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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Application by SBC Communications Inc.,
Southwestern Bell Telephone Company,
and Southwestern Bell Communications
Services, Inc. d/b/a Southwestern Bell Long
Distance for Provision of In-Region,
InterLATA Services in Oklahoma

CC Docket No.

97-121

To: The Commission

**APPLICATION BY SBC COMMUNICATIONS INC., SOUTHWESTERN BELL
TELEPHONE COMPANY, AND SOUTHWESTERN BELL LONG DISTANCE FOR
PROVISION OF IN-REGION, INTERLATA SERVICES IN OKLAHOMA**

APPENDIX - VOLUME I

**SOUTHWESTERN BELL
OKLAHOMA § 271 APPLICATION**

**APPENDIX - VOLUME I
TABLE OF CONTENTS**

TAB	DESCRIPTION	
	Affidavit	Subject
1.	William T. Adair	Number Administration
2.	Debrah Baker-Oliver	Directory White Pages
3.	Betsy Bernard	272 Compliance
4.	Randall K. Butler	Competitive Analysis
5.	William C. Deere	Network Related Elements
6.	John Gueldner	272 Complilance
7.	Elizabeth A. Ham	Operations Support Systems
8.	Elizabeth A. Ham	272 Compliance
9.	James A. Hearst	Poles, ducts, Conduit and Rights of Way
10.	Dale Kaeshoefer	Checklist Compliance
11.	Richard K. Keener	Operator Services and Directory Assistance
12.	Linda D. Kramer	LSP Center
13.	Kathleen Larkin	272 Compliance
14.	Nancy J. Lowrance	LSP Service Center
15.	Michael L. Montgomery	Competitive Analysis
16.	J. Michael Moore	Cost Studies
17.	James Riley	272 Compliance
18.	Robert E. Stafford	Oklahoma Regulatory
19.	Karol Sweitzer	272 Compliance
20.	Gregroy J. Wheeler	Competitive Analysis
21.	Ricardo Zamora	LSP Negotiations and Agreements
22.	Kenneth Gordon	Public Interest
23.	A. Kahn & T. Tardiff	Public Interest
24.	Richard L. Schmalensee	Public Interest
25.	Robert C. Dauffenbach	Benefits to Oklahoma
26.	Edward O. Price, III	Benefits to Oklahoma
27.	WEFA/Michael Raimondi	Benefits to Oklahoma

PROFESSIONAL EXPERIENCE AND EDUCATIONAL BACKGROUND

2. I received my Bachelor of Science in Business Administration from Rockhurst College in 1972. I have also completed graduate level work at the University of Missouri in Kansas City.

3. I have been continuously employed by Southwestern Bell Telephone Company since 1972. I was hired into Southwestern Bell's Management Development Program and began my career in the Network department. I held various Network Management positions until 1976 when I was promoted into the Data Systems organization. In this position I developed detailed specifications for the mechanization of various network operations. From 1978 until 1995 I held numerous positions within the Network Engineering and Network Planning organizations. In 1995 I was appointed to my current position as Area Manager- Number Planning Administration, which require non-discriminatory access to telephone numbers, both before and after the adoption of numbering guidelines. The following are steps taken by me to ensure such non-discriminatory access to all telecommunications providers.

PURPOSE OF AFFIDAVIT

4. The purpose of my affidavit is to describe how, from an operational and administrative perspective, Southwestern Bell Telephone Company has satisfied the competitive checklist set forth in Section 271(c)(2)(B) of the Telecommunications Act of

1996. Specifically, I will discuss actions taken by Southwestern Bell telephone Company to comply with the requirements of Checklist item (ix): Number Administration.

