Qualified CLECs⁷ will indicate objections to handling the change, new interface or retirement as an exception. Lack of a response indicates no objection.
3. PACIFIC may proceed to implement the change, new interface or retirement on an expedited basis only if there are no outstanding issues or CLEC objections at the end of the CLEC response cycle specified in Step 2 above.

Regulatory mandated changes must proceed within the mandated timeframe and are not subject to the objection process for exceptions. In the Accessible Letter notification, PACIFIC will provide any modified timelines for the change.

⁷ The definition of Qualified CLECs is the same as is specified in the Outstanding Issue Solution section of the document.

Manual Processes

Where changes are made to PACIFIC's manual processes (e.g. faxing) these processes will fall into one of the Change Management Process timelines outlined in this document. For example, LSOR changes would affect the faxed forms and would fall into the Changes to Existing Interfaces, Category One timeline, where other paper form changes will fall into the Changes to Existing Interfaces, Category Two timeline. Changes to these types of interfaces would also be communicated via an email Accessible Letter.

Training

All changes to existing interfaces, as well as the introduction of new interfaces, will be coordinated both with external CLEC training and with PACIFIC's internal processes for updating employees on changes to CLEC and its own retail systems. All parties agree that information regarding changes to the interfaces, as well as information regarding new interfaces, needs to be communicated and coordinated with end users and support personnel to ensure effective implementation. This includes updating external CLEC training, and all parties' best efforts to update internal training and Methods and Procedure (M&P) processes, as applicable.

Testing

For Changes to Existing Interfaces, testing is limited to gateway interfaces and technology changes for GUI interfaces. There is no testing for Category Two changes for existing interfaces.

For new interfaces, testing is again limited to gateway interfaces, although for GUIs, CLECs may negotiate through their Pacific Bell Account Manager the ability to pass a limited number of orders, designated as "test orders," over the GUI interface. This would only be available after the interface is in production mode and at the CLEC's initial turn up of the interface.

Where applicable, PACIFIC and CLECs will perform interface testing as mutually agreed in a documented test plan. Each testing party will meet with PACIFIC and agree on its own set of test scenarios that will be included in the test and a test schedule. Should the parties not agree that a successful test was achieved within the specified interval, either PACIFIC or the CLEC may initiate an OIS, using the Category Two Timeline.

Outstanding Issue Solution

1. **PROCESS INITIATION** – The initiating CLEC will provide PACIFIC with written notification of the outstanding issue(s). This notice will include the disputing party's reason(s) for raising the dispute and any alternative recommendations.
2. **LIMITATIONS OF OUTSTANDING ISSUE SOLUTION PROCESS**
 - a. **Changes to Existing Interfaces:** PACIFIC has made several of its retail systems available to CLECs, in addition to interfaces that have been designed primarily for CLEC use. To maintain the distinction between PACIFIC's retail systems and CLEC interfaces, the Outstanding Issue Solution Process does not apply to PACIFIC's retail systems including, but not limited to, SORD, StarWriter, PBSM and PBOD.
 - b. **New Interfaces:** No limitations apply.
 - c. **Retirement of Interfaces:** The OIS process only applies to Group 3 interfaces.
3. **PAYMENT FOR THE DISPUTE SOLUTION CONFERENCE CALL** – The CLEC initiating an OIS, shall provide a bridge number for the conference call with its initiation notice. In the event more than one CLEC initiates an OIS, PACIFIC shall coordinate with the initiating CLECs to determine which bridge number to use.
4. **ISSUE TIMELINE** - In accordance with the appropriate timelines (see above), PACIFIC will publish a summary of all CLEC dispute(s) which will include PACIFIC's position on those disputes.

As soon as reasonably practicable after PACIFIC's receipt of the OIS initiation notices, but in no event later than one business day before the call, PACIFIC will notify the CLECs (via email) that there is a dispute along with the date, time and bridge for the voting call. In this notice, PACIFIC also will include a preliminary list of Qualified CLECs. If a CLEC wishes to contest its status, it may ask to have its status changed during the call, but prior to the vote, to be determined under the standards set forth herein.

All parties agree that it is in their mutual interest to expedite the deliverables that are due during the OIS Process.

5. **VOTING CONFERENCE CALL** - Discussion on the voting call may include:

- a dialogue for the opposing views
- impacts of a "No" vote on the remainder of the release or other connected releases (applies to changes to existing interfaces only)
- discussion of options

The vote by Qualified CLECs during the call will resolve the question appropriate to the change category (e.g., change to existing interface, introduction of new interface or retirement of interface) as follows.

- a. **Change to Existing Interfaces:** Will PACIFIC implement the disputed item as defined by PACIFIC at the end of the notice and comment period (published in the Revised/Confirmed Release Requirements? The allowed votes are "Yes," "No" and "Abstain".
- b. **New Interfaces:** Will PACIFIC implement the new interface as defined by PACIFIC at the end of the notice and comment period (published in the Revised/Confirmed Retirement Notice)? The allowed votes are "Yes," "No" and "Abstain".
- c. **Retirement of Interfaces:** Has PACIFIC provided comparable functionality? The allowed votes are "Yes," "No" and "Abstain".

In the event of a "yes" vote (allowing PACIFIC to retire the interface in the timeframe PACIFIC defined), CLECs who have an interest in continuing to use the retiring interface, beyond the retirement date, should initiate two-party negotiations with PACIFIC. These negotiations will include, but will not be limited to, discussions of the ongoing costs of maintaining a customized interface and its ultimate obsolescence. The OIS process does not apply in this instance.

6. QUALIFIED CLECs

a. Changes to Existing Interfaces: Qualified CLECs must fall into one of the following categories:

- Current production users [Note: CLECs can also qualify if they are using an interdependent interface (e.g. LEX users for an EDI/LSOR change)].
- CLECs currently testing the interface.
- CLECs with a documented intent to implement the interface within one year. This is further defined as either a signed ICA with an implementation schedule OR Record of Understanding (ROU/MOU). Additionally, CLECs who have previously tested the interface OR who are negotiating terms and conditions for access to the interface may also vote, subject to acceptable substantiation, sanctioned by a majority vote of the other qualified CLECs.

All CLECs, including those not qualified to vote, may participate on the Outstanding Issue Solution calls.

a. New Interfaces: Qualified CLECs must meet the following criteria:

- CLECs with a documented intent to implement the initial version of the new interface within 6 months of PACIFIC'S planned implementation. This is further defined as either a CLEC with a signed ICA with an implementation schedule for the interface OR one with a Record of Understanding (ROU/MOU) OR one who is negotiating terms and conditions for access to the interface may also vote, subject to acceptable substantiation, sanctioned by a majority vote of the other qualified CLECs.

All CLECs, including those not qualified to vote, may participate on the Outstanding Issue Solution calls.

a. **Retirement of Interfaces:** Qualified CLECs must meet the following criteria:

- CLECs who are currently live production users of the retiring interface or are testing the interface with PACIFIC.
- PACIFIC is qualified to vote in OIS on retirement of interfaces.

All CLECs, including those not qualified to vote, may participate on the Outstanding Issue Solution calls.

7. **MAJORITY VOTE** - Outstanding Issue Solution shall be resolved by a majority vote, solely among the qualified CLECs. "Majority Vote" shall mean a simple majority of a Quorum of qualified CLECs, indicating that the qualified CLECs either:

Object to ("No")

or

Support PACIFIC's position ("Yes").

For purposes of this definition, "Quorum" shall constitute two-thirds of the qualified CLECs. In the event of a tie, or if no quorum is established, the Revised/Confirmed Release Requirements shall be implemented by PACIFIC.

A qualified CLEC may not give its vote (i.e. proxy) to another voting CLEC. However, a qualified CLEC may designate its company representative as it sees fit, provided that it may not designate another CLEC to cast its vote. An independent designee may represent more than one voting CLEC.

A Corporation, including all affiliates, is entitled to a single vote, unless the Corporation can convince a majority of other qualified CLECs that it has a legitimate need or right for multiple votes.

Managing the Change Management Process

PACIFIC will host quarterly meetings to review the Change Management process and discuss development plans. During these meetings, the parties will review the effectiveness of Change Management Process and agree upon any changes. Additionally, PACIFIC will share with the CLECs a non-binding, 12 month rolling development plan, with scheduled release dates. The meetings will include discussion of PACIFIC's development plan, as well as any CLEC suggested development to PACIFIC OSS.

Enforcement

A standing agenda item at the Quarterly Change Management meeting will provide an opportunity for PACIFIC and CLECs to assess the effectiveness of the Change Management Process and the need for any revisions.

Both CLECs and PACIFIC will use this opportunity to provide feedback of instances of non-compliance and commit to taking the appropriate action(s).

