

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 RANDAL P. VEST**

I, Randal P. Vest, being of lawful age, being duly sworn, depose and state:

1. My name is Randal P. Vest. I am presently Director-Telecom Management Technology. I am employed by SBC Technology Resources, Inc. at 9505 Arboretum Boulevard, Austin, Texas 78746.

2. I am a native of Little Rock, Arkansas. I graduated in 1973 from the University of Arkansas at Fayetteville with a Bachelor of Science degree in Electrical Engineering. After a summer internship with Southwestern Bell in 1972, I began full time employment in 1973, and now have twenty-five (25) years service with the company. I first worked as a switching engineer in Little Rock and subsequently held positions as a transmission engineer and inventory manager before moving to the SWBT St. Louis staff in 1978. In St. Louis my initial assignment was management of an operational support system for inventory control. Subsequently, I was promoted to supervise a group of operational support system experts who managed systems which inventory and assign special services. This is the position I held during divestiture when many of the operational support systems had to be extensively altered for revised operations. I have experience with a variety of provisioning systems such as TIRKS,

Exhibit No. 13  
Date 9-4-98 Case No. TO-98-115  
Reporter KF

LFACS and SWITCH. After divestiture, I was assigned a primary planning role for the complete portfolio of SWBT operational support systems. I served this function for eleven (11) years from 1986 until last September, when I moved to Austin for a job with Technology Resources, Inc., the research and development subsidiary of SBC.

3. My position at TRI is supervisor of a group of computing experts who provide expertise to all of SBC operations. I have taken numerous courses both internal and external to the company on technology and support systems. In addition, I have had extensive experience with SBC's international operations, offering expertise to ventures in England, France, Mexico and other locations.

4. The purpose of my affidavit is to explain the efficiencies achieved by SWBT through the application of Operational Support Systems and the fall out SWBT experiences.

5. The service provisioning processes center around Operational Support Systems. There are actually many different flows dependent on the type of service and customer needs being addressed. I would equate these to assembly lines where different stations exist to perform specific functions. Each different process flow or assembly line may share certain stations with another process, but also may require its own unique functions. The functions to provision an ISDN service are not exactly the same as those necessary to provision a Frame Relay service. It is common to group several process flows into a category based on some common function or characteristic of the processes. As an example, two common categories of these assembly line flows would be Retail and

Wholesale. This categorization recognizes there are distinct requirements between functions for Retail versus Wholesale services.

6. There is a strong emphasis on eliminating the manual effort for every function where it is reasonable and cost efficient to do so. The term "flow-thru" is often used to reflect this objective. A function with 90 (ninety) percent "flow-thru" would require 10 (ten) percent of service activity volume to receive manual assistance to complete the function. There is also a concept of end-to-end "flow-thru", reflecting how well the service is mechanically completed by all the stations in a type of flow.

7. The Retail Provisioning processes generally include the following functions:

- Customer Contact - The retail customer calls a service center. The SWBT service representative is supported by a system named EASE. This system allows the representative to capture the customer request in simple terms, to automatically retrieve service history, to verify address information, and to perform a number of other tasks mechanically. EASE was developed as a retail order support system.
- Service Identification Assignment - For most residential services, the service identification is a telephone number. The Bellcore system PREMIS performs this function.
- Order Generation - The service data is transformed into a Service Order. The Southwestern Bell Telephone system for service order management is the Southwestern Order Retrieval and Distribution (SORD) system. Many years ago, this Southwestern Bell system was transferred to other Regional Bell Operating

Companies. The acronym may be somewhat common, but the Southwestern Bell SORD product is unique to the Southwestern Bell provisioning process.

- Order Analysis and Control - The SORD system passes the order to a Bellcore developed system, the Service Order Analysis and Control (SOAC) system. As its name implies, this system analyzes the order and packages requests to a number of assignment, data base, and work control systems to assemble the network components necessary to provide the service, as well as to initiate the installation of the assembled components. These functions are:
  - Loop Assignment - Assignment of distribution inventory is through a Bellcore system named LFACS.
  - Switch Port Assignment - The Bellcore SWITCH system is used in Southwestern Bell to inventory and assign switch ports.
  - Equipment Assignment - The Bellcore TIRKS system is used to inventory and assign any equipment components.
  - Facility Assignment - Certain facilities, particularly Interoffice Facilities, are inventoried and assigned out of TIRKS.
  - Service Design - If there are computations required to determine if service parameters are being adequately met, TIRKS is the system involved.
  - Translation Update - The Bellcore developed March system, or other translation based applications such as OPS/INE update software controlled network elements. These software systems receive an advance copy of the request from SOAC and await installation of any physical components.

