

**ATTACHMENTS**

**(49 Pages)**



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December 2, 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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

**EX PARTE PRESENTATION**

Re: *In the Matter of Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity, or in the Alternative, Various Other Relief, NSD File L-98-121*

Dear Ms. Salas:

On December 2, 1998, Daryll Howard, Bill Schindler, Marian Dyer, Mark Keiffer, and the undersigned representing SBC met with Yog Varma and Anna Gomez representing the Common Carrier Bureau to discuss issues in the above referenced docket.

The SBC representatives presented a series of maps that depict the seven SBC states and those cases where LATA's cross state boundaries. In addition, where LATA's cross state boundaries, the maps show the number of access lines in each state and the number of end offices that would require programming to enable intraLATA interstate pre-subscription. The SBC representatives stressed that only enabling these end offices for intraLATA interstate pre-subscription would necessitate a duplicate programming effort when enabling intraLATA intrastate pre-subscription.

Please include this letter in the record of these proceedings in accordance with Section 1.1206(a)(2) of the Commission's Rules.

Acknowledgment and date of receipt of this transmittal are requested. A duplicate transmittal letter is attached for that purpose.

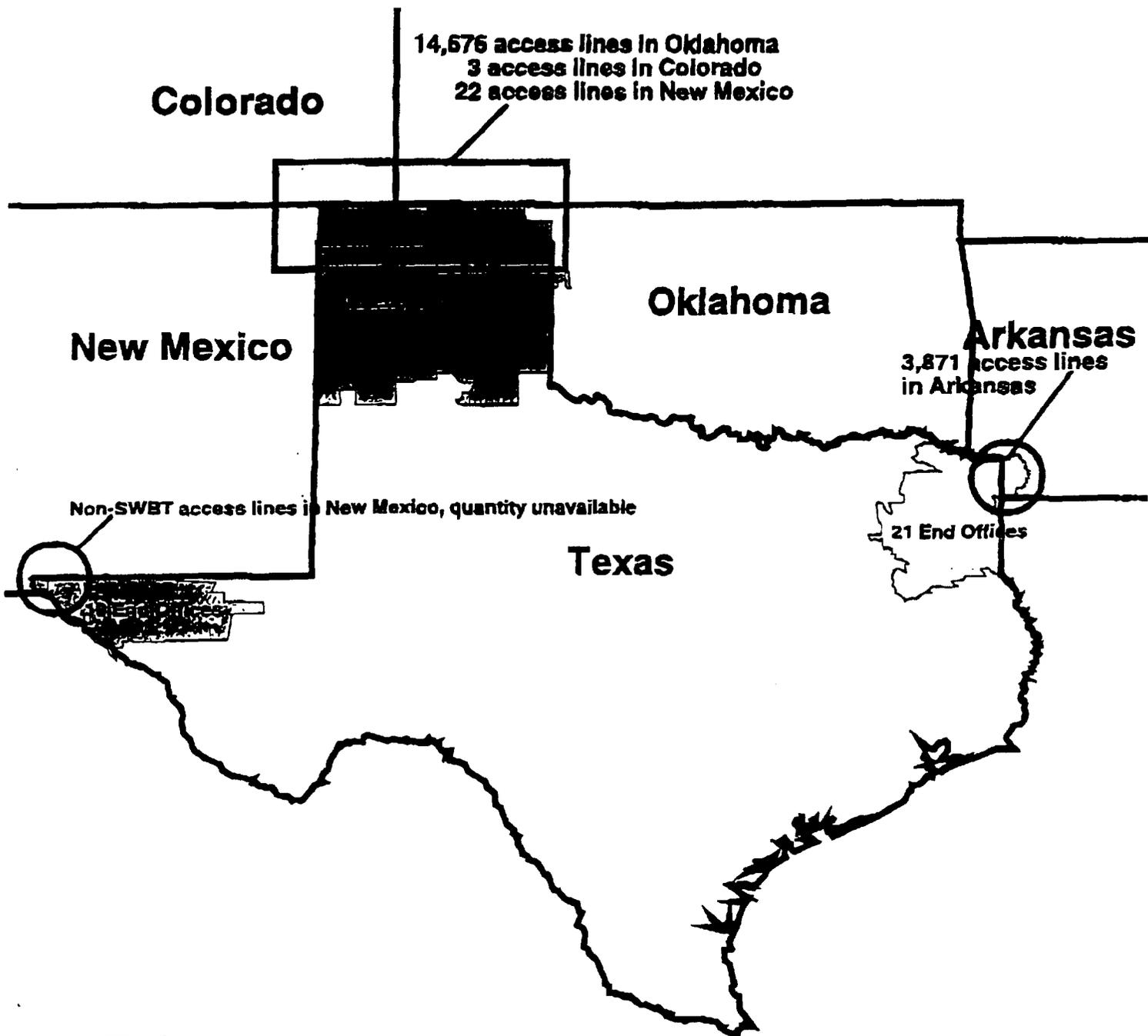
Please contact the undersigned should you have any questions.