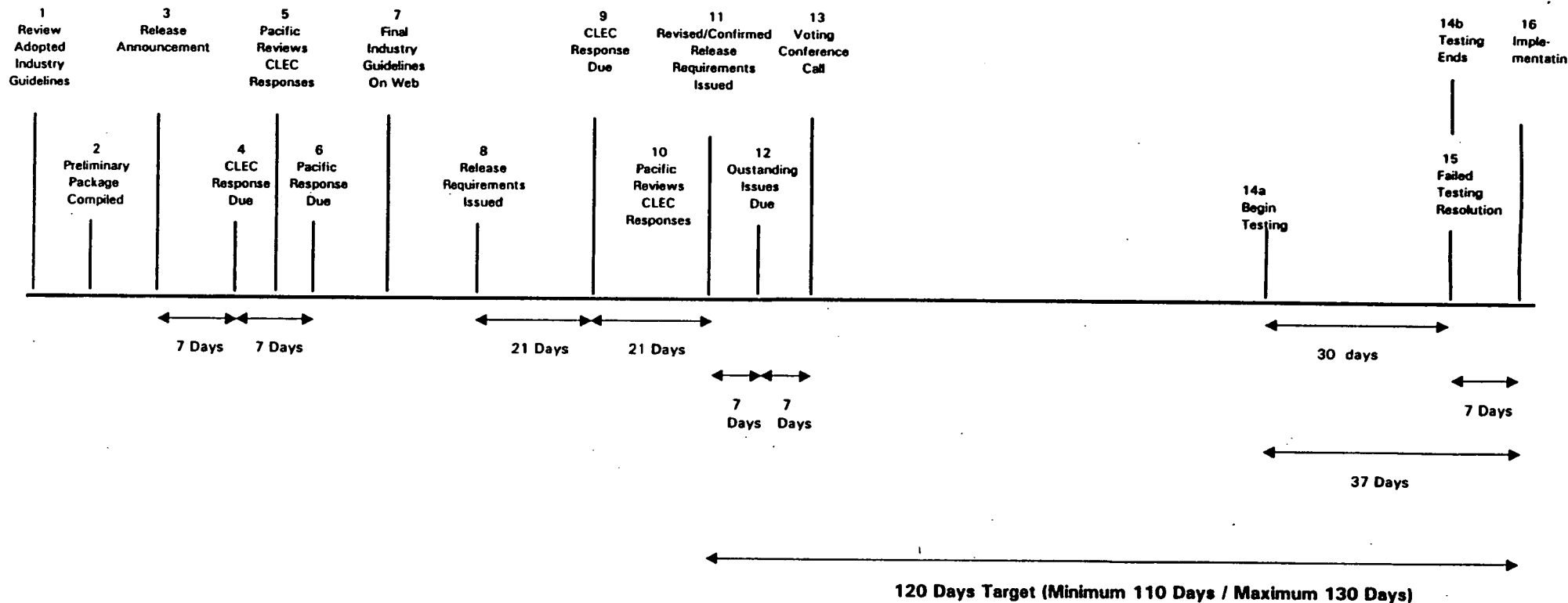
After using the discussion opportunity of the Quarterly Change Management meetings, if there is consensus that the process is no longer working to the mutual benefit of all, the parties will schedule meetings to begin re-engineering of the process. If there is no consensus, individual parties may approach the CPUC after giving notice of its intent to do so at a Quarterly Change Management meeting. The party will also describe the action it intends to take and the reason(s) for its proposed actions.

If parties believe that non-compliance has been blatant and that the proposed solutions offered by the offending party(ies) is (are) unacceptable, both PACIFIC and individual CLECs are free to pursue available legal remedies. The range of available remedies may include, but are not necessarily limited to, the following:

- Alternative Dispute Resolution as provided in individual Interconnection Agreements
- Action before the CPUC
- Mediation
- Action before a court of competent jurisdiction

Appendix A - Interface Change Management Process

Timeline for Category One Changes to Existing Interfaces (Gateway)

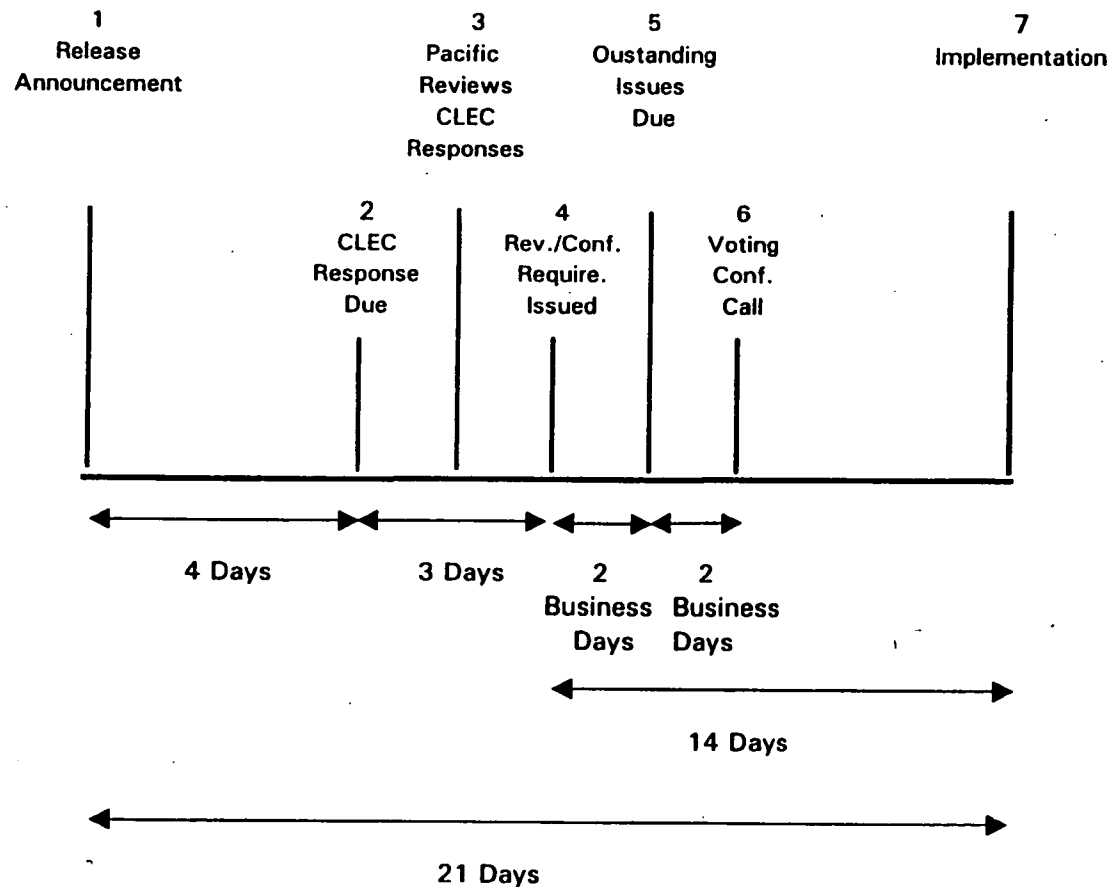


Days shown are calendar days

* * This period may be a maximum of 10 days plus or minus from 60 days

Appendix B - Interface Change Management Process

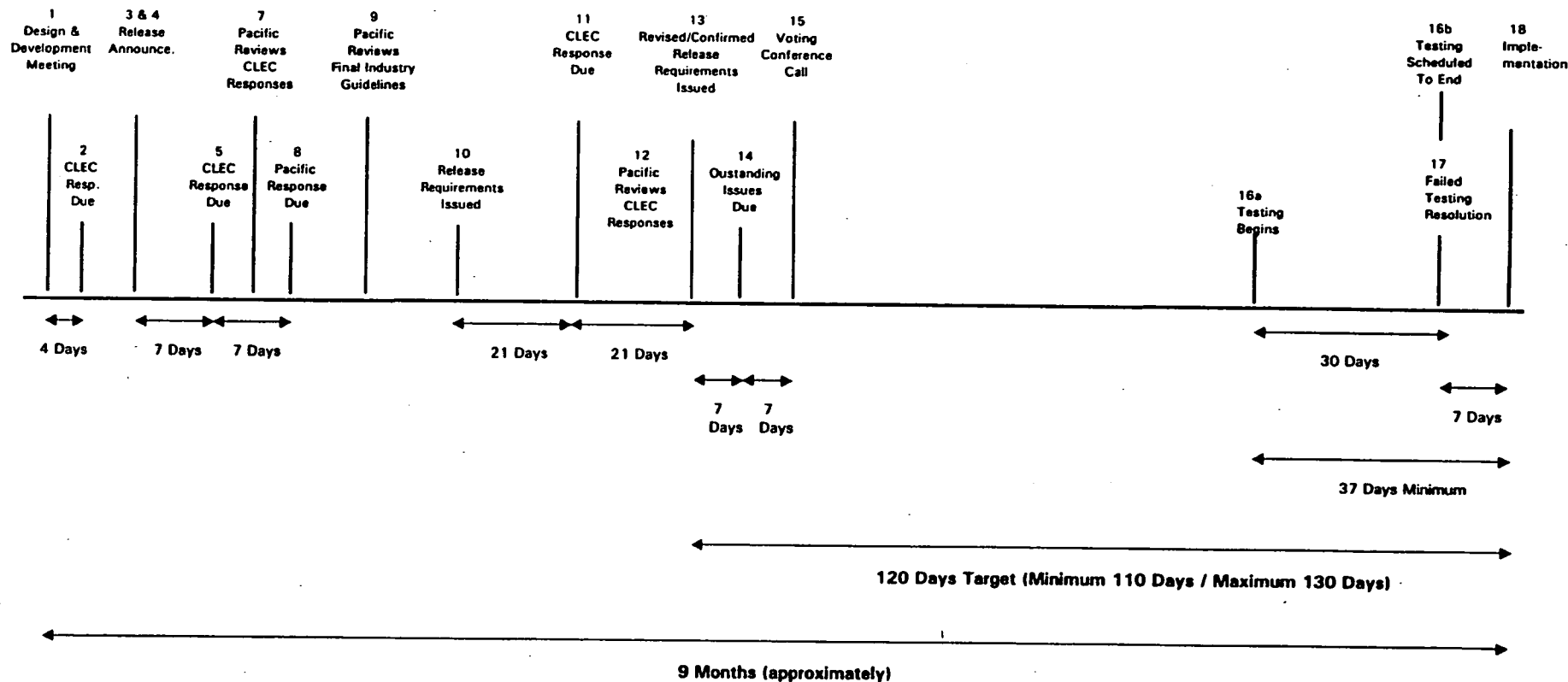
Timeline for Category Two Changes to Existing Interfaces (GUI)



Days shown are calendar days (unless otherwise noted)

Appendix C - Interface Change Management Process

Timeline for Introduction of New Category One Interfaces (Gateway)



