

charge will be assessed for constructing the secure space, and the LSP will be able to install, operate, and maintain its equipment within that space. Arrangements will be made for the installation of cross-connections to SWBT unbundled loop facilities and trunking to other SWBT offices. In addition, SWBT will permit the placement of facilities to allow collocating carriers to connect to the facilities of other collocating carriers within the same central office. A LSP may use these facilities for the same purposes described in the discussion of MSFI. 47 U.S.C. § 251(c)(6) and 47 C.F.R. § 51.321(e); § 51.323(a), (h), (i). (STC II. B. 2. and Appendix NIM, p.5) and (Brooks and USLD II. B. 3 and Appendix NIM, p.5)

17. The collocating LSP may locate any equipment used for interconnection or access to unbundled network elements in the secured space. 47 C.F.R. § 51.323(b). (STC, Appendix NIM, p.10), (Brooks and USLD Appendix NIM p.9) SWBT offers LSPs an optional Central Office Floor Space Arrangement that allows the location of other types of equipment in SWBT central office buildings. Under this option a LSP may locate remote switching modules that do not provide enhanced services in SWBT buildings. 47 C.F.R. § 51.323(c).
18. SWBT will provide to a LSP at the LSP's request, on a first-come - first-served basis, physical collocation under the same terms and conditions available to similarly situated carriers at the time of such request and a manner consistent with OCC Cause No. PUD 960000218. 47 C.F.R. § 52.323 (f). (STC II. B. 2), (Brooks and USLD II. B. 3)
19. Where space is not available for Physical Collocation, or upon request of the LSP, SWBT will offer the Virtual Collocation interconnection option in accordance with the existing SWBT Tariff F.C.C. Number 73, Section 25, "Expanded Interconnection", consistent with

¶ 826 of the FCC Order. Under this option, the LSP would install fiber optic cable to the entrance manhole of the SWBT tandem or end office and provide sufficient additional cable for SWBT to pull the cable into a cable vault. SWBT will splice the LSP's fiber cable to a riser tail and fiber termination shelf assembly. The LSP may designate the type and brand fiber optic termination equipment to be installed by SWBT in the central office. SWBT will install, operate and maintain this equipment. SWBT will at a minimum, install, maintain, and repair collocated equipment within the same time periods and with failure rates that are no greater than those that apply to the performance of similar functions for the same types of equipment used by SWBT itself. The facilities installed under this option can be used for interoffice trunking between the LSP and SWBT and for access to unbundled network components. These virtual collocation facilities may also be used for special or switched access. 47 C.F.R. § 51.323(a), (e). (STC II. B. 1), (Brooks and USLD II. B. 2)

20. With either Physical Collocation or Virtual Collocation, SWBT provides an interconnection point or points, physically accessible by both SWBT and the requesting LSP, at which the fiber optic cables carrying the LSP's circuits enter SWBT's premises. 47 C.F.R. § 51.323(d)(1). The LSP may use at least two such interconnection points at each of SWBT's premises at which there are at least two entry points for the requesting LSP's facilities, and space is available for new facilities at those entry points. 47 C.F.R. § 51.323(d)(2). (STC, Brooks and USLD Appendix NIM, ¶ 6.1 on page 9)
21. The SONET-Based Interconnection arrangement is similar to the Virtual Collocation arrangement, except that both the LSP and SWBT install SONET-based equipment in their respective locations and each can choose the SONET equipment vendor of their choice. All of the same options for service configurations exist for this arrangement as with the Virtual

Collocation Interconnection. The FCC tariff rate will be applied in accordance with ¶ 826 of the FCC Order. (STC II. B. 3), (Brooks and USLD II. B. 4)

22. If a LSP has no cable facilities of its own available for interconnection, it can lease special access, DS1 or DS3 facilities from SWBT. If the LSP already has a fiber facility collocated in a SWBT central office for other purposes, it can use the spare capacity of that facility for local exchange interconnection. 47 C.F.R. § 51.323(g). (STC Appendix UNE, 8.2.1.1) and (Brooks and USLD Appendix NIM, p.5)
23. SWBT and a LSP may mutually agree to utilize another interconnection method when it is determined to be technically feasible. (STC II. B. 4), (Brooks and USLD II. B. 5)
24. The access SWBT provides to points of interconnection will be equal in quality (as defined by 47 C.F.R. § 51.331) to what SWBT provides to itself, except where requested otherwise, and will meet the same technical criteria and standards used in SWBT's network for a comparable arrangements 47 U.S.C. § 251(c)(2)(C); 47 C.F.R. § 51.305(a)(3), (4). Upon request, a LSP may receive access that is superior to what SWBT provides itself or others. (STC II. B. 4)
25. Interconnection at all points and using all methods available is provided under nondiscriminatory and reasonable terms and at the same level of quality that SWBT provides comparable interconnections to itself and its affiliates. 47 U.S.C. § 251(c)(2)(C) and (D). These equal quality interconnections are achieved through the use of the same facilities, interfaces technical criteria and service standards as SWBT applies to itself. Order ¶ 224. (STC II. B. 4) Upon request, SWBT will also provide interconnection that are of greater or lesser quality than it provides itself. 47 C.F.R. § 51.305(a)(4). (STC II. B. 4)

