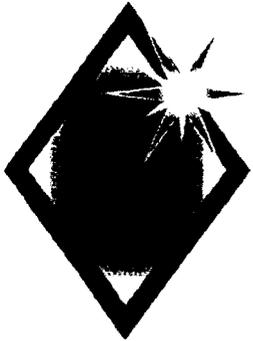


Unbundled Elements

PROVISIONING:

- ◆ **Service Request can be a conversion**
 - ◆ **May or may not require a dispatch if UNE loop**
- ◆ **Service can be new service**
 - ◆ **Normally will require a dispatch if UNE loop**
- ◆ **Service can be a project**
 - ◆ **Eight loops or more**
 - ◆ **After normal business hours (8:00AM - 5:00 PM)**
Monday through Friday

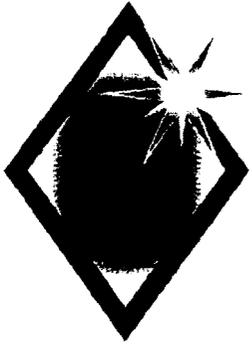


Unbundled Elements

PROVISIONING:

Projects Require:

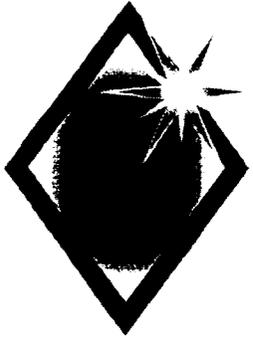
- ◆ **Resource Firm Order Confirmation (FOC) by the LSC**
 - ◆ **Call to the Market Area**
 - ◆ **Call to the LOC**
- ◆ **Coordination call from LOC to CLEC and Market Areas prior to cutover to identify personnel and confirm cutover**
- ◆ **LOC coordinates cutover between all entities**



INTERCONNECTION

CLEC ACCESS TO SWB's NETWORK:

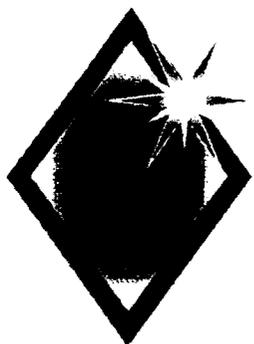
- ◆ ***CLEC is Customer of Record***
- ◆ ***J type circuits at the DS1 level***
- ◆ ***J/K type circuits at the DS3 and STS levels***
- ◆ ***CLEC controls the facility channel assignments***



INTERCONNECTION

SWB ACCESS TO CLEC's NETWORK:

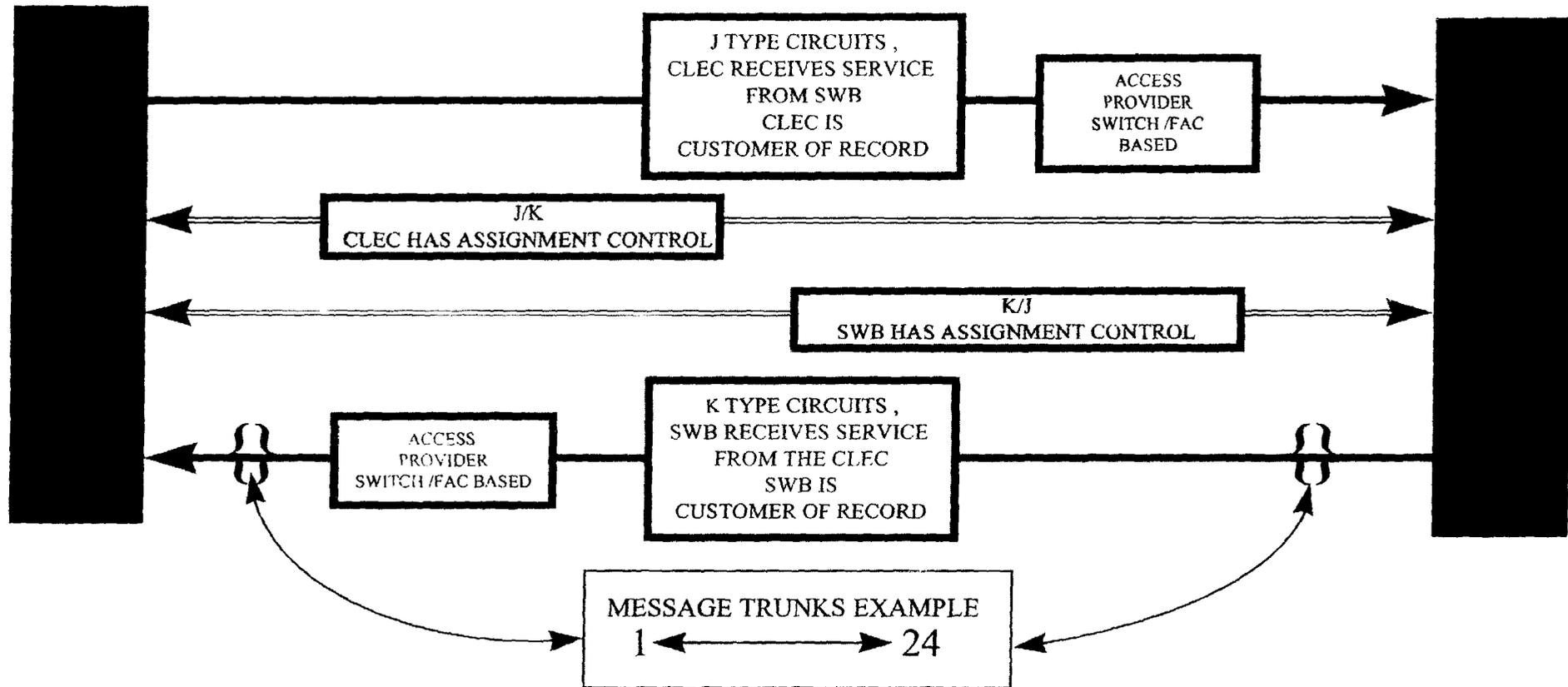
- ◆ ***SWB is Customer of Record***
- ◆ ***K type circuits at the T1 or DS1 level***
- ◆ ***K/J type circuits at the DS3 and STS level***
- ◆ ***SWB controls the facility channel assignments***