IX. CHECKLIST ITEM(ix): NUMBER ADMINISTRATION

5. "Number Administration" refers to the administration and assignment of central office codes or "NXX's" to a facility- based telecommunications provider.
6. A telephone number is made up of three components, consisting of 10 digits. The first three digits of the telephone number consists of a three digit code representing the numbering plan area (NPA), more commonly referred to as area code.
7. The next three digits represent the central office code, or NXX. The NXX is a three digit code where "N" may be represented by any digit 2-9 and "X" by 0-9. Assignable NXX codes range from 200 to 999.
8. The final four digits of a telephone number represent the specific line addresses within the NXX. Thus, a central office codes consists of 10,000 assignable numbers ranging from 0000 to 9999.
9. The format of a telephone number is therefore: NPA-NXX-XXXX.
10. There are 792 central office codes within each NPA (200 to 999, minus all N11 codes-i.e.,211,311,411, etc.) and 10, 000 telephone numbers within each NXX.
11. In order to provide full facility-based local exchange telephone service within the public switched telephone network, and capable of local exchange dialing parity, carriers must have an NXX code(s) assigned to their switching location from which they can assign subscriber lines. This assignment of a central office code is made by

the Code Administrator for that region. The Central Office Code Administrator is traditionally the predominant LEC in the region.

12. Southwestern Bell Telephone Company currently serves as Central Office Code Administrator for the five states served by SWBT, including Oklahoma. Code Administrator responsibilities include: receiving applications for NXX's, determining if the request complies with the Central Office Code (NXX) Assignment Guidelines, responding to the code applicant within 10 days, selecting an unassigned code for assignment, performing notification functions in jeopardy situations, maintaining records on codes assigned plus those available, collecting and forwarding records to the North American Numbering Administrator (NANPA) for use in the Central Office Code Utilization Survey (COCUS), performing code reclamation procedures, tracking NXX assignments within NPA's to ensure effective and efficient utilization of numbering resources, compiling data for relief planning forecasts and projecting NPA exhaust. These responsibilities are defined in a set of industry-developed guidelines which Southwestern Bell Telephone Company has used and will continue to use in its role as industry CO Code Administrator.
13. The FCC began the process of adopting number administration guidelines, plans, and rules in June of 1991. The FCC directed Bellcore to take the lead in the development of a set of industry guidelines to be used uniformly in number administration and NPA relief planning. Bellcore initiated an Industry effort for the development of such guidelines under the auspices of the Exchange Carriers Standards Association now known as the Alliance for Telephone Industry Solutions (ATIS), and the

Industry Carriers Compatibility Forum (ICCF). The progress and reports from these groups were shared with the FCC on a regular basis.

14. In 1993, the ICCF notified the FCC that the industry had completed its work on numbering guidelines. The FCC subsequently acknowledged that the guidelines produced through the industry process satisfied the Commission's charge to Bellcore to develop standards by which NXX codes could be assigned in a fair and impartial fashion while at the same time ensuring an efficient and effective use of these limited resources. The guidelines have been used by the industry since 1994 and have been revised/modified on numerous occasions since their initial issue. The current version of the *Central Office Code (NXX) Assignment Guidelines* is dated September, 1996. The current version of the *NPA Code relief Planning Guidelines* is dated March, 1996.

15. All code requests received by the SWBT Code Administrator must conform to the requirements of the Assignment Guidelines, regardless of the company originating the request. A code applicant must certify a need for a code and be a licensed or certified provider in the area to be served. Codes are assigned on a first-come, first-served basis. SWBT follows the assignment procedures described in the Assignment Guidelines, applying them equally and consistently to all requests received for the assignment of an NXX by a code applicant. Due to the complexities associated with completing the CO Code request form, it is not uncommon for errors/omissions to exist on a submitted application. SWBT's Code Administrator offers technical support to all code applicants to ensure that the CO Code Request form is complete and reflects the services the applicant desires. This support is provided during the

initial code application process as well as after the applicants code(s) have been activated in the network.

16. During the CO code assignment process, a situation described as a "Jeopardy NPA" occasionally occurs. A jeopardy NPA is defined in the CO Code Assignment Guidelines as: "...the forecasted and/or actual demand for NXX resources will exceed the known supply during the planning/implementation interval for relief." When such situations occur within the SWBT region, the Code Administrator notifies the Industry of the situation and conducts Industry meetings to develop a plan to ensure that all Industry participants have fair and equal access to the remaining NXX resource. The jeopardy assignment plan developed is provided to the appropriate regulatory body for review/approval. The jeopardy plan implemented represents an Industry assignment plan, not a Southwestern Bell or Code Administrator plan. On March 17, 1997, an Industry jeopardy assignment plan went into effect for the Oklahoma 405 NPA.
17. In 1995, Southwestern Bell consolidated its Central Office Code assignment organization into a single group. All CO code assignment activities for the 5 states served by Southwestern Bell are performed by this organization. This consolidation was implemented to ensure consistent application of the Assignment Guidelines to all industry participants. In addition, all NPA relief activities are performed by this same group to ensure consistency in application of the NPA relief planning guidelines.
18. As of 4/1/97, Southwestern Bell has processed and assigned a total of 11 requests for central office codes requested by local service competitors in the state of Oklahoma.

Other than as required by the Industry jeopardy plan, no request for codes from an LSP in the state of Oklahoma has been denied by the Code administrator for any reason.

19. In July of 1995, the FCC issued another rulemaking in the area of number administration: CC Docket No. 92-237, In the Matter of Administration of the North American Numbering Plan, Report and Order. In the NANP Order, the FCC required the transfer and centralization of number administration responsibilities to a neutral third party. The FCC also created the North American Numbering Council (NANC) to oversee this transfer and set numbering policies for the North American Numbering Plan.
20. Southwestern Bell Telephone Company is an active participant in the NANC. In fact, Joe Walkoviak, Senior Vice President-Network, is a member of the FCC appointed NANC Council. Southwestern Bell fully supports the efforts of the NANC and has gone on record as supporting the quick and responsible transfer of number administration functions to a neutral third party.
21. In its Second Report and Order and Memorandum Opinion and Order, the FCC held that “the action taken in the NANP Order satisfies the Section 251(e)(1) requirement that the Commission create or designate an impartial third party number administrator” .(para 264) The FCC went on “...authorize Bellcore and incumbent LEC’s to continue performing the number administration functions they performed prior to the enactment of the 1996 ACT.” (para328). The FCC concluded that “incumbent LEC’s should apply identical standards and procedures for processing all

numbering requests, regardless of the identity of the party making the request.” Id.
para 334.

22. The FCC’s NANP Order transfers the number administration functions currently performed by SWBT to a new NANP administrator. However, until the functions are transferred, SWBT is obligated to continue performing the number administration functions. SWBT will continue to perform its responsibilities in a fair, non-discriminatory fashion.

23. The information contained in this affidavit is true and correct to the best of my knowledge and belief.

William T. Clark

Subscribed and sworn to before me this 8 day of April, 1997.

Charlotte J. Brown

NOTARY PUBLIC

My commission expires:

10/28/2000

CHARLOTTE J. BROWN
Notary Public - State of Kansas
My Appt. Expires 10/28/2000

Pages and the provision of Interim Number Portability to requesting Carriers.

PROFESSIONAL EXPERIENCE AND EDUCATION

2. I received a Bachelor of Science degree in Business Management from LaSalle University in 1996. I joined Southwestern Bell in November 1977. My initial position was as a Directory Assistance Operator in the Traffic Department. In 1979, while still in the Traffic department, I was promoted to Service Assistant. Responsibilities of this position included ensuring the adequate number of operators were available to serve incoming customer calls, handling customer complaints, and training existing and new employees. In February of 1984, I was promoted to Group Manager-Operator Services. With this new responsibility, I supervised and led a group of twenty five (25) Operators. In addition, I was responsible for overall office (150 occupational employees) administration ensuring customer service needs were met. In April of 1986, I became Supervisor-Operator Services Training, with responsibility for management of the Operator Services Centralized Training Unit. In this role, I conducted new employee orientation sessions and oversaw the initial training of all new Operator Services employees. In March of 1988, I was promoted to Manager-Methods & Training and Project Management where my primary responsibilities were to implement new directory assistance technology, develop the methods and training, and to develop advertising and business plans for the existing and new DA vertical service available with the new technology. In August of 1990, I was promoted to Area

Manager-Operator Services, with responsibility to lead a multi-purpose (Operator ["0"], Directory Assistance and Intercept Services) Operator Service Center. In February of 1992, I became Area Manager-Human Resources in the Operator Services department, responsible for all human resources and labor relations activities in a two-state area. In January of 1995, I became Area Manager-Labor Relations. With this position, I assumed the responsibility of assisting in preparation for labor arbitrations and participated in company-wide labor negotiations. In September of 1995, I assumed my present responsibilities as Area Manager-Interconnection & Resale.