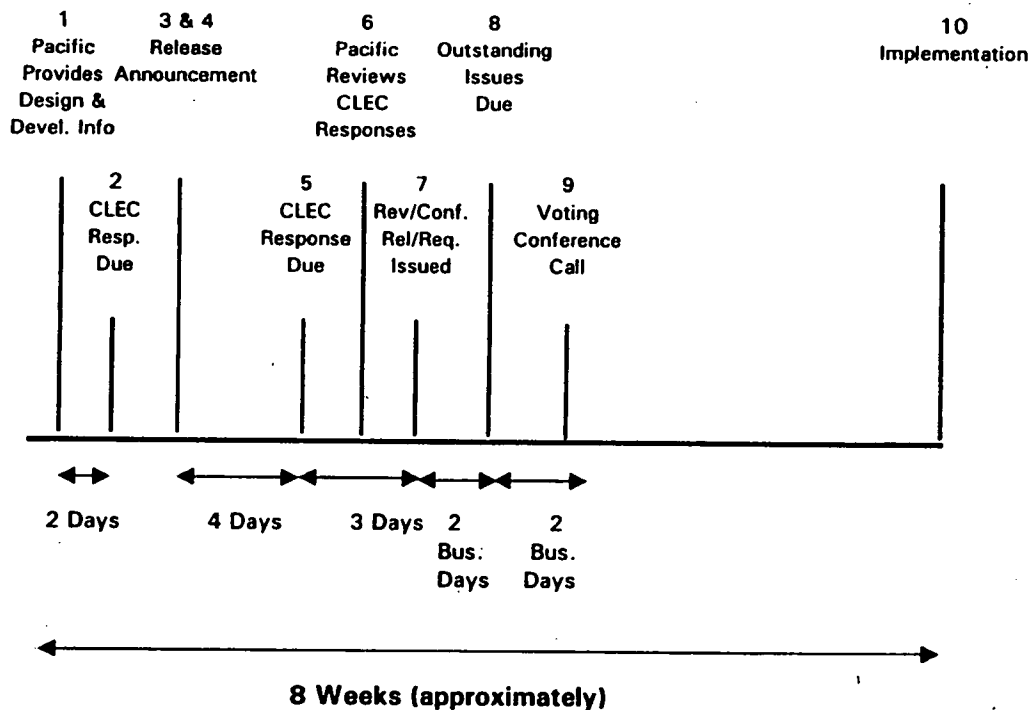
Days shown are calendar days

• • This period may be a maximum of 10 days plus or minus from 60 days

Appendix D - Interface Change Management

Timeline for Introduction of New Category Two I

(GUI)

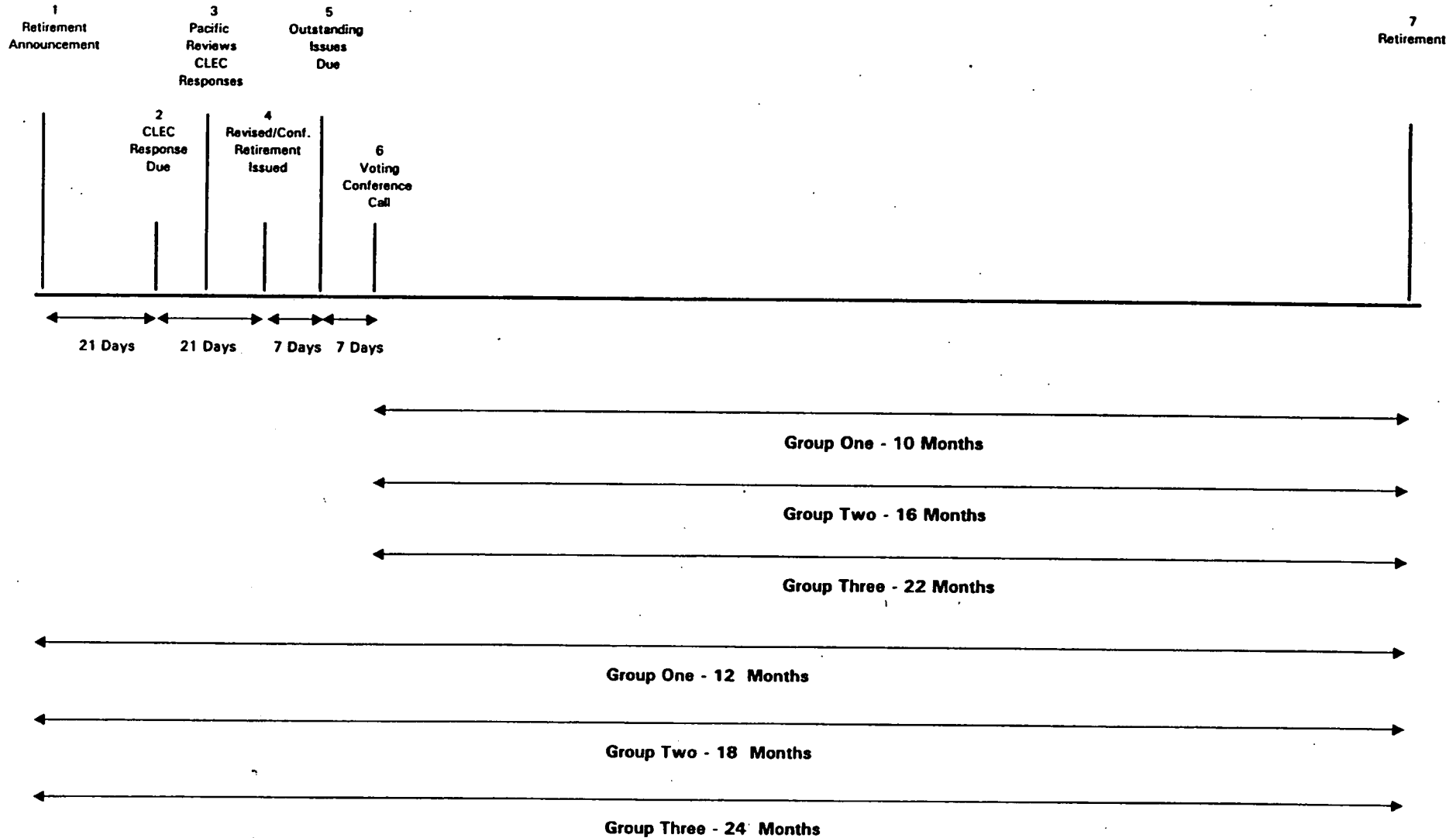


Days shown are calendar days (unless otherwise noted)

Appendix E - Interface Change Management Process

Timeline for Retirement of Existing Interfaces:

Group One
Group Two
Group Three



Days shown are calendar days

GTE Competitive Local Exchange Carrier (CLEC)

Interface Change Management Process

Ver 4.0
10/26/98

Note: This document does not apply to interface and system releases officially announced prior to GTE and CLECs agreement on its content and implementation date.

Interface Change Management Process: GTE and Competitive Local Exchange Carrier (CLEC)

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- Appendix A - Timeline for Category One Changes to Existing Interfaces
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Purpose

This documents the process by which GTE will notify CLECs of changes to the OSS interfaces, introduction of new interfaces and retirement of interfaces detailed below and provides for the identification and resolution of CLEC issues (Change Management Process). The parties intend for the Change Management Process to be dynamic in nature, managed through regularly scheduled meetings, based on group consensus, and in compliance with GTE/CLEC contracts. Any agreed-upon modifications to the process will be included in this document.

Scope

This process pertains to all ordering,¹ pre-ordering, provisioning and maintenance electronic interfaces, including, but not limited to; SIGS, WISE, Connect Mailbox, EDI/NDM, and Fax/manual. Notwithstanding the foregoing, this process does not pertain to Electronic Bonding (EB). The parties will discuss expansion of this process to billing processes and non-end user ordering functions during the quarterly meetings.

This document applies to GTE and all CLECs operating in California.

Section I - Changes to Existing Interfaces

Types of Changes

The Change Management Process manages changes that affect CLECs by altering the production or test environments. Such changes may encompass:

¹ Currently specific to end-user ordering functions only.

- Operations changes to existing functionality that impacts the CLEC interface(s) upon GTE's release date for new interface software.
For example:
 - adding/deleting/modifying fields required to access a function
 - changing the flow, or sequence, of interface operation
 - adding an edit to ensure a required field is entered
- Technology changes that require CLECs to meet new technical requirements upon GTE's release date. For example:
 - eliminating a previously supported operating system software (e.g. Microsoft™ Windows™ 3.0), hardware or protocol
 - requiring a new software, hardware (e.g. 8Mb RAM), or protocol
- Additional functionality changes that may be used at the CLEC's option on or after GTE's release date for new interface software.
For example:
 - adding a new field to access a new function, without other impacts
 - allowance for additional entries into existing fields
 - adding a new supported software, hardware or protocol
- Regulatory mandate:
 - Those changes that may be mandated by regulatory bodies

Two Change Categories

This process divides changes into two categories: Category One (Gateway) and Category Two (GUI).

- Category One (Gateway) changes include changes to gateway applications (such as SIGS, EDI and NDM). It also includes GUI applications where the changes are driven by changes to a gateway interface (e.g. a change to NOCV that is LSR driven) and major technology changes to GUI applications.
- Category Two (GUI) is solely for changes to GUIs where the change is specific to a GUI (e.g. enhancements to the WISE application).

Note: For purposes of clarification, wherever the term "Internet" or "Internet Posting" is used in this document it refers to the placing of information on the GTE CLEC Internet website along with an email notification of such. URL to be provided to all CLECs.