INTERCONNECTION

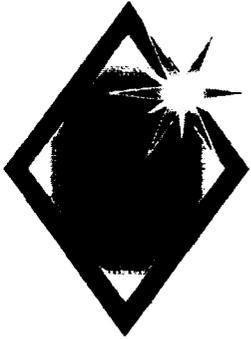
ASSIGNMENT CONTROL:

- ◆ **CLEC orders have MCN's and route to the LOC**
- ◆ **The LOC is currently the Overall Control Office (OCO) on J and J/K CKTS**
- ◆ **Effective 8/23/97 the LOC will be OCO for K and K/J type CKTS**
- ◆ **Effective 8/23/97 the LOC will be OCO for CLEC Message Trunks**



- 1} J/K TYPE CIRCUITS THE CLEC HAS ASSIGNMENT CONTROL
- 2} K/J TYPE CIRCUITS SWB HAS ASSIGNMENT CONTROL
- 3} SECLOC IS THE ACCESS PROVIDERS 1ST POINT OF SWITCHING IT APPEARS AS THE "Z" LOCATION ON THE WORD DOCUMENT
- 4} ON 'K' CIRCUITS THE LSC SENDS AN LSR AND RECEIVES A FIRM ORDER CONFIRMATION 'FOC' FROM THE CLEC
- 5} ON 'J' CIRCUITS THE CLEC SENDS AN LSR TO THE LSC AND THE LSC SENDS A FOC TO THE CLEC

INTERCONNECT DRAWING

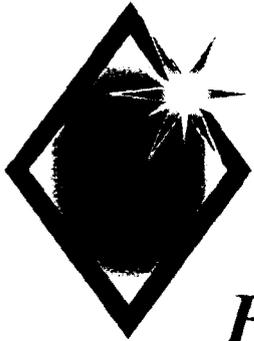


INTERCONNECTION

FACILITY TYPES:

DS3 Transports:

- ◆ **Sonet Facilities**
- ◆ **Switch to POP**
- ◆ **Switch to Facilities**
- ◆ **Collocate and Virtual Collocate**



INTERCONNECTION

FACILITY TYPES:

DS1 - Transports:

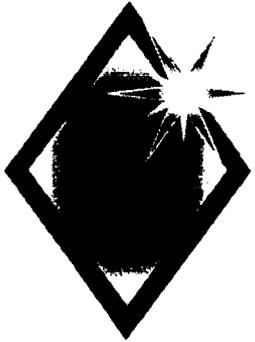
- ◆ **Sonet Facilities**
- ◆ **Copper Facilities**
- ◆ **Channelized DS3**

DS1 - Configurations:

- ◆ **Collocate and Virtual Collocate**
- ◆ **Switch to Pop**
- ◆ **Switch to Facilities**

DS0 Transport

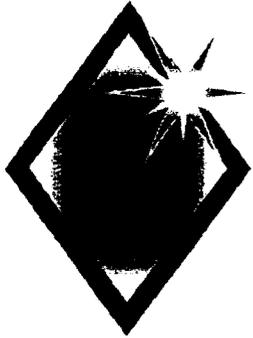
- ◆ **Message Trunks**



INTERCONNECTION LOC RESPONSIBILITIES

PROVISIONING:

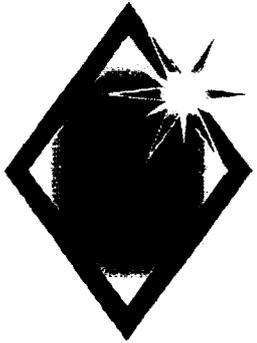
- ◆ **Test and turn-up facilities between SWB and CLEC's / with test access**
- ◆ **Coordinate turn-up of facilities between SWB and CLEC's / no test access**
- ◆ **Coordinate preservice message trunk turn-up**
- ◆ **Track company jeopardies and misses**
- ◆ **Post completions as appropriate**
- ◆ **Publish Market Area results**