The above standard of interconnection fulfills SWBT's obligations under Section 271 (c)(2)(B)(i) and 251(c)(2)(B) and (C) to interconnect with other carriers at a level of quality that is at least equal to what SWBT provides itself.

Trunking Arrangements

LSP Originating (LSP to SWBT)

26. When SWBT has a combined local and access tandem in an exchange, intraLATA toll traffic may be combined with the local traffic on the same trunk group. When there are separate SWBT access and local tandems in an exchange, a separate local trunk group will be provided to the local tandem and a separate intraLATA toll trunk group shall be provided to the access tandem. (STC, Brooks and USLD Appendix ITR A. 1)
27. When a LSP interconnects directly to a SWBT end office, local traffic may be terminated over a direct trunk group to the end office, however, intraLATA toll traffic shall be provided over a separate trunk group to the SWBT access tandem. This trunk group shall be one-way outgoing only and can utilize either Multifrequency ("MF") or Signaling System 7 ("SS7") protocol signaling. 47 C.F.R. § 51.305(f). (STC, Brooks and USLD Appendix ITR A. 1)
28. SWBT allows interLATA traffic to be transported between the LSP central office and the SWBT access tandem over a separate trunk group from local and intraLATA toll traffic. The access toll connecting trunk group can be established for the transmission and routing of Exchange Access traffic between the LSP's end users and interexchange carriers via a SWBT access tandem. This trunk group may be set up as on-way or two-way and can utilize SS7 or MF protocol signaling. . 47 C.F.R. § 51.305(f). (STC, Brooks and USLD Appendix ITR A. 2)

29. If the LSP chooses, additional trunk groups may be established for services such as 800 (888), E911, Mass Calling or Public Response Choke Networks, and Operator services access. (STC, Brooks and USLD Appendix ITR A. 3, 4, 5)

LSP Terminating (SWBT to LSP)

30. SWBT will provide local traffic to the LSP over a separate trunk group from the local tandem. SWBT may trunk directly to a LSP from a SWBT end office. In those exchanges where SWBT has a combined local and access tandem, SWBT will normally combine the local and IntraLATA toll traffic over a single trunk group to the LSP. When SWBT has a separate access and local tandem in an exchange, a trunk group shall be established from each tandem to the LSP. This trunk group(s) will be one-way incoming only and can utilize either MF or SS7 protocol signaling. (STC, Brooks and USLD Appendix ITR B. 1)
31. InterLATA traffic will be transported from SWBT's access tandem over a separate trunk group from local and IntraLATA toll traffic. This trunk group may be set up as one-way or two-way and can utilize either MF or SS7 protocol signaling. (STC, Brooks and USLD Appendix ITR B. 2)
32. All trunk forecasting and servicing for the Local and IntraLATA Toll trunk groups shall be based upon the same industry standard objectives that SWBT uses for its own trunk groups. The standard objective of 2% overall time consistent average busy season busy hour loads (1% from the End Office to the Tandem and 1% from the Tandem to the End Office based on Neil Wilkerson B.01M (Medium Day-to-day Variation) until traffic data is available). The objectives for various types of trunk groups are listed in the STC, Brooks and USLD Appendix ITR Section D.

33. SWBT will be responsible for forecasting and servicing the trunk groups terminating to the LSP. The LSP will be responsible for forecasting and serving trunk groups terminating to SWBT end offices and/or to be used for tandem transit to other providers networks, operator services, DA services and interLATA toll service. (STC, Brooks and USLD Appendix ITR - E)
34. SWBT will use standard trunk traffic engineering methods as described in Bell Communications Research, Inc. document SR-TAP-000191, Trunk Engineering Concepts and Applications. This will insure that all interconnection trunking is managed in the same manner as SWBT does its own trunk groups. (STC, Brooks and USLD Appendix ITR - E)