- Work Control - The Bellcore WFA Control system serves to coordinate the various work steps required to establish service.
- Dispatch - Outside installation activities are under the control of the WFA Dispatch Outside system.
- Inside Work Control - The inside wiring required for the service may be directed through either the Frame Order Management System, or WFA Dispatch Inside system.
- Completion - After all assignment and installation activities have been coordinated, the SOAC system completes the order to SORD. Then SORD controls the necessary data base and system updates to reflect a completed service.
- Billing - SORD triggers an update of the billing process through the CRIS system. Like SORD, several RBOCs have billing systems with this acronym, but this system is unique to Southwestern Bell.
- Ongoing Service Update - A number of records such as calling cards, E911, etc. must be updated to reflect the completed service.

8. I have only described a few of the systems which have been developed to facilitate the provisioning process. In Southwestern Bell, over fifty (50) different systems are involved in one or another type of provisioning flow process.

9. Less than half of these systems are common to many different companies. The common systems include those such as TIRKS, SOAC, etc. which I have described in my outline of the provisioning flow process.

10. SWBT has been a leader among the RBOCs in many areas of commonly used support system definition and development. For example, the major new system added during the past seven years has been the SWITCH system which provides for the complex function of inventorying and assigning switch ports. SWBT was the lead RBOC in this deployment, receiving new computer updates prior to any other company and directing the vendor development process. SWBT was the first RBOC to completely replace its COSMOS computers with this advanced product.

11. Several such systems were mentioned in my description of the provisioning process, including EASE, SORD, and CRIS, which were developed specifically for use by SWBT. SWBT is very adept at internal system development when commercial products are not available to meet business needs.

12. There is much discussion related to efficiencies in operations as expressed by flow-thru percentages. As I have described, the complete provisioning process can be compared to an assembly line of many functions. A composite fallout rate of 2 (two) percent would imply only fractional fallout rates in each of the many functions within the assembly line. While SWBT has been extremely successful in reducing costs by achieving flow-thru in different functions, achieving fractional fallout is highly unlikely due to their complexity and the presence of even the most minimal human errors. As I have testified, SWBT has many systems and processes unique to SWBT, and through these we have achieved efficiencies comparable to any in the industry.

13. There are limitations to SWBT's application of technologies related to provisioning. We certainly are always conscious of being cost effective. We have a

rigorous process of analysis for the application of new systems and technologies. And since the most cost effective manner to obtain much of our systems needs are from third party vendors, the acceptance and application of new technologies to their product lines is a factor. For example, in other cases or in the media, there is suggested use of the technology of Global Positioning for dynamic technician dispatching. This is a very expensive technology which is not currently applied to dynamic dispatching in our third party vendor's dispatch system. We are working closely with our vendor to determine the best and most cost effective manner to utilize this technology.

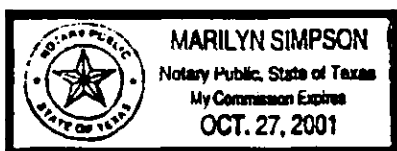
14. In my experience Staff's proposed fallout rate of five (5) percent is unreasonable. A cumulative fallout rate of only 5 (five) percent for all of the provisioning steps of a typical process would be difficult to justify economically. Some very complex steps are required for some services, and these are automatically dropped (counted as fallout) and the step is completed manually. SWBT has a continual emphasis on programming updates to reduce this manual intervention, but this is performed only when the benefits justify the additional mechanization costs. Fictitious estimates of fallout rates should be avoided in favor on measured results.

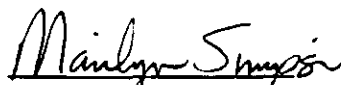
Further, affiant sayeth not.

  
Randal P. Vest

STATE OF TEXAS     )  
                                  ) SS  
COUNTY OF TRAVIS )

Subscribed and sworn to before me this 20<sup>th</sup> day of August, 1998.



  
Notary Public

My commission expires:

\_\_\_\_\_