BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

| In the Matter of AT&T Communications of the |) | |
|--|---|--------------------|
| Southwest, Inc.'s Petition for Second Compulsory |) | |
| Arbitration Pursuant to Section 252(b) of the |) | |
| Telecommunications Act of 1996 to Establish an |) | Case No. TO-98-115 |
| Interconnection Agreement with Southwestern Bell |) | |
| Telephone Company. |) | |

AFFIDAVIT OF BARBARA MCCRARY-BAZZLE

- I, Barbara McCrary-Bazzle, of lawful age, being sworn, deposed and state:
- 1. My name is Barbara McCrary-Bazzle. I am presently Area Manager-Translations for Southwestern Bell Telephone (SWBT) at 530 McCullough, San Antonio, Texas 78250. I understand that the Arbitration Advisory Staff filed a Costing and Pricing Report, Volume 2, on July 24, 1998. The Report recommends cutting Southwestern Bell's nonrecurring rates in half based upon the AAS opinion that Southwestern Bell does not have sufficient evidence to demonstrate the labor required to perform nonrecurring activities. The purpose of my affidavit is to explain the work I did by explaining the process I used to develop the time estimates used in the cost studies.
- 2. My primary responsibility is to develop and test Methods and Procedures for new service offerings in the 5ESS Lucent technology which is the primary switching technology utilized in SWBT's network. I also provide technical support to other staff employees on issues relating to the 5ESS switch. I support network operations organizations with activation and maintenance of switch based translations. I develop time estimates, as requested by the Cost Study organization, for switch based services and features for the 5ESS switch. I participate as SWBT's representative on a National

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Forum of translations subject matter experts (SMEs) from all the RBOCs on the 5ESS Lucent switches.

- 3. I have been an employee of SWBT since 1968. I began as an operator, moved to a Clerical position in 1973, and the business office as a Service Representative in 1976. In September 1997, I was promoted to Central Office Manager responsible for Crossbar and 1E/1AESS switches. From 1982 to 1983 I held the position of RCMAC (Recent Change Memory Administration Center) manager. From 1983 to 1987 I reassumed the position of Central Office Manager responsible for 1E/1AESS and 5ESS switches. In January 1998, I acquired the position of Translations Manager and assumed the responsibility of developing, inputting and maintaining translations in Lucent, Nortel and Ericsson switch technologies. I was also responsible for office upgrades, converting 2BESS and 1ESS offices to digital Lucent 5ESS or Nortel DMS switches. In August 1996, I assumed my current position and have responsibility for Lucent 5ESS switches.
- 4. I developed several time estimate packages for preparation and implementation of switch based translations for various services, features and routing costs study requests.
- 5. I have been in my current position since August 1996. Any time estimates for cost study purposes for the 5ESS Lucent switch are completed by me. I have provided approximately twenty (20) time estimate packages.
- 6. I requested a review by field Translations Managers (TXCs), with whose work I am familiar, of the current 5ESS time template developed for Lucent recent change views, to develop time estimates. Their recommendations were incorporated in the

template. The field managers have similar skill levels and experience as I do and are actively involved in 5ESS translations on a daily basis.

- 7. The time estimates were developed to be reflective of an "average skill level" of the employee performing the task. The work force in Southwestern Bell is comprised of employees with varying levels of experience and time on the job. The time estimates reflect that variance and are targeted for an average work time. My skill level was required to research and develop time estimates.
- 8. The time estimates I prepared were specifically for the translations administration centers, which are referred to as the TXC. The translations activities, for which I prepared time estimates, are reviewed, prepared and implemented by Communications Technicians and Translations Specialists (Clerks).
- 9. Product teams comprised of individuals are responsible for implementing and managing UNE services. This team consists of personnel from Network, Billing, Marketing and Service Order Methods departments. The service and the exact way the service will be provided are discussed in detail at Product team meetings to ensure all participants have the same understanding before cost assumptions are made and the cost study is actually conducted. Information from the Product Team went into the preparation of the cost study.
- 10. I also used Vendor documentation to determine the appropriate recent change views applicable to this service. This same process is used for Southwestern Bell retail service and these are the exact same time estimates as those provided for Southwestern Bell retail services.