Respectfully submitted,

A handwritten signature in cursive script that reads "Lincoln E. Brown".

**Attachments**  
**Cc: Yog Varma**  
**Anna Gomez**

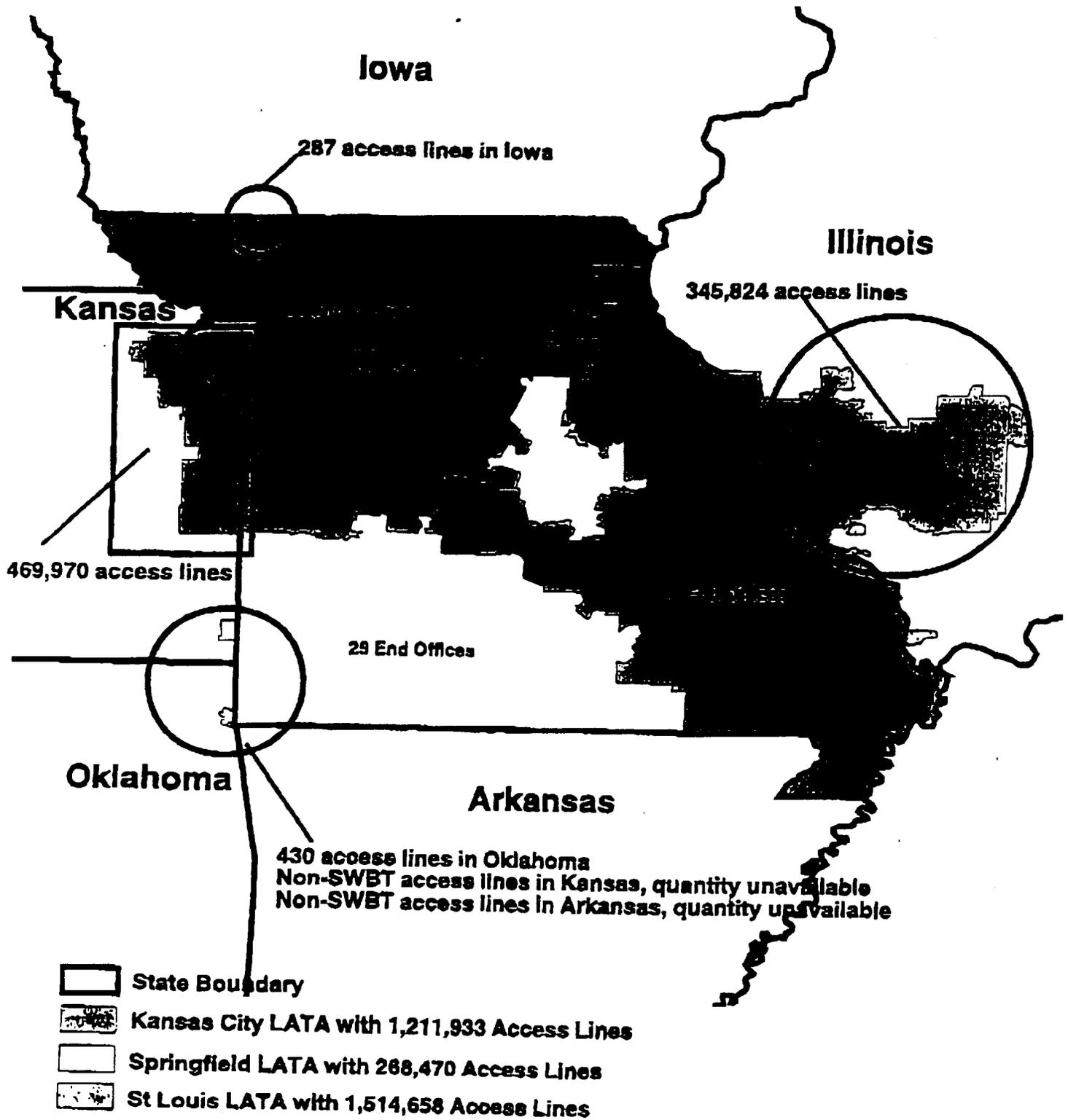
# Texas LATAs 540, 546, 554



-  State Boundary