Category One (Gateway) Process

1. For interfaces based on industry guidelines, the parties presume that the guidelines developed at the industry forum (i.e. ATIS, OBF) will be the basis for managing change. GTE anticipates using the applicable OBF Guidelines; however the needs and constraints of GTE's legacy systems may limit use of all such Guidelines; GTE will identify any proposed variances from OBF Guidelines². Therefore, as the industry guideline (e.g. LSOG) requirements are being determined at OBF, GTE will review the requirements to determine compatibility with GTE's systems. There may be other changes initiated by GTE to gateway interfaces that are not a result of ATIS/OBF change drivers (e.g., changes to enhance order flow through).
2. Regardless of the change driver, GTE may or may not choose to prepare a preliminary package of the required issue changes. If prepared, GTE will share these plans at a Quarterly Change Management meeting nine (9) to twelve (12) months in advance of the target implementation date. GTE will share its plans as part of its rolling 12-month Development View (see "Managing the Change Management Process", below).
3. If a preliminary package is prepared, GTE will detail the changes in a Release Announcement (Initial Notification) delivered to CLECs via Internet. The letter will contain a written summary of the change(s) in plain English insofar as practical, a target timeframe for implementation, any cross reference to industry documentation, and any known exceptions to industry guidelines.
4. If a CLEC identifies issues or requires clarification, the CLEC must send a written response (via email, fax, Internet or regular mail) to its GTE Account Manager. The CLEC response will specify the

² This is in accordance with General Section 1.0, paragraph 1.4 of the practices in the OBF Local Service Ordering Guidelines (LSOG), which state that "Options described in this practice may not be applicable to individual provider's tariffs; therefore, use of either the field or valid entries within the field is based on the provider's tariffs/practices."

CLEC's questions, issues and any alternative recommendations for implementation. The GTE Account Manager must receive the CLEC response no later than the 14th calendar day following the date of the Release Announcement.³

5. GTE will review all CLEC responses.
6. Within 14 calendar days of the end of the time period specified in Step 4 (28th calendar day following the date of the Release Announcement), GTE will provide written answers to CLEC questions via Internet. GTE's answers will be shared with all CLECs, unless any questions were specifically identified as "private" by any CLEC.
7. If GTE announces any changes before applicable guidelines are finalized at the ATIS/OBF industry forums, GTE will review the final guidelines when they are issued for any alterations that may be necessary for compliance with the finalized requirements
8. As soon as practical after the release of the final OBF/ATIS guidelines, or no sooner than the last day of the period specified in Step 6, GTE will send the Release Requirements to CLECs via Internet. The Release Requirements will contain the planned implementation date, Change Log, updated interface requirements (e.g., LSR changes), exceptions to the EDI transactions set, industry cross reference reporting impacts, and whether the implementation will be on a phase cut or flash cut basis, if any. Generally GTE's planned implementation will fall within 152 to 172 calendar days from the date of the Release Requirements, unless GTE proposes use of the exception process.
9. If a CLEC identifies issues or requires clarification (including issues with the planned implementation date), the CLEC must send a written response (via email, fax, Internet or regular mail) to its GTE Account Manager. The GTE Account Manager must receive the CLEC response to the Release Requirements not later than the 21st calendar day after the date of the Release Requirements.
10. GTE will review all responses to the Release Requirements.

³ In all cases, the date of any Internet posting referenced in this Agreement will be the date on which GTE forwards the document to the website. GTE will send an email notification of the Internet posting to the point(s) of contact designated by the CLEC. It is each CLECs responsibility to ensure that GTE has a current contact list.

11. Not later than the 21st calendar day following the end of the period specified in Step 9, GTE will provide written answers to CLEC questions via Internet. GTE's answers will be shared with all CLECs, unless any questions were specifically identified as "private" by any CLEC. Any changes that may occur as a result of the answers will be distributed to all CLECs via Internet. This will constitute the Revised/Confirmed Release Requirements which will include a summary of changes from Step 8 above, Indication of type of change (i.e. documentation change, business rule change, clarification change), changed requirements pages and release date. Generally, GTE's planned implementation will fall within 110 to 130 calendar days from the date of the Revised/Confirmed Release Requirements, unless GTE proposes use of the exception process.
12. Should a CLEC elect to initiate the Outstanding Issue Solution (OIS) process described in this Change Management Process, the CLEC must send a written notice (via email, fax, Internet or regular mail) to its GTE Account Manager. The CLEC's notice initiating the OIS process must be received by the GTE Account Manager within 7 calendar days from the date of the Revised/Confirmed Release Requirements.
13. Upon receipt of a CLEC OIS notice, GTE will schedule an OIS conference call for 12:00 p.m. PST, 7 calendar days after the due date for the OIS notices (14 calendar days after the date of the Revised/Confirmed Release Requirements).
14. If no OIS is initiated (or after successful conclusion of any OIS), testing will be conducted by GTE and any interested CLEC until the agreed upon testing exit criteria have been satisfied in accordance with the test plan to the mutual satisfaction of the parties.
 - a. GTE will strive to make testing available beginning 60 calendar days from the Revised/Confirmed Release Requirements; provided, however, that all CLEC testing must commence no later than 30 calendar days prior to the scheduled implementation date.
 - b. Testing must be scheduled to end at least 14 calendar days prior to the scheduled implementation date, unless otherwise agreed between GTE and a CLEC.

15. **CONDITIONAL:** If the parties cannot agree on whether the test criteria have been satisfied within the planned time frame, either GTE or the CLEC may invoke a second OIS process, using the Category Two OIS timeline.
16. GTE implements the new release or updates. For a phase cut as identified in step 8 above, GTE will continue to maintain the new and previous versions of the interface for a period of not less than 3 months or in compliance with OBF standards. GTE's intent is to maintain the current and previous version and sunset the oldest release version concurrent with implementation of the newest version (e.g., LSOG 1 sunsets with implementation of LSOG 3).

Category Two (GUI) Process

1. GTE will share plans for changes to GUI interfaces at a Quarterly Change Management meeting, where known. GTE will share its GUI plans, where known, as part of its rolling 12-month Development View (see "Managing the Change Management Process", below).
2. GTE will detail the changes in a Release Announcement (Initial Notification) delivered to CLECs via Internet. The letter will contain a written summary of the change(s) in plain English insofar as practical, a target timeframe for implementation, and any cross reference to updated User Guide or revised User Guide pages.
3. If a CLEC identifies issues or requires clarification, the CLEC must send a written response (via email, fax, Internet or regular mail) to its GTE Account Manager. The CLEC response must be received by GTE within 4 calendar days of the date of the Release Requirements. The response will specify the CLEC's questions, issues and any alternative recommendations for implementation.
4. GTE will review all CLEC responses.
5. Within 3 calendar days of the end of the period specified in Step 3, GTE will provide written answers to CLEC questions via Internet. GTE's answers will be shared with all CLECs, unless any questions were specifically identified as "private" by any CLEC. Any changes that may occur as a result of the responses will be distributed to all CLECs via Internet. This will constitute the

Revised/Confirmed Release Requirements which will include a summary of changes from Step 2 above, indication of type of change (i.e. documentation change, business rule change, clarification change), changed requirements pages, and release date. Generally, GTE's planned implementation date will be no sooner than the 14th calendar day from the date of the Revised/Confirmed Release Requirements, unless GTE proposes use of the exception process.

6. Should a CLEC elect to initiate the OIS process described in this Change Management Process, the CLEC must send a written notice (via email, fax, Internet, or regular) to its GTE Account Manager. This GTE Account Manager must receive this notice within 2 business days of the date of the Revised/Confirmed Release Requirements.
7. Upon receipt of an OIS notice, GTE will schedule a conference call to be held at 12:00 p.m. PST, 2 business days after the due date for OIS initiation notices (4 business days after the Revised/Confirmed Release Requirements). NOTE: The OIS process does not apply to GTE's retail systems as specified in the Outstanding Issue Process below.
8. NOTE: No provision for testing is included in the Category Two process.
9. If there is no OIS (or after successful resolution of the OIS), GTE will implement the new release or updates.

Section II – Introduction of New Interfaces

Two Categories of New Interfaces⁴

This process divides the introduction of new interfaces into two categories: Category One (Gateway) and Category Two (GUI).

⁴ Even though the names "Category One" and "Category Two" are re-used in this section, their use is slightly different than defined in Section I, Changes to Existing Interfaces. See definition above.

- Category One (Gateway) interfaces are all gateway applications. (i.e. SIGS)
- Category Two (GUI) interfaces are all GUI applications. (i.e. WISE)

Category One (Gateway) Process

1. Approximately nine (9) months in advance of the target implementation date, GTE will convene a Design and Development meeting with the CLEC community. GTE will share preliminary plans for the new interface, including estimated OSS charge, (including any free trial period, if applicable) regional availability, proposed implementation timeline, GTE constraints and exceptions to industry standards, etc. During the meeting, CLECs will provide feedback to GTE, including interest in developing to the initial version of the interface. If available, GTE will share draft Release Requirements.
2. If a CLEC identifies additional issues or feedback, the CLEC must send a written response (via email, fax, Internet or regular mail) to its GTE Account Manager. The CLEC response will specify the CLEC's questions, issues and any alternative recommendations for implementation. The CLEC response must be received by the GTE Account Manager no later than the 4th calendar day following the date of the Design and Development Meeting.⁵
3. GTE will communicate its interface development plans, including how it has incorporated CLEC feedback (this can be combined with Step 4).
4. GTE will detail the new interface in a Release Announcement (Initial Notification) delivered to CLECs via Internet. The notice will contain a written summary of the new interface in plain English insofar as practical, a target timeframe for implementation, any cross reference to industry documentation and any known exceptions to industry guidelines.

⁵ In all cases, the date of the Internet posting referenced in this agreement will be the date on which GTE posts the information on the Internet and emails the notice to CLECs. GTE will send the notice to the point(s) of contact designated by the CLEC. It is each CLEC's responsibility to ensure that GTE has a current contact list.

5. If a CLEC identifies issues or requires clarification, the CLEC must send a written response (via email, fax, Internet or regular mail) to its GTE Account Manager. The CLEC response will specify the CLEC's questions, issues and any alternative recommendations for implementation. The GTE Account Manager must receive the CLEC response no later than the 14th calendar day following the date of the Release Announcement⁶.
6. CLECs who are interested in developing to the initial version of the interface within six months of GTE's planned implementation will document that intent via a ROU (Record of Understanding) with its initial response. ROUs can be modified or submitted through step 13 of the process.
7. GTE will review all CLEC responses.
8. Within 14 calendar days of the end of the time period specified in Step 5 (28th calendar day following the date of the Release Announcement), GTE will provide written answers to CLEC questions via Internet. GTE's answers will be shared with all CLECs, unless any questions were specifically identified as "private" by any CLEC.
9. If GTE announces a new interface before applicable guidelines are finalized at the ATIS/OBF industry forums, GTE will review the final guidelines when they are issued for any alterations that may be necessary for compliance with the finalized requirements. GTE will consider its system requirements and provide known exceptions to industry guidelines.
10. No sooner than the last day of the period specified in Step 8, GTE will send the Release Requirements to CLECs via Internet. The Release Requirements will contain the planned implementation date, interface requirements, exceptions to the EDI transaction set (if applicable), industry cross-reference and reporting impacts, if any. GTE will also provide the finalized OSS charge applicable to the new interface. Generally, GTE's planned implementation will fall within 152 to 172 calendar days from the date of the Release Requirements, unless GTE proposes use of the exception process.

