BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of a Request for the Modification Of the Kansas City Metropolitan Calling Area Plan To Make the Greenwood Exchange Part of the Mandatory MCA Tier 2	))))	Case No. TO-2005-0144

SOUTHWESTERN BELL TELEPHONE, L.P., D/B/A AT&T MISSOURI'S RESPONSE TO THE MISSOURI PUBLIC SERVICE COMMISSION'S ORDER DIRECTING FILINGS

Executive Summary

The implementation of the Stipulation and Agreement that the Missouri Public Service Commission ("Commission") approved on January 10, 2006, requires significant changes to Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri's ("AT&T Missouri") information technology systems (including ordering and billing), network systems (including translation changes and potentially trunking changes), and several other key components of AT&T Missouri's business operations. These changes, described in detail below, must follow a very structured path to ensure the integrity of AT&T's Missouri's critical systems. These changes are very labor intensive due to the many work groups that must work interdependently throughout the process. The key driver of the earliest possible date when the provisions of the Stipulation and Agreement can be implemented is the time that it will take the information technology ("IT") organization to make all of the necessary ordering and billing changes. The Standard Services' Software Development Lifecycle ("SDLC") is utilized to accomplish this result. This process, which is described in detail below, results in six Retail Major Billing Releases per year. Under the SDLC process, the IT changes for this project would normally be completed on October 14, 2006. Network would then need

approximately two weeks to implement the necessary network changes. Various other organizations, whose activities are also described in detail below, would work concurrently during this time frame. This would result in an implementation date near the end of October.

In order to deliver mandatory MCA service to its Greenwood customers more quickly, AT&T Missouri has expedited the process and believes that the project can be implemented by August 22, 2006. AT&T Missouri will continue to closely monitor the progress of this project and, if possible, will further expedite the process in order to implement the Stipulation and Agreement in June, 2006. If that is possible, AT&T Missouri will notify the Commission.

Concurrently with this pleading, AT&T Missouri has filed a tariff to implement the Stipulation and Agreement with a proposed effective date of August 22, 2006. If AT&T Missouri is able to further expedite the implementation schedule, it will revise the tariff effective date accordingly.

Description of Implementation Process

1. On January 10, 2006, the Missouri Public Service Commission ("Commission") entered its Order Approving Stipulation and Agreement and Order Directing Filings ("Order"). In its Order, the Commission approved the Stipulation and Agreement and ordered AT&T Missouri to expeditiously file proposed tariff sheets with an effective date on the earliest possible date that the provisions of the agreement can be implemented. The Commission also directed AT&T Missouri to file a pleading accompanying its tariff explaining the steps necessary to implement the agreement and what the earliest projected date of implementation is expected to be.

2. The process that is generally used to implement a change such as that required by the Commission's Order is as follows. After approval by the Commission, the marketing organization has the responsibility of determining which organizations within AT&T Missouri will be impacted by the changes that are required to implement the project. When the marketing organization determines that a project will impact AT&T's Missouri's billing system (as is the case with the Stipulation and Agreement), it contacts the IT organization for placement of the project on IT's Retail Major Billing Release Calendar. To implement the changes required by the Stipulation and Agreement, the standard Services' Software Development Lifecycle ("SDLC") process is utilized. The SDLC process is designed to ensure that the project implementation results in an accurate billing system, not only for our retail customers but also for our wholesale customers that depend on the billing system to yield accurate information for their own end user billing. Any short cuts (reduced time for definition, design, testing, etc.) can jeopardize the entire process. This process generally takes about eight ("8") months to complete. The SDLC process involves four phases: (1) Consultation and Assessment ("C&A"); (2) Definition and Funding ("D&F"); (3) Development and Testing ("D&T"); and (4) Deployment. Each phase contains multiple steps or milestones. Under its standard SDLC process, ten milestones would be utilized: (1) the Work Request; (2) Resource Commitment for Definition and Funding; (3) Baselined Business Requirements; (4) Baselined Technical Requirements; (5) Baselined High Level Design; (6) Project Release Commitment; (7) Baselined Detail Design; (8) Software Project Approved for System Test; (9) System Test Complete; and (10) Software Deployed. A

more detailed description of each of these milestones is provided in the following paragraphs.

3. Consultation and Assessment—During the Consultation and Assessment phase, the following milestones are completed: (a) the Work Request; and (b) the Resource Commitment for Design and Funding.

a. The Work Request: The Work Request is a document which includes a project description, identifies the regions impacted, indicates the kind of work, and any special testing requirements. During this phase of the SDLC process, the marketing organization assigns a Project Manager who will gather all of the necessary work groups to discuss potential ordering and billing changes. The Project Manager will work with the identified work groups to ensure that all impacted work groups are included in the project.[1] Each work group will take action items to assess the impact of the project on their group. Thereafter, the work groups will coordinate to create a high level estimate of the amount of the work involved. The Work Request ensures that the outcome of the IT project matches the scope of the project identified by the marketing organization.

b. The Resource Commitment for Definition and Funding. During this phase of the SDLC process, the IT organization determines if the initiative has the necessary priority and resources from the impacted IT work groups to design the project and to proceed to the next phase of the SDLC process.

