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James D. Earl
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Friday, November 06, 1998

VIA FED EX

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
1919 M Street, NW Room 222
Washington, DC 20554

Re: Ex Parte Presentation in CC Docket No. 98-147

Dear Ms. Salas:

In its Reply Comments *In the Matter of Deployment of Wireline Services Offering Advanced Telecommunications Capability,* Covad referenced a Letter from Anjali Joshi to Administrative Law Judge Katherine D. Farroba in a proceeding before the Public Utility Commission of Texas (see page 11 and footnote 22).

Covad has been requested to provide the entire letter in order to better illustrate its concerns with SBC/SWBT's announced spectrum management policy and Covad's suggested alternative. Please find the entire letter attached for inclusion in CC Docket No. 98-147.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206(a)(2) of the Commission's rules.

No. of Copies rec'd 0+2
List A B C D E

An additional copy and a self-addressed stamped envelope are also enclosed for a date-stamped return copy.

Sincerely,

James D. Earl

Attachment per above

cc: Larry Strickling
Stagg Newman
Jonathan Askin
Jason Oxman

98 0 : 45

October 12, 1998

Honorable Katherine D. Farroba
Administrative Law Judge
Public Utility Commission of Texas
1701 N. Congress Ave, Suite 7-130
Austin, Texas 78701

RE: Project 16251 – Checklist # 4 Digital Services and Spectrum Management
October 7, 1998 ADSL Meeting

Dear Judge Farroba:

On October 7, 1998, SBC/SWBT sponsored a "technical" meeting to discuss its spectrum management policy. In my view the meeting was focused primarily on operations issues and was not technically productive. Despite earlier promises, SBC/SWBT did not supply technical data supporting its spectrum management policy.

SBC/SWBT's policy and its implications for themselves as well as the CLECs need to be fully understood. Until the technical benefits of this scheme are established for the real operating environment (current loop plant), the implementation details of this policy are irrelevant and should not be discussed. Covad is prepared to meet with both the Texas Public Utility Commission and SBC/SWBT concerning spectrum issues and explain the specific problems with SBC/SWBT's program.

In an effort to start a technical discussion, I have attached a list of reasons why we believe that SBC/SWBT's policy needs to be re-examined.

Respectfully yours,

Anjali Joshi by [illegible]

Anjali Joshi
Director, Network Engineering
Covad Communications Company

cc: Donna Nelson
Nara Srinivasa
Howard Siegel
All parties of record

ATTACHMENT: RESPONSE TO SBC/SWBT POSITION ON ADSL

1. SBC/SWBT has asserted in its presentations that assigning an ADSL loop to a dedicated binder group in the feeder plant will enable it to achieve higher reach for ADSL service. For most ADSL loops, the down link is more likely to limit reach. In the downlink, the interference that causes reach reduction can come from Far End Cross Talk (FEXT) close to the CO and Near End Cross Talk (NEXT) close to the home. Since the effect of NEXT is far more than that of FEXT, downstream reach is limited mainly by near-end cross-talk (NEXT) in the distribution cable. Because distribution cable binder groups cannot be dedicated, many if not most ADSL loops will have interference from non-ADSL data signals. Assigning an ASDL connection to an ADSL-only feeder binder group will therefore not increase the reach.

2. Cross connecting between feeder and distribution cable will require significant additional work by field technicians and will introduce provisioning delays and errors, and increase SBC/SWBT's costs. Also SBC states that in 30 percent of the plant, feeder and distribution cables are directly connected and do not use cross connects. For these cables the proposed scheme cannot be implemented. This further limits the potential benefit of the binder-group management plan.

3. SBC/SWBT plans to divide the feeder cable into multiple sets of binder groups, and limit the services that can be assigned to each group. This reduces the availability of facilities that can satisfy particular service orders, and makes capacity management significantly more complex and suboptimal. Loop capacity will need to be added due to spectrum exhaust in some binders while there may be loops available in other binder groups. Again this will increase SBC/SWBT's costs.

4. The consequence of segregating ADSL in a dedicated binder group will be that the other xDSL (HDSL, SDSL, IDSL) loops will get segregated as well in the other binder groups. Because these are echo cancelled systems, they are their own worst interferers and their reach will be significantly decreased if they all end up in the same binder groups.

Alternate Proposal

The minimal, if any, improvement in reach that SBC/SWBT's plan may achieve does not justify the cost and complexity of the binder-group-management plan. We would therefore like to simplify the feeder-binder-group management plan. Design which binder groups will carry any future AMI T1 signals, if indeed any will be added (instead of using HDSL). Use all other feeder binder groups to provision xDSL services.