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AT&T

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DOCKET FILE COPY ORIGINAL February 2, 1998

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Ex Parte
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; Public Notice, DA 98-139 (rel. Jan. 17, 1998)

Dear Ms. Roman Salas:

Please be advised that on January 30, 1998, Michelle Bourianoff, John Dyess, Jodie Donovan-May, Joyce Davidson, Rosalie Johnson, Randolph Deutsch, Robert Kargoll, Gary Rall, Karen Itzkowitz, and the undersigned met with Carol Mattey, Michael Pryor, Susan Launer, Patrick DeGraba, Audrey Wright, Gregory Cooke and Erin Duffy of the Commission's Common Carrier Bureau Staff in connection with the above referenced proceedings. The purpose of the meeting was to discuss SBC's checklist compliance in all states with respect to "Group 1" issues, as designated in the Public Notice.

During the course of the meeting, representatives provided the attached documents that render an overview of the Group 1 checklist items discussed as well as one non-Group 1 issue in the Southwest Region – poles, ducts, conduits and rights-of-way. The documents also discuss certain region-specific ways in which some of the problems identified could be addressed.

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Recycled Paper

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's rules.

Sincerely,

Attachment

cc: C. Mattey
M. Pryor
S. Launer
P. DeGraba
A. Wright
G. Cooke
E. Duffy

AT&T Southwest Region
Section 271 Update
Group 1 Issues

White Pages Directory Listings
Section 271(c)(2)(B)(viii)

CLEC info placement is discriminatory: SWB secured an inherent advantage in directories printed earlier this year (approximately 112 copies) by placing information about its services on page 2 of the Consumer Guide pages and information about CLECs' services on page 53. SWB has since agreed to move the CLEC information closer to the beginning of the Consumer Guide pages.

Solution: Because customers are used to navigating a white pages directory in alphabetical order, SWB should place information about itself and all CLECs in alphabetical order in the Consumer Guide pages.

Requirement for AT&T to re-establish directory listing information: In spite of the requirements of the September 30, 1997 Texas Second Arbitration Order and its own ordering documentation, SWB continues to treat UNE orders as disconnect/reconnect orders, and will delete existing directory information. AT&T is required to re-establish the information for the customer. SWB's tampering with existing information in this manner could lead to customer-affecting errors.

Solution: SWB should not delete existing information, and its systems development should mirror its existing documentation, which already specifies optional or not required fields (LSOR 1 and LSOR 2, see below).

Directory Assistance/Directory Listings
Section 271(c)(2)(B)(vii)(II)

Refusal to provide information contained in ILEC agreements: In violation of its obligation to offer non-discriminatory access to its directory listing database, SWB refuses to provide AT&T with information concerning the terms on which it grants access to the database to other ILECs.

Solution: SWB should be require to provide non-discriminatory access to its directory listing database. AT&T intends to pursue alternative dispute resolution of the issue at the Texas PUC.

Interim Number Portability ("INP") orders: In violation of the September 30, 1997 Texas Arbitration Award and its own EDI ordering documentation, SWB continues to insist that AT&T re-populate directory listing data for "conversion as specified UNE orders" on which the customer requests INP.

SWB will treat such an order as a network disconnect/re-connect, and will delete directory listing information contained in its directory assistance database for the customer in question. Tampering with pre-existing directory listings in the manner contemplated by SWB, and requiring AT&T to re-establish the directory listing information could lead to customer-affecting errors.

Solution: SWB should not delete existing information, and its systems development should mirror its existing documentation, which already specifies optional or not required fields.

Operator Call Completion Services/Customized Routing to AT&T's OS/DA Platform
Section 271(c)(2)(b)(vii)(III)

Customized routing development costs: SWB seeks to charge the first CLEC in each state (e.g., $600,000 in Texas) which requests customized routing for 100 percent of SWB's initial development costs.

Solution: Cost recovery for customized-routing development should be administered through a competitively-neutral mechanism.

Discriminatory post-dial delay: SWB chose to implement customized routing using an AIN solution as opposed to a line class code solution. As a result, an AIN trigger requires AT&T to perform and pay for a database dip on every call, which results in a post-dial delay. SWB does not experience any delay when it routes calls to its own OS/DA services.

Solution: SWB should be required to reduce or eliminate post dial delay.

Emergency agency listings: SWB provided AT&T with emergency agency listings in March 1997 for use by AT&T in providing OS/DA services. SWB has refused to provide AT&T with updates to this information.

Solution: As a matter of public safety, SWB should cooperate with CLECs to develop a standard for updating emergency agency listings.

