



## Telecom Decision CRTC 2005-58

Ottawa, 6 October 2005

### Issues related to CLEC Access to ILEC OSS

Reference: 8638-C12-200506016

*The Commission **approves** the operational support systems (OSS) working group quarterly progress report on competitive local exchange carrier (CLEC) access to incumbent local exchange carrier OSS.*

*The Commission finds that Bell Canada and TELUS Communications Inc. (TCI) are not required to provide the service address query function proposed by the CLECs as part of CLEC access to OSS. The Commission directs, however, Bell Canada to provide CLECs with Bell Canada's proposed graphical user interface service address query function by 31 December 2005, and TCI to provide CLECs with a service address query function similar to that proposed by Bell Canada by 16 March 2006.*

### Background

1. In *Competitive local exchange carrier access to incumbent local exchange carrier operational support systems*, Telecom Decision CRTC 2005-14, 16 March 2005 (Decision 2005-14), the Commission directed Bell Canada and TELUS Communications Inc. (TCI) to develop and implement competitive local exchange carrier (CLEC) access to certain operational support systems (OSS) within a one-year period.
2. In order to achieve that objective, the Commission directed the CRTC Interconnection Steering Committee (CISC) OSS working group (OSWG) to report to the Commission, within two months of Decision 2005-14, the industry-wide standard formats and protocols that would be used for the exchange of OSS information between incumbent local exchange carriers (ILECs) and CLECs. The Commission also indicated that any non-consensus items should be reported to the Commission as soon as possible so that these items could be dealt with by the Commission on an expedited basis, in order to not delay the development and implementation process.
3. The OSWG report on industry-wide formats and protocols was approved by the Commission in *Approval of CISC operational support systems working group report on CLEC access to ILEC OSS*, Telecom Decision CRTC 2005-31, 27 May 2005 (Decision 2005-31). Although Decision 2005-31 approved the OSWG's approach to developing and implementing CLEC access to ILEC OSS, the Commission noted that there were still issues that needed to be finalized and, accordingly, directed the OSWG to provide quarterly updates starting 15 July 2005.

## **Filings**

4. The OSWG sent two items to the Commission for its consideration, both of which are available on the CRTC's CISC website:
  - A. on 15 July 2005, the Commission received the first OSWG quarterly report, *CLEC Access to ILEC's Operational Support Systems*, 15 July 2005 (OSRE003a); and
  - B. on 29 August 2005, the Commission received a non-consensus report, *CLEC Access to ILEC's Operational Support Systems*, 29 August 2005 (OSRE004a), on the need for a service address query.

### **A. Quarterly OSWG report on the implementation of CLEC access to OSS**

5. The Commission notes that the OSWG reported that the development of CLEC access to ILEC OSS was proceeding as planned. Based on its review, the Commission **approves** the report as submitted.

### **B. Non-consensus report on the need for a service address query**

6. The CLECs submitted that the customer telephone number query being developed by the OSWG would not allow them to deal with customers that did not have existing service with an ILEC, such as customers that are in a newly built location or customers that move (new/move).

## **Position of parties**

### **CLECs**

7. The CLECs proposed that a service address query be developed that would provide address information down to the unit number, the capability to narrow down the address by matching other addresses, information on whether the address qualifies for Digital Subscriber Line service, and the first eight characters of the wire centre common language location identification (CLLI) code, which allows the CLECs to identify the serving wire centre. The CLECs submitted that using a telephone number query and a service address query would allow them to provide their customers with an equivalent level of service as that provided by an ILEC to their customers under the same circumstances.
8. The CLECs submitted that without a service address query, rejection of local service requests (LSRs) by ILECs for new/move customers would occur more often because the customer service address field in the LSR did not match the address in the ILEC database and/or the CLLI code was wrong. The CLECs submitted, as a result, that new/move customers could be inconvenienced at a minimum or, in the worst case, could be left without local service for an extended period of time. The CLECs were of the view that negative customer experiences are detrimental to the market perception of the CLEC's ability to offer local telephone service.

9. The CLECs submitted that without access to the information produced by the requested service address query, the efficiency gains expected from CLEC access to OSS and indicated in the OSWG report approved by the Commission in Decision 2005-14 would be reduced.