⁶ In all cases, the date of the Internet posting referenced in this agreement will be the date on which GTE posts the information on the Internet and emails the notice to CLECs. GTE will send the notice to the point(s) of contact designated by the CLEC. It is each CLEC's responsibility to ensure that GTE has a current contact list.

- 11.If a CLEC identifies issues or requires clarification (including issues with the planned implementation date), the CLEC must send a written response (via email, fax, Internet or regular mail) to its GTE Account Manager. The CLEC response to the Release Requirements must be received no later than the 21st calendar day after the date of the Release Requirements.
12. GTE will review all responses to the Release Requirements.
- 13.Not later than the 21st calendar day following the end of the period Specified in Step 11, GTE will provide written answers to CLEC questions via an Internet. GTE's answers will be shared with all CLECs, unless any questions were specifically identified as "private" by any CLEC. Any changes that may occur as a result of the answers will be distributed to all CLECs via Internet. This will constitute the Revised/Confirmed Release Requirements which will include a summary of the changes from Step 12 above, indication of type of change, (i.e., documentation change, business rule change, clarification change, etc...), changed requirements pages and release date. Generally, GTE's planned implementation will fall within 110 to 130 calendar days from the date of the Revised/Confirmed Release Requirements, unless GTE proposes use of the Exception process.
- 14.Should a CLEC elect to initiate the Outstanding Issue Solution (OIS) process described in this Change Management Process, the CLEC must send a written notice (via email, fax, Internet or regular mail) to its GTE Account Manager. The CLEC's notice initiating the OIS process must be received within 7 calendar days from the date of the Revised/Confirmed Release Requirements.
- 15.Upon receipt of a CLEC OIS notice, GTE will schedule an OIS Conference call for 12:00 p.m. PST, 7 calendar days after the due date for the OIS notices (14 calendar days after the date of the Revised/Confirmed Release Requirements).
- 16.If no OIS is initiated (or after successful conclusion of any OIS), testing will be conducted by GTE and any interested CLEC, until the agreed upon testing exit criteria have been satisfied in accordance with the test plan to the mutual satisfaction of the parties.
- 17.GTE will make testing available beginning 60 calendar days

from the Revised/Confirmed Release Requirements; provided, however, that all CLEC testing must commence no later than 30 calendar days prior to the scheduled implementation date.

18. Testing must be scheduled to end at least 14 calendar days prior to the scheduled implementation date, unless otherwise agreed to between GTE and a CLEC.
19. **CONDITIONAL:** If the parties cannot agree on whether the test criteria have been satisfied within the planned time frame, either GTE or the CLEC may invoke a second OIS process, using the Category Two OIS timeline.
20. GTE implements the new interface.

Category Two (GUI) Process

1. Approximately 8 weeks in advance of the target implementation date, GTE will share Design and Development information with the CLEC community (e.g., via a meeting, conference call Internet, etc.). GTE will share preliminary plans for the new interface, including the estimated OSS charge (including any free trial period, if applicable), regional availability, proposed implementation timeline, GTE's constraints and exceptions to industry standards, etc. CLECs will provide feedback to GTE, including interest in implementing the initial version of the interface. If available, GTE also will share draft Release Requirements.
2. If a CLEC identifies additional issues or feedback, the CLEC must send a written response (via email, fax, Internet or regular mail) to its GTE Account Manager. The CLEC response will specify the CLEC's questions, issues and any alternative recommendations for implementation. The CLEC response must be received by the GTE Account Manager no later than the 2nd calendar day following the date of the Release Announcement.⁷

⁷ In all cases, the date of the Internet posting referenced in this agreement will be the date on which GTE posts the information on the Internet and emails the notice to CLECs. GTE will send the notice to the point(s) of contact designated by the CLEC. It is each CLEC's responsibility to ensure that GTE has a current contact list.

3. GTE will communicate its interface development plans, including how it has incorporated CLEC feedback (this can be combined with Step 4).
4. GTE will detail the new interface in a Release Announcement (Initial Notification) delivered to CLECs via Internet. The letter will contain a written summary of the new interface in plain English, a target timeframe for implementation, how and when the User Guide will be available and user training requirements. GTE will also provide the finalized OSS charge applicable to the new interface.
5. If a CLEC identifies issues or requires clarification, the CLEC must send a written response (via email, fax, Internet, or regular mail) to its GTE Account Manager. The CLEC response must be received by GTE no later than the 4th calendar day after the date of the Release Requirements. The response will specify the CLEC's question, issues and any alternative recommendations for implementation.
6. GTE will review all CLEC responses.
7. No later than the 3rd calendar day after the end of the period specified in Step 5, GTE will provide written answers to CLEC questions via Internet. GTE's answers will be shared with all CLECs unless any questions were specifically identified as "private" by any CLEC. Any changes that may occur as a result of the answers will be distributed to all CLECs via Internet. This will constitute the Revised/Confirmed Release Requirements which will include a summary of the changes from Step 4 above, indication of type of change, (i.e., documentation change, business rule change, clarification change, etc...), changed requirements pages and release date. Generally, GTE's planned implementation will be no sooner than the 14th calendar day from the date of the Revised/Confirmed Release Requirements, unless GTE proposes use of the Exception process.
8. Should a CLEC elect to initiate the Outstanding Issue Solution (OIS) process described in this Change Management Process, the CLEC must send a written notice (via email, fax, Internet or regular mail) to its GTE Account Manager. The GTE Account Manager must receive this notice within 2 business days of the date of the Revised/Confirmed Release Requirements.
9. Upon receipt of a CLEC OIS notice, GTE will schedule an OIS

conference call for 12:00 p.m. PST, 2 business days after the due date for the OIS notices (4 business days after the date of the Revised/Confirmed Release Requirements). NOTE: The OIS process does not apply to GTE's retail systems, as specified in the Outstanding Issue Solution process, below.

10. CLECs may negotiate through their GTE Account Manager the ability to pass a limited number of orders, designated as "test orders." This would only be available after the interface is in a production mode and at the CLEC's initial turn up of the interface.
11. If no OIS is initiated (or after successful conclusion of any OIS), GTE will implement the new interface.

Section III - Retirement of Existing Interfaces

Retirement Groups

This process divides the retirement of all interfaces in the scope of this document into two groups, Group One and Group Two.

- Group One: retail interfaces (If any – GTE does not currently provide direct CLEC entry into its retail systems).
- Group Two: all other current and future interfaces (non-retail). These include, but are not limited to, SIGS, WISE, NDM, etc.

Interface Retirement Process

1. GTE will detail the retirement of the interface in a Retirement Notice delivered to CLECs via Internet. The notice will contain a written summary of the retirement plans in plain English insofar as practical, a target timeframe for retirement, the grandfather date (last date which new CLECs may begin use of the interface) and where comparable functionality currently exists. For retirement of interfaces, GTE will provide the following notice (broken out by Interface Group) from the time of the Retirement Notice to the

retirement of the interface, unless GTE invokes use of the Exception process.

Group One	-	12 months
Group Two	-	24 months

Prior to sending a retirement notice, GTE will share its initial plans for retirement of existing interfaces at a Quarterly Change Management meeting nine (9) to twelve (12) months in advance of the proposed retirement date. GTE will share its plans as part of its rolling 12-month Development View (see "Managing the Change Management Process", below). During such quarterly meeting, GTE will explain the rationale for retiring the interface, where the replacement functionality resides or where it will exist at the time the Retirement Notice is sent, and its plans to grandfather the interface.

2. If a CLEC identifies issues or requires clarification, the CLEC must send a written response (via email, fax, Internet or regular mail) to its GTE Account Manager. The CLEC response will specify the CLEC's questions, issues and any alternative recommendations. The GTE Account Manager must receive the CLEC response no later than the 21st calendar day following the date of the Retirement Announcement.
3. GTE will review all CLEC responses.
4. Not later than the 21st calendar day following the end of the period specified in Step 3, GTE will provide written answers to CLEC questions via Internet. GTE's answers will be shared with all CLECs, unless any questions were specifically identified as "private" by any CLEC. Any changes that may occur as a result of the answers will be distributed to all CLECs via Internet. This will constitute the Revised/Confirmed Retirement Notice which will include a summary of changes from Step 2 above, indication of type of change, (documentation change, business rule change, clarification change, etc.), and retirement date.
5. With respect to retirement of Group Two interfaces only, a CLEC may elect to use the OIS process.⁸ Should a CLEC elect to initiate the OIS process described in this Change Management Process, the CLEC must send a written notice (via email, fax, Internet or regular mail) to its GTE Account Manager. The CLEC's notice

⁸ The OIS process does not apply to Group One interfaces.

initiating the OIS process must be received by the GTE Account Manager within 7 calendar days from the date of the Revised/Confirmed Retirement Notice (step 5 above).

6. Upon receipt of a CLEC OIS notice, GTE will schedule an OIS conference call for 12:00 p.m. PST, 7 calendar days after the due date of the OIS notices (14 calendar days after the date of the Revised/Confirmed Retirement Notice).
7. If no OIS is initiated, (or after successful conclusion of any OIS), GTE will retire the interface on the retirement date announced.

Section IV - Other Items

Emergency Situations

Emergency releases or emergency implementation date changes will be handled as special cases.