INTERCONNECTION LOC RESPONSIBILITIES

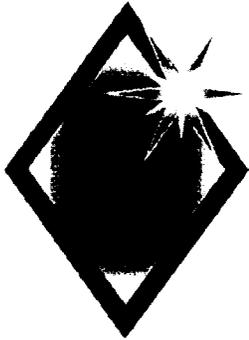
MAINTENANCE:

- ◆ **Serve as the maintenance SPOC for CLEC's**
- ◆ **Sectionalize trouble on facilities**
- ◆ **Coordinate trouble sectionalization on facilities when remote test access is not available**
- ◆ **Coordinate trouble sectionalization on Message Trunks**
- ◆ **Publish Market Area Results**



ESCALATION LIST

LOC INTERCONNECT	MARK BELSER	817 212 4900
LOC SPECIALS-INP/LNP	VACANT	817 212 4888
LOC POTS-RESALE MTCE	CATHY GREGG	817 212 5300
LOC POTS-RESALE PROV	SHARON HUTCHISON	817 212 5202
LOC RESOLD SPCL & UNE	FRANKIE BRAZOS	817 212 5400
AREA MGR-LOC	CANDY CONWAY	817 212 5500
AREA MGR-SPEC. SERVICES	DANNY HILTON	817 212 5100
AREA MGR-SPEC. SERVICES	RENE' MILLER	817 212 4700
DIR. INTER-IND. OPRS	LINDA KRAMER	817 871 1500



CONTACT NUMBERS

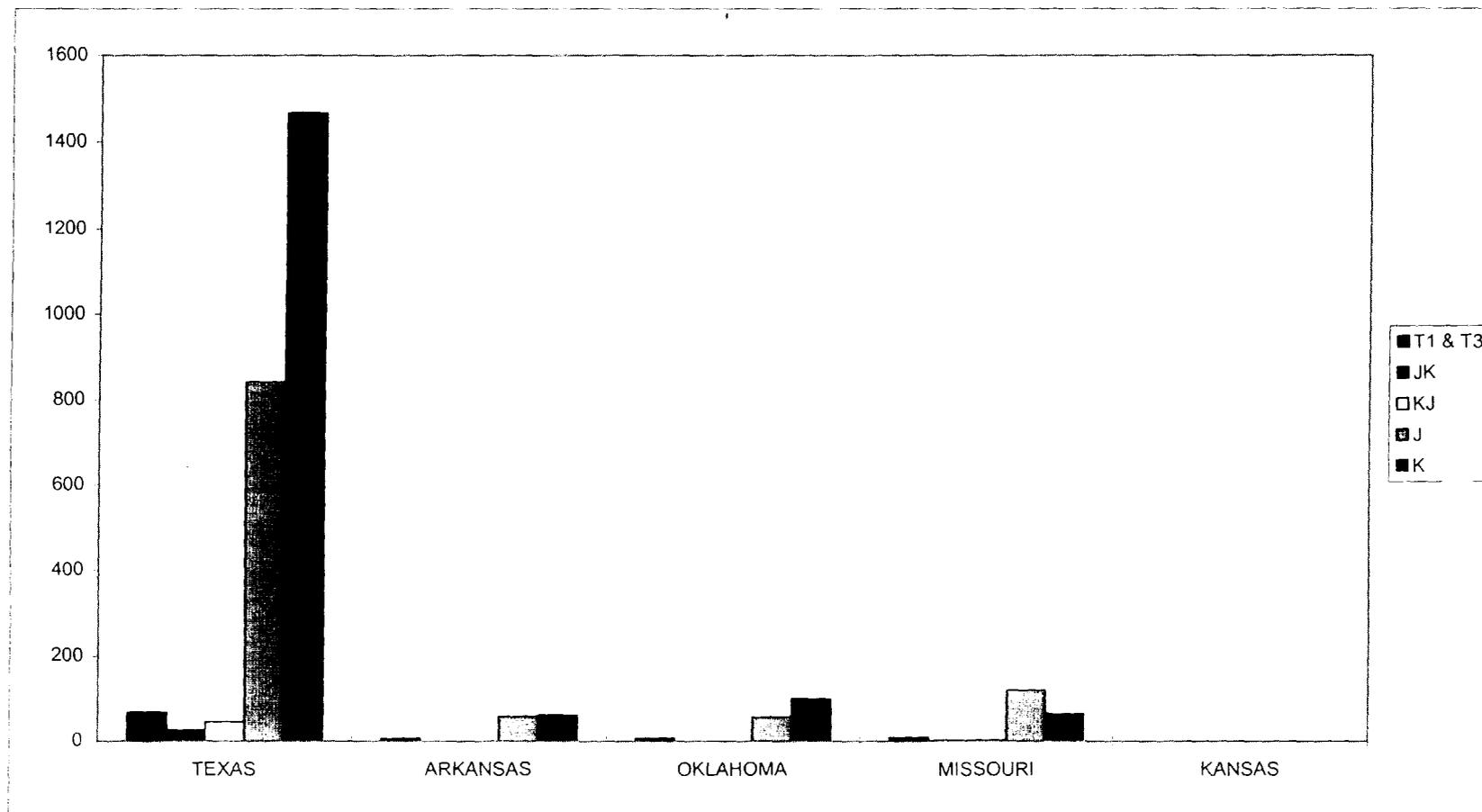
Trouble Report / Status Line
800-220-4818

