



Telecom Decision CRTC 2010-680

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Ottawa, 10 September 2010

CISC Business Process Working Group – Consensus report BPRE079a – Reduction of local service request rejections

File number: 8621-C12-01/08

Introduction

1. In *Bell Aliant Regional Communications, Limited Partnership and Bell Canada – Introduction of Local Service Request Rejection Charge*, Telecom Order CRTC 2009-805, 23 December 2009 (Telecom Order 2009-805), the Commission approved a local service request (LSR) rejection charge for Bell Aliant Regional Communications, Limited Partnership and Bell Canada (collectively, the Bell companies). The Commission concluded that the introduction of this charge would provide incentive for competitors to reduce the overall LSR rejection rate in the Bell companies' incumbent operating territories.
2. In Telecom Order 2009-805, the Commission also directed the Bell companies to make changes to their respective tariffs in order to permit access by wireless service providers (WSPs)¹ and Internet service providers (ISPs) to the Bell companies' competitive local exchange carrier (CLEC) Access to Operational Support Systems (OSS) Service. The Commission further requested that the CRTC Interconnection Steering Committee (CISC) Business Process Working Group (BPWG) propose solutions to reduce LSR rejection rates.
3. On 23 March 2010, the BPWG filed *Reduction of LSR Rejections*, Consensus Report BPRE079a (the report) for Commission approval. The report can be found in the "CISC – Intercarrier Operations Group – Business Process Reports" section of the Commission's website.

The report

4. In the report, the BPWG submitted that it had examined statistics provided by group members on volumes of rejections, classified by type of rejection. Based on these statistics, the BPWG identified 14 areas or situations where a reduction in the LSR rejection rate could be achieved and provided associated recommendations for the Commission's consideration. A summary of the recommendations is included in the Appendix to this decision.

¹ In this decision, the term "WSPs" refers to wireless carriers.

5. The BPWG submitted that
 - no further action is required on a number of recommendations;
 - several of the recommendations involve only process changes, which should be implemented immediately; and
 - further analysis and work is required regarding the remaining areas and situations identified in the report.
6. In addition, the BPWG noted that where system changes are required, other than for compliance with guidelines, service providers should implement these changes coincident with the next major release of the Canadian Local Ordering Guidelines (C-LOG).

Commission's analysis and determinations

7. The Commission notes that a number of the report's recommendations relate to situations where corrective actions are within the control of the local exchange carriers (LECs) and other carriers issuing LSRs, and could be acted upon immediately through the proper training of staff involved in issuing LSRs. The Commission agrees that recommendations 3, 4, and 8 should be implemented immediately and directs all carriers issuing LSRs to take the actions specified in these recommendations.
8. The Commission also agrees that no further action is required as stated in recommendations 11 and 14. In this regard, the Commission considers that involving resellers in the LSR process would involve revamping current processes and systems, and that the development of CLEC OSS access services for use by other carriers would require significant implementation costs. The Commission notes that these two initiatives have not been mandated by the Commission to date.
9. The Commission notes that the BPWG recommended that it undertake activities to analyze and develop solutions with regard to the remaining nine situations or areas identified in the report. The BPWG also recommended that it undertake to develop or revise industry-developed ordering and provisioning guidelines, which may require introducing new or enhanced codes for LSR forms. The Commission notes that these improvements or enhancements may require system changes to carriers' OSSs. The Commission agrees with the BPWG's approach.
10. The Commission notes that the industry recently incurred costs to implement a major upgrade of the C-LOG when version 6.0 took effect. The Commission therefore finds it reasonable for the industry to delay implementing any system changes, other than to comply with guidelines, until the next major C-LOG release.

11. In Telecom Order 2009-805, the Commission determined that the Bell companies' LSR rejection charge should also apply to WSPs and ISPs, and that the Bell companies are to make their CLEC Access to OSS Service available to these providers. The Commission therefore requested that all parties involved in issuing and receiving LSRs should have an opportunity to propose solutions for reducing the number of LSR rejections, and that CISC prepare and submit a report containing the proposed solutions. The Commission notes that the BPWG report primarily included recommendations related to LSR exchanges between LECs. The Commission reiterates that CISC's activities should focus on reducing LSR rejections for all entities (LECs, WSPs, and ISPs) issuing and receiving LSRs.
12. The BPWG indicated that it would issue reports to the Commission as required and that it expects to issue its initial report within three months of the date of this decision. The Commission agrees with the BPWG's proposed approach and requests that the BPWG file its first report within three months of the date of this decision. The Commission also requests that the BPWG submit a work plan schedule for follow-up purposes, by item, no later than the date on which the BPWG files its first report.

Secretary General

Summary of BPWG recommendations

#	Recommendations	Implementation requirements / Impact on systems
1	BPWG to review pending order scenarios and develop guidelines to explicitly identify situations when LSRs may be rejected	Develop guidelines / Potential system impacts
2	BPWG to review current guidelines on a data field basis to determine when validation rules can be revised to reduce unnecessary rejections	Review guidelines / System impacts
3	LECs to review current internal processes to ensure that appropriate validation is in place to send LSRs to the correct LEC	Implement immediately
4	LECs to ensure that they train staff and provide appropriate scripts to reconfirm the owner of the service prior to issuing an LSR	Implement immediately
5	BPWG to review current existing account number/existing account telephone number requirements to see whether conditional requirements can be eliminated entirely	Review current requirements / Potential system impacts
6	BPWG to determine whether validation rules for stand-alone number porting can be relaxed LECs and WSPs to improve quality of LSR information	Review current validation rules / Potential system impacts
7	BPWG to implement a new reject code for “deny port” situations	Establish a new reject code / System impacts
8	LECs to reinforce compliance with current guidelines	Implement immediately
9	BPWG to clarify the C-LOG to require the use of specific reject codes	Clarify the C-LOG / Potential system impacts
10	BPWG to review the C-LOG to improve transfer processes for partial migration and digital subscriber line changes, and LECs to improve scripts to better identify these situations	Review the C-LOG / Potential system impacts

11	LECs not to send LSRs to resellers for validation at this time	No further action planned
12	BPWG to review the proposal to deal with missing/invalid reseller names to determine whether current validation rules can be relaxed	Review current validation rules
13	BPWG to undertake further analysis to find solutions for reducing intermodal port rejections	Undertake further analysis to find solutions
14	LECs to provide access to and use of CLECs' OSSs	No further action planned