**II. CHECKLIST ITEM (ii):
NONDISCRIMINATORY ACCESS TO NETWORK ELEMENTS**

General Unbundling Rules

35. A BOC, such as SWBT, meets the requirements of the Checklist if it offers access and interconnection that includes:
 - (ii) Nondiscriminatory access to network elements in accordance with the requirements of sections 251(c)(3) and 252(d)(1).
36. In its Order, the FCC identified a minimum list of network elements that must be provided on an unbundled basis. These include unbundled access to local loops, network interface devices, local and tandem switching capability, interoffice transmission facilities, signaling and call-related databases, operations support systems functions, and operator services and directory assistance facilities. Each of these will be discussed below.
37. SWBT must provide access to each network element on an unbundled basis, that is without requiring the purchase of any other network element as a condition for the purchase of

another. 47 C.F.R. § 51.307. SWBT is not allowed to impose limitations, restrictions or requirements on the request or the use of unbundled network elements that would impair the ability of a LSP to offer a telecommunications service in the manner that it intends. 47 C.F.R. § 51.309. The network elements and the access to those elements must be equal in quality to that SWBT provides to itself. 47 C.F.R. § 51.311. In addition, the terms and conditions pursuant to which SWBT provides access to unbundled network elements must be offered equally to all requesting LSPs. 47 C.F.R. § 51.313. SWBT must also allow requesting LSPs to combine network elements. 47 C.F.R. § 51.315. (STC Appendix UNE, 2.2. and Pricing Schedule.)

38. SWBT provides requesting LSPs with nondiscriminatory, unbundled access to network elements for use in providing telecommunications services to their customers. Access to network elements is provided on a nondiscriminatory, and equal-in-quality basis under the same terms and conditions to all LSPs. Each of the above requirements will be discussed below.
39. As required by 47 C.F.R. § 51.307 SWBT will provide to a requesting LSP for the provision of a telecommunications service, nondiscriminatory access to network elements on an unbundled basis at any technically feasible point. These network features will provide the LSP access to all features, functions and capabilities in a manner that allows the LSP to provide any telecommunications service that the network element is capable of providing. 47 C.F.R. § 51.307(a), (c). (STC Appendix UNE 2.1 and 5.1.)
40. SWBT also provides access to the facilities or functionality of network elements separately from access to other network elements and for a separate charge. 47 C.F.R. § 51.307(d). (STC Appendix Pricing Schedule and Appendix UNE 2.2), (Brooks Fiber and USLD UNC)

41. SWBT will provide LSPs access to the unbundled network elements to permit LSPs to combine such network elements with other network elements obtained from SWBT or with network components provided by the LSP itself to provide telecommunications services to its customers, provided that such combination is technically feasible and would not impair the ability of other carriers to obtain access to other unbundled network elements or to interconnect with SWBT's network. 47 C.F.R. § 51.309(a). (STC Appendix UNE 2.2.)
42. SWBT permits a LSP to purchase unbundled network elements in order to provide exchange access service to itself. 47 C.F.R. § 51.309(b)
43. Requesting LSPs are entitled to exclusive use of an unbundled network facility, and to the use of features, functions, or capabilities, for a set period of time. 47 C.F.R. § 51.309(c). However, SWBT retains ownership of the facility and retains the obligation to maintain, repair or replace unbundled network elements as necessary. (STC Appendix UNE 2.5, 2.9), (Brooks and USLD Appendix UNC, p.1)
44. Each network element provided by SWBT to all LSPs will meet applicable regulatory performance standards and be at least equal in quality and performance as that which SWBT provides to itself. However, a LSP may request, and SWBT will provide, to the extent technically feasible, network elements that are superior or of lesser quality than SWBT provides to itself. 47 C.F.R. § 51.311(a), (b), (c), (STC Appendix UNE 2.14.1)
45. The terms and conditions pursuant to which SWBT provides access to unbundled network elements will be offered equally to all requesting LSPs. 47 C.F.R. § 51.313(a). The STC contains the terms and conditions available to any and all LSPs.

46. SWBT provides unbundled network elements in such a way that the LSP may combine such network elements with other network elements obtained from SWBT, or with network components provided by itself. 47 C.F.R. § 51.315(a). (STC Appendix UNE 2.2.) (Brooks and USLD Appendix UNE p.1) In addition SWBT will perform the network functions necessary to combine unbundled network elements in any manner that is technically feasible and does not impair the ability of other carriers to obtain access to unbundled network elements or to interconnect with the SWBT network. 47 C.F.R. § 51.315(c), (d). (STC Appendix UNE 2.3)
47. If SWBT denies a request to combine elements for either technical feasibility reasons or because it would impair the ability of other carriers to obtain access to unbundled network elements or to interconnect with the SWBT network, SWBT will explain why to the requesting LSP and to the Oklahoma Corporation Commission if necessary. 47 C.F.R. §51.315(e), (f).

