

**Southwestern Bell**

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August 14, 1996

**Durward D. Dupre**  
Vice President-  
Associate General Counsel

Mr. Todd F. Silbergeld  
Director-Federal Regulatory  
SBC Communications Inc.  
1401 I Street, N.W., Suite 1100  
Washington, D.C. 20005

Dear Todd:

**Re: Southwestern Bell Telephone Company's Comparably  
Efficient Interconnection Plan for Interactive Call  
Manager, CC Docket Nos. 85-229, 90-623 and 95-20**

Enclosed please find an original and eight (8) copies of the above-referenced pleading to be filed with the Secretary of the Commission on Thursday, August 15, 1996. Also enclosed is a copy of the pleading to be file-stamped and returned to me.

Additional copies of the pleading are attached to be used as the courtesy copies and one is included for your files.

Please call to confirm that the pleading has been filed. Thank you for your assistance.

Very truly yours,



(f) Durward D. Dupre

One Bell Center  
St. Louis, MO 63101

Phone 314 235-4300

Enclosure

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BEFORE THE  
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WASHINGTON, D.C. 20554

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In the Matter of )

Southwestern Bell Telephone Company's )  
Comparably Efficient Interconnection Plan )  
for Interactive Call Manager )

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CC Docket Nos. 85-229,  
90-623 and 95-20

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SOUTHWESTERN BELL TELEPHONE COMPANY'S  
COMPARABLY EFFICIENT INTERCONNECTION PLAN  
FOR INTERACTIVE CALL MANAGER

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August 15, 1996

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SOUTHWESTERN BELL TELEPHONE COMPANY'S  
COMPARABLY EFFICIENT INTERCONNECTION PLAN  
FOR INTERACTIVE CALL MANAGER

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## SUMMARY\*

Pursuant to the Bureau's Memorandum Opinion and Order, SWBT seeks approval of its Comparably Efficient Interconnection (CEI) Plan to offer Interactive Call Manager (ICM). This CEI Plan provides a description of SWBT's ICM offering and details the basic services used in its provision. The CEI Plan also specifies the manner in which SWBT complies with each of the Commission's nine comparably efficient interconnection parameters. In order that SWBT can meet pent-up customer demand for this service, SWBT hereby respectfully requests expedited approval of its ICM CEI Plan by January 1997.

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\* All abbreviations used herein are referenced within the text.

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D. C. 20554

In the Matter of )  
 )  
Southwestern Bell Telephone Company's ) CC Docket Nos. 85-229,  
Comparably Efficient Interconnection Plan ) 90-623 and 95-20  
for Interactive Call Manager )

**SOUTHWESTERN BELL TELEPHONE COMPANY'S  
COMPARABLY EFFICIENT INTERCONNECTION PLAN  
FOR INTERACTIVE CALL MANAGER**

Southwestern Bell Telephone Company (SWBT), by its attorneys,  
respectfully submits for Common Carrier Bureau (Bureau) approval SWBT's  
Comparably Efficient Interconnection (CEI) Plan for SWBT Interactive Call Manager  
(ICM) pursuant to the Bureau's Memorandum Opinion and Order.<sup>1</sup> In that Order, the  
Bureau granted waivers, pending remand proceedings on its Computer III rules,  
permitting the Bell Operating Companies (BOCs) to offer new enhanced services upon  
approval of service-specific CEI plans.<sup>2</sup> SWBT requests expedited Bureau  
consideration of this Plan so that it can satisfy pent-up consumer demand and meet a  
planned January 1997 roll-out date.

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<sup>1</sup> Bell Operating Companies' Joint Petition for Waiver of Computer II Rules, Memorandum Opinion and Order, 10 FCC Rcd. 1724 (1995) (Order).

<sup>2</sup> Id., at para. 30(c).