-  Amarillo LATA with 173,321 Access Lines
-  Longview LATA with 235,130 Access Lines
-  El Paso LATA with 317,497 Access Lines

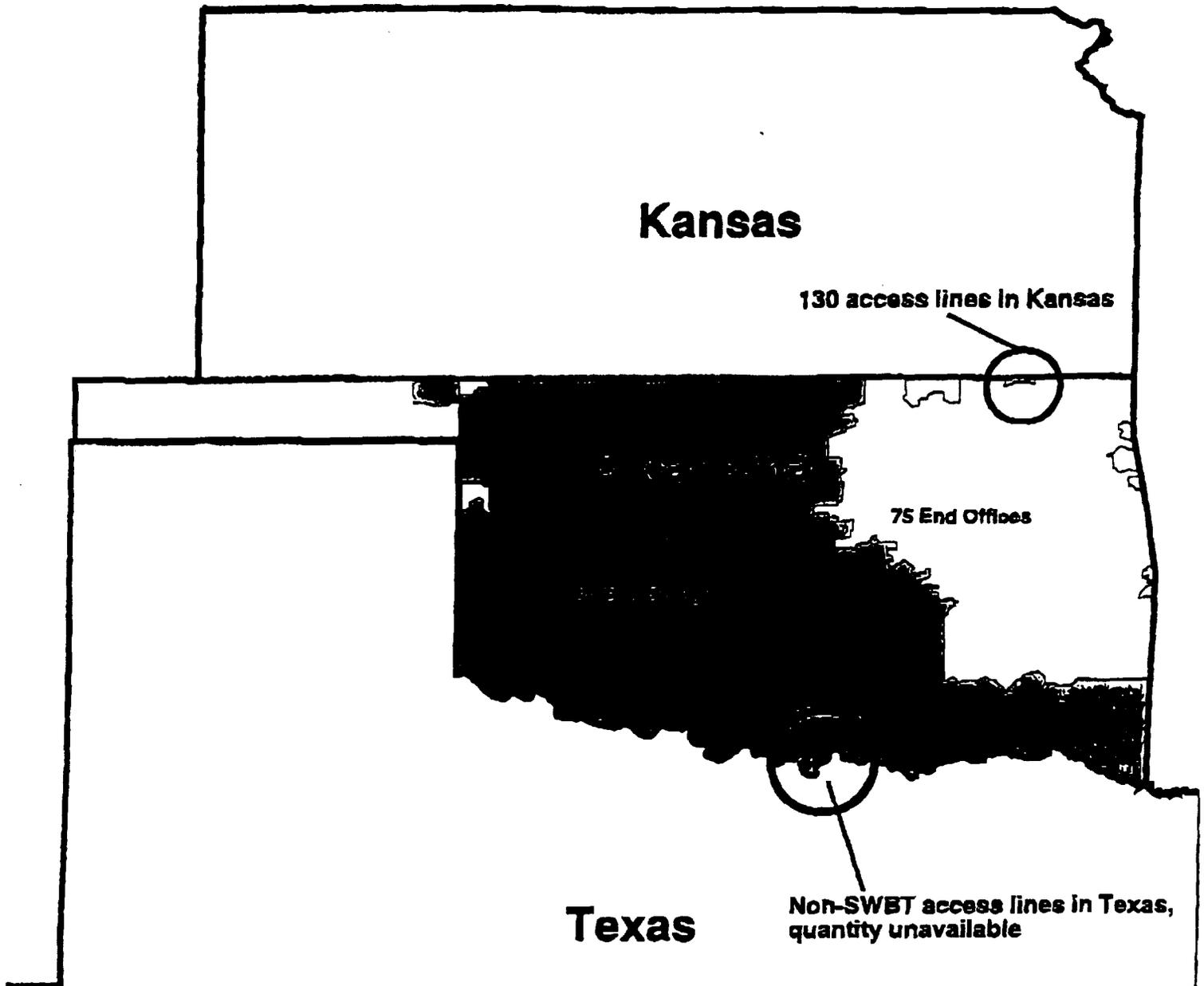
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# Missouri LATAs 522, 520, 524