#### **Bell Canada**

10. Bell Canada submitted that it would have to invest significant amounts of money, resources and time to develop a link to its facilities database and then determine the correlation between the CLLI code and the civic address in order to provide the information requested by the proposed service address query. Bell Canada noted that in Decision 2005-14 the Commission determined that the ILECs would not be required to provide access to their facilities databases, with the exception of indicating to CLECs whether a particular customer was served from a remote.
11. Bell Canada submitted that a service address query would not result in a significant reduction of rejected LSRs to CLECs. Bell Canada noted that in a sample of rejected LSRs provided by Call-Net Communications Inc., less than 37 percent of rejected LSRs would have been resolved if a service address query existed. Bell Canada submitted that their new/move customers supply incorrect or incomplete address information that often results in increased delays and costs in providing service. Bell Canada submitted that, therefore, the experience of the CLECs in this regard was no different than that of Bell Canada.
12. Bell Canada noted that starting sometime in the fourth quarter of 2005, CLECs will have access to an interactive service address query capability using a graphical user interface (GUI) that will allow the CLECs to perform "wild card" searches and to validate an address down to the unit level. Bell Canada was of the view that CLEC customer service representatives (CSRs) would then have access to the same information, in the same format, as Bell Canada's CSRs. Bell Canada submitted that CLECs would therefore have the opportunity to provide services to new/move customers that is equivalent to those offered by Bell Canada.

#### **TCI**

13. TCI committed to providing the CLECs with access to their OSS by 16 March 2006, but noted that due to the current work stoppage they were unable to undertake any new development activity, such as the CLEC-proposed service address query. TCI submitted that once the work stoppage was over, it would be able to assess the development effort and time to implement a service address query capability.

#### **Commission's analysis and determinations**

14. In Decision 2005-14, the Commission did not require ILECs to give CLECs access to the facilities databases, with the exception of indicating to CLECs whether a customer is served off a remote. The Commission notes that the information requested by the CLECs as part of a service address query is located in ILEC facilities databases.
15. The Commission, in arriving at the determinations in Decision 2005-14, balanced the needs of the ILECs, CLECs and customers. The Commission determined that CLECs needed access to ILEC OSS in order to provide ILECs with accurate LSRs and to provide better service to customers. The Commission recognized, however, that the ILECs store their information in

several databases that do not necessarily communicate with each other, and the process of allowing CLEC access to all of the information available to the ILECs would be expensive, time consuming and ultimately would not necessarily be of significant use to CLECs. Accordingly, the Commission ordered CLEC access to a set of ILEC information that the Commission determined would be useful to CLECs, would be provided in a determinate period of time, and could be provided at a reasonable cost.

16. The Commission considers that the currently approved method of allowing CLEC access to ILEC OSS using telephone number queries will attain the objectives established in Decision 2005-14, reducing the number of rejected LSRs to a better level than the accepted service standard and giving CLECs the opportunity to provide local services to customers at levels that more closely resemble what is offered by the ILECs.
17. The Commission considers that requiring the ILECs to allow CLEC access to their facilities database through the CLEC-proposed service address query would not provide CLECs with a benefit that is proportional to the increased expense and the additional delay that this would cause to the implementation of CLEC access to ILEC OSS.
18. The Commission considers that although it is unfortunate that providing local service to new/move customers presents a challenge to the CLECs, it also presents challenges to ILECs. The Commission is of the view that having access to the GUI service address query capability like that proposed by Bell Canada, when used in conjunction with the other tools available to the CLECs such as postal code address search engines and ILEC wire centre maps, will allow CLECs the opportunity to provide an equivalent level of service to new/move customers as the service provided by ILECs.
19. Accordingly, the Commission finds that CLEC access to ILEC OSS is not required to include a service address query function as proposed by the CLECs.
20. The Commission directs that Bell Canada provide CLECs with Bell Canada's proposed GUI service address query by 31 December 2005. The Commission also directs TCI to provide CLECs with a service address query function similar to that proposed by Bell Canada that will allow wild card searches and will return an address down to the unit level, by 16 March 2006.

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>*