## I. INTRODUCTION

SWBT intends to offer ICM as described herein, upon Commission approval of this CEI plan. The plan fully demonstrates how SWBT will comply with each of the CEI parameters established by the Commission in Phase I of Computer III<sup>3</sup>, as directed by the Bureau's Order.<sup>4</sup>

## II. SERVICE DESCRIPTION

SWBT's proposed ICM offering is a network based service that will enable ICM customers to provide their callers with voice menu options conveyed by means of customized network announcements. These announcements are stored on the Intelligent Peripheral (IP), served by a Service Switching Point (SSP) office (see Figure B, attached). In addition to storing the announcements, the IP also allows ICM

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<sup>3</sup> Amendment of Section 64.702 of the Commission's Rules and Regulations (Computer III), Report and Order, 104 FCC 2d 958 (1986) (Phase I Order) at paras. 147, 154-166, recon., 2 FCC Rcd 3035 (1987) (Phase I Reconsideration Order), further recon., 3 FCC Rcd 1135 (1988) (Phase I Further Reconsideration Order), second further recon., 4 FCC Rcd 5927 (1989) (Phase I Second Further Reconsideration, Phase I Order and Phase I Reconsideration Order vacated, California v. FCC, 905 F.2d 1217 (9th Cir. 1990); Phase II, 2 FCC Rcd 3072 (1987) (Phase II Order), recon., 3 FCC Rcd 1150 (1988) (Phase II Reconsideration Order), further recon., 4 FCC Rcd 5927 (1988) (Phase II Further Reconsideration Order), Phase II Order vacated, California v. FCC, 905 F.2d 1217 (9th Cir. 1990); Computer III Remand Proceeding, 5 FCC Rcd 7719 (1990) (ONA Remand Order), recon., 7 FCC Rcd 909 (1992), pets. for review denied, California v. FCC, 4 F.3d 1505 (9th Cir. 1993); Computer III Remand Proceedings: Bell Operating Company Safeguards and Tier 1 Local Exchange Company Safeguards, 6 FCC Rcd 7571 (1991) (BOC Safeguards Order); BOC Safeguards Order vacated in part, California v. FCC, Nos. 92-70083, 92-70186, 92-70217, 92-70261 (9th Cir. Oct. 18, 1994).

<sup>4</sup> Order, at para. 23.

customers to record, change, add, and delete announcements from their ICM menus, through the use of an ordinary Touch-Tone telephone utilizing Dual Tone Multi-Frequency (DTMF) signaling. Callers may then be automatically directed to the department or person of their choice. ICM customers will determine the content of their announcements.

Thus, callers will be able to:

1. Listen to recorded announcements, respond to voice prompts, and be routed to alternate numbers for completion of the call (whether terminating in conversation or a voice mail application).
2. Listen to customer-recorded information after responding to prompts in the voice menu. Voice menus may have multiple options.

Each option offered in the voice menu, when selected by a caller, results in the forwarding of the call to a specific telephone number or to an announcement. The ICM customer predefines the voice menu design by determining the number of "boxes" to purchase. Each "box" can be described as an option in the voice menu where the caller either hears a recorded prompt and is asked to make a menu selection, or where the call is forwarded to a customer defined telephone number (see Figure A, attached). The specific options and the call routing information reside in an Integrated Service Control Point (ISCP) database for ICM (see Figures B and C, attached, for further detail).

Customers of the service call the ICM's automated Interactive Voice Response (IVR) to initially record (or subsequently modify) their voice greeting, set-up

and change telephone numbers to which calls are routed, and establish and change Personal Identification Numbers (PINs) required to access the IVR. This IVR resides on the IP. All of these inputs are selected and reviewed by the customer before acceptance by the IVR. Customers will also have the ability to "toggle" their service on and off, as needed, without losing the content of the previously selected voice menu in the process of doing so.

ICM customers will have the option, within their selected voice menus, to have their callers forwarded elsewhere at the same location, or forwarded to another location. When ordering ICM, the customer will select a long distance carrier to carry any outdial interLATA toll calls (i.e., calls forwarded from the called point to the forwarded-to location).

All ICM subscribers are routed over common facilities by market area. ICM customers will purchase the number of call paths they will need to provide callers with simultaneous access to their menus. Customers can select the number of access paths, based on their individual requirements.

Initial voice menu structures will be designed by SWBT based on customer specification. Once designed, ICM customers can change the following data by dialing into the IP and keying in changes and/or re-recording changes over the telephone:

- Change Structure within service parameters. The ICM customer may add and delete the number of boxes within their voice menu as long as they do not exceed the total number of boxes for the size option they have purchased.

