

**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 SHARON S. SADLON

1. My name is Sharon S. Sadlon. I am presently Area Manager - Translations for Southwestern Bell Telephone Company ("SWBT"). My business address is 530 McCullough, 3-FF-06. San Antonio. Texas.

2. My primary responsibility is to develop and test methods and procedures for new service or feature deployment in the NORTEL family of switches, commonly known as DMS100. DMS100 includes end office, access tandem and TOPS applications. I also provide technical support to other staff employees on issues relating to NORTEL switches. I support local network operations organizations with activation and maintenance of switch based translations. I develop time estimate packages, as requested by the Cost Study organization, for switch based services and features deployed on the NORTEL family of switches. I also participate as SWBT's representative on a national forum of translation Subject Matter Experts funded by all the Regional Bell Operating Companies (RBOC), through Bellcore, on the NORTEL switches.

3. I have been an employee of Southwestern Bell Telephone Company since 1974. I began as an operator and moved into the business office as a Service Order Writer (a clerical

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position) in 1975. In 1978, I applied for the job of Switching Technician, now Communications Technician. After passing the required tests, I moved into that position in December 1978. Initially, I worked in the central office environment on the 1E/1AESS switches. I moved on to the Switching Control Center (SCC) and worked through the job functions of the SCC. I built and maintained trunk groups, analyzed trouble reports, monitored office performance, and eventually moved into inputting and maintaining central office translations.

In 1989, the NORTEL switches were added to the network environment where I worked. I assumed responsibility of developing, inputting, testing and maintaining translations in the NORTEL switches in the St. Louis market area until 1993 when I was promoted to management. This is my current position and I now work exclusively with the NORTEL family of switches. Throughout my time as a Communications Technician and in the current management position, I have attended various training courses specific to the maintenance and support of the switching network. I am considered a Subject Matter Expert (SME) for NORTEL switches.

4. I am providing this affidavit to explain the process I used to develop time estimates which are used in developing cost studies. I understand that a recommendation for cutting Southwestern Bell's nonrecurring rates in half was based on the Arbitration Advisory Staff's filed Costing and Pricing Report, Volume 2 of July 24, 1998. The recommendation is based on their opinion that Southwestern Bell does not have sufficient evidence to demonstrate the labor time to perform nonrecurring activities.

5. I provided the time estimate packages for preparation and implementation of switch based translations. This information was used by cost study personnel to prepare the studies under review in this docket. I have been in my current position since August 1993. Any cost study request that requires time estimates for translation work on a NORTEL switch comes to me. I have provided more than 100 time estimate packages since 1993.

6. In order to perform switch based translations, software definitions must be programmed into the switch to establish basic classes of service, code definitions (NPA-NXX), call routing, call charging and features. For example, routing and charging translations are table entries which cause call processing in the central office (switch) to determine the correct steps to deliver the originating end user's call to the desired destination and to create appropriate records for billing. These translations are needed for each and every SWBT retail and CLEC unbundled or resold service.

7. The time estimates I provided involve work done in the translation administration work groups, known as the TXC. In most cases, the work is prepared, reviewed, and implemented by Communication Technicians. In some cases preparation is done by Translations Clerks, who are trained to datafill the translation forms of the specific switch technologies. The Communications Technician is a more highly skilled job. These employees develop the complete translation packages; from completing forms, developing the required recent change messages, and analyzing and/or correcting any errors encountered once the data is released to the central office. Forms prepared by Translations Clerks must be reviewed by a Communications Technician for accuracy before release to the switch. Review is necessary to prevent possible loss of service due to errors in switch-wide translations. The

time estimates I prepared reflect an average of the work done by the personnel in the two jobs. I used various vendor documents developed by design personnel and the knowledge I gained through 19 years of experience to establish the time estimate packages used in this case.

8. My participation in Product Teams where development and deployment of the service is determined, also provided me a common understanding of the work involved in time estimates. A Product Team which is made up of representatives from network, billing, marketing, service order methods and any other department needed to provide the service is used for both SWBT retail and UNE services.