Unbundled Network Elements

48. As required by the Act the FCC's Order, Southwestern Bell makes available nondiscriminatory access to the following core unbundled elements:
- Local Loop
 - Network Interface Device
 - Local Switching Capability
 - Tandem Switching Capability
 - Interoffice Transmission Facilities
 - Signaling Networks and Call-Related Databases
 - Operations Support Systems Functions

- Operator Services and Directory Assistance

47 C.F.R. § 51.319 (a) - (g), (STC Appendix UNE), (Brooks Fiber and USLD UNC) SWBT offers all of these unbundled network elements and one additional unbundled network element called "Cross connects". (STC Appendix UNE 12.0)

49. Most of the minimum set of network elements are separately required by the checklist and therefore will be discussed in later sections of my affidavit. However, the Network Interface Device ("NID") and the Cross-connects will be discussed in this section. The Operations Support Systems Functions ("OSS") will be discussed in detail in the Affidavit of Ms. Elizabeth Ham.

50. The NID is a cross-connect device used to connect loop facilities to a customer's inside wiring. The NID contains connection points to which the service provider and the end-user customer each make their connections.

51. The LSP will provide its own NID and will interface to the customer's premises wiring through connections in the customer chamber of the SWBT NID. 47 C.F.R. § 51.319(2), (STC Appendix UNE 3.3)

52. LSP's may connect to the customer's inside wire at the SWBT NID, as is, at no charge. Any repairs, upgrades or rearrangements required by the LSP will be performed by SWBT based on time and material charges. (STC Appendix UNE 3.2.)

53. At multiple dwelling units or multiple-unit business premises, it is normally expected that the LSP will provide its own NID and will connect directly with the customer's inside wire without any requirement to connect to the SWBT NID. In those situations where it is necessary to relocate or rearrange the SWBT NID to allow access to the customer's inside

wiring, such rearrangements or relocation's will be charged to the LSP on a time and materials basis. (STC Appendix UNE 3.4)

54. The FCC Order required the incumbent LECs to provide cross-connect facilities, for example between an unbundled loop and a LSP's collocated equipment, in order to provide access to that loop. The Order also stated that the LEC could recover the cost of providing such facilities. Order ¶ 386. However, the Order failed to include this necessary function in the minimum set of unbundled network elements. Since the cross-connects are essential to the provisioning of services using unbundled loops, and it is technically feasible to provide such cross-connects, SWBT will provide them as an additional unbundled network element.

55. The cross connect is the media between the SWBT distribution frame and a LSP designated collocation facility or to other SWBT provided unbundled network elements purchased by the LSP. (STC Appendix UNE 11.1.)

56. SWBT offers a choice of four types of cross connects with each unbundled loop type. The applicable cross connects are as follows:

- Cross connect to Digital Cross connect System ("DCS")
- Cross connect to multiplexing equipment
- Cross connect to collocation facilities
- Cross connection to Switch Port

(STC Appendix UNE 11.2.)

Cross connections must also be used with Unbundled Dedicated Transport ("UDT"). The following cross connects are available with UDT:

- Voice Grade 2-Wire

- Voice Grade 4-Wire
- DS0-DCS to Collocation facilities
- DS1
- DS3
- OC3
- OC12
- OC48

(STC Appendix UNE 11.3.3.)

Bona Fide Request

57. Upon request, SWBT will provide additional points of interconnection, new methods of interconnection and additional unbundled network elements. The process to be used for developing the requested arrangement is called the Bona Fide Request process. This same process can be used for a carrier to request a form of access that is of greater or lesser quality than SWBT provides to itself. (STC, appendix UNE 2.16)
58. A Network Element Bona Fide Request will contain a written technical description of the requested Network element and the projected quantity of interconnections points. SWBT will normally provide the requesting LSP a preliminary analysis of the request within thirty days of its receipt. (STC, Appendix UNE, 2.16.2 and 2.16.5)
59. As soon as feasible, but not more than 90 days after it is authorized to proceed with development of the Network element Bona Fide Request quote, SWBT will provide the requesting LSP a quote which will include at least a description of the Network Element,

the availability, the applicable rates and the installation intervals. (STC, Appendix UNE, 2.16.8)

60. If the requesting LSP does not agree with the terms, conditions, or price of a requested Network Element, they may seek arbitration by the OCC pursuant to § 252 of the Act. (STC Appendix UNE 2.16.10)

III. CHECK LIST ITEM (iv): LOCAL LOOP

61. The local loop network element is defined as a transmission facility between a distribution frame (or its equivalent) in an incumbent LEC central office and an end user customer premises. The loop terminates in the NID at the customer's premises. 47 C.F.R. § 51.319(a). (STC Appendix UNE 4.1), (Brooks and USLD Appendix UNC, p.1)
62. SWBT provides the following standard local loops as network elements unbundled from local switching or other services. 47 U.S.C. §271(c)(2)(b)(iv):
- 2-Wire analog loop supporting analog voice frequency with no more than 8 dB loss.
 - 4-Wire analog loop
 - 2-Wire digital loop (160 Kilobits per second) to support Basic Rate Integrated Services Digital Network based services.
 - 4-Wire digital loop (1.544 Megabits per second) to support DS1 services including Primary Rate ISDN services.