Provisioning, Turn-up & Testing

Resale Specials	817-212-5584
Unbundled Loops	817-212-5584
Interconnect	817-212-5588

INTERCONNECTION CARRIER CIRCUITS (As of 12-28-97)

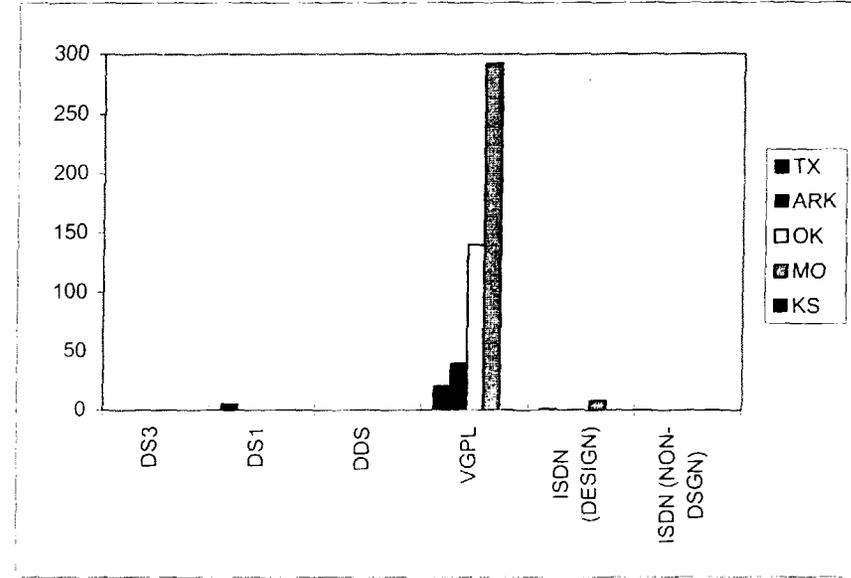
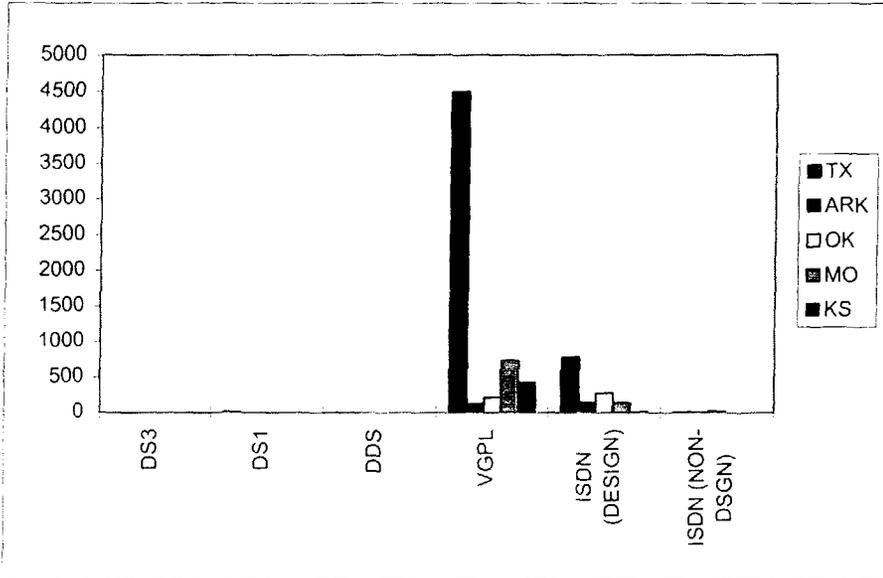
Attachment 4



	TEXAS	ARKANSAS	OKLAHOMA	MISSOURI	KANSAS
T1 & T3	67	6	7	8	0
JK	26	0	0	2	0
KJ	45	0	0	3	0
J	842	58	56	120	0
K	1468	61	100	64	0