9. Additionally, internal Southwestern Bell documents such as Marketing and Technical Service descriptions, produced by Product Managers or Technology Planners were used to develop the company-specific translations requirements.

10. I use the lab environment to implement new translations and validate my time estimates.

11. The time estimates are developed to be reflective of an "average skill level" of the employees who will do the work. The work force in Southwestern Bell is made up of employees with varying levels of experience and time on the job. Time estimates should be reflective of that variance and are targeted for an average work time. Neither the highest nor lowest skill level would be appropriate as the work effort required to prepare and implement translations. My skill level is required to research and develop the time estimates.

12. Southwestern Bell utilizes two systems, Mechanized Translation System (MTS) and Automated Processing Recent Input Letters (APRIL), working together to create and

input translations in the switches. Unbundled Network Element (UNE) orders will pass through these same operations support systems. The use of mechanization was considered when time estimates were developed. Within the last year I requested a review by the TXC field managers of the current time template developed for NORTEL translation tables to make sure it was still valid in light of mechanization activities. Comments and recommendations from them have been incorporated in the template. The field managers have experience and skill level similar to mine and have the added benefit of being in the working environment day to day.

13. The mechanized system, MTS, is not used on all translations. MTS was developed for the high runner (a frequently requested service) or most common translation forms. It does not support every translation type required for any switch. Each vendor product has translation procedures which require sequenced input or development that prevents mechanization from being effective or network secure. Additionally, new development by the vendors create ongoing requirements of manual input.

14. Since MTS does not interface any operation support system, manual creation of MTS packets is required. Communications Technicians, and in some cases Central Office Translation Specialists, receive Translations Questionnaires (TQs), Access Service Requests (ASRs), Code Activation Notifications (CANs), Design Orders or other switch translation requirements which are used to manually develop packets in MTS.

15. The work I do is in support of approximately 170 DMS switches, the number fluctuates with the growth and change of the network.

16. The translation work on these switches is prepared when a new service or feature is ordered in the central office for switch wide deployment or just one customer. For example, if a Competitive Local Exchange Carrier (CLEC) requests an unbundled line class code (LCC) in a central office, a Class Of Service Transmittal (COST) is prepared based on the CLEC's request and placed on the INTRANET of Southwestern Bell. A notice is sent to the TXC of the COST document via e-mail. The appropriate Communications Technician, or Translations Clerk, will be notified by the TXC manager to prepare the switch specific translation forms in MTS required for the LCC. MTS will create the recent change messages required.

The Communications Technician will then review the messages for content and sequence of implementation. Once this is complete, with any corrections or manual intervention required, the Communications Technician will release the packet to the switch via APRIL. *Following successful completion of the packet, the translations are verified in the switch and the packet is completed in MTS.* If MTS is not available for the specified switch or the translation forms required are not available from MTS, the Communications Technician will have to develop the recent change and use manual input to build the LCC in the switch.

The DMS100 requires several translation tables to be datafilled in sequence to establish a single LCC. The Communications Technician is required to monitor the release of the MTS packet to maintain the sequencing and insure correct completion of the order.

17. The validity and accuracy of the time estimates I provide is based on actual work experience and technical ability developed over many years. I continue to practice my skills

in the lab environment and interact with the field work force day to day as a support person. I strive to maintain my expertise through continued training and development of translation methods and procedures.

I maintain a database of time estimates using a template of the times required to populate the various tables of the NORTEL family of switches. When a time estimate packet is prepared, the template data becomes part of a workbook created based on the tables and the entries in the tables required to implement the feature or service.

The same time estimates used to price or cost out SWBT's competitive retail services were provided to support the pricing of UNEs.

Further, affiant sayeth not.

Sharon S. Sadlon
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State of Texas }
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City of San Antonio }

Subscribed and sworn to before me this 20th day of August, 1998.

Lynne R. Brown
Notary Public

My appointment expires:

