

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 was hired into Southwestern Bell's Management Development Program in 1972 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 requires non-discriminatory access to telephone numbers, both before and after the adoption of numbering guidelines. This affidavit describes steps taken under my direction to ensure all telecommunications providers such non-discriminatory access. Specifically, I will discuss actions taken by Southwestern Bell telephone Company to comply with the requirements of Checklist Item (ix) Number Administration.

CHECKLIST ITEM (ix): NUMBER ADMINISTRATION

I. Assignment of Central Office Codes

4. Checklist Item (ix) requires that SWBT provide, "[u]ntil the date by which telecommunications numbering administration guidelines, plans, or rules are established, nondiscriminatory access to telephone numbers for assignment to the other carrier's telephone exchange service customers." 47 U.S.C. § 271(c)(2)(B)(ix).

The FCC's rules, in turn, require that a LEC permit competing providers to have access to telephone numbers that is identical to the access the LEC provides itself. 41 CFR § 51.217(e)(i). As this affidavit demonstrates, SWBT meets these requirements.

5. As used in this affidavit, "Number Administration" refers to the administration and assignment of central office codes to requesting facilities-based telecommunications providers.
6. A telephone number is made up of three components, totaling 10 digits. The first three digits represent the "numbering plan area" or "NPA." The NPA is commonly referred to as the "area code."
7. The second three digits constitute the central office – or "NXX" – code. The final four digits of the telephone number represent the specific line addresses within the NXX. The format of a telephone number is therefore: NPA-NXX-XXXX.
8. In the NXX, any number from 2 to 9 may represent "N," and any number from 0 to 9 may represent "X." There are 792 assignable NXX codes within each NPA (200 through 999, less all "N11" codes such as 911, 411, etc., which are reserved for emergency and other public access purposes), and 10,000 telephone numbers (NXX-0000 through NXX-9999) within each NXX.
9. In order to provide facility-based local exchange telephone service within the public switched telephone network, carriers must have an NXX code(s) assigned to their switching location for the provision of telephone numbers to their subscribers. The regional Central Office Code Administrator – traditionally the incumbent LEC – makes assignment of central office codes.

10. SWBT currently acts as Central Office Code Administrator ("Code Administrator") for the five states served by SWBT, including Oklahoma. In this capacity, SWBT provides nondiscriminatory access to telephone numbers for all carriers in accordance with the *Central Office Code Assignment Guidelines* (the "Assignment Guidelines"), and the *NPA Code Relief Planning Guidelines* and subject to the oversight and complaint jurisdiction of the FCC and MPSC 47 C.F.R. § 51.217(a)(2).
11. In 1995, SWBT consolidated its central office code assignment organization into a single group. All code assignment and NPA relief activities for the 5 states served by SWBT are performed by this organization. This consolidation was implemented to ensure consistent, equal and nondiscriminatory application of the Assignment Guidelines and NPA Relief Guidelines to all industry participants.
12. The process for obtaining a central office code "NXX" block of up to 10,000 numbers is set out in the Assignment Guidelines. It is identical for all requesting carriers, including SWBT, and is relatively simple. First, the applicant makes a request to the Code Administrator using the Central Office Code Assignment Request and Confirmation Form. The Code Administrator date-stamps the request and then determines if the request is in compliance with the national code assignment guidelines. If the application is in compliance, the Code Administrator selects an unassigned code for assignment. The Code Administrator honors requests for specific numbers or blocks of numbers if available. The Code Administrator will respond to the Applicant with an NXX assignment within 10 working days from receipt of the application. Any denial of an application which may be necessary is based upon nondiscriminatory criteria as authorized in the guidelines and orders of the FCC and, where a request is

denied, the administrator will provide specific reasons for the denial and information on where to appeal the decision.

13. All code requests received by SWBT in its capacity as Code Administrator must conform to the requirements of the Assignment Guidelines, regardless of the company originating the request. SWBT follows the assignment procedures described in the Assignment Guidelines, applying them equally and consistently to all requests for the assignment of an NXX. As required by the Assignment Guidelines, central office codes are assigned on a first-come, first-served basis. The Applicant must certify a need for a code and be a licensed or certified provider in the area to be served. Due to the complexities associated with completing the central office code request form, it is not uncommon for errors or omissions to exist on a submitted application. In its capacity as Code Administrator, SWBT offers technical support to all code applicants to ensure that the 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 applicant's code(s) has been activated in the network.
14. As of 12/1/97, the Code Administrator has assigned a total of 33 NXX central office codes to six different local service competitors in the state of Oklahoma, representing 330,000 telephone numbers throughout the state. Once assigned a central office code, the applicant assumes control over the assignment and administration of the entire 10,000 numbers within the assigned code. The Code Administrator is not involved in the individual telephone number assignment, NXX-XXXX, for any code holder. Aside from the jeopardy situation described below, no requests by certified CLEC's for NXX codes have been denied in Oklahoma.

II. Jeopardy Plans

15. During the assignment process, a situation described as a "Jeopardy NPA" occasionally occurs. A "Jeopardy NPA" is defined in the *NPA Code Relief Guidelines* as occurring when "...the forecasted and/or actual demand for NXX resources will exceed the known supply during the planning/implementation interval for relief." Using historical CO code growth data as well as reasonable projections of future CO code requirements, the CO Code Administrator determines when a jeopardy condition exists. Once a jeopardy is declared the Code Administrator notifies the appropriate regulatory authority that the NPA is in jeopardy and that special conservation procedures will be invoked. In addition, the Code Administrator notifies the North American Numbering Plan Administrator (NANPA) of the jeopardy situation and NANPA issues a Planning Letter to all affected parties.
16. Consistent with the Assignment Guidelines the Code Administrator, along with members of the industry as well as representative(s) from the state Commission staff, develops... "NPA -specific conservation procedures with the affected parties in the jeopardy NPA. The Code Administrator will work with the affected parties to continually refine the NPA-specific conservation procedures, as necessary, until NPA relief... The Code Administrator will notify the affected parties and applicable regulatory authorities of the NPA-specific conservation procedures as they occur."
17. The jeopardy plan implemented represents a telecommunications industry assignment plan, not a Southwestern Bell or Code Administrator plan. All code requests processed by the Code Administrator are treated equally under the Jeopardy plan developed by the industry.

18. As of December 1, 1997 one Jeopardy Plan has been required in Oklahoma. This jeopardy was in conjunction with the 405 NPA relief effort conducted within the state during 1997. The 405 NPA jeopardy plan began on March 17, 1997. The specific conservation plan used during this jeopardy plan was developed consistent with the steps outlined in the Assignment Guidelines. Two industry meetings were held in Oklahoma City to detail the requirements of the jeopardy, review the Assignment Guidelines and the steps outlined for the development of a jeopardy plan and to develop a specific 405 NPA jeopardy plan. Representatives from numerous telecommunications companies, including AT&T, Sprint, Cox Telecommunications as well as representatives from the Oklahoma Corporation Commission staff attended these meetings. Minutes from all meetings were distributed by overnight mail service to the industry. Since the jeopardy plan was implemented, no complaints have been received by the Code Administrator or by the Oklahoma Commerce Commission concerning the plan or its implementation.

III . Establishment of Numbering Guidelines

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. SWBT is an active participant in the NANC. In fact, Mike Bennett, SWBT Director-Regulatory Planning, 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, FCC 96-333, In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, 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 to "...authorize Bellcore and incumbent LEC's to continue performing the number administration functions they performed prior to the enactment of the 1996 ACT." (para 328). The FCC concluded "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 Southwestern Bell Telephone Company is in compliance with this FCC directive and does apply identical standards and procedures when processing Central Office code requests from any industry member.
22. The FCC's NANP Order transfers the number administration functions currently performed by SWBT to a new NANP administrator. A new administrator, Lockheed Martin has been chosen by the F.C.C. A tentative date of January, 1999 for the transition of the Code Administration function from Southwestern Bell has been recommended by Lockheed Martin. Southwestern Bell will continue to perform its Code Administration responsibilities until this transition is complete and will actively

work with Lockheed Martin to facilitate this transfer of Code Administration responsibilities.

23. This concludes my affidavit.

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

Subscribed and sworn to before me this ___ day of _____, 1997.

NOTARY PUBLIC

My commission expires:

TABLE OF CONTENTS

	<u>PAGE</u>
PROFESSIONAL EXPERIENCE	5
PURPOSE OF AFFIDAVIT	6
INTERCONNECTION NEGOTIATIONS	9
IMPLEMENTATION OF THE 1996 ACT	11
COLLOCATION.....	15
A. PHYSICAL COLLOCATION	15
i. Physical Collocation Provisioning.....	15
ii. Physical Collocation Job Intervals.....	17
iii. Current Physical Collocation Status.....	23
iv. Physical Collocation Pricing Policy	26
B. VIRTUAL COLLOCATION	29
ACCESS TO NETWORK ELEMENTS ON AN UNBUNDLED BASIS.....	31
A. General Unbundling Rules	31
B. Intellectual Property Rights of Third Party Vendors	32
C. SWBT's Billing for Shared Transport Services.....	33
WHITE PAGES LISTINGS.....	34
RECIPROCAL COMPENSATION	44
CLEC TRAINING.....	47
CONCLUSION.....	52

INDEX OF SCHEDULES

- Schedule 1** Affidavit of Ricardo Zamora, filed on behalf of Southwestern Bell in support of its April 11, 1997 Application for the Provision of In-Region InterLATA Services in Oklahoma.
- Schedule 2** CLEC Agreements under the Telecommunications Act of 1996
- Schedule 3** Status of Arbitration
- Schedule 4** SBC's Section 251/Checklist Provisioning Status
- Schedule 5** SWBT Basic Physical Collocation Agreement
- Schedule 6** Interconnector's Technical Publication for Physical Collocation
- Schedule 7** CLEC Price Quote (Proprietary)
- Schedule 8** Status of Physical Collocation in Oklahoma (Proprietary)
- Schedule 9** Physical Collocation Checklist
- Schedule 10** Specific CLEC Request (Letter) (Proprietary)
- Schedule 11** Actual Cost Analysis (True-up) for Collocation (Proprietary)
- Schedule 12** CLEC Provision of Service by Purchasing UNEs – Price Comparison
- Schedule 13** Oklahoma City White Pages CLEC Informational Page
- Schedule 14** INP conversion “with Loop”
- Schedule 15** INP conversion “without Loop”

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

In the Matter of

Application of 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. _____

AFFIDAVIT OF MICHAEL C. AUINBAUH
ON BEHALF OF SOUTHWESTERN BELL TELEPHONE COMPANY

STATE OF TEXAS)
)§
COUNTY OF DALLAS)

I, Michael C. Auinbauh, being of lawful age and duly sworn upon my oath, do hereby depose and state as follows:

1. My name is Michael C. Auinbauh. My business address is Four Bell Plaza, 311 S. Akard, Room 1361, Dallas, Texas 75202. My title is Director-Wholesale Marketing/Regulatory Support for SBC Telecommunications, Inc. SBC Telecommunications Inc. is a first tier subsidiary of SBC, whose primary function is to provide management services to SBC's local telephone operating companies, Nevada Bell, Pacific Bell Telephone, and Southwestern Bell Telephone Co.

(hereinafter SWBT). My current responsibilities include representing SWBT wholesale marketing positions to regulatory bodies and other external stakeholders. The wholesale marketing group's primary responsibilities are to develop wholesale marketing opportunities for SWBT, to negotiate local interconnection agreements with Competitive Local Exchange Carriers (hereinafter CLECs), to participate in state arbitration proceedings where agreements cannot be reached on all issues, to comply with the Telecommunications Act of 1996 (hereinafter "the Act" or "FTA") and federal state laws concerning universal service and the implementation of increased local exchange service competition.

PROFESSIONAL EXPERIENCE

2. I began my career with SWBT in 1978. I have served in numerous positions and locations managing various aspects of SWBT's line operations, including supervision of installation and maintenance organizations, customer service bureaus and maintenance bureaus, facility assignment centers, and outside plant maintenance forces. From 1991 to 1996, I managed the Company's transport cost analysis organization that was responsible for developing cost information to support pricing decisions. In this position, I was involved in supporting various aspects of state and federal regulation, including the FCC expanded interconnection and local transport restructure proceedings, as well as Texas PUC proceedings to implement House Bill 2128. These various proceedings began the process of expanding access to SWBT's network to encourage further local exchange service competitive entry. In 1996, I

joined the newly formed Wholesale Marketing organization of SWBT as a Product Manager for unbundled network elements and interconnection. In this position I developed products and unbundled element offerings to comply with the Telecommunications Act of 1996 and related state laws. As a wholesale product manager, I supported and often participated in negotiations with requesting telecommunications carriers. I accepted my current position as Director-Wholesale Marketing/Regulatory Support in October 1997. As Director of the organization, I am responsible for supervising and participating in most of the decisions relating to the activities of the wholesale marketing/regulatory support group, while coordinating subject matter experts in other SWBT departments with interconnection/regulatory and legal compliance responsibilities.