SPECIALS - RESALE and UNE As of 12/31/97

Attachment 5



RESALE

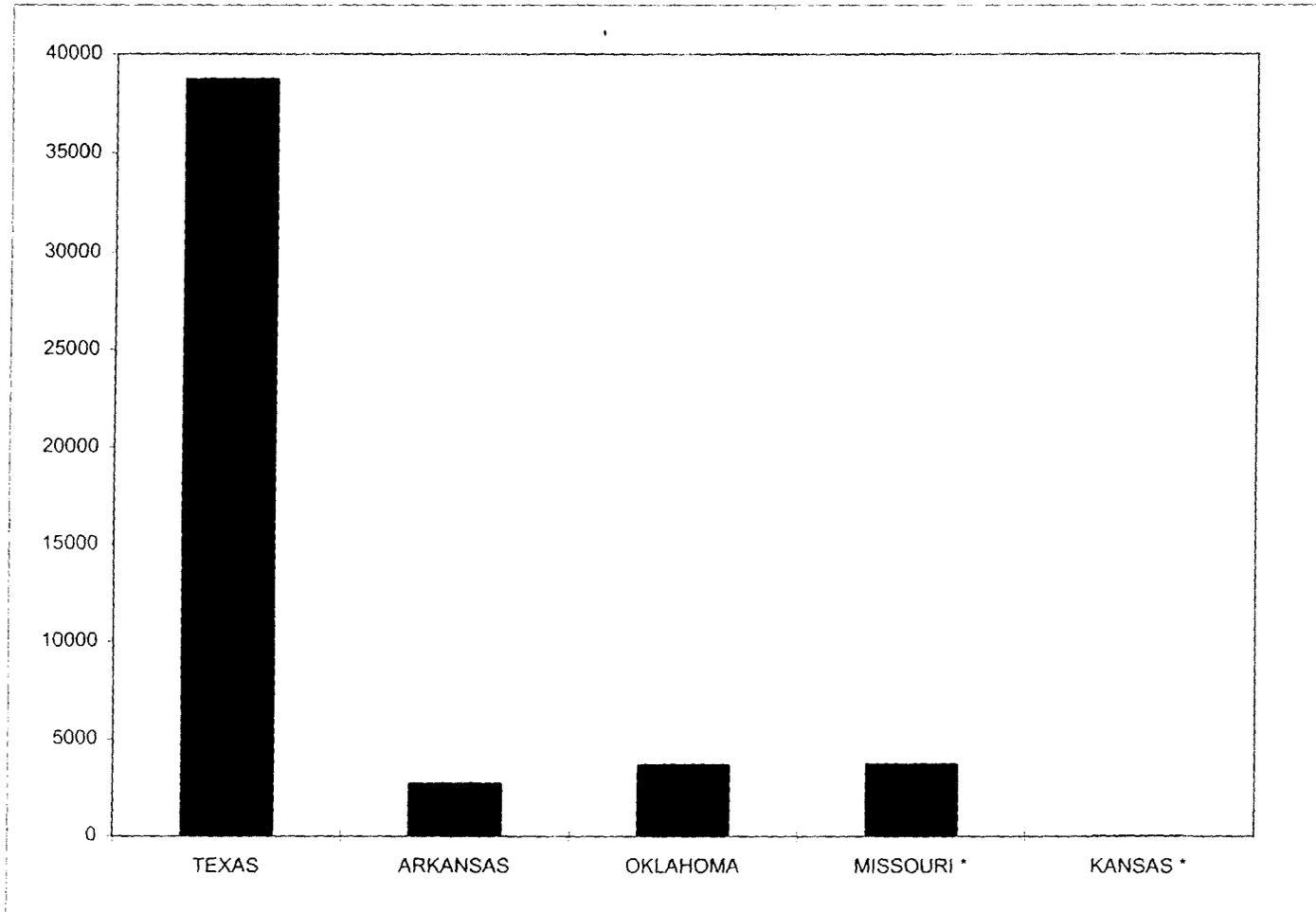
	TX	ARK	OK	MO	KS
DS3	0	0	0	0	0
DS1	8	0	0	0	0
DDS	5	0	0	2	1
VGPL	4501	121	212	733	430
ISDN (DESIGN)	775	145	274	137	7
ISDN (NON-DSGN)	15	10	28	0	0

UNE

	TX	ARK	OK	MO	KS
DS3	0	0	0	0	0
DS1	5	0	0	0	0
DDS	0	0	0	0	0
VGPL	20	40	140	292	0
ISDN (DESIGN)	1	0	0	8	0
ISDN (NON-DSGN)	0	0	0	0	0