Emergency releases are releases that address major software problems, production system failure or an interface failure. These also include releases that address significant production problems and the failure of scheduled release enhancements.

The notification process interval will be handled on a case by case basis and will depend on the type and extent of the emergency. Notification to the CLECs will be sent as soon as reasonably practicable after the emergency is recognized. The emergency notification need not be in the form of an Internet posting, and may be sent via other expedited means (e.g., broadcast fax).

In emergency situations, mutual testing and problem resolution will be conducted through the OSS contacts for all companies involved.

Exceptions

Above and beyond the need to handle emergency situations, the parties recognize the need to occasionally allow for other exceptions to the Change Management Process described herein. However, because it will

be difficult for GTE or other CLECs to accurately assess the impact of GTE's proposed change on any given CLEC's current or future development, any agreement to deviate from the normal Change Management Process shall be agreed to unanimously.

Steps in the Exceptions Process:

1. If GTE wishes to propose that a specified change, introduction of a new interface or retirement of an interface be handled on an exception basis, it will issue a Release (or Retirements) Announcement or Requirements Exception posting via Internet. The posting will indicate that it seeks an expedited due date following the conclusion of a reply and comment cycle.
2. In CLEC responses, due within the applicable timeframe documented in process, CLECs will raise questions and issues. Qualified CLECs⁹ will indicate objections to handle the change, new interface or retirement as an exception. Lack of a response indicates no objection.
3. GTE may proceed to implement the change, new interface or retirement on an expedited basis only if there are no outstanding issues or CLEC objections at the end of the CLEC response cycle specified in Step 2 above.

Regulatory mandated changes must proceed within the mandated timeframe and are not subject to the objection process for exceptions. In the Internet notification, GTE will provide any modified timelines for the change.

Manual Processes

Where changes are made to GTE's manual processes (e.g. faxing) these processes will either fall into one of the Change Management Process timelines outlined in this document. For example, LSR changes would affect the faxed forms and would fall into the Changes to Existing Interfaces, Category One timeline, where other paper form changes will fall into the Changes to Existing Interfaces, Category Two timeline.

⁹ The definition of Qualified CLECs is the same as is specified in the Outstanding Issue Solution section of this document.

Changes to these types of interfaces would also be communicated via Internet.

Training

All changes will be communicated with CLECs for their external training and with GTE's internal processes for updating its employees on changes to CLEC and its own retail systems, as well as the introduction of new interfaces. All parties agree that information regarding changes to the interfaces needs to be communicated and coordinated to the end users and support personnel to ensure effective implementation. This includes CLECs updating their own external training, and all parties' best efforts to update internal training and Methods and Procedure (M&P) processes, as applicable.

Testing

For Changes to Existing Interfaces, testing is limited to gateway interfaces and technology changes for GUI interfaces. There is no testing for Category Two changes.

For new interfaces, testing is again limited to gateway interfaces, although for GUIs, CLECs may negotiate through their GTE Account Manager the ability to pass a limited number of orders, designated as "test orders", over the GUI interface. This would only be available after the interface is in production mode and at the CLEC's initial turn up of the interface.

Where applicable, GTE and CLECs will perform interface testing as mutually agreed in a documented test plan. Each testing party will meet with GTE and agree on its own set of test scenarios that will be included in the test and a test schedule. Should the parties not agree that a successful test was achieved within the specified interval, either GTE or the CLEC may initiate an OIS, using the Category Two Timeline.

Outstanding Issue Solution

1. **PROCESS INITIATION** – The initiating CLEC will provide GTE with written notification of the outstanding issue(s). This notice will include the disputing party's reason(s) for raising the dispute and any alternative recommendations.
2. **LIMITATION OF OUTSTANDING ISSUE SOLUTION PROCESS** –
 - a) **Changes to Existing Interfaces:** GTE has made available several interfaces that have been designed primarily for CLEC use. To maintain the distinction between GTE's retail systems and CLEC interfaces, the Outstanding Issue Solution Process does not apply to GTE's retail systems including, but not limited to SOLAR, NOCV, TAS, and DDM.
 - b) **New Interfaces:** No limitations apply.
 - c) **Retirement of Interfaces:** The OIS process only applies to Group Two interfaces.
3. **PAYMENT FOR THE DISPUTE SOLUTION CONFERENCE CALL** – The CLEC initiating an OIS, shall provide a bridge number for the conference call with its initiation notice. In the event more than one CLEC initiates an OIS, GTE shall coordinate with the initiating CLECs to determine which bridge number to use.
4. **ISSUE TIMELINE** - In accordance with the appropriate timelines (see above), GTE will publish a summary of all CLEC dispute(s) which will include GTE's position on the disputes.

As soon as reasonably practicable after GTE's receipt of the OIS initiation notices, but in no event later than one business day before the call, GTE will notify the CLECs (via email and/or Internet) that there is a dispute, along with the date, time and bridge for the voting call. In this notice, GTE also will include a preliminary list of Qualified CLECs. If a CLEC wishes to contest its status, it may ask to have its status changed during the call, but prior to the vote, to be determined under the standards set forth herein.

All parties agree that it is its mutual interest to expedite the deliverables that are due during the OIS Process.

5. **VOTING CONFERENCE CALL** - Discussion on the voting call may include:

- a dialogue for the opposing views
- impacts of a "No" vote on the remainder of the release or other connected releases (applies to changes to existing interfaces only)
- discussion of options

The vote by Qualified CLECs during the call will resolve the question appropriate to the change category (e.g., change to existing interface, introduction of new interface or retirement of interface) as follows:

- a) **Change to Existing Interface:** Will GTE implement the disputed item as defined by GTE at the end of the notice and comment period (published in the Revised/Confirmed Release Requirements)? The allowed votes are "Yes," "No" and "Abstain".
- b) **New Interfaces:** Will GTE implement the new interface as defined by GTE at the end of the notice and comment period (published in the Revised/Confirmed Retirement Notice)? The allowed votes are "Yes," "No" and "Abstain".
- c) **Retirement of Interfaces:** "Has GTE provided comparable functionality?" The allowed votes are "Yes," "No" and "Abstain".

In the event of a "yes" vote (allowing GTE to retire the interface in the timeframe GTE defined), CLECs who have an interest in continuing to use the retiring interface, beyond the retirement date, should initiate two party negotiations with GTE. These negotiations will include, but will not be limited to, discussions of the ongoing costs of maintaining a customized interface and its ultimate obsolescence. The OIS process does not apply in this instance.

6. QUALIFIED CLECs

- a) **Changes to Existing Interfaces:** Qualified CLECs must fall into one of the following categories:
 - Current production users
 - CLECs currently testing the interface
 - CLECs with a documented intent to implement the interface within one year. This is further defined as either a signed ICA with an implementation schedule OR Record of Understanding (ROU/MOU). Additionally, CLECs who have previously tested the interface OR who are negotiating terms and conditions for access to the interface may also vote, subject to acceptable

substantiation, sanctioned by a majority vote of the other qualified CLECs.

All CLECs, including those not qualified to vote, may participate on the Outstanding Issue Solution calls.

b) New Interfaces: Qualified CLECs must meet the following criteria:

- CLECs with a documented intent to implement the initial version of the new interface within 6 months of GTE's planned implementation. This is further defined as either a CLEC with a signed ICA with an implementation schedule for the interface OR one with a Record of Understanding (ROU/MOU). A CLEC who is negotiating terms and conditions for access to the interface may also vote, subject to acceptable substantiation, sanctioned by a majority vote of the other qualified CLECs.

All CLECs, including those not qualified to vote, may participate on the Outstanding Issue Resolution calls.

c) Retirement of Interfaces: Qualified CLECs must meet the following criteria:

- CLECs who are currently live production users of the retiring interface, or are testing the interface with GTE.
- GTE is qualified to vote in OIS on retirement of interfaces.

All CLECs, including those not qualified to vote, may participate on the Outstanding Issue Solution calls.

7. MAJORITY VOTE - Outstanding Issue Solution shall be resolved by a majority vote, solely among the qualified CLECs. "Majority Vote" shall mean a simple majority of a Quorum of qualified CLECs, indicating that the qualified CLECs either:

Object to ("No")

Or

Support GTE's position ("Yes").

For purposes of this definition, "Quorum" shall constitute two-thirds of the qualified CLECs. In the event of a tie, or if no quorum is established the Revised/Confirmed Release Requirements shall be implemented by GTE.

A qualified CLEC may not give its vote (i.e. proxy) to another voting CLEC. However, a qualified CLEC may designate its company representative as it sees fit, provided that it may not designate another CLEC to cast its vote. An independent designee may represent more than one voting CLEC.

A Corporation, including all affiliates, is entitled to a single vote unless the CLEC can convince a majority of other qualified CLECs that they have a legitimate need or right for multiple votes.

Managing the Change Management Process

GTE will participate in quarterly meetings to review the Change Management process and discuss development plans. During these meetings, the parties will review the effectiveness of Change Management process and agree upon any changes. Additionally, GTE will share with the CLECs a non-binding, 12 month rolling development plan, with scheduled release dates. The meetings will include discussion of GTE's development plan, as well as any CLEC suggested development to GTE OSS.

Enforcement

A standing agenda item at the Quarterly Change Management meeting will provide an opportunity for GTE and CLECs to assess the effectiveness of the Change Management Process and the need for any revisions.

Both CLECs and GTE will use this opportunity to provide feedback of instances of non-compliance and commit to taking the appropriate action(s).

After using the discussion opportunity of the Quarterly Change Management meetings, if there is consensus that the process is no longer working to the mutual benefit of all, the parties will schedule meetings to begin re-engineering of the process. If there is no consensus, individual parties may approach the CPUC after giving notice of its intent to do so at a Quarterly Change Management meeting. The party will also describe the action it intends to take and the reason(s) for its proposed actions.