- 11. Southwestern Bell uses Mechanized Translations System (MTS) and Automated Processing of Recent Change Input Letters (APRIL) to create and input translations into the switches. UNE orders will use these same operational systems.
- 12. My consideration of the Mechanized Systems is reflected in the time submitted. To insure that the mechanized processes were properly taken into consideration in the time estimates. I requested field managers to review the 5ESS templates.
- 13. The time estimates also take into account the difference between Switch Translations and Line Translations. Switch translations encompass software characteristics that establish routing, charging, features and classes of service in the 5ESS switch to accurately route calls from an originating party to their destination while generating the appropriate billing record, if required. Switch translations define characteristics that effect entire classes of service. Switch translations must be established before an individual line can be assigned to a particular service. Line translation consists of individual characteristics or options that are specific to a particular line.
- 14. The difference between Central Office Translations Specialists (COTS) and Group 1 Craft time is the COTS time consists of 5ESS translations forms populated, in MTS, for the specific feature or service. MTS generates the recent change messages required for the feature or service. The Communications Technician (Group 1 Craft) reviews the messages for content and accuracy. If corrections are required the Communications Technician makes the appropriate changes and releases the packet to the

in the switch and the packet is completed in MTS. If MTS is not available for the specified switch the Communications Technician will manually input the recent change views. The time estimates reflect these different activities.

- 15. There are no system or routing translations that are fully automated. MTS and APRIL are mechanized processes, however both still require Central Office Translations and/or Communications Technicians to develop the complete translations packet and analyze the data before it is released to the switch. This process is necessary to insure correct information is input in the switch to provide good service and alleviate customer reports.
- 16. Currently, all Lucent 5ESS offices are not on MTS. Efforts are underway to evolve these offices to MTS when the cost/benefit analysis determines that these offices would benefit from mechanization. This benefits AT&T.
- 17. I provide support for approximately 147 Host and 385 Remote 5ESS switches in a five state area.
- 18. In SWBT's five (5) state area, nine (9) managers that supervise Central Office Translations Specialists and Communications Technicians provided input and recommendations to the time estimate template I forwarded to the field.
- 19. I maintain documents that reflect the translations requirements and back up the time estimates submitted in a database spreadsheet template. When a time estimate package is prepared, the spreadsheet becomes part of the package created based on the recent change views required to implement the service or feature.
- 20. I feel confident that the work I provided is accurate and reflects the true time required to perform translations work. My expertise is based on experience as a field

- 20. I feel confident that the work I provided is accurate and reflects the true time required to perform translations work. My expertise is based on experience as a field manager, management of employees that perform translations functions and my technical ability.
 - 21. Attached hereto as Attachment A are the actual time estimates I prepared.

Further, affiant sayeth not.

Barbara McCrary-Bazzle

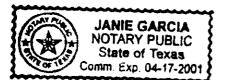
STATE OF TEXAS

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CITY OF SAN ANTONIO

Subscribed and sworn to before me this $2/8^{\frac{7}{2}}$ day of August, 1998.



Notary Public

My commission expires:

4-17-2001

Missouri TO-98-115 Time Estimates Provided By: Barbara McCrary-Bazzle

Analog - Unbundled Local Switching Centrex-Like Features - 5ESS

| System Charge | SCC | 45 minutes |
|------------------------------|-----|------------------|
| | TXC | 1 hr. 25 minutes |
| Subsequent System Charge | SCC | 45 minutes |
| | TXC | 1 hr. 15 minutes |
| Call Waiting - Original | SCC | 10 minutes |
| | TXC | 10 minutes |
| Speed Call - Personal | SCC | 15 minutes |
| _ | TXC | 15 minutes |
| Dial Call Waiting | SCC | 10 minutes |
| <u> </u> | TXC | 10 minutes |
| Distinct Ring & Call Waiting | SCC | 15 minutes |
| | TXC | 15 minutes |
| Dir Call Pickup-Non Barge In | SCC | 15 minutes |
| | TXC | 15 minutes |
| Dir Call Pickup-Barge In | SCC | 15 minutes |
| | TXC | 15 minutes |
| | | |
| | | |

Missouri TO-98-115 Time Estimates Provided By: Barbara McCrary-Bazzle

ISND - Unbundled Local Switching Centrex-Like Features - 5ESS

| System Charge | SCC | 40 minutes | |
|--------------------------|-----|------------------|---|
| | TXC | 1 hr. 20 minutes | |
| Subsequent System Charge | SCC | 40 minutes | |
| | TXC | 1 hr. 10 minutes | ٦ |
| Distinct Ring | SCC | 15 minutes | ٦ |
| | TXC | 15 minutes | |
| Speed Call - Personal | SCC | 10 minutes | ٦ |
| | TXC | 25 minutes | ٦ |
| Call Pickup | SCC | 15 minutes | ╗ |
| | TXC | 15 minutes | |

Missouri TO-98-115 Time Estimates Provided By: Barbara McCrary-Bazzle

DID NONRECURRING - 5 ESS

| | Preparation Time | Implementation Time |
|------------|---------------------|------------------------|
| Initial | 25 | 40 |
| Subsequent | 0 | 69 |
| Total | 25 | 109 |
| | | |

Assume 1 span 24 trunks: Time estimate includes 5 minutes for first trunk and 3 minutes for each additional trunk (implementation only).