MESSAGE TRUNKS
As of 12/31/97

Attachment 6



TEXAS	ARKANSAS	OKLAHOMA	MISSOURI *	KANSAS *
38752	2692	3669	3693	22

LOCAL OPERATIONS CENTERS FORCE MODEL ASSUMPTIONS 1998

UPDATED: 12/7/97

FORCE MODEL ASSUMPTIONS	SOUTHWESTERN	BELL	PACIFIC BELL
RESALE POTS REPORT RATE	4.0%		2.5%
SPECIALS REPORT RATE	2.0%		N / A
'UNE' / LINK REPORT RATE	2.0%		2.5%
INTER. CARRIER REPORT RATE	2.0%		N/A
INTER. MESSAGE REPORT RATE	1.0%		1.5%
CUST. SVCE. REP. / MAINT. ADMIN. (MTC) *2; 3	800 RPTS PER MTH		415 REPTS / MO / MA
COM. TEST TECH. / TEST DESK TECH. (SPCL)	166 RPTS PER MTH		N / A
COM. TEST TECH. / TEST DESK TECH. (UNE)	45 MIN PER RPT		N / A
COM. TEST TECH. / TEST DESK TECH. (CXR)	60MIN PER RPT		N / A
COM. TEST TECH. / TEST DESK TECH. (MSG)	8 MIN PER RPT		N / A
CUST. SVCE. REP. / MAINT. ADMIN. (PROV)	N / A		275 LINKS / MO / MA
COM. TEST TECH. / TEST DESK TECH. (PROV)	25 MIN PER UNE/INP		N / A
COM. TEST TECH. / TEST DESK TECH. (PROV)	25 MIN PER SPCL CKT		N / A
COM. TEST TECH. / TEST DESK TECH. (PROV)	60 MIN PER CXR CKT		N / A
COM. TEST TECH. / TEST DESK TECH. (PROV)	3 MIN PER MSG CKT		N / A
SPAN OF CONTROL *1			
POTS	12 TO 1		12 TO 1
SPECIALS; UNE / LINK; CARRIER; MESSAGE	10 TO 1		N / A
% FLOW THRU	0		0
% MECHANIZATION	17% EOY 98		0
COVERAGE 24 X 7	20% OVERHEAD		20% OVERHEAD
% OVERTIME	0% OBJ		0% OBJ
PRODUCTIVE HOURS PER EMPLOYEE	400 MIN/DAY		400 MIN/DAY
TIME REQUIRED FOR CSRs TO BE QUALIFIED	8 WEEKS		8 WEEKS
TIME REQUIRED FOR CTTs TO BE QUALIFIED	4 MONTHS		4 MONTHS

NOTES:

1. Spans of control will be re-evaluated as the work force matures
2. Effective 1-1-98. SWBT adopting Pac Bell Report Entry Procedures
3. Both LOC's are monitoring and comparing call volumes vs report volumes

Local Operations Center Operational Overview Southwestern Bell

Force Model Assumptions 1998 Customer Service Representatives (CSRs)

	<u>JAN</u>	<u>FEB</u>	<u>MAR</u>	<u>APR</u>	<u>MAY</u>	<u>JUN</u>	<u>JUL</u>	<u>AUG</u>	<u>SEP</u>	<u>OCT</u>	<u>NOV</u>	<u>DEC</u>
# Of Business Days	21	20	22	22	20	22	22	21	21	22	19	22
Total Min / CSR / Day	450	450	450	450	450	450	450	450	450	450	450	450
Productive Min / CSR / Day	400	400	400	400	400	400	400	400	400	400	400	400
% Overtime Adjustment	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Adjusted Productive Min / CSR / Day	400	400	400	400	400	400	400	400	400	400	400	400
Average Report Handle Time	11	11	11	11	11	11	11	11	11	11	11	11
Average Reports / Day / CSR	36	36	36	36	36	36	36	36	36	36	36	36
TOTAL CSRs ON THE PAYROLL	31	35	39	40	44	45	45	45	45	45	46	48
CSRs Req for Analysis	5	5	5	5	5	5	5	5	5	5	5	5
CSRs Req for Tier II Support	1	1	4	4	4	4	4	5	5	5	5	5
TOTAL CSRs REQ FOR ANYL & SUPP	6	6	9	9	9	9	9	10	10	10	10	10
CSRs IN TRAINING	9	13	8	5	5	5	1	0	0	0	1	3
TOTAL CSRs AVAIL FOR CUST RPTS	16	16	22	26	30	31	35	35	35	35	35	35
CSRs Forecasted for RES rpts	7	8	9	9	10	10	9	9	10	10	10	11
CSRs Forecasted for BUS rpts	7	8	8	9	10	11	11	11	11	12	12	12
CSRs Forecasted for SPCL rpts	1	1	1	1	2	2	2	2	2	2	3	3
CSRs Forecasted for CXR/MSG rpts	0	1	1	1	1	1	1	1	1	1	1	1
CSRs Forecasted for COV 7X24	3	3	4	4	4	5	4	4	5	5	5	5
CSRs Forecasted for LNP rpts	4	7	11	11	11	11	11	11	11	11	11	11
TOTAL CSRs FORECASTED FOR RPTS	22	28	34	35	38	40	38	38	40	41	42	43
LOC RPT CAPACITY PER DAY (Manual)	581	581	799	945	1,090	1,126	1,271	1,271	1,271	1,271	1,271	1,271
LOC RPT CAPACITY PER MO (Manual)	12,206	11,625	17,582	20,779	21,796	24,775	27,972	26,701	26,701	27,972	24,158	27,972
Forecasted Lines (Official)	226,174	255,435	284,598	313,967	343,218	372,478	401,740	431,001	460,282	489,523	518,784	548,083
Forecasted Report Rate	5.0%	5.0%	5.0%	5.0%	5.0%	5.0%	4.0%	4.0%	4.0%	4.0%	4.0%	4.0%
Forecasted Reports	11,309	12,772	14,230	15,698	17,161	18,624	16,070	17,240	18,411	19,581	20,751	21,923
Mechanization Factor	9.00%	9.00%	9.00%	11.00%	11.00%	11.00%	13.00%	13.00%	13.00%	17.00%	17.00%	17.00%
Mechanized Reports	1,018	1,149	1,281	1,727	1,888	2,049	2,089	2,241	2,393	3,329	3,528	1,727
TOTAL MANUAL RPTS FORECASTED	10,291	11,622	12,949	13,972	15,273	16,575	13,981	14,999	16,018	16,252	17,224	18,196
% FORECASTED LOAD TO CAP.	84.3%	100.0%	73.6%	67.2%	70.1%	66.9%	50.0%	56.2%	60.0%	58.1%	71.3%	65.1%
Actual/Projected Lines												
Actual/Projected Total RPT Rate												
Actual/Projected Total RPTS												
Actual/Projected Total Mechanized RPTS												
Actual/Projected Total Manual RPTS												
% ACTUAL/PROJ LOAD TO CAP.	0.0%											