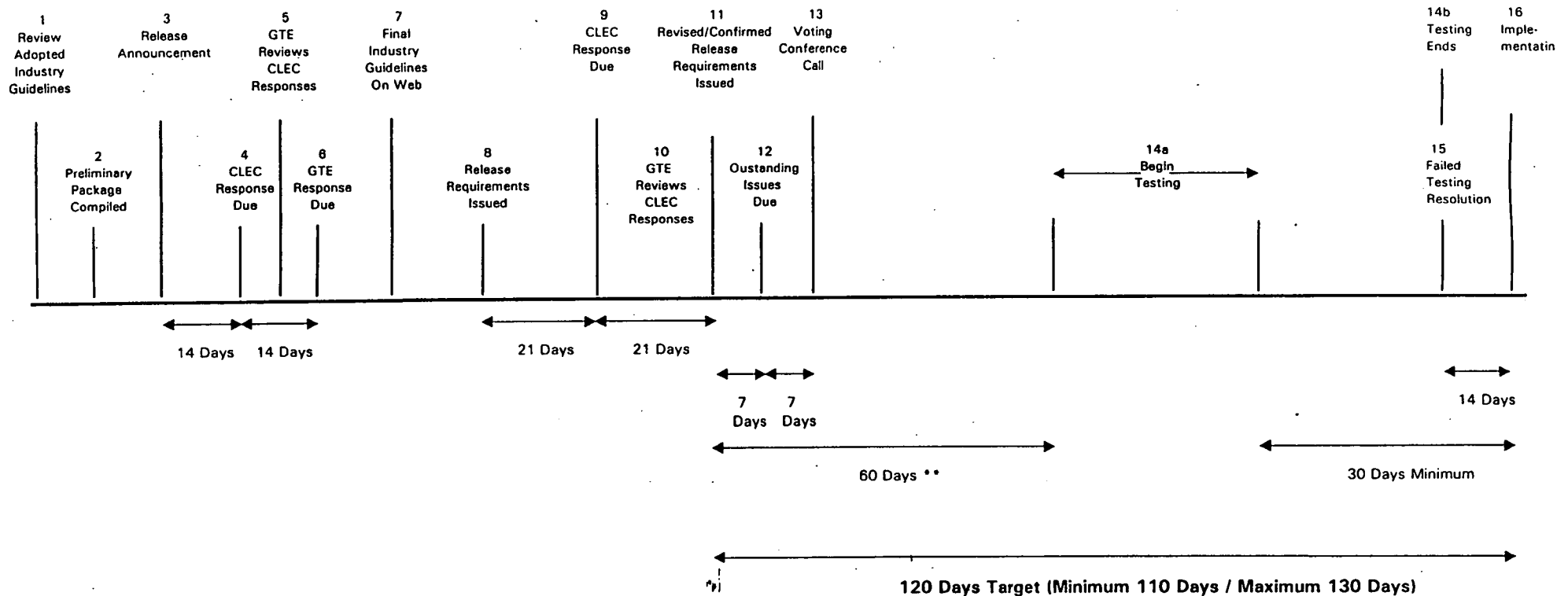
If parties believe that non-compliance has been blatant and that the proposed solutions offered by the offending party(ies) is(are) unacceptable, both GTE and individual CLECs are free to pursue available legal remedies. The range of available remedies may include, but are not necessarily limited to, the following:

- Alternative Dispute Resolution as provided in individual Interconnection Agreements
- Action before the CPUC
- Mediation
- Action before a court of competent jurisdiction

EXHIBIT B

Appendix A - Interface Change Management Process

Timeline for Category One Changes to Existing Interfaces (Gateway)

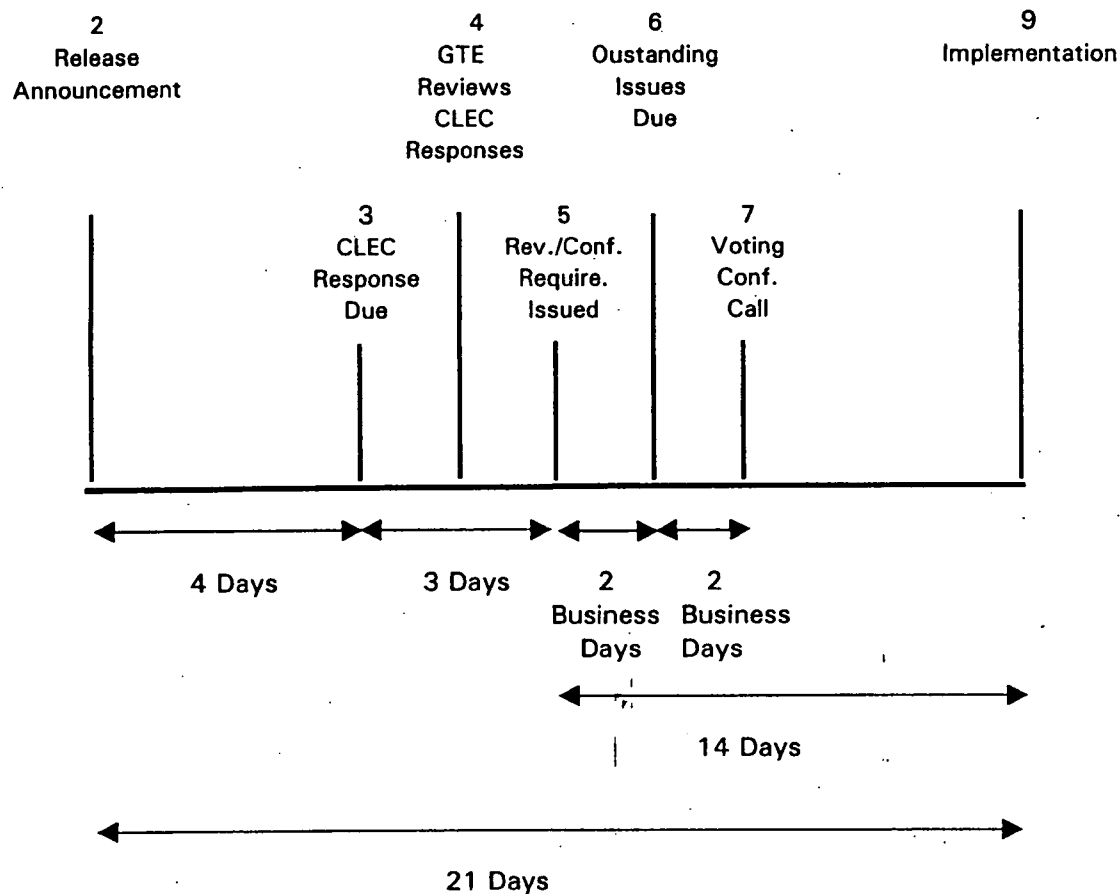


Days shown are calendar days

* * This period may be a maximum of 10 days plus or minus from 60 days

Appendix B - Interface Change Management Process

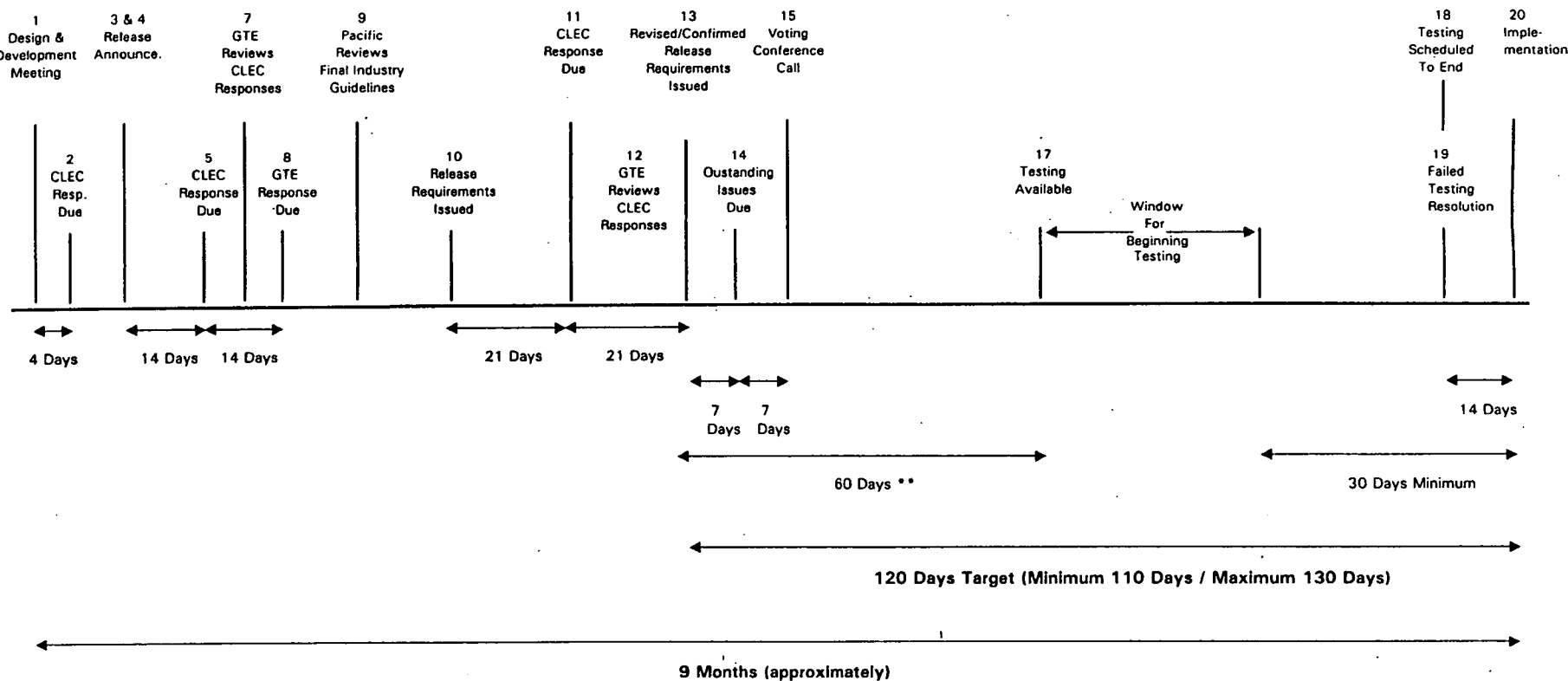
Timeline for Category Two Changes to Existing Interfaces (GUI)