PURPOSE OF AFFIDAVIT

3. The purpose of my affidavit is to describe how Southwestern Bell (hereinafter, "SWBT") has satisfied competitive checklist ("Checklist") items viii and xi set forth in U.S.C. § 271(c)(2)(B). In doing so, I will describe how SWBT is providing access to White Pages directory listings and how SWBT is providing interim telecommunications number portability through remote call forwarding and direct inward dialing to all requesting carriers. My affidavit will further describe that, in addition to meeting requirements of the Act, SWBT also meets the requirements pertaining to access to White Pages outlined in the FCC First Report and Order CC Docket 96-98, and in FCC First Report and Order And Further Notice Of Proposed Rulemaking CC Docket 95-116 ("Number Portability Order") pertaining to Telephone Number Portability. I will explain how SWBT is making these items available through its Statement of Terms

and Conditions (hereinafter “STC”) in addition to making them available to requesting carriers through SWBT’s approved interconnection agreements with Brooks Fiber Communications, US Long Distance, Inc. (“USLD”) and Sprint Communications Company L.P. These interconnection agreements were negotiated by the parties and subsequently approved by the Oklahoma Corporation Commission (“OCC”). I will describe SWBT’s procedures for, and the operational aspects of, providing these two Checklist items in a nondiscriminatory manner.

4. As my affidavit will show, along with the affidavit of Mr. Kaeshoefer, SWBT is currently providing access to White Pages and Interim Number Portability (“INP”) to Brooks Fiber, USLD and Sprint in Oklahoma. These items are available to these carriers upon request under the carriers’ agreements on terms and conditions that satisfy the Checklist. (Brooks Fiber, Appendix WP and Appendix PORT; USLD, Appendix WP and Appendix PORT; Sprint, Appendix WP-Resale-WP; Attachment 14: INP; and Attachment 19: White Pages-Other)

CHEKLIST ITEM (viii): WHITE PAGES

5. As described by Mr. Kaeshoefer, SWBT will ensure that a White Pages listing is provided to an end user of a Carrier providing resale services in the same manner as SWBT provides such to its own customers. (STC, Appendix Resale, ¶3.5; Brooks Fiber, Appendix Resale, ¶15; USLD, Appendix Resale, ¶15; and Sprint, Appendix WP-Resale, ¶2.3) Listing information pertaining to resale services will be interfiled,

alphabetically with SWBT end user listings. In addition, carriers providing local exchange service through the purchase of unbundled switching 47 C.F.R. 51.319(C)(1)(c)(1), or solely through its own facilities, also have available access to White Pages listings. (STC, Appendix WP, Brooks Fiber, Appendix WP; USLD, Appendix WP; and Sprint, Attachment 19: WP-O) Telecommunications Carriers providing local service through unbundled switching or through their own facilities, may choose to either include their end user listings interfiled alphabetically with SWBT end user listings, or may choose to have a separate section following the main section of SWBT end user listings. (STC Appendix WP, § I. ¶ D; Brooks Fiber, Appendix WP, § I. ¶ D; and USLD, Appendix WP, § I. ¶ D) In either event, all Carrier subscriber listing information will be included in SWBT White Pages indistinguishable from SWBT subscriber listing information.

6. SWBT manages Carrier White Pages listing information in the same manner as it does its own. The Directory White Pages database contains information pertinent to how the end user listings will appear in the White Pages Directory such as end user name, address, and listed telephone number. In addition, the database contains directory delivery information regarding the number of directories to be delivered and where those directories should be delivered.
7. SWBT makes available, to all requesting Carrier's end users, Primary, Additional and Foreign listings under the terms and conditions contained in the STC and respective

Interconnection Agreements. (Brooks Fiber, Appendix WP, ¶¶I.A and III.B; USLD, Appendix WP, Paragraphs §I. ¶A, and §III. ¶B; STC, Appendix WP, Paragraphs §I. ¶A and §III. ¶B.; and Sprint, Appendix WP-Resale, Attachment 19: WP-O) A Primary listing is associated with the end user subscribing to the local telephone service. An Additional listing is the one that is requested by an end user which pertains to, or is associated with, the Primary listing. A Foreign listing is one that does not fall within the local scope of the directory in which it is listed. Each of these types of end user listings will contain a name, address and telephone number in the White Pages directory.