PURPOSE OF AFFIDAVIT

3. The Act provides three methods by which telecommunications carriers may enter the local market. First, Section 251(c)(2) requires Incumbent Local Exchange Carriers (ILECs) to provide facilities-based competitors with non-discriminatory interconnection to the ILECs network "at any technically feasible point," and on terms that are "just and reasonable." Thus a CLEC that wishes to construct its own telecommunications network is assured its customers will be able to call and be called by users of the ILEC's network.
4. Second, Section 251(c)(4) enables new entrants to purchase finished telecommunications services from the ILEC and then resell those services to its

customers in competition with the ILEC. And third, Section 251(c)(3) gives new entrants access to network elements on an "unbundled basis" and permits the new entrant to "combine such elements in order to provide...telecommunications service." Thus, carriers are entitled to lease some or all of the individual elements of the ILEC's network, and combine them together or with other facilities which they lease or own, for the provision of service to end users. Such access to network elements allows the new entrant to compete with the ILEC on a facility basis without the requirement to build-out their own network.

5. My affidavit, together with the affidavits of other SWBT witnesses, demonstrates that SWBT's local exchange service markets are open to competition, and that all of the items specified in the "Competitive Checklist" of Section 271(c)(2)(B) are either currently being furnished or are available to any requesting carrier. As a result of our efforts, CLECs seeking to provide service to local exchange service customers have access to the SWBT network and interconnection facilities necessary to make such service available in a timely and efficient manner on nondiscriminatory terms and at just and reasonable rates.
6. My affidavit will show that SWBT has engaged in negotiations with all CLECs who have requested to provide local exchange service in SWBT's five-state territory. I will demonstrate that CLECs seeking to interconnect with SWBT's network may do so through physical or virtual collocation arrangements, and that SWBT makes those arrangements available on rates, terms and conditions that are just, reasonable and non-discriminatory. My affidavit will also show that SWBT provides for the

inclusion of CLEC directory listings in the appropriate SWBT White Pages directories. I will also discuss SWBT's provision of Interim Number Portability (INP) and the process by which SWBT undertakes to comply with CLEC requests for conversion of customers from SWBT to CLEC service. My affidavit will show that SWBT has established reciprocal compensation arrangements for the transport and termination of CLEC calls on what are just and reasonable terms and conditions. Finally, my affidavit will explain the training offered by SWBT to CLECs to facilitate their ability to obtain resale, interconnection, and network elements from SWBT.

INTERCONNECTION NEGOTIATIONS

7. SWBT has dedicated itself and devoted substantial time and resources to fulfilling its duties under the Act to negotiate the terms and conditions of interconnection agreements, and to providing any requesting carrier non-discriminatory interconnection, unbundled access to network elements and resale on terms and conditions that are just and reasonable. A copy of the Affidavit of Ricardo Zamora, filed on behalf of Southwestern Bell in support of its April 11, 1997 Application for the Provision on In-Region InterLATA Services in Oklahoma, is attached as Schedule 1 to my affidavit. Mr. Zamora's affidavit details SWBT's efforts to meet the needs of CLECs in the negotiating process, while also meeting the statutory requirements for the provision of access and interconnection as quickly, thoroughly and effectively as possible. I adopt his testimony as my own. SWBT has continued to devote enormous time and resources negotiating and arbitrating interconnection with requesting carriers.
8. As of February 12, 1998 SWBT had negotiated 222 interconnection and resale agreements with different CLECs in its five-state region. The state commissions have approved 170 of those agreements, and CLECs currently are providing competitive local exchange service to end-users in the state of Oklahoma. Fifty-two additional agreements have been filed with state commissions, and are pending approval. A current list of signed CLEC agreements is attached to my affidavit as Schedule 2. The status of competition in Oklahoma is discussed in the affidavits of Charles Cleek and George Elizondo.