- **Change PINs.** The customer may, as required, change the PIN of the voice menu administrator or PINs that have been assigned to individual users.
- **Change outdial numbers.** Telephone numbers that have been defined by the customer as telephone numbers that callers will be forwarded to, can be changed by the ICM customer as needed.
- **Operator Number.** Telephone numbers that have been initially defined as the operator number for the voice menu, can be changed at any time by the customer.
- **Time of Day / Day of Week.** Customers that have selected this optional feature may access this information and change business hours at any time, as needed.
- **Toggle the service on/off.** Customers can control when callers will be forwarded to their voice menu by turning their service on and off, at their discretion.
- **Record voice prompts and announcements.** ICM customers determine the content of their announcements and have the flexibility to re-record their voice menu announcements as needed and associated voice prompts which provide callers with instructions to navigate through the voice menu.

Subscribers may elect to have SWBT maintain their voice menu structures and data on an ongoing basis. If so, appropriate charges will be applied.

Basic call detail reports will be provided with the service. On a monthly basis subscribers can receive summarized call volumes on a per terminating box basis. This information will give subscribers information on how incoming calls are being terminated, assisting them in determining the effectiveness of their voice menus, and identify when and if revisions may be required. Additional detailed reports will be available on an optional basis. All such report information will reflect only aggregate data; none will identify any specific end-user or calling party number.

SWBT's ICM offering will be available to all business customers, but may be most useful for small and medium-sized business customers. The customer does not have to purchase or maintain any equipment, and can activate and deactivate the service as needed.

SWBT plans to offer ICM initially in the Austin, Texas, market area in January 1997, and to offer it in other major metropolitan market areas in SWBT's five state territory (Arkansas, Kansas, Missouri, Oklahoma and Texas) when the IP becomes available. SWBT plans to offer ICM on a purely intraLATA basis. Thus, the separate affiliate provisions of Section 272 (a)(2) of the Act, 47 U.S.C. § 272 (a)(2) is inapplicable.

### **III. CEI COMPLIANCE ISSUES**

#### **A. CEI Parameters**

The Commission's nine CEI parameters are designed to ensure that the basic services used by a BOC's enhanced service are equally available to other Enhanced Service Providers (ESPs). SWBT demonstrates its compliance with each such parameter below.

##### **1. Interface Functionality**

As part of its CEI offering, a BOC must generally make available standardized hardware and software interfaces that support transmission, switching, and signaling functions equal to those utilized in its own enhanced service offering, with information and technical specifications for such interfaces subject to the Commission's

network information disclosure requirements.<sup>5</sup> All interactive call manager providers, including SWBT, will connect their facilities to SWBT's network through existing standard trunk-side network interfaces which have already been made available to the public via SWBT's standard network disclosure procedures, which comply with the FCC's network disclosure rules.<sup>6</sup> No special interfaces, signaling, abbreviated dialing, or other unique capabilities will be provided by SWBT to end users, or to other providers in support of the enhanced offerings described in this Plan. If such access arrangements are to be made available to SWBT's ICM, they will be made available to other ESPs at the same time, in the same jurisdictions and on the same terms and conditions. SWBT will abide by its prior commitments and provide advance notification to ESPs of new interfaces, and will provide prior notification (including "make/buy" disclosure) required by the network disclosure rules.<sup>7</sup>

## **2. Unbundling of Basic Services**

To satisfy the CEI requirements, the basic services and basic service functions that underlie the carrier's enhanced service offering must be unbundled from other basic service offerings and associated with a specific rate element in the tariff.<sup>8</sup>

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<sup>5</sup> Phase I Order, at para. 157.

<sup>6</sup> Id., at paras. 252-253.

<sup>7</sup> Id., at para. 157.

<sup>8</sup> Id., at para. 158.

Two services, Primary Rate Interface (PRI) ISDN and Direct Inward Dial (DID), will be used to provide SWBT's ICM offering to the subscriber and any other ESP.

A description of the basic services that will support SWBT's ICM offering is attached hereto as Exhibit A. These services will be available to end users of SWBT's ICM offering and to end users of unaffiliated competing ESPs on an unbundled basis, at the same rates, and under the same terms and conditions, from state or federal tariffs in effect in all jurisdictions currently served by SWBT.<sup>9</sup> As noted in a previous CEI Plan filing for PC Backup and Recovery Service<sup>10</sup> (subsequently approved by the Bureau<sup>11</sup>), it is not technically feasible for SWBT to offer PRI-ISDN (SmartTrunk Service) in the Federal Access Tariff. This service was designed to exist only between the end-office and the user's termination point, and therefore there is no network-to-network interface associated with this service today.<sup>12</sup>

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<sup>9</sup> Copies of the illustrative tariff pages are attached hereto as Exhibit B.

<sup>10</sup> See, SWBT's CEI Plan for PC Backup and Recovery Service (CC Docket Nos. 85-229, 90-623, 95-20), filed August 3, 1995. See also, related ex parte filing dated April 23, 1996.

<sup>11</sup> See, Order, CCBPol 95-7, DA 96-932, released June 11, 1996 (PC Backup and Recovery Service Order).

<sup>12</sup> As provided in the PC Backup and Recovery Service Order, id., at para. 27, if in the future a customer requests SmartTrunk Service on an interstate basis, SWBT will federally tariff the service or seek a waiver of same. See also, Bell Atlantic Telephone Companies, Offer of Comparably Efficient Interconnection to Providers of Internet Access Services, Order, CCBPol 96-09, DA 96-891, released June 6, 1996, at para. 33.

SWBT has committed to filing DID in the Federal Access Tariff, as requested by the Bureau staff,<sup>13</sup> by the end of August 1996.

Any interLATA services required will be separately obtained by ICM customers without any SWBT involvement. Any additional intraLATA basic services that may be used to support SWBT's ICM offering in the future will be added to this CEI plan by way of an amendment prior to their use by SWBT, as required by prior Commission rulings.

### **3. Resale**

The Phase I Order requires a BOC's enhanced service operations to take the basic services used in its enhanced service offerings at their unbundled tariffed rates as a means of preventing improper cost-shifting to regulated operations and anticompetitive pricing in nonregulated markets.<sup>14</sup> SWBT's ICM will be provided by obtaining underlying basic services at tariffed rates. The resulting enhanced service will be provided on a nonregulated basis.

### **4. Technical Characteristics**

The Phase I Order requires that, as part of its CEI offering to enhanced service competitors, a BOC must offer to unaffiliated ESPs basic services with technical characteristics that are equal to those of the basic services it utilizes for its own enhanced services. These characteristics include, but are not limited to: transmission

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<sup>13</sup> See, Minor Amendment to SWBT's CEI Plan for Facsimile Service (CC Docket Nos. 85-229, 90-623, 95-20), dated May 7, 1996.

<sup>14</sup> Phase I Order, at para. 159.

parameters, such as bandwidth and bit rates; quality, such as bit error rate and delay distortions; and reliability, such as mean time between failures.<sup>15</sup> Interconnection between SWBT's ICM offering and the underlying basic services will be achieved through existing, published standard network interfaces identical to those provided under existing local tariffs and the technical references noted in those tariffs.

Therefore, the technical characteristics of the underlying interfaces that will be used by SWBT to provide these enhanced services will also be the same as those available to nonaffiliated competitors who wish to use them in providing their own interactive call management offerings. SWBT's procedures for processing and assigning circuits are described in detail in the August 3, 1995, amendment to its CEI Plan for Payment Processing Service filed in CC Docket Nos. 85-229, 90-623 and 95-20. These procedures ensure that there can be no systematic discrimination in circuit assignment based upon the customer or proposed use. Finally, pursuant to Commission requirements, SWBT files annual affidavits attesting that proper procedures have been followed and that no discrimination has occurred.<sup>16</sup>

#### **5. Installation, Maintenance and Repair**

The time periods for installation, maintenance and repair of the basic services and facilities included in a CEI offering must be the same as those the carrier

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<sup>15</sup> Id., para. 160.

<sup>16</sup> See, Amendment of Sections 64.702 of the Commission's Rules and Regulations (Computer III) Memorandum Opinion and Order on Reconsideration, 3 FCC Rcd. 1150 (1988) (Phase II Recon Order) at para. 76.

provides to its own enhanced service operations.<sup>17</sup> SWBT's internal methods for installing, maintaining and repairing all of its basic services are sufficiently mechanized that discrimination against any given customer or type of customer is prevented. SWBT's methods all are either random in nature or involve mechanized prioritization techniques. For a detailed description of these methods, refer to the August 3, 1995, amendment to SWBT's CEI Plan for Payment Processing Services, filed in CC Docket Nos. 85-229, 90-623, and 95-20, which was approved on October 31, 1995 (DA 95-2264).

