

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

In the Matter of)	
)	DOCKET NO. UT- 041127
THE JOINT PETITION FOR)	
ENFORCEMENT OF)	AFFIDAVIT OF SHERRY
INTERCONNECTION AGREEMENTS)	LICHTENBERG
WITH VERIZON NORTHWEST, INC.)	
(a/k/a GTE))	

I, Sherry Lichtenberg, declare as follows:

1. I am a Senior Manager, Operational Support Systems Interfaces and Facilities Development at MCI.
2. I have twenty-three years of experience in the telecommunications market, fifteen years with AT&T and seven with MCI. I joined MCI in 1997 as a member of the initial team responsible for the development of MCI's local services products, both UNE-P and facilities based. Prior to joining MCI, I held a number of positions at AT&T, including working in the General Departments organization, where I developed methods and procedures and billing and ordering systems for use by the Bell Operating Companies. I was Pricing and Proposals Director for AT&T Government Markets, and Executive Assistant to the President and Staff Director for AT&T Government Markets. I also held a number of positions in Product and Project Management.
3. My current responsibilities at MCI include designing, managing, and implementing MCI's local telecommunications services to residential and small business customers on a mass-market basis nationwide. I support both UNE-P product development and our testing and planning for facilities based competition via UNE-L. In addition, I have worked with the MCI contracts organization to negotiate our interconnection agreements with the incumbents.
4. The purpose of this affidavit is to provide a factual, technical description of the Operations Support Systems ("OSS") Verizon would need to support unbundled local switching on the Nortel Succession switch it deployed at the Mt. Vernon central office (CO). Specifically, I will demonstrate that Verizon's claim that it has no OSS to support unbundled local switching is not correct.

**VERIZON'S OSS CAN SUPPORT UNBUNDLED CIRCUIT
SWITCHING ON THE NORTEL SUCCESSION SWITCH**

5. Verizon states that it replaced its existing Nortel DMS-100 circuit switch with a Nortel Succession “Packet Switch” in its Mt. Vernon CO on September 10, 2004.¹
6. Verizon claims that because it has deployed the Nortel Succession switch, “unbundled circuit switching is no longer available in the affected wire centers.”²
7. Verizon further claims that even if the Nortel Succession switch could support unbundled circuit switching, Verizon could not do so because “it [Verizon] has no OSS to allow for the back office functions necessary to provision UNEs from the new packet switches and it is not obligated to build such an OSS under either the [Interconnection] agreements or federal law.”³
8. Verizon has provided no technical information indicating what OSS it is lacking, or what efforts (if any) it would have to take to modify its existing OSS to support unbundled local switching on the Nortel Succession switch. In fact, Verizon refused to provide any information in discovery regarding any OSS changes that it has, or might need to make, to support unbundled local switching on the Nortel Succession switch. In response to discovery requests issued by MCI, Verizon claimed that “changes to its OSS, if any, relating to the switch replacement” are not relevant to this proceeding.⁴
9. However, based on my experience with Verizon’s OSS, and MCI’s experience since Verizon deployed the Nortel Succession switch, I believe that Verizon’s claim that it “has no OSS” and would need to “build” and OSS to support UNE-P is incorrect from a technical standpoint.
10. On information and belief, Verizon’s existing OSS could support all of the functions (such as ordering and billing) for unbundled local switching on the Nortel Succession switch. I base this belief in part on the fact that Verizon’s OSS currently support resale on the Nortel Succession switch. To the best of my knowledge, the OSS needed to support resale is virtually identical to the OSS that would be needed to support UNE-P. Thus, at most, Verizon would need only to make minor modifications to its OSS for resale in order to support UNE-P.

¹ Verizon Motion for Judgment on the Pleadings of, and Answer to, Joint Petition for Enforcement of Interconnection Agreements, ¶¶ 29,34, filed in Docket No. UT-041127, on September 27, 2004 [hereinafter cited as Verizon Motion].

² Verizon Motion, at ¶ 36.

³ Verizon Motion, at ¶ 56, n.23.

⁴ Verizon’s Responses to MCI’s First Set of Data Requests, Oct. 15, 2004, at Responses 1-3. [hereinafter cited as Verizon’s Responses]. A copy of Verizon’s response is provided as Attachment 1 to Exhibit A, Jeff Haltom Affidavit.

