



Telecom Decision CRTC 2007-61

Ottawa, 31 July 2007

Competitive local exchange carrier access to incumbent local exchange carrier operational support systems – Manual provisioning of equipment records

Reference: 8621-C12-01/00

In this Decision, the Commission determines that Bell Canada and TELUS Communications Company are required to continue to manually provide access to equipment records (manual ERs) to competitive local exchange carriers (CLECs) that subscribe to their respective operational support system access services only when the manual ERs contain information that is not available through electronic access to their operational support systems. This determination also applies to the CLECs' agents and resellers and is subject to the implementation timelines set out in this Decision.

Introduction

1. In Telecom Decision 2005-14, the Commission directed Bell Canada and TELUS Communications Company (TCC) to provide competitive local exchange carriers (CLECs) with electronic access to certain of their operational support systems (OSS).
2. In a report entitled *CLEC Access to ILEC's Operational Support Systems Update*, dated 8 December 2006 (OSRE003d), the CRTC Interconnection Steering Committee OSS Working Group (OSWG) noted that electronic access to OSS by CLECs had been successfully implemented in Bell Canada's and TCC's territories and that issues, when they came up, had been generally dealt with between the affected carriers. However, the OSWG identified a non-consensus issue regarding whether Bell Canada and TCC would have to continue to manually provide equipment records (manual ERs)¹ to CLECs that had implemented electronic access to their respective OSS. The OSWG requested that the Commission deal with this issue.

Non-consensus issue

Positions of parties

3. Bell Canada and TCC proposed that incumbent local exchange carriers (ILECs) no longer be required to deal with manual ER requests from a competitor, its resellers, or its agents following

¹ Manual ERs are hard copy customer equipment records that are produced through a manual process.

a two-week transition period after electronic access to OSS had been implemented for a particular CLEC. Bell Canada and TCC indicated that they would continue to provide access to manual ERs to competitors that chose not to subscribe to their respective OSS access services.

4. Bell Canada and TCC submitted that if the ILECs were required to maintain a parallel manual ER access process for CLECs that chose to use their OSS access services, many of the efficiency gains the Commission had expected to accrue to the ILECs as a result of implementing the OSS access services would not be achieved.
5. MTS Allstream Inc. (MTS Allstream) and Rogers Communications Inc. (RCI) were of the view that competitors using the ILECs' OSS access services should continue to have access to manual ERs. They submitted that electronic access to the ILECs' OSS had never been intended as a complete replacement of manual ER processes and that nowhere in the OSWG deliberations had there been any discussion of entirely eliminating CLEC access to manual ERs.
6. MTS Allstream and RCI submitted that there were instances, particularly for customers with complex installations, where CLECs would require details that were only available through manual ERs. MTS Allstream noted, for example, that to identify the specific number of features held by such a customer, the CLEC would have to order a manual ER to augment the information received from the electronic query.
7. MTS Allstream and RCI submitted that they expected that ILECs would still be able to achieve efficiency gains since electronic access to the ILECs' OSS would substantially reduce the need for manual ERs, and access to manual ERs would only be required on occasion.
8. MTS Allstream and RCI noted that access to the ILECs' OSS by the CLECs' resellers or agents had initially been considered out of scope in OSWG discussions. They indicated that, currently, CLECs' resellers and agents issued manual ER requests directly to the ILECs, without notifying the associated CLEC.
9. MTS Allstream and RCI submitted that it was not until 30 October 2006 that the ILECs had proposed that CLECs subscribing to ILEC OSS access services should be responsible for providing OSS gateway access to their resellers and agents. MTS Allstream and RCI were of the view that CLECs would require a period of not less than nine months to deliver reseller and agent proxy access via their OSS gateways.

Commission's analysis and determinations

10. The Commission notes that Bell Canada and TCC have requested that they no longer be required to offer manual ER service to
 - I. CLECs that have electronic access to their OSS, and
 - II. the agents and resellers of the CLECs that have electronic access to their OSS.
11. The Commission will consider these two requests separately.