#### **6. End User Access**

If a carrier offers end users the ability to use abbreviated dialing or signaling to activate or access the carrier's enhanced offerings, it must provide, as part of its CEI offering, the same capabilities to end users of all enhanced services that utilize the carrier's facilities.<sup>18</sup> End users will access SWBT's ICM via the same tariffed services that end users can use to access the competing services of other ESPs. No abbreviated dialing or signaling arrangements nor any special derived channel access arrangements are uniquely associated with SWBT's ICM offering.

#### **7. CEI Availability**

A carrier's CEI offering must be fully operational and available on the date that it offers its corresponding enhanced service to the public. In addition, the carrier

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<sup>17</sup> Phase I Order, at para. 161.

<sup>18</sup> Id., at para. 162.

must specify a reasonable time prior to this date during which prospective users of CEI, such as enhanced service competitors, can utilize the CEI facilities and services for purpose of testing their enhanced service offerings.<sup>19</sup> The underlying basic services utilized by SWBT in the provision of its ICM offering are currently offered under tariff in all jurisdictions served by SWBT, except as stated earlier in Section III. A. 2. Therefore, the underlying services will be made available to any ESP on the same terms and conditions. In jurisdictions where access arrangements are not currently available, SWBT will make testing capability available to ESPs at the same time that such capability is available to itself.

#### **8. Minimization of Transport Costs**

In the Phase I Order, the Commission recognized that carriers may reduce or eliminate certain equipment and transmission costs by collocating or integrating enhanced service facilities with their basic network facilities. Although the Commission did not impose mandatory collocation requirements on carriers subject to CEI, it did require such carriers to provide others with interconnection facilities that minimize such transmission costs. The Commission required that carriers demonstrate in their CEI plans what steps they would take to reduce transmission costs for competitors.<sup>20</sup>

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<sup>19</sup> Id., at para. 163.

<sup>20</sup> Id. at para. 164.

In the Phase I Recon Order, the Commission clarified that, while the requirements that transmission costs be minimized focuses on technological methods rather than pricing, it does not require a CEI offering that is substantially identical to existing services to be priced lower than those services simply for CEI purposes. Instead, the Commission encouraged the use of existing basic services in CEI in order to expedite initial CEI development.<sup>21</sup> In the Phase II Recon Order, the Commission clarified that a carrier may satisfy this CEI requirement if it charges itself an access link rate that is the same as that paid by non-collocated ESPs, provided that the access connections in each case are equivalent in technical quality.<sup>22</sup>

Interconnection to all facilities used to provide the underlying basic services supporting SWBT's ICM offering will be offered under tariff, and will therefore be made available at the same rates, and on the same terms and conditions, to both affiliated and nonaffiliated providers of interactive call manager offerings. As other configurations and serving arrangements are requested by end users and/or become technically feasible, SWBT will work in good faith with customers to develop and implement new techniques which minimize transport costs.

SWBT plans to collocate its ICM equipment with (but not physically integrate it into), its central office equipment. SWBT will comply with the Commission's

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<sup>21</sup> Amendment of Section 64.702 of the Commission's Rules and Regulations (Computer III), Memorandum Opinion and Order on Reconsideration, 2 FCC Rcd 3035 (1987) (Phase I Recon Order), at n. 261.

<sup>22</sup> Phase II Recon Order, at para. 34.

pricing parity rules and any applicable nondiscrimination requirements. The Commission has found that such commitments comport with the minimization of transport costs requirement.<sup>23</sup>

## 9. Recipients of CEI

In the Phase I Order, the Commission stated that carriers should not restrict the availability of CEI to any particular class of customer or enhanced service competitor.<sup>24</sup> In the Phase I Recon Order, the Commission clarified that customer use or user restrictions for state-tariffed basic services were permissible, but required carriers to provide an explanation of, and justification for, any such state-tariffed restrictions in their CEI plans.<sup>25</sup> The availability of the underlying basic services required for SWBT's ICM offering will not be limited to any class of customer or service provider. All such services are available on a tariffed basis and will be accessible by all users for any lawful purpose. If any new arrangements are to be made available for SWBT's ICM offering, they will be made available to other enhanced service providers at the same time, in the same jurisdictions, and on the same terms and conditions, and the Commission and the industry will be notified thereof.

