BEFORE THE PUBLIC SERVICE COMMISSION OF FLORIDA

In re: Petition of Competitive)
Carriers for Commission action)
to support local competition in)   Docket No. 981834-TP
BellSouth Telecommunications,)
Inc.'s service territory.)
_____)

In re: Consideration of BellSouth)
Telecommunications, Inc.'s entry)
into interLATA services pursuant)   Docket No. 960786-TL
to Section 271 of the Federal)   Filed: October 29, 1999
Telecommunications Act of 1996.)
_____)

Comments of MGC Communications, Inc.
Regarding Third Party OSS Testing

MGC Communications, Inc. ("MGC") hereby submits its comments regarding the draft

Third-Party OSS Master Test Plan.

Introduction

MGC provides local service to small business and residential customers in Florida,

Georgia, California, Nevada, and Illinois. In Florida, MGC has mostly small business customers.

MGC installs its own switch, collocates in the central offices of the incumbent local exchange

carrier ("ILEC"), and leases loops and transport from BellSouth or other carriers.

MGC has built its own interface and has been testing for many months in an attempt to

obtain a functioning operational support system ("OSS") connection for ordering unbundled

network elements ("UNEs") and loops, in particular, via TAG-API.

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Recommendations

1. TAG-API is marketed as supporting UNEs; consequently, directory orders should be tested. MGC does not see evidence of documentation of the intent to test this critical component of the order and strongly recommends that it be tested.

2. The BellSouth testing systems do not represent a comprehensive sample of "live" data. Instead, the test orders are "canned" and never contain any errors. Consequently, the "production environment" within BellSouth is very different from this simulated "test" environment. MGC, for example, has been testing its interface with BellSouth's TAG-API for more than five months, with no end yet in sight.

Because of numerous and continuing errors in the BellSouth product, MGC has been forced to make a series of modifications to the design of its interface in an attempt to compensate. First, there are inconsistencies in TAG-API and MGC was required to wait approximately 4 weeks for any clarification. Second, there are serious inaccuracies in the documentation which continues to create problems for the competitive local exchange carrier ("CLEC") attempting to interface with and use the system.

Of particular consequence to MGC has been a back-end limitation error in the processing of pre-orders. More specifically, TAG-API processes pre-orders by a request to retrieve the main telephone number, which is then populated into the Location Billing Account Number ("LOCBAN"). Since this represents the major portion of MGC's order types, this function must be fully operational. Because it is not, MGC cannot use the system.

There has also been a question – given different answers at different points in time - regarding whether it is possible to process multiple types of requests on one purchase order

number ("PON"). In addition, problems with TAG-API prevented the delivery of a large number

of billing account numbers ("BANs") urgently needed by MGC.

CLEC data, such as MGC data, should be used to test for these and other continuing

problems with this system.

3. Another area which should be reviewed and tested is the firm order commitment

("FOC") mechanism for returning messages to the CLEC. Today, MGC receives multiple and

different messages for any given order. These messages originate from various systems within

the BellSouth OSS environment and are returned to the CLEC without a priority or sequencing

scheme, which makes it impossible to determine the overall meaning of the collective responses.

This component of the system is vital to the successful implementation of automation between

BellSouth and a CLEC.

4. The OSS Test Plan seems to be focused primarily on the functionality of a single

release. While this is certainly a good start, MGC believes that release-to-release procedures

must also be tested. This type of testing will identify concerns with changing definitions of

existing and operating TAC software, which has been a significant and continuing part of the

problems experienced by MGC. Since BellSouth is releasing code approximately every thirty

days, there should be adequate data necessary for such testing.

5. Finally, success in any implementation is directly related to good documentation.

This means that the TAG-API software should match exactly with the supporting documentation.

As referenced above, MGC has found the discrepancies between the documentation and the

operation of the TAG-API software a continuing and very frustrating problem. With each

release, MGC has struggled to code the changing business rules into its software interface. There

is no other way to understand what codes are valid and what codes are not, however, the

BellSouth documentation on TAG-API continues to contain errors in each and every subsequent release.

Conclusion

MGC recommends that the BellSouth OSS testing include:

1.   Testing of directory orders;

2.   Testing with "live" data from a CLEC; (MGC would be more than willing to provide data for such tests);

3.   Testing of the FOC message return mechanism;

4.   Testing of release-to-release procedures; and

5.   Testing of the accuracy of the implementation documentation.

Respectfully submitted this 28th day of October, 1998.

MGC COMMUNICATIONS, INC.

By _____

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