[1] The impacted work groups that have been identified for this project to date are: BSD-Common Rating, CRIS, MARCH, Exchange Plus, Reference Tables, RPM, SORD, and UPS. These work groups include many of the core billing applications that are involved with the creation and maintenance of all customer billing, service order processing, and detailed usage exchange.

4. Definition and Funding. During the Definition and Funding Phase, the following milestones are completed: (a) Baselined Business Requirements; (b) Baselined Technical Requirements; (c) Baselined High Level Design; and (d) Project Release Commitment.

a. Baselined Business Requirements. During this part of the SDLC process, a document is coordinated with all identified areas of the business to ensure that the needs of the requesting client (here the marketing organization) do not negatively impact other areas of the business. If an unexpected impact is identified, plans must be made to either change the other areas of the business or to notify customers of an impending, non-negotiable change. For example, an analysis must be conducted to determine if Competitive Local Exchange Carriers ("CLECs") will be impacted by the requested change. If CLECs are impacted, as will be the case with this project, the appropriate business unit will need to assess how to proceed. Potential impacts to wholesale billing and operational support systems will be assessed and decisions on how, when, and where the CLECs will be notified of the upcoming change will be made. This phase of the SDLC process includes the Project Manager from the marketing organization, technical requirements employees, methods and procedures groups, an Electronic Data Warehouse ("EDW") representative, Service Order business managers, as well as any other identified work group. The goal is to create one document that works for the entire business to implement the changes. The Project Manager will then to ensure that each area of the business understands the scope of the project and has an opportunity to analyze any impacts to their organization and/or products.

b. Baselined Technical Requirements. During this phase of the SDLC process, a document is created that defines the technical functionality that must exist to satisfy the Business Requirements. This document describes what the software must do and must identify any operational constraints. The Technical Requirements are created through multiple meetings with experts from each of the application groups, as defined above in the Consultation and Assessment Phase. See footnote 1. Just as in the Business Requirements, each of the predetermined impacted areas must complete their section of this document. When this document is completed, it will further explain the scope of the marketing organization's project, this time in technical terms that can be understood by developers.

c. Baselined High Level Design. This step identifies and describes the new, modified, and/or deleted components needed to support the business requirements for a functional area. This document will identify each impacted functional area and describe the impacts to data models, functionality changes, and/or file layouts that affect multiple system applications. Research will be required to determine what is necessary for this particular project. Dedicated Systems and Application Leads will coordinate with all of the applications that have been identified. The Leads will work with the marketing organization, its Project Manager, and the Technical Requirements document to create a design document. This document will be a pictorial view or road map of necessary changes that will be followed by developers. This phase of the SDLC process

involves multiple meetings with committed personnel from the previous steps as well as informal communication with developers.

d. Project Release Commitment. In this step all definition documents are reviewed to ensure that there is no contradiction with other projects in the targeted release. A firm release date is established.

5. Development and Testing. During the Development and Testing Phase, the following milestones are completed: (a) Baselined Detail Design; (b) Software Product Approved for System Test; and (c) System Test Complete.

a. Baselined Detail Design. During this phase of the SDLC process, the IT organization uses the High Level Design document to determine which components of the design will require a Detailed Design. Designers will identify any opportunity to reuse existing coding in an effort to save development time and resources. The designers will also review the High Level Design Document to further decompose each of the key components into modules and sub-processes. Specifically, the designers will take the High Level Design document and create a step by step process so that each application developer is working towards the same goal, even though the application developers work independently. The resultant document will demonstrate the processing logic, data structures, data definitions, modules and sub-processes in sufficient detail so that each application developer can develop the code.

b. Software Project Approved for System Test. During this phase of the SDLC process, the software is modified and/or created, using existing code, as appropriate. Once the coding and/or new system applications are complete, they

are approved for testing. Most software is developed in modules, which are simply units of code. The application developers must continually coordinate with all development groups, as well as the design leads, to ensure compliance with the detailed design.

c. System Test Complete. System testing consists of many steps and frequently results in necessary code modifications, which were created in the previous step. The IT organization develops a test plan, and testing begins with a test unit. During this step, the IT organization is testing the new code within the containing module. The IT organization then conducts integration testing, which includes the identified impacted modules within the application leg. Integration testing is followed by system tests, performance tests, and end-to-end tests. These tests ensure that there is no negative impact to the system (including memory or data storage concerns), Central Processing Unit efficiency, or other products or services. Tests are also conducted to evaluate the impacts to other ILEC and/or CLEC customers.

6. Software Deployed. After all testing is completed, the new code is prepared for production release. This includes coordination between the software developers and the regional data centers. During this phase of the SDLC process, the new code is installed and validated. The affected ordering and billing systems include Customer Records Information Service ("CRIS"), Ease Access Sales Environment ("EASE"), and Service Order Retrieval and Distribution ("SORD").

7. As a project proceeds through the SDLC process, it can take different paths depending on the complexity and/or work in a particular release. As previously

indicated, the process has been expedited in order to deliver mandatory MCA service to its Greenwood customers as quickly as possible. As a result, AT&T Missouri is now operating under modified dates that will result in an implementation by August 22, 2006.