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

In the Matter of)
)
Application of SBC Communications, Inc.,)
Southwestern Bell Telephone Company, and) CC Docket No. _____
Southwestern Bell Communications)
Services, Inc., for Provision of In-Region,)
InterLATA Services in Oklahoma)

AFFIDAVIT OF NANCY J. LOWRANCE

I, NANCY J. LOWRANCE, being duly sworn, do hereby depose and state as follows:

1. My name is Nancy J. Lowrance. My business address is 5501 Alliance Gateway Freeway, Ft. Worth, Texas, 76168. I am Director-Alternate Service Providers. In this position, I am responsible for directing the activities associated with daily order activity and billing matters for the competitive local exchange carriers (CLECs).

I. Education and Professional Experience

2. I received a Bachelor of Business Administration degree from Amber University in 1988.
3. I began working for Southwestern Bell Telephone Company (SWB) in 1974. Through the years, I have held various positions managing and directing our Network Operations Department and our Messaging Services and Telecom subsidiaries. In 1996, I assumed my current assignment of Director-Alternate Service Providers.

II. Purpose of Affidavit

4. The purpose of my affidavit is to describe how SWB's Local Service Center (LSC) provides a single point of contact for ordering, provisioning, and billing services to CLECs for interconnection, resold services, and unbundled network elements. I will show that the LSC receives and processes both electronic and manual CLEC service orders on a timely, efficient and nondiscriminatory basis; that LSC order processing capacity exceeds both current and projected demand levels; and that SWB is prepared to expand LSC operations as necessary to meet CLEC demand for service in Oklahoma and throughout the five-state region.

5. As my affidavit will further demonstrate:
 - The LSC processed more than 730,000 service orders for more than 120 different CLECs during 1997. Since the Act passed in February 1996, more than 772,000 orders have been processed.
 - Although order volume increased steadily during most of the year, increases were dramatic during the last quarter. Of the 730,000 orders processed in 1997, referenced above, close to half - 322,000 - were processed between October and December, with more than 130,000 orders processed in December alone.
 - Despite substantial and increasing volume, the LSC handled all orders - including almost 570,000 manual orders - without any backlog.
 - The LSC has established procedures to ensure that all CLECs receive non-discriminatory service that allows them to compete effectively in the local market, regardless of whether

they provide facilities-based or resold service, or whether they choose to place orders on an electronic or manual basis.

- The LSC's procedures and staffing are more than sufficient to accommodate CLEC growth -- both in the number of orders processed, and in the number of CLECs utilizing its services.

6. My affidavit, together with the affidavits of Elizabeth A. Ham and Linda D. Kramer, demonstrates that SWB is in compliance with its obligation under the Telecommunications Act of 1996 and the rules of the Federal Communications Commission to provide nondiscriminatory access to its OSS functions.

III. Organization of the LSC

7. SWB created the LSC in 1995 to provide CLECs with a single point of contact for purposes of ordering, provisioning, and billing and collections related to interconnection facilities, resold services, and unbundled network elements. This affidavit deals only with the five-state SWB region, as SBC utilizes different personnel and facilities to serve its local markets in California and Nevada.

8. Whereas the LSC handles wholesale activities comparable to the retail business office as discussed above, the Local Operations Center (LOC) handles the installation, repair and maintenance functions for wholesale providers. The affidavit of Linda Kramer discusses the operation of the LOC.