8. SWBT determines whether a listing is Primary or Foreign based on geographic scope of the directory. A geographic scope is based on the SWBT serving exchanges (NXXs) that are in the local calling area. As an example, the NXX of 291 in the 405 Area Code is included in the Oklahoma City White Pages directory. All published end user listings with the 291 NXX will appear in the Oklahoma City White Pages, along with other serving exchanges (NXXs) which are geographically included in the Oklahoma White Pages directory.
9. If the Carrier's local calling scope differs from SWBT's geographical scope for a particular White Pages directory, and the Carrier wants to include its listings in a directory that SWBT does not define as local for the Carrier's exchange, the Carrier may list such end user listing information in SWBT's White Pages on a Foreign listing

basis.

10. SWBT also makes available to requesting Carriers for their end users, enhanced White Pages residential listing products, such as Signature listing, Lines of Distinction and Personality Logos. Signature listings are distinctive listings associated with a residence listing and can either be contemporary bold, or script. Lines of Distinction permit a residential end user to add a customized, extra line of information to a Primary or Additional listing in order to further describe the listed party. Personality Logo allows the residential end user to add a logo (selected from choices provided by SWBT) to a Primary or Additional listing and enclose that listing in a box frame. These enhanced residential listing products are made available to requesting Carriers pursuant to the terms and conditions contained in the respective Carrier Agreement. (Brooks Fiber, Appendix WP, ¶¶I.A and III.B; USLD, Appendix WP, ¶¶I.A and III.B; STC, Appendix WP, ¶¶I. A and III.B; and Sprint, Appendix WP-Resale, ¶2.5;)
11. Carriers requesting business listing enhancements and Yellow Page advertisements for their business end users are referred to Southwestern Bell Yellow Pages, a separate, non-regulated affiliate of SWBT.
12. SWBT has gone beyond the requirements of the Act and associated FCC Rules pertaining to access to White Pages listings. In addition to providing nondiscriminatory access to White Pages directory listings, SWBT will arrange for the

delivery of White Pages directories to requesting Carrier's end users. Where SWBT makes available its telecommunications services for resale, SWBT delivers White Pages to the reselling Carrier's end users in the same manner and at the same time as it delivers directories to its own subscribers. Telecommunications Carriers providing local exchange service through the purchase of unbundled switching from SWBT, or through the use of its own facilities may choose to have SWBT arrange for the delivery of its directories, or may opt to have SWBT "bulk drop" directories to a specified location. SWBT also has in place methods and procedures by which a requesting Carrier can obtain additional copies of White Pages directories subsequent to the normal directory distribution cycle. The terms and conditions associated with White Pages directory distribution are contained in Brooks Fiber, Appendix WP, ¶¶2, and I. F., G.; USLD, Appendix WP, ¶¶2, III. C; STC, ¶¶2, III. C.; and Sprint Appendix WP-Resale ¶¶2.8 and 2.9; Attachment 19 WP-O ¶¶1.2, 1.4 and 2.7.

13. In addition to providing nondiscriminatory access to White Pages listings for customers of other Carrier's telephone exchange service and distribution of White Pages directories, SWBT also makes available to requesting Carriers access to the informational section of the White Pages. Requesting Carriers may choose to be included on a "index-like" informational page, along with other Carriers, listing Carrier business specific contact information (e.g., Business Office, Residence Office, Repair Bureau, etc.) Carriers may also choose to include their logo along with this Carrier specific information. In addition to providing opportunity for appearance on an

“index-like” page, Carriers may also opt to purchase their own information page(s) which would include more specific detail pertaining to the Carrier’s local service offering. The terms and conditions whereby such access is made available are included in Brooks Fiber, ¶VI. E. 3 and Appendix WP ¶I. H; USLD, ¶VI. C and Appendix WP, ¶I. G; STC, Appendix WP, ¶I. G.; and Sprint Appendix WP-Resale, ¶¶2.10 and 2.11; and Attachment 19: WP-O, ¶¶2.8 and 2.9.