8. The Network Organization. After the IT organization completes the SDLC process, the Network Organization will make translation routing changes, network translation changes, any necessary trunking changes, and changes to the Local Exchange Routing Guide ("LERG").

a. Translations Routing—The Translations Routing organization makes changes to the calling scope tables in A Complete Code Opening Routing Deployment ("ACCORD") which defines what calls can be dialed locally from a specific NPA NXX. This work must be completed before any changes can be made to the Business Integrated Routing/Rating Database System ("BIRRD"), which is the system that feeds AT&T Missouri's routing information into the LERG. In this instance, AT&T Missouri will put routing information in the LERG which will identify changes to the calling scope tables that will go into effect on August 22, 2006.

b. Network Translations. The line class code ("LCC"), which defines the originating characteristics (outbound calling scope) of a line and determines what calls are local and what calls are toll, of every 816-623 customer (currently the non-MCA customers) will be changed to match the LCC of the 816-537 customers (currently the MCA customers). Additionally, translations will have to be performed in every central office in the Kansas City mandatory area, which includes 23 5ESS offices and 8 Nortel DMS-100 offices, so that calls that are

made to 816-623 telephone numbers (currently the non-MCA customers) will be local calls for which no toll charges will be assessed. The Network Organization has committed to accomplishing this work within ten days after IT's Software Deployment.

c. Trunking Changes. The Network organization will also evaluate whether any trunking changes will be required. At this time, AT&T Missouri believes that it has sufficient spare capacity for growth; however, the Network organization will monitor this on an ongoing basis.

d. LERG. Prior to making any change to the LERG, the Telephone Numbering Administration Center ("TNAC") organization, which is part of the Network Organization, will prepare a Part I Form for the Code Administration organization to change the Special Service Code ("SSC") applicable to the NXX at issue. The LERG notification will then take place. After LERG notification, all of the associated AT&T Missouri central office switches will be updated for new switch translations. Once mechanized switch translations are complete in all central offices, any fallout or errors are pinpointed and corrected. Additionally, on the day of the change, the Network Organization will conduct call through testing and Automatic Message Accounting ("AMA") verifications to ensure that record generation is accurate.

9. Other Work. While the IT and Network organizations are performing the work identified above, other work groups will be concurrently performing activities so that the Greenwood exchange will be a mandatory MCA exchange on August 22, 2006. Some of these activities are as follows.

a. Product Management. Product Management will develop a Marketing Service Description ("MSD") and will be responsible for keeping the MSD updated. Product Management will need to review AT&T Missouri's current contracts with business customers to ensure that no business customer is negatively impacted.

b. Channel Delivery. Channel Delivery will need to develop a Sales Job Aid. This document will provide the customer service representatives with an explanation of the changes that are occurring in the Greenwood exchange and conduct any necessary training. Channel Delivery will also develop information for customer service representatives to respond to questions that customers may ask (e.g. Why did my EAS charge increase from $0.10 to $6.21? Why don't I see the MCA charge on my telephone bill? I noticed that I can now call Kansas City without making a 1+ call. Am I being charged for these calls?)

c. Industry Markets. Industry Markets ("IM") will assess whether there are intercompany compensation impacts. In this case, 1+ 816-623 telephone calls (currently non-MCA customers) will become subject to reciprocal compensation. IM will ensure that the recording and settlement systems reflect this so that the records process goes smoothly. Additionally, IM will issue a Local Exchange Carrier/Competitive Local Exchange Carrier ("LEC/CLEC") network modification notice explaining the changes. For example, the notice will direct LECs/CLECs that they should start routing calls from the Kansas City exchange to the Greenwood exchange 816-623 as local, not toll, calls. IM will

also ensure that resale billing will reflect the elimination of optional MCA charges in the Greenwood exchange and the addition of a mandatory EAS charge.

d. Sales Operations. The Sales Operations organization will create the materials that will provide the basis for the Channel Delivery organization to write a Sales Job Aids and scripting.

e. AT&T Online. This group is responsible for updating the material that is contained on AT&T Missouri's internal and external web pages. AT&T Online works closely with Product Management and Channel Delivery to identify any changes that need to be made and how these changes should be reflected on the web sites.

Conclusion

As can be seen from this process overview, there are numerous inter-related steps that must be painstakingly taken to ensure that the project is completed with no adverse impacts on the many inter-twined retail and wholesale operational support and billing systems. AT&T Missouri is committed to implementing the changes contemplated by the Stipulation and Agreement as soon as possible. AT&T Missouri has already expedited the process to meet an August, 2006 schedule and will continue to monitor the project to determine if the implementation can be advanced to June, 2006. If that becomes feasible, AT&T Missouri will advise the Commission.

Respectfully submitted,

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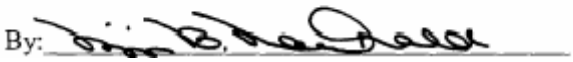
By: 

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CERTIFICATE OF SERVICE

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