9. The LSC began in 1995 with 17 employees in a single location in Dallas, Texas. As of January 1998, the LSC has grown to 735 management and non-management employees with a budgetary need of more than \$29Million. In order to accommodate the growing CLEC market, in 1997 SWB opened a second LSC facility outside Fort Worth, Texas. This facility, which is capable of housing up to 700 employees, was built-out from an existing warehouse shell at a cost of approximately \$5Million. Currently, more than 540 employees work out of the Fort Worth LSC, with another 195 working at the Dallas facility.

10. The LSC has 14 Area Manager groups, which oversee the pre-ordering, ordering, provisioning and servicing functions of the LSC in support of CLEC accounts and serve as SWB's liaison with these CLECs. Ten of these Area Manager groups are composed of both management and non-management employees, including service representatives and communications consultants. Their duties include personnel administration, subordinate development and force management, assistance in negotiations with CLECs, and implementation of CLEC resale and interconnection agreements. The other four Area Managers handle specialized activities such as billing and collection, internal coordination on major projects, contract implementation, and serve as internal points of contact to ensure the LSC works smoothly and efficiently with other SWB organizations.

11. LSC service representatives undergo three months of initial training, as well as extensive continuing training, to handle CLEC orders for interconnection, resold residence and business

services, unbundled network elements, and billing services. Among other things, service representative are trained to perform the following functions:

- receipt of incoming requests for local service from CLECs, including orders for resale, interconnection facilities, unbundled network elements and interim number portability;
- assistance in handling ordering and billing inquiries for these services;
- reviewing manual orders for accuracy and querying CLECs on missing or incorrect information;
- issuance of service orders to establish, change or disconnect service; and
- correction of CLEC-initiated orders which have errored out of OSS.

12. As noted above, the LSC Area Manager groups also include communications consultants. The communications consultant training course is approximately 7 weeks of intensive training involving the intricacies of the telecommunications network. The consultant will learn how to handle requests involving everything from a simple telecommunications trunk conversion to highly complicated switching systems. Some of the responsibilities of the communications consultant are:

- internal coordination on major provisioning projects involving interconnection and unbundled network elements;
- compilation of relevant information to support project coordination;
- serves as a technical resource, both interdepartmentally and for the CLECs;
- negotiation of due dates and telephone number assignments on major projects; and
- assistance to CLECs in preparation of service order requests.

13. The LSC provides ordering and provisioning services to CLECs Monday through Friday from 8:00 a.m. to 5:30 p.m. Central Time. Additional LSC coverage can be negotiated or requested as needed by the CLECs. For example, AT&T requested extended hours on Monday through Friday until 9:00 p.m. and Saturday coverage from 8 a.m.-5 p.m. To accommodate this request, the LSC adjusted work schedules and created different shifts so that the requested coverage could be provided. In addition, the LSC has accommodated requests from CLECs for electronic transaction processing during SWB holidays and stands ready to meet similar requests from CLECs for extended LSC coverage.

IV. Receipt of Orders by the LSC

A. Electronic and Manual Orders Processed through the LSC

14. Through the end of 1997, in the five-state SWB region, the LSC processed more than 770,000 service orders. These orders include the addition of more than 266,000 lines to CLEC service through the provision of resold service. The majority of these lines are converted SWB lines. The LSC has also processed orders resulting in the loss of approximately 14,000 SWB access lines to CLEC service through interim number portability. The LSC has processed CLEC orders for more than 500 unbundled loops, 65,000 one and two-way interconnection trunks, 88 E-911 and 674 Directory and Operator Assistance trunks.

15. To better meet the needs of different CLECs, the LSC is set up to receive CLEC orders for interconnection, resold services, and unbundled network elements in a variety of ways. The choice of ordering method is made totally by the CLEC for its own business reasons.

16. As discussed in the Affidavit of Elizabeth Ham, SWB provides all CLECs the opportunity to utilize five primary electronic interfaces for pre-ordering and ordering/provisioning: Easy Access Sales Environment (EASE), Verigate, DataGate, Electronic Data Interchange (EDI) and Local Service Request Exchange (LEX). All of these electronic interface options provide CLECs with "real time" access on a dial-up or direct connection basis as determined by the individual system selected. For those CLECs who choose not to take advantage of the mechanized interfaces, the LSC will manually process their orders.

17. As of December 31, 1997, 11 CLECs had opted to use SWB's electronic OSS interfaces and 37% of the orders processed in the SWB five-state territory were being transmitted by the CLECs using these electronic interfaces (see Attachment 1). Of the 730,000 total orders processed in SWB's five-state region in 1997, approximately 570,000 were processed on a manual basis and 160,000 were sent by CLECs through SWB's electronic OSS interfaces.

18. For service in Oklahoma, SWB processed 20,400 manual orders submitted by 10 CLECs and more than 2400 electronic orders during 1997.

19. The LSC processed the more than 570,000 manual orders as referenced above with no service backlog. Even though approximately 40% of these orders were processed in the last three months of 1997, SWB was able to live up to its internal commitment of no order backlog.