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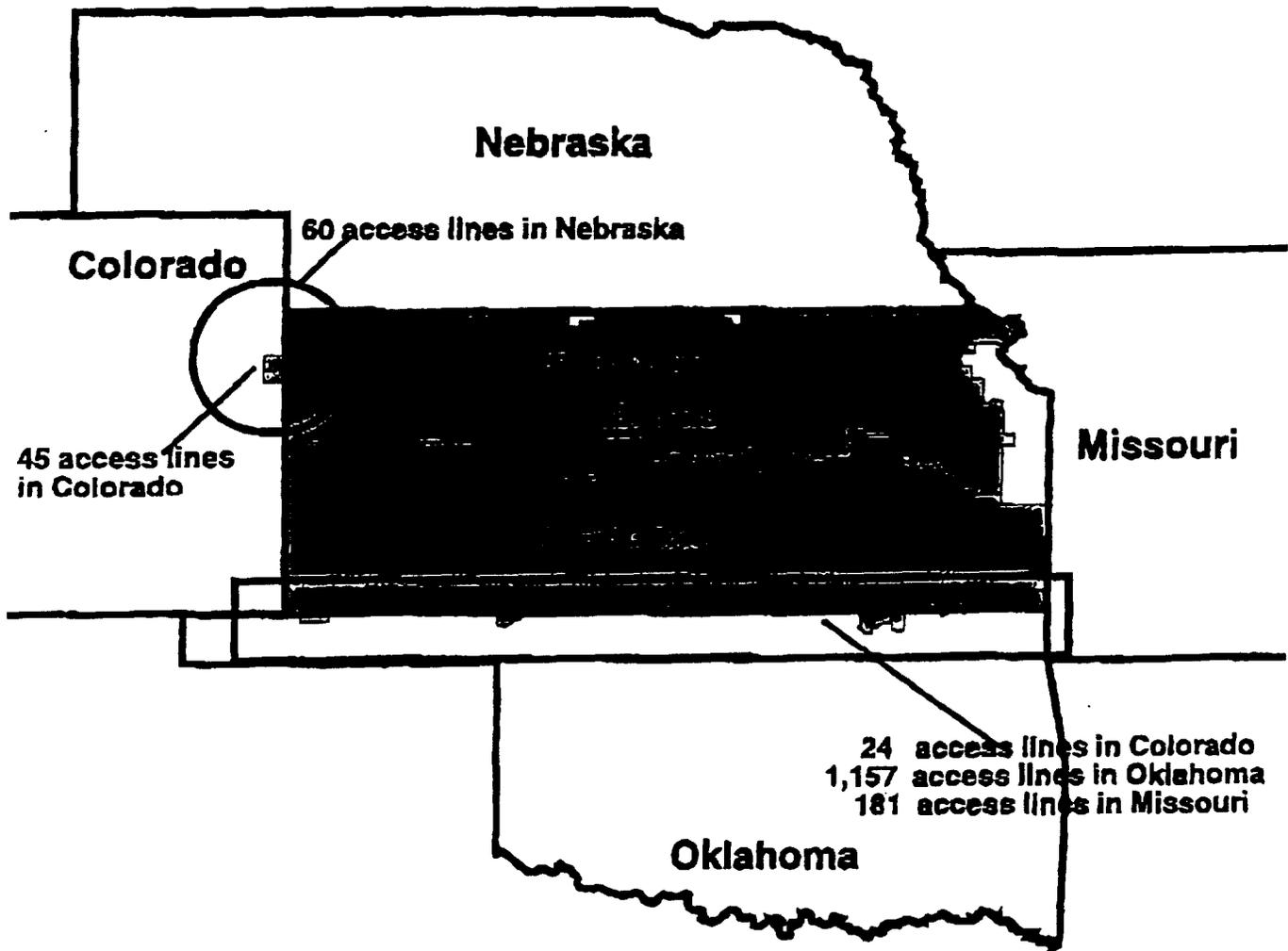
# Oklahoma LATAs 536, 538



-  State Boundary
-  Oklahoma City LATA with 1,033,487 Access Lines
-  Tulsa LATA with 614,845 Access Lines

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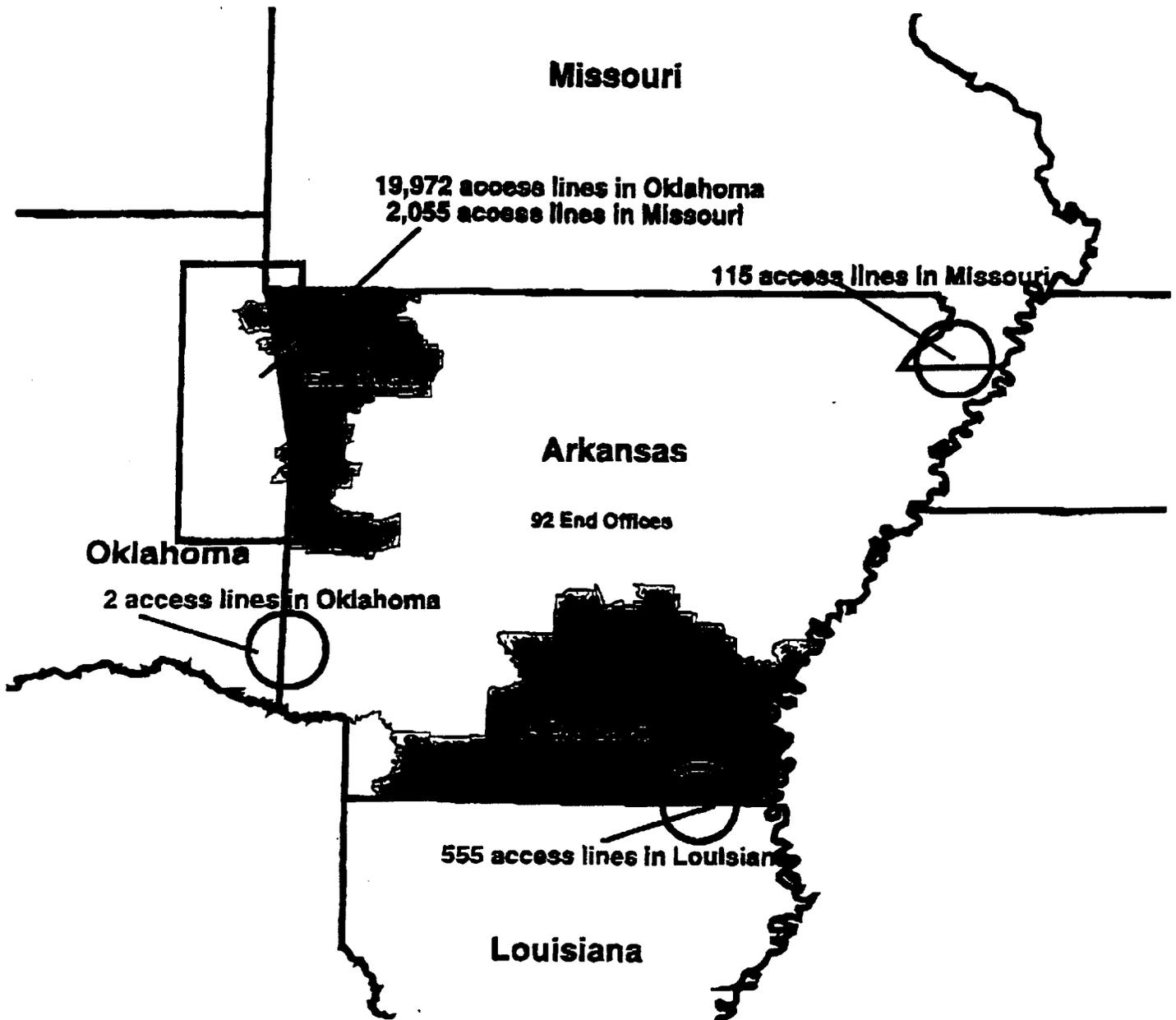
# Kansas LATAs 532, 534