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<sup>23</sup> PC Backup and Recovery Service Order, at para. 30.

<sup>24</sup> Phase I Order, at para. 165.

<sup>25</sup> Phase I Recon Order, at para. 111; see also, Phase I Further Recon Order, 3 FCC Rcd 1135 (1988), at para. 71.

## **B. Other Nonstructural Safeguards**

### **1. Allocation of Joint and Common Costs**

In the Joint Cost Order,<sup>26</sup> the Commission adopted rules for the allocation of costs between regulated and nonregulated services provided by carriers subject to its jurisdiction. In the Phase II Order, the Commission required as part of its CEI requirements that the BOCs comply with those rules.<sup>27</sup> SWBT's cost allocation procedures for ICM will be consistent with the Cost Allocation Manual (CAM) that it submitted to the Commission pursuant to the Joint Cost Order.<sup>28</sup>

### **2. Customer Proprietary Network Information (CPNI)**

In the Phase II Order, the Commission adopted CPNI requirements for the enhanced service operations of the BOCs that require them to: (1) make CPNI available, upon customer request, to unaffiliated enhanced service vendors on the same terms and conditions that are available to their own enhanced services personnel; (2) limit their enhanced service personnel from accessing a customer's CPNI, if the customer so requests; and (3) notify multiline business customers annually of their CPNI rights. The Commission also required the BOCs to provide to unaffiliated

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<sup>26</sup> In the Matter of Separation of costs of regulated telephone service from costs of nonregulated activities. Amendment of Part 31, the Uniform System of Accounts for Class A and Class B Telephone Companies to provide for nonregulated activities and to provide for transactions between telephone companies and their affiliates, Report and Order, (Joint Cost Order), modified on reconsideration, Order on Reconsideration, 2 FCC Rcd 6283 (1987) (Joint Cost Recon Order).

<sup>27</sup> Phase II Order, at para. 72.

<sup>28</sup> SWBT's CAM was most recently amended June 28, 1996.

enhanced service vendors the same type of nonproprietary, aggregate CPNI that the BOCs provide to their own enhanced services personnel. This information must be provided to unaffiliated vendors on the same terms and conditions that are available to the BOC's own enhanced service operations.<sup>29</sup>

SWBT will continue to abide by the Commission's existing rules and requirements regarding the use of CPNI in all respects. For a detailed description of SWBT's CPNI policies and procedures, refer to the August 3, 1995, amendment to SWBT's CEI Plan for Payment Processing Services filed in CC Docket Nos. 85-229, 90-623 and 95-20.

It is SWBT's position that as long as it remains in full compliance with existing FCC rules governing use of CPNI for enhanced service or CPE purposes, SWBT will be deemed compliant with Section 222 of the Act, 47 U.S.C. Section 222.<sup>30</sup> In any event, pending completion of the Commission rulemaking proceedings in CC Docket No. 96-115 and pursuant to the customer approval provisions of Section 222 (c) of the 1996 Act, SWBT plans to obtain customer approval for use of its CPNI to sell SWBT's ICM service during each telephone conversation between Southwestern Bell internal sales channels and a prospective customer of the service.

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<sup>29</sup> Phase II Order, at paras. 154-156.

<sup>30</sup> This will be true at least until such time as the Commission may change those rules. See Notice of Proposed Rulemaking in CC Docket No. 96-115 (FCC 96-221), released May 17, 1996.

### **3. Nondiscrimination Reporting**

SWBT will continue to abide by the Commission's existing nondiscrimination reporting rules which require BOCs to file quarterly installation and maintenance and nondiscrimination reports.<sup>31</sup>

### **4. Network Information Disclosure**

The Phase II Order required the BOCs to disclose information about network changes or new network services that affect the interconnection of enhanced services with the network at two points in time.<sup>32</sup> First, a carrier must disclose such information at the "make/buy" point-- that is, when the carrier decides to make itself, or to procure from another entity, any product the design of which affects or relies upon the network interface. The Commission permitted the BOCs to condition "make/buy" disclosure of technical network information on the signing of a nondisclosure agreement, and to provide the required network information within 30 days of the execution of such an agreement. Second, the Commission required the BOCs to release publicly all technical information at least twelve months prior to the introduction of the new service or network change that affects enhanced service interconnection with the network. However, if a carrier is able to introduce the service between six and

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<sup>31</sup> Phase II Order, at para. 98; Filing and Review of Open Network Architecture Plans, Memorandum Opinion and Order 4 FCC Rcd 1 (1988) (BOC ONA Order), at para. 451; Memorandum Opinion and Order on Reconsideration, 5 FCC Rcd 3084 (1990), at paras. 73-80.