SWBT also offers a standard conditioning option on the 2-wire analog loop to reduce loss to no more than 5 dB. (STC Appendix UNE 4.2), (Brooks and USLD Appendix UNC p.3)

63. A LSP may request, and to the extent technically feasible, SWBT will provide additional loop types and conditioning pursuant to the Bona Fide Request process. (STC Appendix UNE 4.3.)

IV. CHECKLIST ITEM (v): LOCAL TRANSPORT

64. Local transport, also known as interoffice transmission facilities, is defined as incumbent SWBT interoffice transmission facilities dedicated to a particular customer or carrier, or shared by more than one customer or carrier, that provide telecommunications between wire centers owned by SWBT or a LSP or third parties acting on behalf of the LSP. Inter office transport includes Common Transport and Dedicated Transport. SWBT offers both Common Transport and Dedicated Transport to all LSPs. 47 U.S.C. § 271(c)(2)(B)(v). 47 C.F.R. § 51.319(d). (STC Appendix UNE 8.0.), (Brooks and USLD Appendix NIM)
65. SWBT will be responsible for the engineering, provisioning, and maintenance of the underlying equipment and facilities that are used to provide Interoffice Transport. (STC Appendix UNE 8.0.)
66. Common Transport is a shared interoffice transmission path between SWBT switches. Common Transport will permit a LSP to have calls switched using the Unbundled Local Switching element purchased from SWBT to other SWBT switches over SWBT's common transport network. Common Transport will also permit a LSP to utilize SWBT's common transport network between a SWBT tandem and a SWBT end office switch. 47 C.F.R. § 51.319(d)(2)(i). (STC Appendix UNE 8.1.1.)
67. Dedicated Transport is an interoffice transmission path dedicated to a particular customer or LSP that provides telecommunications between wire centers owned by SWBT or a LSP. (STC Appendix UNE 8.2.1)

68. SWBT will offer Dedicated Transport as a circuit dedicated to a LSP. The following transmission speeds will be available:

- DS1 (1.544 Mb/s)
- DS3 (45 Mb/s)
- OC3 (155.520 Mb/s)
- OC12 (622.080 Mb/s)
- OC48 (2488.320 Mb/s)

(STC Appendix UNE 8.2.1.1, 8.2.1.2.)

69. SWBT will offer Digital Cross-Connect System (“DCS”) in conjunction with the unbundled dedicated transport element with the same functionality that is offered to interexchange carriers. 47 C.F.R. § 51.319 (d)(2)(iv). (STC Appendix UNE 8.2.4)

70. As previously discussed in the section on cross-connects, SWBT will provide the cross-connects necessary to permit a LSP to connect Dedicated Transport facilities to equipment designated by the LSP, including, but not limited to the LSP’s collocated facilities. 47 C.F.R. § 51.319(d)(2)(iii). (STC Appendix UNE 11.3.3.)

71. SWBT’s unbundled local transport allows access to both shared and dedicated transport, including all technically feasible transmission facilities, features, functions and capabilities that a requesting LSP could use to provide a telecommunications service. In addition to the standard arrangements, the LSP may request new or additional elements using the Bona Fide Request process.

V. CHECKLIST ITEM (vi): LOCAL SWITCHING

72. The Checklist (§ 271(c)(2)(B)(vi)) and the FCC Rules (47 C.F.R. § 51.319(c)) require SWBT to unbundle local switching from transport, local loop transmission or other services. The Rules also require unbundling of local and tandem switching capabilities, including trunk-connect facilities, including but not limited to, the connection between trunk termination at a cross-connect panel and a switch trunk card, the basic switching function of connecting trunks, and the functions that are centralized in tandem switches. 47 C.F.R. § 51.319(c)(2). SWBT satisfies these requirements. (STC Appendix UNE 5.0), (Brooks and USLD 2(A)(1)(a))
73. SWBT offers a local switching element that encompasses line-side and trunk-side facilities plus the features, functions and capabilities of the switch. The line side facilities include the connection between a loop termination at, for example, a main distribution frame, and a switch line card. 47 C.F.R. § 51.319(c)(1)(i)(A). (STC Appendix UNE 5.1.)
74. The trunk-side facilities include the connection between, for example, trunk termination at a trunk-side cross-connect panel and a trunk card. 47 C.F.R. § 51.319(c)(1)(i)(B). (STC Appendix UNE 5.1.)
75. The local switching element includes all features, functions and capabilities of the local switch, including but not limited to the basic switching function of connecting lines to lines, lines to trunks, trunks to lines and trunks to trunks. It also includes the same basic capabilities that are available to SWBT customers, such as a telephone number, dial tone, signaling and access to 911, operator services, directory assistance, and features and functions necessary to provide services required by law. In addition, the local switching element includes all vertical features that the switch is capable of providing, including

custom calling, CLASS features, and centrex-like features, as well as any technically feasible routing features. 47 C.F.R. § 51.319(c)(1)(i)(C). (STC Appendix UNE 5.1.)