-  State Boundary
-  Wichita LATA with 583,155 Access Lines
-  Topeka LATA with 330,633 Access Lines

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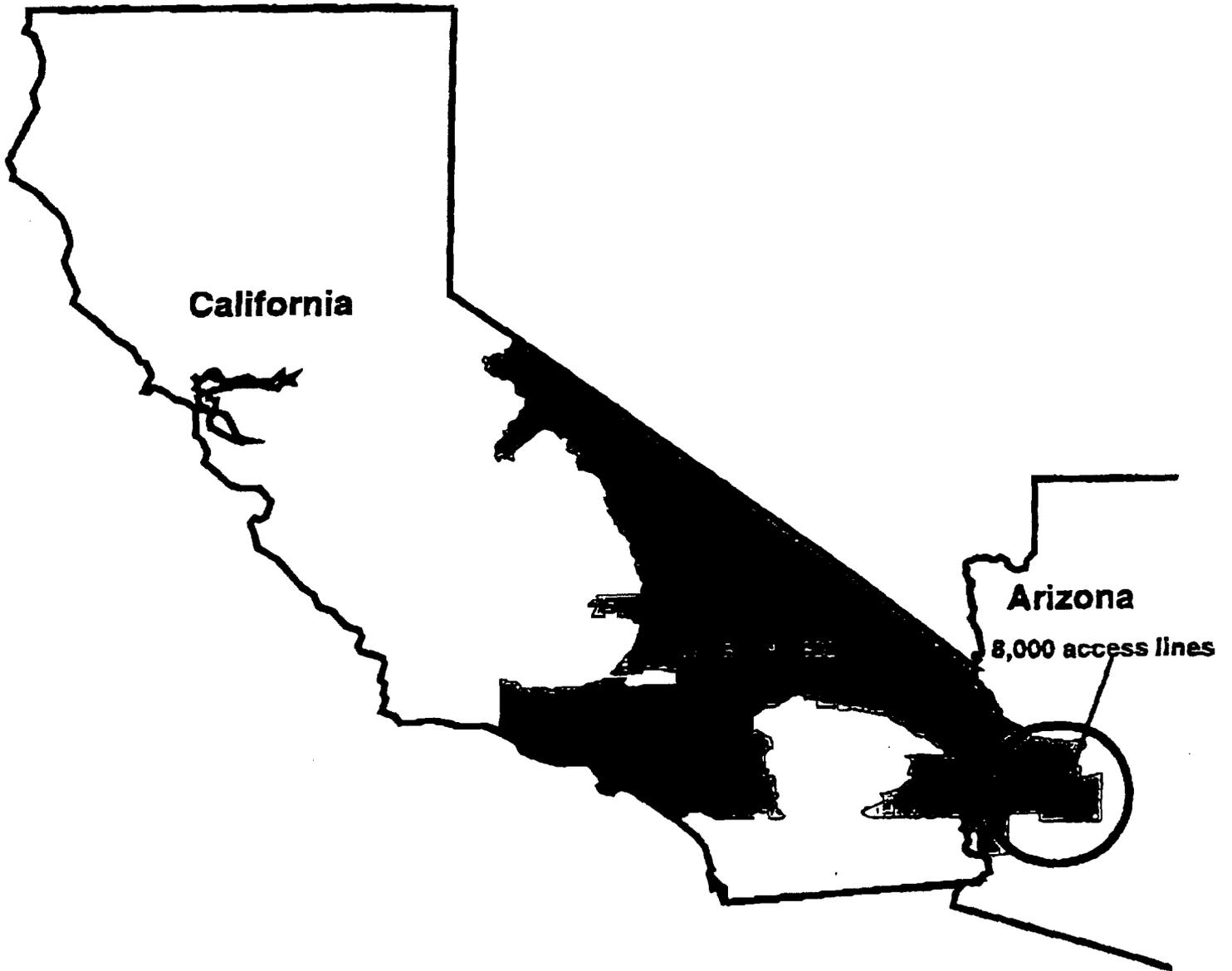
# Arkansas LATAs 526, 528, 530,