Unavailability: SWB refuses to make customized routing available for resale in Oklahoma and Arkansas, and it is only available for UNEs in those states on an ICB. In Kansas, customized routing is not available until after intraLATA presubscription.

Solution: SWB should be required to implement customized routing in all states.

911 and E911 Services
Section 271(c)(2)(b)(Vii)(1)

Accuracy of customer name and address: For INP ported numbers, SWB requires that the customer's primary listing contain AT&T's name and address and that the customer's name and address be contained in a secondary listing. This could cause confusion for emergency dispatch agencies responding to a 911 call from the customer.

Deletion of listing information on INP orders: As explained above, by treating all INP "conversion as specified" orders as a disconnect/re-connect, SWB will delete listing information contained in its 911 database for the customer in question. Tampering with pre-existing 911 information in the manner contemplated by SWB, and requiring AT&T to re-establish the information could lead to customer-affecting errors.

Solution: SWB should not delete existing listing information in its 911 database, and its systems development should mirror existing documentation. In addition, it should maintain the database in a manner that does not impact public safety.

Numbering Administration
Section 271(c)(2)(B)(ix)

Rate center consolidation: Without rate center consolidation, CLECs must obtain a separate NXX for each rate center. The Texas PUC has ordered rate center consolidation, which prevented a situation in which it would have taken AT&T eight months to acquire NXXs for AT&T DigitalLink DID service. No other state in the SWB region has ordered consolidation.

Solution: The Texas solution should be applied in the other SWB states.

Other Issues

Poles, Ducts, Conduits and Rights-of-Way
Section 271(c)(2)(B)(iii)

Access to records: SWB claims that it will not allow CLECs physical access to its dark fiber records or maps because such records are proprietary, but will only answer questions regarding routes, capacity, etc. It is not clear whether or not SWB will also deny CLECs access to other rights-of-way records.

Solution: SWB has refused to comply with the Texas arbitration order on this issue. SWB should cooperate with CLECs to provide a practical form of access to these records.

Operator Services / Directory Assistance

Non-Compliance with § 271 Checklist

Pacific refuses to route local directory assistance (i.e., 411) dialed calls to the the AT&T network using AT&T's requested routing procedures (900 number translation)

Pacific refuses to route intraLATA foreign NPA directory assistance calls (i.e., NPA-555-1212) to the AT&T network using AT&T's requested routing procedures, claiming that these are "intraLATA" -- not local -- calls

Pacific will only convert to AT&T's OS/DA on a customer by customer basis -- it refuses to process a single order which would change all of AT&T's OS/DA service

Operator Services / Directory Assistance

Non-Compliance with § 271 Checklist

Pacific's refusal to route DA traffic as requested by AT&T is a plain violation of the FCC's orders:

> *"We therefore find that incumbent LECs must unbundle the facilities and functionalities providing operator services and directory assistance from resold services and other unbundled network elements to the extent technically feasible... we require incumbent LECs, to the extent technically feasible, to provide customized routing, which would include such routing to a competitors operator services or directory assistance platform."* ¶ 536 of FCC's First Interconnection Order

Operator Services / Directory Assistance

Non-Compliance with § 271 Checklist

Pacific's refusal also violates the clear requirements of the AT&T/Pacific Bell Interconnection Agreement:

> *"At AT&T's option, PACIFIC shall route Directory Assistance calls dialed 411 by AT&T Customers directly to the AT&T Network. The Parties will meet and confer immediately after the Effective Date of this Agreement in an effort to find a solution which can be implemented by April 30, 1997 for PACIFIC to route local Directory Assistance dialed via (NPA) 555-1212 by AT&T Customers directly to the AT&T Network.."*
> (Attachment 5, § 4.2.2.1)

AT&T has found -- and demonstrated -- a solution which Pacific now refuses to implement

Thus, AT&T is pursuing Alternative Dispute Resolution to force compliance by Pacific

Numbering Administration

California Area Codes (NPAs) are being "exhausted" at the rate of one NPA every two months.

In areas where NPA exhaust exists, or is imminent, Pacific Bell has relentlessly pursued relief through code "overlays" in spite of the fact that the California Commission has adopted geographic "splits" as its preferred method of code relief.

- Pacific Bell has also opposed methods of code conservation such as rate center consolidation and number pooling.

Moreover, Pacific Bell's marketing actions have accelerated code exhaust:

- Pacific Bell has offered customer promotions on second lines and DID lines
- Pacific Bell's large customers have been able to obtain entire NXX blocks containing 10,000 numbers
- CLCs, on the other hand, face area code rationing which limits their ability to expand in the local exchange market