<sup>32</sup> Phase II Order, at paras. 107-112.

twelve months after the make/buy point, public disclosure is permitted at the make/buy point, but no less than six months before the introduction of the service.

The interconnection between SWBT's ICM offering and the underlying basic services will be achieved through already existing, previously published standard network interfaces. Therefore, no changes to existing network interface specifications or publication of any new interfaces are required. In the future, should interface specifications change, SWBT will comply with the advance notice requirements described above.

#### **5. Tariffs**

Illustrative tariff pages (for the State of Texas) for the underlying basic services that will be used in the provision of SWBT's ICM offering are attached hereto as Exhibit B.

**IV. CONCLUSION**

SWBT has demonstrated herein compliance with all relevant Commission CEI requirements for approval of a service-specific CEI plan under the Commission's interim waiver procedures. Therefore, SWBT respectfully requests expedited approval of its Interactive Call Manager CEI Plan by January 1997, so that it can begin meeting pent-up subscriber demand for this service.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

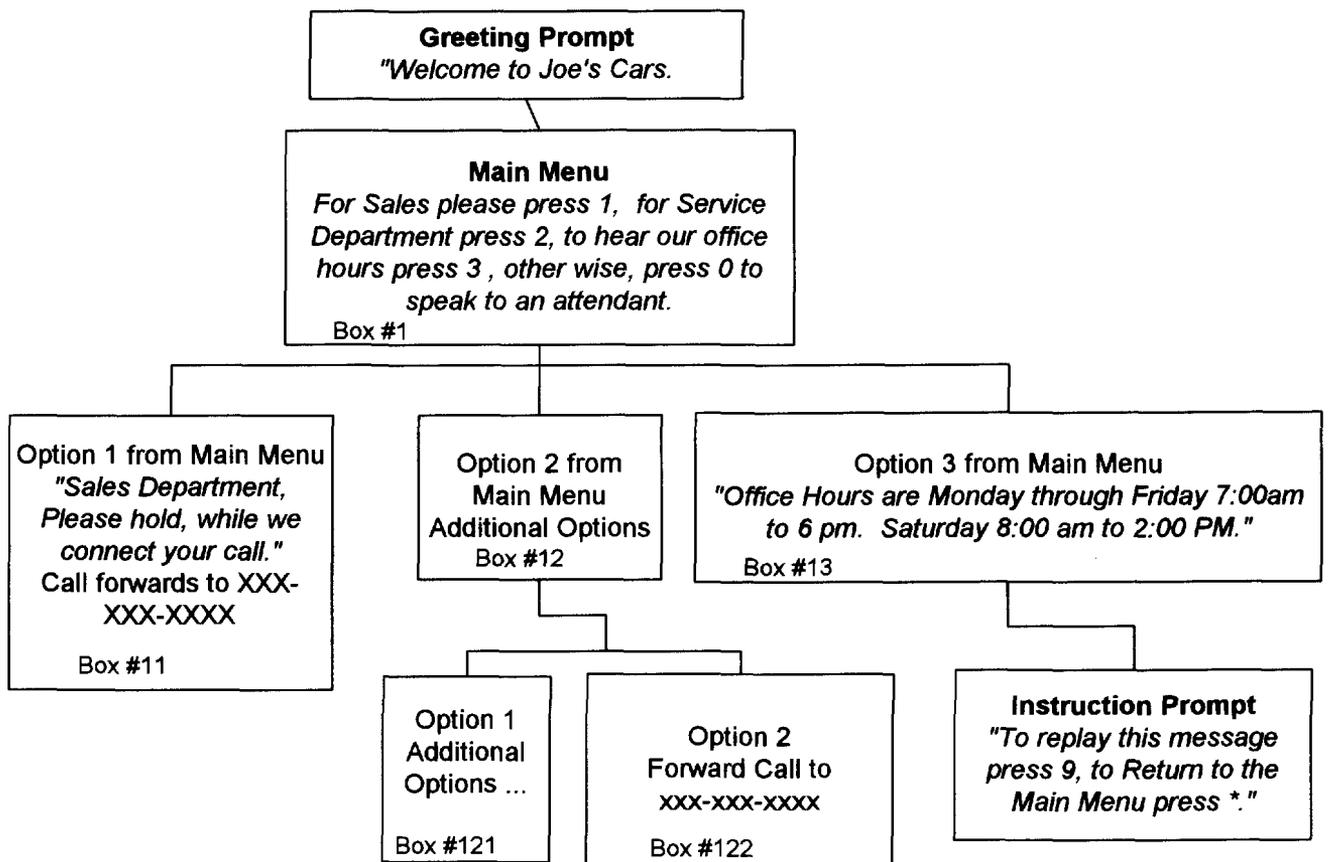
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August 15, 1996