76. When a LSP request Unbundled Common Transport, SWBT's Local Switching element will route calls on SWBT's common transport network to the appropriate trunks or lines for call origination or termination. (STC Appendix UNE 5.3.)
77. Where a LSP purchases Unbundled Local Switching and elects to provide Directory Assistance and Operator Services to its customers through its own Directory Assistance and Operator Services platforms, SWBT will provide the local switch functionality and features required to route calls from the LSP's customers to LSP designated trunks for the provision of LSP Directory Assistance and Operator Services where technically feasible. (STC Appendix UNE 5.4.)
78. SWBT will allow a LSP to designate the features and functions that are to be activated on a particular unbundled switch port to the extent that such features and functions are available. (STC Appendix UNE 5.8.)
79. Access to unbundled local switching is provided through switch ports. Three standard switch ports are available to all LSPs:
 - Analog Line Port: A line-side switch connection available in either loop or ground start signaling configurations used primarily for switched voice communications.
 - ISDN Basic Rate Interface Port: A line-side switch connection which provides ISDN Basic Rate Interface based capabilities.
 - ISDN Primary Rate Interface Trunk Port: A trunk-side switch connection which provides Primary Rate Interface ISDN Exchange Service capabilities.

(STC Appendix UNE 5.9)

80. SWBT's unbundled tandem switching element meets all requirements of the FCC's Rules. Included are trunk-connect facilities, including, but not limited to the connection between trunk termination at a cross-connect panel and a switch card, the basic switching function of connecting trunks to trunks, and all technically feasible functions that are centralized in tandem switches (as distinguished from separate end-office switches), including but not limited to call recording, the routing of calls to operator services, and signaling conversion features. In addition, a LSP may request additional switching elements through the Bona Fide Request process. 47 C.F.R. § 51.319(c)(2). (STC Appendix UNE 6.0)

**VI. CHECKLIST ITEM (vii):
911/E911, DIRECTORY ASSISTANCE AND OPERATOR CALL COMPLETION**

911 and E911 Services

81. Checklist item (vii) (I) requires that SWBT provide nondiscriminatory access to 911 and E911 Services. 47 U.S.C. § 271(c)(2)(B)(vii)(I). SWBT satisfies this requirement.
82. Access to 911 and E911 services is provided through existing tariffs to local government bodies in Oklahoma. SWBT will provide customers of LSPs with access to the type of 911 service selected by the governmental body of the area in which they reside in a manner identical to the 911 service supplied to SWBT's own customers. A LSP may provide 911 access service directly to the governmental body, or may interconnect to SWBT's existing service arrangement, at the request of the governmental body. (STC, Brooks and USLD Appendix 911 IV. A.)

83. SWBT will provide and maintain equipment at the E911 Control Office and the Database Management System as necessary to perform E911 services for the requesting local E911 customer. This will include some or all of the following as needed:

- Transporting the E911 calls from the LSP's switches to the Control Office of the E911 system.
- Switching the E911 calls through the Control Office to the Public Safety answering Point
- Storing the names, addresses and associated telephone numbers from the LSP's customers in electronic data processing databases for the E911 Database Management System.
- Transmission of the information associated with the LSP's customers to the Public Safety answering Point upon the customer calling 911.

(STC, Brooks and USLD Appendix 911, II A)

84. SWBT will provide and maintain sufficient dedicated E911 circuits, according to provisions of the E911 tariff and specifications of the E911 customer. SWBT will also provide the LSP a description of the geographic area and Public Safety Answering Points served by the E911 Control Office. (STC, Brooks and USLD Appendix 911, II B and C)

85. SWBT's STC recognizes the authority of the E911 Customer to establish service specifications and grant final approval of service configurations offered by SWBT and the LSPs. (STC, Brooks and USLD Appendix 911, IV A.)