14. Upon request from a facility based Carrier, SWBT will agree to transmit the Carrier’s end user subscriber listing information to designated third party directory publishers (e.g., Yellow Pages) pursuant to the terms and conditions contained in the White Pages Appendix agreed to by the Parties. (USLD, Appendix WP, ¶II. B; STC, Appendix WP, ¶II. B) SWBT will automatically transmit, to third party directory publishers, the subscriber listing information of resale services end users and the subscriber listing information associated with Carriers providing local service through the purchase of SWBT’s unbundled switching.

CHECKLIST ITEM (xi): INTERIM TELECOMMUNICATIONS NUMBER

PORTABILITY

15. As described by Messrs. Kaeshoefer, and Deere and in accordance with 47 U.S.C. § 271(c)(2)(B)(xi), SWBT has made available interim telecommunications number portability through remote call forwarding and direct inward dialing. As the FCC found in its Number Portability Order, at ¶110, Remote Call Forwarding (“RCF”) and

Direct Inward Dialing (“DID”) may be deployed to satisfy a LEC’s duty to offer INP. Accordingly, in the Brooks Fiber Agreement (§II. E); USLD Agreement (§II. E); Sprint Agreement, Attachment 14: INP; and as stated in the STC (§§II. E and F) SWBT provides RCF (INP-Remote) and DID (INP-Direct) as interim number portability options. SWBT’s provision of these INP options has been approved by the OCC.

16. SWBT provides INP-Remote by using the same type of central office feature used to provide existing RCF service. To provide INP, the end user’s previous telephone exchange service is disconnected, and the telephone number associated with that service is re-used as part of the INP-Remote service. The Carrier to whom the number is to be ported assigns one of its own telephone numbers which is associated with the exchange services it provides to the end user. With the INP-Remote service, if a call is placed to the original SWBT assigned number, a SWBT switch receives the call and uses information in its memory to associate the new telephone number that the Carrier has assigned in its switch to the customer who used to have the called number. The SWBT switch then sends the call, along with the new Carrier assigned telephone number, to the Carrier’s switch. The Carrier switch uses the new number to complete the call to the customer.
17. INP-Remote also provides for the provision of additional paths for the forwarding of simultaneous calls (e.g., call waiting). The number calls that can be forwarded to a

single telephone number varies (from 1 to 512) by the type of central office switch used to provide the INP-Remote service option.

18. SWBT provides INP-Direct by using the same features that are used today to provide DID PBX trunks. With this option, when a call is placed to the original SWBT assigned number, a SWBT switch receives the call. The SWBT switch then routes the call to a trunk group that connects to the Carriers switch. The dialed digits and the call are transmitted on the trunk group to the Carrier switch and the Carrier switch determines the new telephone number and routes the call to the appropriate end user's exchange service.

19. INP-Remote and INP-Direct are ordered through the Local Service Provider Service Center (LSPSC). All status and inquires related to the provisioning of INP service options are handled by the LSPSC. SWBT provides for the ordering of INP-Remote and INP-Direct via facsimile or via EDI (electronic data interexchange). The EDI format used for ordering INP is similar to that currently used throughout SWBT for the ordering of exchange services to be resold. Resale, unbundled elements, and INP ordering functions are supported through the use of this interface. Requests for maintenance or repair of INP-Remote and INP-Direct can be made using industry standard EBI (electronic bonding interface). The EBI provides electronic confirmation of receipt, status and notification that the trouble has been resolved.

20. The intervals for provisioning INP are consistent with order intervals for comparable RCF and DID trunks in Oklahoma. Maintenance intervals for INP-Remote and INP-Direct are also comparable to maintenance intervals for RCF DID trunk intervals in Oklahoma.
21. To date, SWBT has processed several INP-Remote orders in Oklahoma for Brooks Fiber and is also successfully providing this service offering in Texas. SWBT plans to begin implementation of the long term number portability solution in Oklahoma in accordance with the implementation schedule set forth in the Number Portability Order.
22. As described herein, SWBT is providing access to White Pages and methods of Interim Number Portability in a manner that opens the local exchange market, promotes competition, and ensures parity of treatment of itself, its affiliates, and all other carriers.
23. This concludes my affidavit.