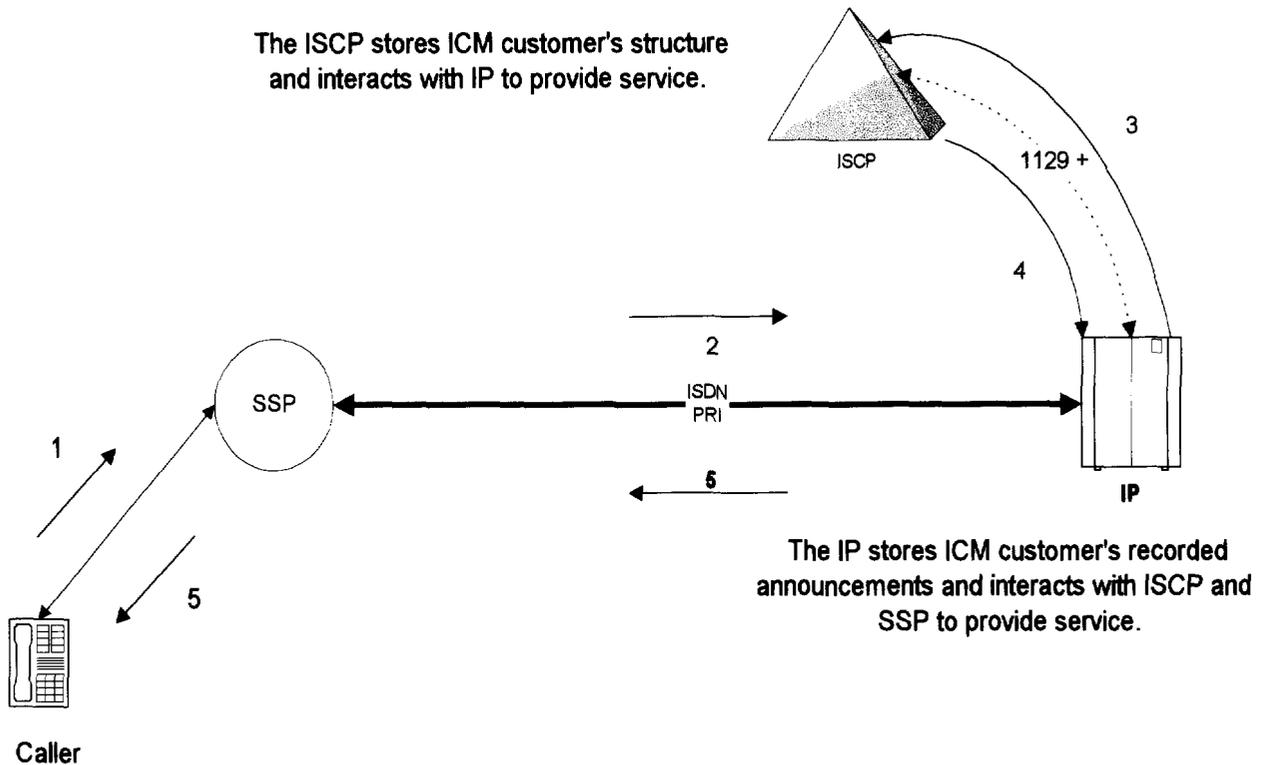
**Example of Interactive Call Manager (ICM)  
"Box" Layout**



**Figure A**

## SWBT Interactive Call Manager (ICM)

**Caller dials ICM Service and receives desired information in a recorded announcement.**



**Figure B**