9. SWBT and CLECs have been able to agree upon mutually acceptable language and prices in the vast majority of negotiations. In the five state region, a total of 15 carriers had filed 27 petitions with state commissions for compulsory arbitration in accordance with the provisions of section 252. Seven (7) of these petitions were withdrawn when SWBT and the CLEC were able to resolve their differences while the request was pending. One arbitration proceeding is pending before the Texas Public Utility Commission. There are no pending arbitrations in Oklahoma.
10. Nineteen (19) arbitrations have been completed and SWBT and the CLECs in those cases subsequently have entered into 14 signed agreements pursuant to the arbitration awards. Twelve of these agreements are final, and not subject to appeal. Of the two agreements currently on appeal, SWBT has appealed one agreement, and a CLEC has appealed one agreement. SWBT is currently negotiating agreements pursuant to arbitration awards in Arkansas, Kansas, Missouri and Texas. A chart outlining the status of arbitrations in Oklahoma is attached as Schedule 3 to my affidavit. The status of arbitrations in Oklahoma also is discussed in the affidavit of Charles Cleek.
11. Although SWBT has not been able to resolve every negotiation difference with every CLEC, SWBT's record in meeting CLEC requests has been outstanding. SWBT's willingness to address the concerns of those CLECs, and the time and effort it has devoted to compliance with its statutory requirements is reflected in the large number of interconnection agreements which have been negotiated, signed and implemented in Oklahoma and other states.

IMPLEMENTATION OF THE 1996 ACT

12. From February 8, 1996 through year-end 1997, SBC's expenditures in its seven-state operating region on implementing the major provisions of the Act -- including but not limited to the equipment, computer hardware and software, and manpower necessary to implement the significant projects discussed below -- total almost \$1 billion. Expenditures on long term number portability alone are approximately \$345 million. By the end of 1998, SBC estimates that it will have spent \$1.5 billion in making certain that it meets the requirements of the Act.
13. The extensive efforts undertaken by SBC to implement the requirements of the Act are discussed in detail in the various affidavits accompanying this application. Among other things, the Act has required and will continue to require significant expenditures by SBC in order to implement the following:
- **Tandem Trunking (Deere Affidavit):** Significant changes to SWBT's trunking network have been made in order to accommodate the change in traffic flows as CLECs enter the local marketplace. In SWBT's five-state region, expenditures for this item through year-end 1997 total approximately \$7.1 million.
 - **Development of OSS Capabilities (Ham Affidavit):** Development and implementation of multiple electronic interfaces for the purpose of enabling CLECs to obtain access to SWBT's Operations Support Systems (OSS) for pre-ordering, ordering, provisioning, maintenance and repair and billing of interconnection facilities, unbundled network elements and resale. SWBT's expenditures on OSS implementation through 1997 are in excess of \$25 million.

- **AcceSS7 Implementation (Deere Affidavit):** AcceSS7 is a modular system consisting of a processor, measurement and communications hardware, together with operating and applications software. It is required in order to enable SWBT to capture the information necessary to measure the various components required for billing unbundled network elements. The basic product for AcceSS7 is the HP AcceSS7 signaling monitoring system. SWBT has expended approximately \$44.5 million on implementing AcceSS7.
- **Originating Line Number Screening (OLNS) and Branding Feature, External Rating System and Direct Access Implementation (Keener Affidavit).** The following hardware and software enhancements allow SWBT to provide CLECs with the capability to brand and rate operator services and directory assistance calls with CLEC - specific information based on originating line number, and to provide direct access to SWBT's Directory Assistance database. Through December 31, 1997, SWBT has expended approximately \$18.3 million on OLNS implementation including the following separate projects.
 - a) OLNS/Branding - The Intelligent Service Node Branding Service application enables SWBT to provide a unique Branding announcement based on the Operating Company Number (OCN) or Preferred Inter/IntraLATA Carrier information as obtained via an OLNS database query. This means all CLEC Operator Services calls can be branded with the CLEC's name.