11. Based on my knowledge of Verizon's OSS, Verizon would need to take two steps in order to support UNE-P on the Nortel Succession switch. First, Verizon must allow its OSS to process an order for a simple ordering code (known as a USOC) to specify the UNE-P product on the Nortel switch. On information and belief, adding such USOC is as simple as updating a table in the provisioning systems so that the OSS and the Verizon billing processor recognizes that a feature is available that will be billed at UNE-P rates. In addition, Verizon might have to change the format of its EMI billing processor output in order to identify call records as UNE-P rather than resale. As I discuss below, Verizon previously had UNE-P USOCs for its circuit switch, and it has retained two UNE-P USOCs for use in the Nortel switch to specify features that are available through UNE-P but not resale. Thus, I believe the necessary UNE-P USOCs already exist, and Verizon need only reload them, or enable them for the Nortel switch.
12. Second, Verizon has created a code in its OSS that causes any order for UNE-P on the Nortel switch to be rejected at the initial CLEC/Verizon interface. Thus, Verizon would need to remove this reject code in order to allow MCI or other CLECs to place UNE-P orders for the Nortel switch.
13. In the next sections, I provide a detailed discussion of the two simple steps Verizon must take to allow unbundled local switching on the Nortel switch.

**MCI IS NOT DIRECTING VERIZON TO PROVIDE UNBUNDLED
PACKET SWITCHING TO SUPPORT UNE-P TRAFFIC**

14. In order to place a UNE-P order for any given switch, MCI must use a USOC, which identifies the product and associated features that it wishes to purchase.
15. Since Verizon deployed the Nortel Succession switch, resale orders continue to provision in that switch. Based on my knowledge about Verizon' OSS, I believe this means that the Nortel switch can continue to "read" the USOCs for features and other services provided by the new switch just as it did prior to the implementation of the soft switch. The "resale" USOCs and "resale" ordering process have not changed.
16. On information and belief, Verizon did not change or add any USOCs for the Nortel switch to support resale. It simply did not add or (or perhaps disabled) USOCs to support UNE-P.
17. Verizon's description of the changes it made to convert MCI's customer records from UNE-P to resale in the Nortel switch at Mt. Vernon shows that Verizon retained UNE-P USOCs for message waiting indicator and SMDI. If Verizon had "removed" the UNE-P USOCs from the

provisioning systems or had not built the UNE-P USOCs into the provisioning system, this would not be possible. On information and belief, Verizon retained these two UNE-P USOCs because they specify features that are available with UNE-P but not with resale. See Exhibit 1 attached to this affidavit showing the USOC changes that Verizon made.

18. Therefore, based on my knowledge of the way in which Verizon's OSS operates, I believe that Verizon could easily put the necessary coding in place to support UNE-P on the Nortel switch. The reason UNE-P orders are rejected by Verizon's OSS is either that Verizon has removed the existing UNE-P USOCs or not yet enabled them for the Nortel switch, or that Verizon has put in place a code that overrides the USOC, and rejects UNE-P orders. I describe this reject code below.

VERIZON MUST REMOVE THE ERROR CODE IT CREATED THAT CAUSES UNE-P ORDERS FOR THE NORTEL SWITCH TO BE REJECTED

19. MCI's experience with the Verizon OSS, as well as Verizon's testimony, indicates that MCI can submit resale orders through Verizon's WISE GUI for the Nortel switch. Because MCI can send resale orders without any problem, but cannot do the same for UNE-P orders, I believe that Verizon must have implemented a code or look-up table that causes all UNE-P orders to reject.
20. MCI's orders reject at the CLEC interface between Verizon and the CLEC. Based on my knowledge of Verizon's OSS, this suggests that Verizon changed its OSS to implement a new edit at the interface (the point where the MCI order goes into the Verizon OSS) to provide a fatal reject for UNE-P orders.
21. Orders are sent through the interface to the service order processor. Verizon has not explained whether code was removed from this processor in order to stop the provisioning of UNE-P. There is a single service order processor ("SOP") for the Verizon-West region. It is not switch based and does not interface directly to the switch. Messages are sent from the SOP to the translations software to the switch and to the billing processor. These messages cause "features" to be implemented on the switch to provide service to the customer. The "features" are the same for both UNE-P and resale; they are simply billed differently. If a feature can be offered via resale, it can also be offered through UNE-P. The billing software must simply be adjusted to bill MCI at UNE-P rates rather than the higher resale rates.
22. If Verizon implemented such reject code, this change was not discussed in Change Management or was discussed only as a part of a larger discussion of reject codes that would be added to the OSS. The type of OSS changes that Verizon has made should have been introduced through Change

Management because the changes require modifications to CLEC processes and systems. For example, CLECs must adjust their automated error handling software to “read” and “react” to the new error message, as well as change their billing systems to accept resale call records for accounts that Verizon changed from UNE-P to resale. These changes are not trivial. Had CLECs been informed of this change as part of the Change Management process, they would have been on notice further in advance that Verizon was making OSS changes that would cause CLECs to be unable to continue ordering unbundled local switching on the Nortel switch. Such notice would have given CLECs an additional opportunity to try to work with Verizon to resolve the issue prior to Verizon’s unilateral changes.

VERIFICATION

The facts stated in this affidavit are true and correct to the best of my knowledge and belief.

Executed on this 27th day of October, 2004.

Sherry Lichtenberg