-  State Boundary
-  Fort Smith LATA with 209,985 Access Lines
-  Little Rock LATA with 635,204 Access Lines
-  Pine Bluff LATA with 122,284 Access Lines

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# California LATA 730



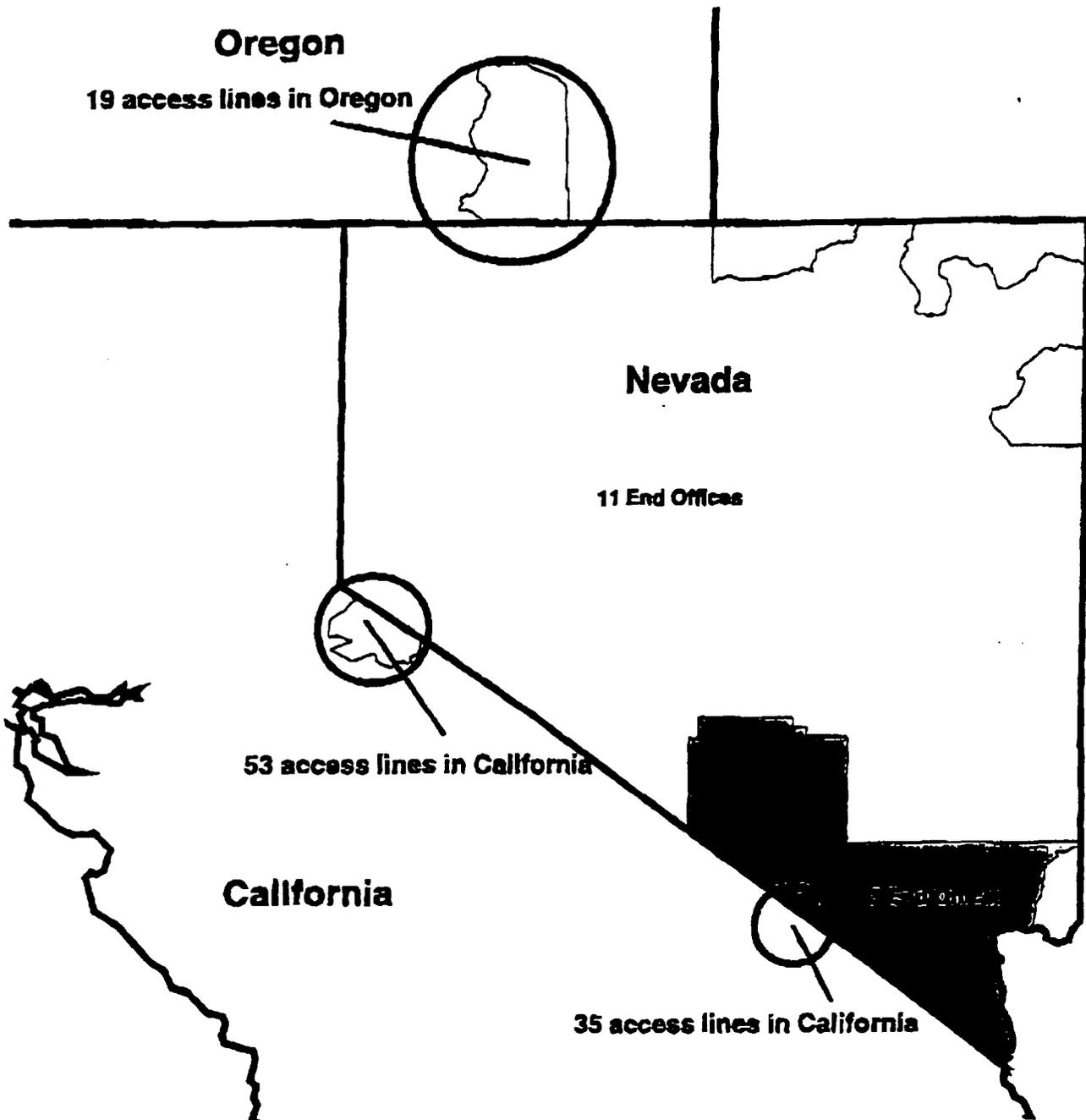
**State Boundary**



**Los Angeles LATA with 6,462,000 Access Lines**

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# Nevada LATAs 720, 721



-  State Boundary
-  Pahrump LATA with 17,000 Access Lines
-  Reno LATA with 321,000 Access Lines

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# **SBC LECs INTERSTATE INTRALATA PRESUBSCRIPTION**

- INTERSTATE INTRALATA TRAFFIC A VERY SMALL PORTION OF TOTAL INTRALATA TRAFFIC
- CO. AVG. 6% OF LINES OUTSIDE PRIMARY STATE - MOST LATAs MUCH LESS THAN 6%

## SUMMARY OF LINES OUTSIDE PRIMARY STATE

LATA Name	# of lines in LATA	# of lines outside primary state	% of lines outside primary state
OKC	1,033,487	-	0.000%
El Paso	317,497	0	0.000%
Little Rock	635,204	117	0.018%
Tulsa	614,845	130	0.021%
Reno	321,000	72	0.022%
Topeka	330,633	105	0.032%
