

Todd F. Silbergeld
Director-
Federal Regulatory

SBC Communications Inc.
1401 I Street, N.W.
Suite 1100
Washington, D.C. 20005
Phone 202 326-8888
Fax 202 408-4806



July 2, 1996

EX PARTE

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

RECEIVED

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: Implementation of the Local Competition Provisions in the
Telecommunications Act of 1996, CC Docket No. 96-98

Dear Mr. Caton:

On July 2, 1996, staff of the Common Carrier Bureau's Policy and Program Planning Division requested clarification of a network diagram that was originally submitted in response to a staff request.* The network diagram depicts the direct copper loop plant currently used by Southwestern Bell Telephone Company (SWBT) to reach a subscriber's premises. A copy of the diagram is attached.

Ninety-two (92) percent of SWBT's access lines are served via direct copper loops.** Of this loop plant, approximately 60 percent is routed to a subscriber's premises through a feeder distribution interface,** which, due to physical space limitations and concerns about network security and reliability, is not a technically feasible point of interconnection.

Of the remaining 32 percent of SWBT's direct copper loops, the majority terminate at a "serving terminal" (serving between 4 and 6 living units) before connecting to a subscriber's premises at the network interface. Before reaching the serving terminal, outside plant cables are "tapered," whereby the feeder cable is spliced to smaller feeder/distribution cables serving various distribution areas. These cables are, in turn, spliced to still smaller distribution cables, which feed housing subdivisions and ultimately individual subscribers. Tapering splice points are buried, hard splices and would not be a technically feasible point of interconnection.

* Ex Parte Letter from Sandra L. Wagner, Director-Federal Regulatory to William F. Caton, FCC, Diagram No. 2 (June 4, 1996).

** Id.

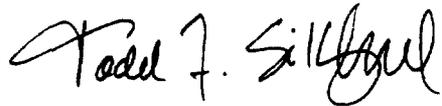
*** In SWBT's terminology, these interfaces are called "Serving Area Concepts" or SACs.

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Please direct any questions concerning this subject matter to the undersigned.

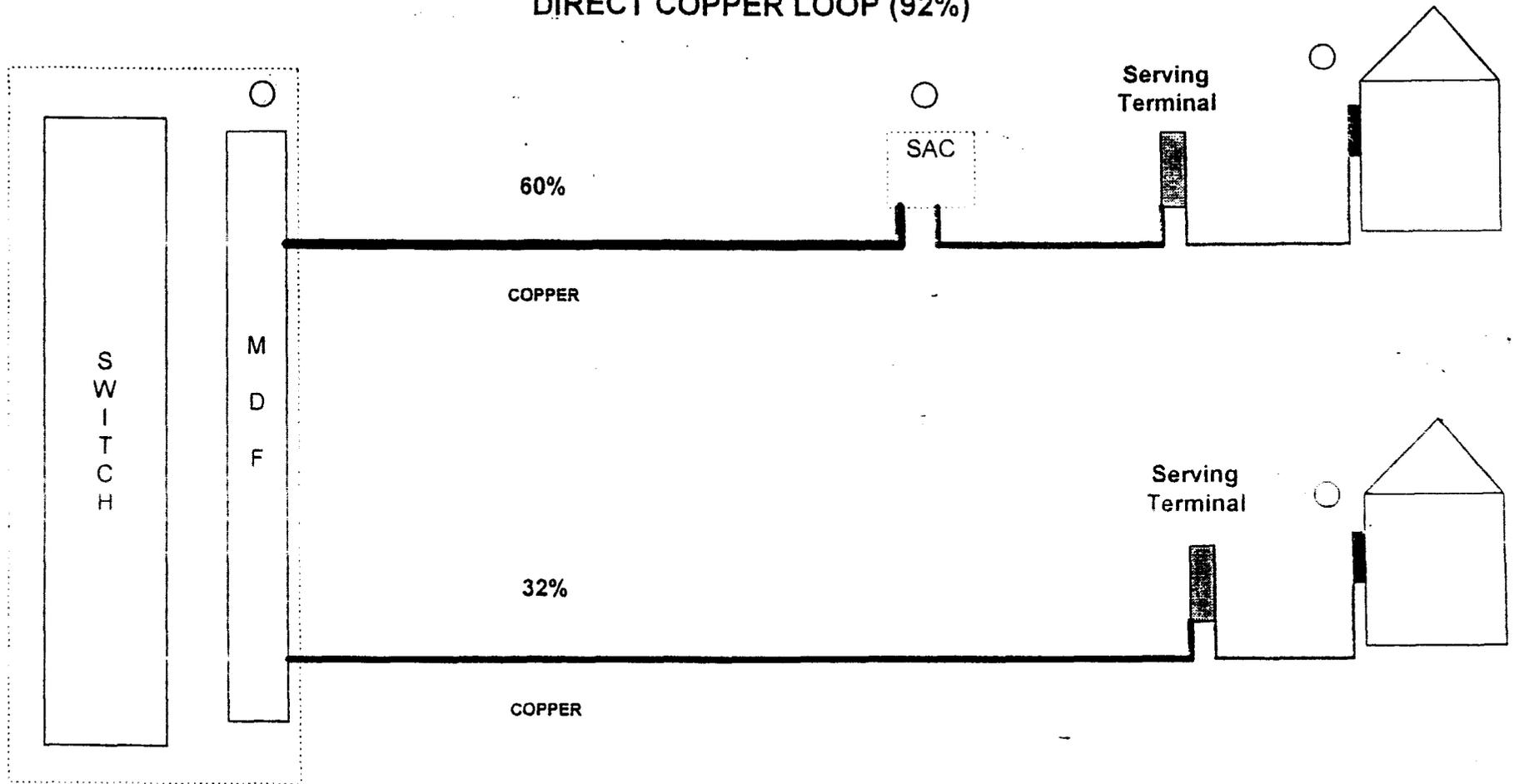
Very truly yours,

A handwritten signature in black ink that reads "Todd F. Silbaugh". The signature is written in a cursive style with a large, stylized initial "T".

Attachment

cc: Paul Gallant, Esq.

PROPOSED UNBUNDLED SUB-LOOP ELEMENTS -
DIRECT COPPER LOOP (92%)



— LOOP FEEDER

— LOOP DISTRIBUTION

○ PROPOSED UNBUNDLING POINTS

█ NETWORK INTERFACE