86. SWBT will provide all necessary street address information for the exchanges or communities where the LSP will operate in order to allow the LSP to create the necessary

customer files for E911 automatic location identification. SWBT will also provide the LSP with all necessary documentation for the operation of the local E911 system and the methods of downloading and maintaining files of end user records. (STC Appendix 911, II D)

**VII. CHECKLIST ITEM (x):
ACCESS TO DATABASES AND ASSOCIATED SIGNALING**

87. The Checklist requires that SWBT:

(x) Nondiscriminatory access to databases and associated signaling necessary for call routing and completion. 47 U.S.C. § 271(c)(2)(B)(x).

The FCC Rules further expand this responsibility to provide nondiscriminatory access to signaling networks and call-related databases. 47 C.F.R. § 51.319(e). SWBT's STC provides for non-discriminatory access to its signaling networks and call-related databases used for call routing and completion. (STC, Brooks and USLD Appendix UNE 9.0, and Appendices SS7, LIDB-V, LIDB, CNAM, 800, and AIN.)

88. SWBT provides nondiscriminatory access to its signaling links and Signal Transfer Points ("STPs") on an unbundled basis. 47 C.F.R. § 51.319(e)(1)(i). (STC Appendix SS7 I, II.), (Brooks and USLD Appendix SS7, I.) SS7 Interconnection Service is available to LSPs for their use in furnishing SS7-based services to their end users or the end users of another LSP subtending the Signaling Service Point or STP of the interconnecting LSP. This arrangement, which is identical to the one used by SWBT itself, permits LSPs to use SWBT's SS7 signaling network for signaling between their switches, between their switches and SWBT's switches, and between their switches and the networks of other parties connected to the SWBT SS7 network. 47 C.F.R. § 51.319(e)(1)(iii).

89. When a LSP purchases unbundled switching capability for SWBT, SWBT will provide access to its signaling network in the same manner that it provides such access to itself. Since all unbundled switching elements will be provided on switches that SWBT uses to provide service to its own customers, all signaling functions will be identical. 47 C.F.R. § 51.319 (e)(1)(ii).
90. SWBT's SS7 Interconnection Service is a Switched Access service which provides dedicated two-way signaling links that interconnect SWBT STP locations and the LSP Signaling Points at Signaling Point of Interface locations. The SS7 Interconnection Service consist of STP Port Termination(s) for LSP signaling and STP Interconnection Facility. The port terminations will consist of port connections of 56 Kilobits per second transmission facilities on SWBT's STP. The STP Interconnection Facility is the facility which lies between the multiplexing hub, which demultiplexes the LSP's 56 Kb/s transmission from DS1 transmission facilities and the STP port. 47 C.F.R. § 51.319(e)(1)(ii). (STC, Brooks and USLD Appendix SS7 I.)
91. The FCC Rules identified certain call-related databases at § 51.319(e)(2)(ii). SWBT's STC provides access to its Line Information Database, 800 Service Database, Calling Name Delivery Database, and Advanced Intelligent Services Feature Database. (STC Appendix UNE 9.0., LIDB, CNAM and LIDB-V), (Brooks and USLD Appendix SS7 - Attachment 6)
92. SWBT allows LSPs access to its Line Information Database ("LIDB") on the same basis as it obtains access itself. Appendix LIDB of the STC sets forth the terms and conditions upon which SWBT will provide data base administration to store the LSP's line/billing

records in SWBT's LIDB. Appendix LIDB-V provides the methods and procedures to allow a LSP to query the SWBT LIDB database.

93. When a LSP deploys its own local switching system, they will obtain access to the LIDB by using the SS7 Interconnection Service and will have access to the same functions and features of the data base as SWBT. 47 C.F.R. § 51.319(e)(2)(iv). (STC, Brooks and USLD Appendix LIDB, Appendix LIDB-V),
94. When a LSP purchases unbundled local switching elements, the access will be identical to that of SWBT in the same switch. 47 C.F.R. § 51.319(e)(2)(iii). (STC, Brooks and USLD Appendix LIDB)
95. SWBT will provide access to the LIDB in accordance with the customer privacy rules of §222 of the Act. 47 C.F.R. § 51.319(e)(2)(vi). (STC, Brooks and USLD Appendix LIDB, III)
96. SWBT will provide all requesting LSPs nondiscriminatory access to its Calling Name Delivery Service Database. Calling Name Delivery ("CNAM") service enables the terminating end-user to identify the calling party by a displayed name before the call is answered. The calling party's name, date and time of the call are retrieved from a Service Control Point ("SCP") database and delivered to the end-user's premises between the first and second ring for display on a compatible customer premise equipment. CNAM Service Query is SWBT's service that allows a LSP to query SWBT's Calling Name database. (STC, Brooks and USLD Appendix CNAM 2. A.)
97. When a LSP operates its own switching center, access to the CNAM database is obtained by SS7 Interconnection Service. The LSP accesses the SCP through the STP in the same

manner as SWBT. The same features, functions and capabilities are available to the LSP.
47 C.F.R. § 51.319(e)(2)(iv). (STC, Brooks and USLD Appendix CNAM.)

