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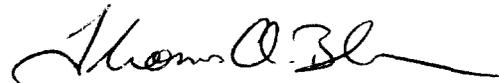
Mr. William F. Caton, Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

Re: Application by SBC Communications, Inc. For Authorization Under
Section 271 of the Communications Act To Provide In-Region InterLATA
Service in the State of Oklahoma, CC Docket No. 97-121

Dear Mr. Caton:

On behalf of AT&T Corp., I am submitting a corrected pg. 25 and copies thereof of its Comments in the above-captioned proceeding filed May 1, 1997. Paragraph references to the affidavit of Robert V. Falcone and Steven E. Turner were inadvertently omitted. Please call me at the number listed above with any questions you might have regarding this letter or the attached corrected page.

Sincerely,



Thomas A. Blaser
Legal Assistant

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toll service.¹² *Falcone/Turner Aff.* ¶¶ 39-43. SBC's position is flatly inconsistent with the Act and the Commission's Orders. It is clear that CLECs are permitted to use network elements to provide any telecommunications service. See Local Competition Order ¶¶ 292, 342, 356; 47 C.F.R. § 51.307(c); Order on Reconsideration ¶ 11 Docket 96-98 (rel. Sept. 27, 1996) ("a carrier that purchases the unbundled local switching element to serve an end user effectively obtains the exclusive right to provide all features, functions, and capabilities of the switch, including switching for exchange access and local exchange service for that end user")(emphasis added). Indeed, the Commission specifically confirmed that "new entrants may assess exchange access charges to IXCs originating or terminating toll calls on those [unbundled network] elements." Local Competition Order ¶ 363 n.772.¹³

Second, SBC has not yet made available one of the essential "capabilities" of the switch -- customized routing. *Id.* ¶ 412; see id. ¶¶ 418, 536 (requiring customized routing, where feasible, to a competitor's operator services and directory assistance platform). Customized routing is particularly important to AT&T, because combining unbundled network elements with AT&T's operator services is central to AT&T's plan to offer consumers a distinctive, high-quality, competitive local service. *Falcone/Turner Aff.* ¶ 18. SBC's SGAT

¹² Indeed, SBC may be unable to provide CLECs with the data necessary to bill for terminating access before January 1988. *Falcone/Turner* ¶ 52.

¹³ This rule (47 C.F.R. § 51.515) was temporarily stayed by the Eighth Circuit on jurisdictional grounds. But that stay only relieves states of the duty to follow FCC rules in § 252 arbitrations and has no effect on the Commission's duty to follow its interpretations of § 251 in proceedings under § 271 -- as SBC correctly told the Eighth Circuit. *RBOC* 8th Cir. Br. 31. Beyond that, SGAT also applies to interstate access revenues over which this Commission's jurisdiction is unquestioned.