- b) Direct Access - This service application allows a CLEC's operator the ability to obtain subscriber listings in SWBT's Directory Assistance database for the purpose of providing voice Directory Assistance to the CLEC's end user. The database accessed is the same database used by SWBT operators.
- c) External Rating System - This service application was required to allow a CLEC utilizing SWBT's Operator Services (OS) to bill their customers at different rates than SWBT bill its customers for OS. Prior OS technology allowed real time rating to the NXX level only. The External Rating System provides the capability to rate at the line level, so SWBT operators can quote accurate rates for all CLEC OS calls, including resold lines.
- **Long Term Number Portability (Fleming Affidavit):** Implementation of long term number portability is a matter of enormous scope and technical complexity, involving development, modification and deployment of new software and/or hardware by multiple suppliers for every switching and signaling network component within SWBT's network, in addition to the provision of several new network components. Through year end 1997, SBC expended approximately \$345 million on this item alone in its seven-state area.
 - **Local Service Center (LSC)/Local Operations Center (LOC) Operations:** As outlined in the Affidavits of Nancy Lowrance and Linda Kramer, these centers have been established and staffed exclusively to handle the ordering and provisioning of CLEC service orders. SWBT's expense in establishing and staffing these service centers through 1997 is in excess of \$31 million.

- **Other Implementation Projects:** These projects include Customized Routing (\$4.2 million); IntraLATA Dialing Parity (\$23.4 million) and Facility Intraconnection (\$.4 million). In all, exclusive of long term number portability, SBC has expended more than \$223 million on implementing related projects in the five-state SWBT region. California and Nevada account for additional implementation expenditures of more than \$340 million.

14. Attached as Schedule 4 to my affidavit is a table showing SWBT's provision of checklist items to CLECs in Oklahoma, in the SWBT five-state region and in the seven states. Although SBC may employ different systems and procedures to serve CLECs in California and Nevada than in SWBT's five states, and SWBT therefore does not rely on its provision of checklist items in California and Nevada for purposes of this application, the seven-state total numbers are provided to demonstrate the extent to which competition has developed throughout SBC's territory. SWBT's provisioning of individual checklist items is discussed in the various affidavits accompanying this SBC application. It should be noted that quantities shown on Schedule 4 were current as of December 31, 1997. To the extent that quantities referred to by other affiants differ, they may represent more current figures.

COLLOCATION

15. SWBT offers both physical and virtual collocation to CLECs as one means of connecting the facilities and equipment of the two companies, as well as a means of providing access to network elements on an unbundled basis. Mr. Deere's affidavit addresses these interconnection arrangements in greater detail. (STC Sec. II.B.2 and Appendix NIM; ACS, Brooks and USLD Appendix NIM; Cox and Interprise Appendix Physical Collocation; AT&T and Dobson Appendix Collocation)
16. This section of my affidavit will discuss SWBT's processes and procedures for provisioning physical and virtual collocation to CLECs on rates, terms, and conditions that are just, reasonable, and nondiscriminatory, under subsection 251(c)(6) of the Act. Physical collocation for interconnection and access to unbundled network elements is provided as detailed herein. Virtual collocation for these purposes is provided under the rates, terms and conditions of SWBT Tariff FCC No. 73. I will discuss the current status of collocation in Oklahoma, the efforts undertaken by SWBT to provide collocation in Oklahoma, and the pricing policies of collocation in the state.

A. PHYSICAL COLLOCATION

i. Physical Collocation Provisioning

17. SWBT provides physical collocation to requesting CLECs on a first-come, first-served basis, under the same terms and conditions available to similarly situated CLECs at the time of such request.

18. All requesting collocators are provided with a copy of SWBT's basic physical collocation agreement and Interconnector's Technical Publication for Physical Collocation. These documents contain specific requirements for physical collocation, including such details as insurance requirements, equipment standards, billing and liability details, procedures and intervals for quotes and other activities throughout the application process, and other information necessary to complete the construction of a collocation arrangement. Copies of the most current versions of these documents are attached to my affidavit. The basic physical collocation agreement is attached as Schedule 5 and the technical publication is attached as Schedule 6.

19. SWBT exceeds its obligations as an incumbent LEC in order to accommodate CLECs' collocation requests. Although not required by the Act and, indeed, specifically not required by the FCC's rules (47 C.F.R. §51.323(c)), where space exists SWBT also permits CLECs to locate remote switch modules (RSMs) within their physical collocation spaces in SWBT central offices for use in connection with interconnection to SWBT and access to UNEs. That placement is subject to the same terms and conditions as any physically collocated telecommunications equipment and other mutually agreeable terms and conditions that address the unique technical and operational requirements of RSMs (*e.g.*, grounding, power, trunking to host). As revealed by their actions, CLECs find SWBT's willingness to accommodate RSMs beneficial and, to date, have placed three (3) RSMs in three (3) SWBT central offices in Oklahoma.