a) Manual ER service for CLECs

12. In Telecom Decision 2005-14 the Commission stated that it expected all parties to benefit from the implementation of CLEC access to ILEC OSS as a result of, among other things, increased efficiencies.
13. The Commission considers that with CLECs using Bell Canada's and TCC's OSS access services, they should have seen a reduction in work associated with rejected local service requests and a drop in manual ER requests.
14. The Commission notes that evidence provided as part of the OSWG report indicates that although there has been a significant drop in manual ER requests in Bell Canada's territory, there has not been a similar drop in rejected local service requests. The Commission also notes that usage of Bell Canada's OSS services is significantly below the access volumes originally forecasted by the CLECs.
15. Although the CLECs' relatively low uptake of OSS access services can be explained partly by changes in the competitive environment during the time it took to implement the ILECs' OSS access services, the Commission is nevertheless concerned with the low usage levels of these services experienced by Bell Canada to date. In the Commission's view, removing the requirement for Bell Canada and TCC to provide access to manual ERs to CLECs that subscribe to their OSS access services would encourage CLECs to increase their usage of these services and would lead to further efficiency gains.
16. The Commission notes, however, that MTS Allstream has offered evidence that in some instances manual ERs contain information that is not available through Bell Canada's and TCC's OSS access services.
17. The Commission considers that in order for CLECs to have access to the same level of information that is available to the ILECs, CLECs that access Bell Canada's and TCC's OSS access services electronically still need access to manual ERs in situations where they contain information only available via manual ERs. Further, the Commission considers that it would be uneconomical for a CLEC with electronic access² to Bell Canada's or TCC's OSS to pay for a manual ER unless it contains information only available on that manual ER.
18. Accordingly, the Commission determines that, subject to the timing issues discussed in the next paragraph, Bell Canada and TCC are required to continue to manually provide access to equipment records to CLECs that subscribe to their respective OSS access services, but only when they contain information that is not available through electronic access to OSS.
19. The Commission considers that because the above determination will require the CLECs to ensure that their internal OSS access processes are in place and functioning, it is appropriate to allow a reasonable adjustment period before the above determination becomes effective.

² In tariff notices Bell Canada 7017 and Bell Aliant 72, dated 2 March 2007, these two companies are requesting that the Commission approve rates to be charged to CLECs for electronic access to their OSS.

The Commission therefore considers it reasonable that CLECs that already subscribe to an OSS access service be given three months from the date of this Decision to adapt their processes accordingly. The Commission also considers it reasonable that new OSS access service subscribers be given six months to implement their internal OSS access processes before the above determination becomes effective.

20. The Commission-approved *Canadian Local Ordering Guidelines* (CLOG)³ requires that charges to CLECs for provisioning manual ERs must be billed in accordance with applicable tariffs and published rates. The Commission finds Bell Canada's and TCC's tariffs for provisioning manual ERs are unclear. The Commission considers that the tariff for manual ERs should clearly specify the applicable terms of service and rates. The Commission therefore directs Bell Canada and TCC to either propose updates to their current tariffs or to propose new tariffs for manual ER service that clearly indicate or provide a reference to the specific terms of service and rates charged for the service.

b) Manual ER service for CLECs' agents and resellers

21. The Commission notes that the current CLOG does not prevent the CLECs' agents and resellers from making manual ER requests, with appropriate customer consent, directly to Bell Canada or to TCC.
22. The Commission notes that Bell Canada and TCC do not have direct business relationships with the agents and resellers of CLEC services in relation to CLEC services.⁴ The Commission considers that because CLECs with electronic access to the ILECs' OSS have the same information available to them as the ILECs, except for information that is only available via manual ERs, it is no longer appropriate that Bell Canada or TCC be required to deal with manual ER requests from agents and resellers of these CLECs.
23. The Commission considers that requiring CLECs to act as intermediaries between their agents and resellers and the ILECs in the case of manual ERs would add a level of complexity to the CLECs' dealings with their agents and resellers that was not at issue when discussions were underway to implement CLEC access to ILEC OSS. The Commission also considers that CLECs would have to develop and implement solutions to either provide their agents and resellers with electronic access to the appropriate ILEC's OSS or set up a manual process to provide their agents and resellers with the equivalent information.
24. The Commission considers that given that the process to implement CLEC access to ILEC OSS took five years, it would be unreasonable to expect CLECs to be able to set up and manage customer information requests from their agents and resellers immediately after a decision is issued in this proceeding. As a result, the Commission considers the nine-month implementation period proposed by MTS Allstream and RCI to be reasonable.

³ The most recent version of the *Canadian Local Ordering Guidelines* was approved by the Commission in *CRTC Interconnection Steering Committee – Consensus items*, Telecom Decision CRTC 2006-43, 20 July 2006.

⁴ These resellers and agents may have a direct business relationship with Bell Canada and/or TCC in relation to other services.

25. Accordingly, the Commission determines that beginning either nine months after the date of this Decision or nine months after a CLEC first subscribes to an ILEC's OSS access service, whichever is later, Bell Canada and TCC will be required to continue to manually provide equipment records to agents and resellers of CLECs that have access to their respective OSS only when the manual ERs contain information that is not available through electronic access to OSS.

Related document

- *Competitive local exchange carrier access to incumbent local exchange carrier operational support systems*, Telecom Decision CRTC 2005-14, 16 March 2005

Secretary General

This document is available in alternative format upon request, and may also be examined in PDF format or in HTML at the following Internet site: <http://www.crtc.gc.ca>