Days shown are calendar days (unless otherwise noted)

Appendix C - Interface Change Management Process

Timeline for Introduction of New Category One Interfaces (Gateway)

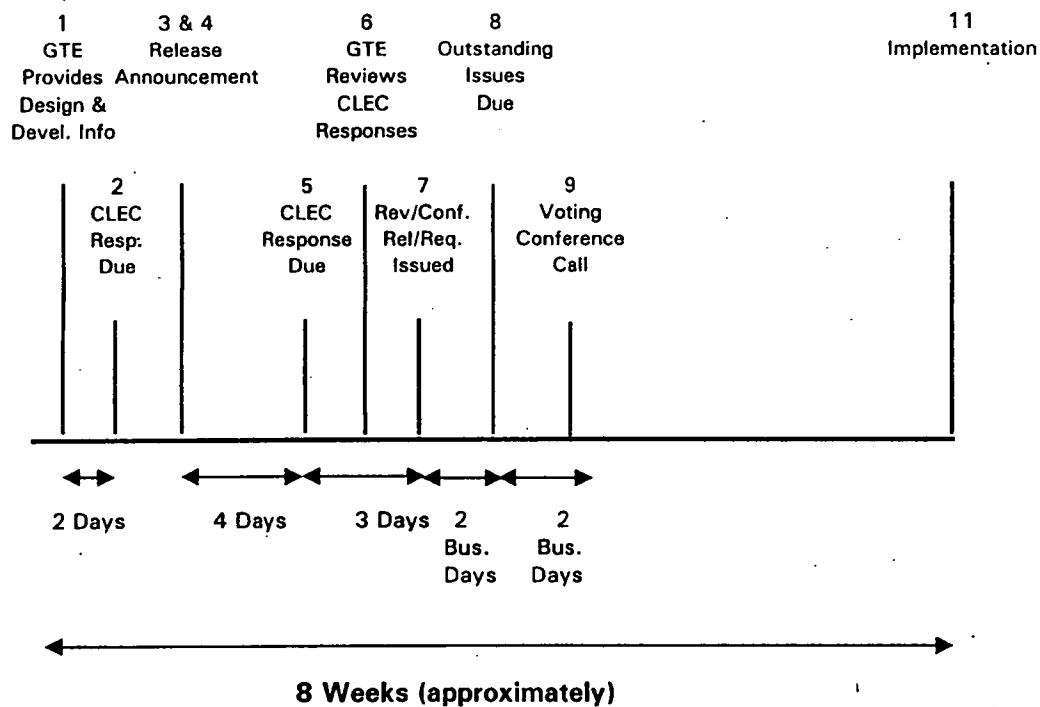


Days shown are calendar days

** This period may be a maximum of 10 days plus or minus from 60 days

Appendix D - Interface Change Management Process

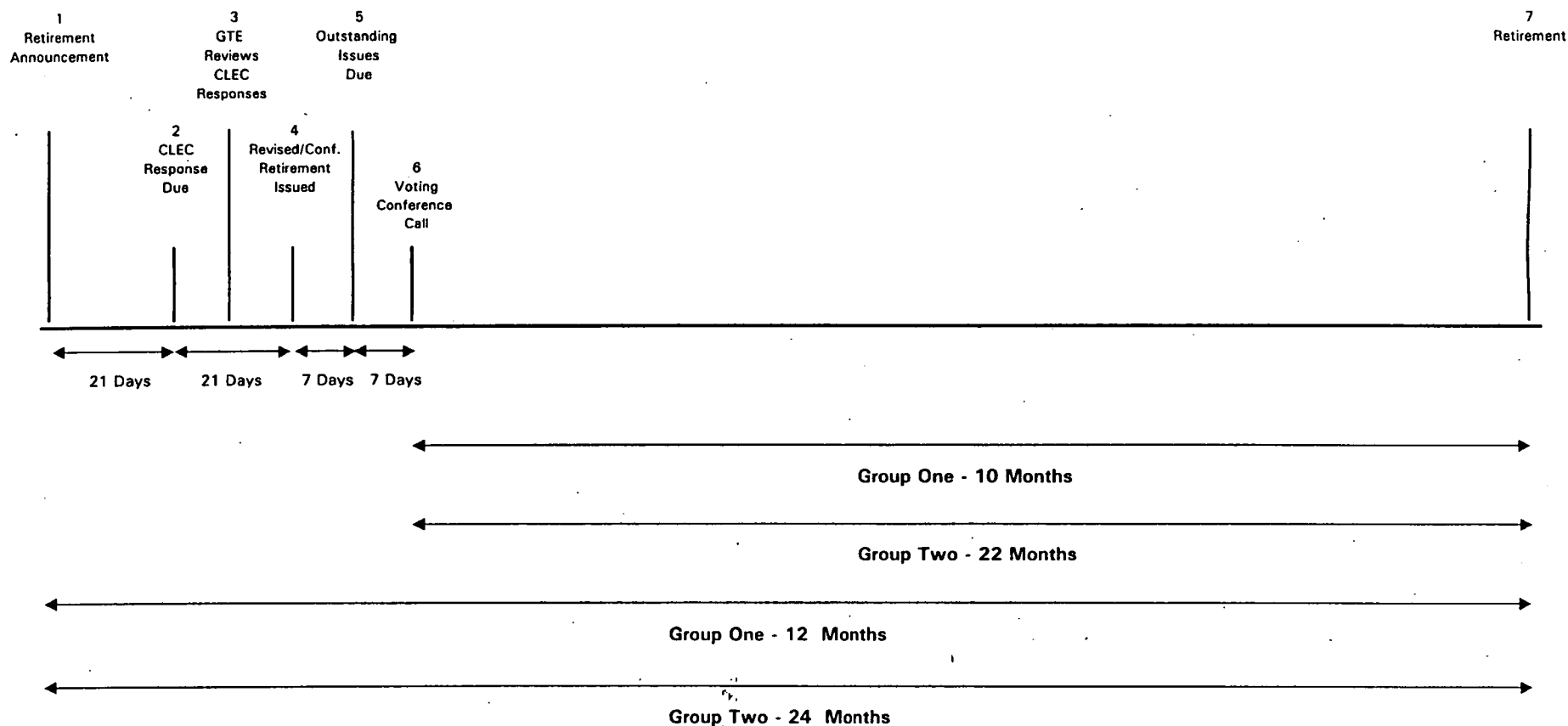
Timeline for Introduction of New Category Two Interfaces (GUI)



Days shown are calendar days (unless otherwise noted)

Appendix E - Interface Change Management Process

Timeline for Retirement of Existing Interfaces: Group One
Group Two



Days shown are calendar days

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 29, 1999

To: NANPA CO Code Administration
310 and 424 Code Holders and Interested Industry Members

RE: Special Emergency Pool Lottery on December 15, 1999 for Central Office Codes in the 310 NPA

By Decision 99-11-027, the California Public Utilities Commission ordered emergency code allocation procedures for the 310 Area Code. This information is being sent to the NANPA CO Code Administration, 310 and 424 code holders and other interested parties to clarify procedures for the Special Emergency Pool Lottery Drawing to be held on December 15, 1999.

Eight Central Office Codes (five in the Initial Category, three in the Growth Category) will be rationed to applicants who satisfy the Imminent Exhaust Criteria delineated in Attachment A of D 99-11-027. The Imminent Exhaust Criteria shall be applied to all code requests in 310 NPA, both for the Special Emergency Pool Lottery Drawing and for the Regular Monthly Lottery Drawing. The Special Emergency Pool Lottery Drawing will be held on December 15, 1999 in the CPUC Training Room at 505 Van Ness Avenue, San Francisco, California, commencing at 10:00 am. Applications and associated Imminent Exhaust Documentation for this special lottery must be submitted by 5:00 pm on December 6, 1999 to the NANPA, with copies to the Director of the California Public Utilities Commission's Telecommunications Division. Applications for the Regular Monthly Lottery Drawing (and associated Imminent Exhaust Documentation) shall be submitted by 5:00 pm on December 7, 1999 to the NANPA, with copies to the Director of the California Public Utilities Commission's Telecommunications Division. These documents can be mailed or delivered via overnight mail to: Jack Leutza, Director of Telecommunications Division, CPUC, 505 Van Ness Avenue, San Francisco, CA 94102, or faxed to Jack Leutza at (415) 703-4415.

For Applicants who have satisfied the Imminent Exhaust Criteria in the Initial category, each company shall be given one chance to be drawn in the lottery to receive a maximum of one code out of the five codes available in the emergency pool. If the company had been assigned a code in the 424 Area Code and documents that assignment, the company would receive an additional chance to be drawn in the lottery (for a total of two chances), but would still only be eligible to receive a maximum of one code out of the five codes available.

For Applicants who have satisfied the Imminent Exhaust Criteria in the Growth category, each company shall be given one chance to be drawn in the lottery to receive a maximum of one code out of the three codes available in the emergency pool. If the company had been assigned a code in the 424 Area Code and documents that assignment, the company would receive an additional chance to be drawn in the lottery (for a total of two chances), but would still only be eligible to receive a maximum of one code out of the three codes available.

It should also be noted that the January 19, 2000 will be the last lottery for LNP capable carriers under present procedures for NXX codes in the 310 NPA. Central Office Codes received in that lottery will be opened 66 days later or in late March, 2000. Thousand Block Number Pooling will begin on March 18, 2000 and all LNP capable carriers will be eligible to obtain thousand-number blocks from the pool.

Should you have questions or wish to discuss this memo further, please contact Mary Jo Borak of my staff at (415) 325-7270.

Sincerely,

Jack Leutza

John Leutza
Director, Telecommunications Division

cc: Commissioner Hyatt
ALJ Pulsifer
Service List for R. 95-04-043, I. 95-04-044