98. When a LSP purchases unbundled switching elements from SWBT, the access to the CNAM database will be identical as that used by SWBT in the same switch. 47 C.F.R. § 51.319(e)(2)(iii). (STC, Brooks and USLD Appendix CNAM)
99. Appendix 800 to the STC provides the terms and condition for nondiscriminatory access the SWBT's Toll Free Calling Database. Access to the Toll Free Calling Database allows an LSP to access SWBT's 800 database for the purpose of switch query and database response. This provides the LSP information required to determine the appropriate routing of an 800 (888) number. SWBT offers three optional features with 800 Service: Designated 10-Digit Translation, Call Validation, and Call Handling and Destination. (Brooks and USLD Appendix SS7 - Attachment 6)
100. The Designated 10-Digit Translation feature converts the 800 number into a designated 10-digit telephone number and returns this information to the sender of the query. (STC Appendix 800, I. E. 1.)
101. The Call Validation feature limits calls to an 800 number to calls originating only from an 800 Subscriber's customized service area. Calls originating outside the area will be screened and a recording will be returned to the calling party. (STC Appendix 800, I. E. 2.)
102. The Call Handling and Destination feature allows routing of 800 calls based on one or any combination of the following: time of day, day of week, percent allocation and specific 10-digit automatic number identification. . (STC Appendix 800, I. E. 3.)

103. All of the above features are available to a LSP and its customers in the same manner as provided by SWBT. When a LSP operates its own switching system, access to the database will be obtained by using the SS7 Interconnection Service. 47 C.F.R. § 51.319(e)(2)(iv). (STC Appendix 800) and (Brooks and USLD Appendix SS7 - Attachment 6)
104. When a LSP purchases unbundled switching elements from SWBT, the access to the 800 database will be identical to that used by SWBT in the same switch. 47 C.F.R. § 51.319(e)(2)(iii). (STC Appendix 800) and (Brooks and USLD Appendix SS7 - Attachment 6)
105. Advanced Intelligent Network (“AIN”) is a vendor independent network architecture deployed by SWBT that provides capabilities for creation of custom telecommunications services that are invoked by SS7 messages from a switch to a SCP database. In Appendix AIN of the SWBT STC, SWBT offers to provide two AIN services to all LSPs. LSPs may develop AIN applications on SWBT’s Integrated Service Control Point using the LSP AIN Application Creation Service (“LAACS”). These applications can then be placed on SWBT’s network. Using SWBT’s LSP AIN Access Service (“LAAS”), end user customers of the LSP may access SWBT-created AIN applications and/or LSP created AIN applications residing in SWBT’s ISCP via, 1) an unbundled local switching element purchased from SWBT or, 2) LSP’s own switch that is connected to SWBT’s SS7 signaling network via the SS7 network element. 47 C.F.R. § 51.319(e)(2)(iii), (iv), § 51.319(e)(3)(C). (STC Appendix AIN II. A and B)
106. SWBT provides access to the Service Management Systems (“SMS”) associated with each of the databases described above in accordance with 47 C.F.R. §51.319(e)(3). Requesting Carriers are provided with the relevant information necessary to enter correctly, or format

for entry input into the various databases by their associated SMSs. (STC Appendixes LIDB, LIDB-V, CNAM, 800, and AIN), (Brooks and USLD Appendices LIDB and CNAM)

107. All data maintained in the above databases is maintained in accordance with § 222 of the Act. (STC, Brooks and USLD Appendix LIDB Section III)
108. SWBT will respond to request for additional arrangements for access to call-related databases and associated signaling facilities through the Bona Fide Request process.
109. In summary, as required by 47 C.F.R. § 51.319(e) SWBT provides unbundled, nondiscriminatory access to its signaling networks, to its call-related databases used in signaling networks for billing and collection or the transmission, routing or other provision of telecommunications services, and to the associated SMS for each database, each database is accessed through SWBT's STPs by a requesting LSP in the same manner and via the same signaling links that are used by SWBT itself.

VIII. CHECKLIST ITEM (xi): NUMBER PORTABILITY

110. Checklist item (xi) requires:

(xi) Until the date by which the Commission issues regulations pursuant to section 251 to require number portability, interim telecommunications number portability through remote call forwarding, direct inward dialing trunks, or other comparable arrangements, with as little impairment of functioning, quality, reliability, and convenience as possible. After that date, full compliance with such regulations.

111. Local Number Portability is a service arrangement whereby an end-user, who switches subscription for exchange services from one exchange service provider to another is