

Todd F. Silbergeld  
Director-  
Federal Regulatory

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



April 24, 1997

EX PARTE OR LATE FILED

RECEIVED

**EX PARTE**

APR 24 1997

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

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

Dear Mr. Caton:

Please be advised that today the attached letter was delivered to Kalpak Gude,  
Attorney-Adviser, Policy and Program Planning Division, Common Carrier  
Bureau.

Please associate this letter and the attachment with the above-referenced rule  
making docket. In accordance with Commission procedure, an original and one  
copy of this document is provided for your use.

Should you have any questions concerning the foregoing, do not hesitate to  
contact me.

Very truly yours,

*Todd F. Silbergeld*

Attachment

No. of Copies rec'd  
LIST ABOVE

021

Todd F. Silbergeld  
Director-  
Federal Regulatory

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



April 24, 1997

Kalpak Gude, Esq.  
Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: Public Forum On Operations Support Systems, May 28-29, 1997

Dear Mr. Gude:

The Commission recently announced that it will host a public forum consisting of panel discussions among interested parties on issues surrounding operations support systems (OSS) for unbundled network elements and resale.

As the Commission is well aware, access to OSS functions has been the subject of much highly charged rhetoric but little discussion of the facts. Competitive local exchange carriers (CLECs) have alleged that the access being provided by the Bell Operating Companies (BOCs) is not in compliance with the Commission's rules, nor sufficient to meet the "competitive checklist" for in-region interLATA relief. Therefore, SBC Communications Inc. (SBC) applauds the Commission's initiation of a public discussion of this important issue.

SBC can provide the Commission with a unique perspective on this issue. The BOC subsidiaries of SBC -- Southwestern Bell Telephone Company (SWBT), Pacific Bell, and Nevada Bell -- together make it the nation's largest incumbent local exchange carrier serving approximately 32 million access lines including the two largest states in the nation, California and Texas. SWBT provides CLECs with access to its OSS functions equivalent to that provided to itself and its customers, and has negotiated to provide forms of access to its OSS functions which were not available when the '96 Act was passed. Pacific Bell has made similar strides in offering access to its OSS functions. While relatively few complaints have been made about the OSS access SWBT provides, some CLECs have been quite critical of the OSS access provided by Pacific Bell. However, Pacific Bell has been called upon to provide such access in the face of significant local exchange competition.

Kalpak Gude

4/24/97

Page 2

Accordingly, SBC respectfully requests the opportunity to be represented at the upcoming forum by Elizabeth A. Ham. Ms. Ham is the Executive Director- Interconnection & Resale Technical Implementation for SWBT and is responsible for the development of access to SBC's OSS functions consistent with the Commission's rules and the requirements of the state commissions. She has had 26 years of experience with SWBT in a variety of Operator Services, Network Operations, and Customer Services positions and is one of SWBT's Quality Consultants. Ms. Ham is more than qualified to address these issues and to answer the Commission's questions.

In terms of the structure of the forum, may I suggest that the Commission have a single representative from each of the regional Bell companies to discuss the five issues identified in the News Release. Separate, individual representation is important, since each of the regional Bell companies has implemented access to their OSS functions in a different way and any complaints about compliance with the Commission's rules will be different for each region. Accordingly, the Commission will not gain a full appreciation of this issue, without a complete understanding of the differences between each regional Bell company's OSS. Moreover, if the forum is intended to provide information relevant to the evaluation of applications for in-region interLATA relief, the Commission will need to address this issue on a regional Bell company-specific basis.

If you have any questions concerning this request, please feel free to call me.

Sincerely yours,



Todd F. Silbergeld  
Director - Federal Regulatory  
SBC Communications Inc.

cc: Richard Welch