Los Angeles	6,462,000	8,000	0.124%
Springfield	268,470	430	0.160%
Pehrump	17,000	35	0.206%
Wichita	583,155	1,362	0.234%
Pine Bluff	122,284	555	0.454%
Longview	235,130	3,871	1.646%
Amarillo	173,321	14,701	8.482%
Ft. Smith	209,985	22,027	10.490%
St. Louis	1,514,658	345,824	22.832%
Kansas City	1,211,933	469,970	38.779%
Total	14,050,602	867,199	6.17%

**NOTE:** # of lines outside primary state in OKC and El Paso LATAs is unknown



## **CUSTOMER IMPACT IS SEVERE:**

- **14 MILLION ACCESS LINES  
AFFECTED (nearly half of total co. lines)**
- **16 OF SBC LECs 39 LATAS AFFECTED**
- **GEOGRAPHIC/LATA BUBBLES  
DIFFICULT FOR CONSUMERS TO  
UNDERSTAND**

**LATA MAPS WILL BE PROVIDED DURING THIS  
STAGE OF PRESENTATION**

# **REGULATORY OVERLAP WILL CREATE IMPLEMENTATION CONFUSION**

**•CONSUMERS WILL NOT UNDERSTAND  
INTERSTATE INTRALATA AND THEN  
FULL INTRALATA**

- Restricted application of interstate intraLATA**
- Multiple providers of 1+ (even within a LATA  
in the interstate intraLATA situation)**

**REGULATORY OVERLAP WILL  
CREATE IMPLEMENTATION  
CONFUSION**

- ONE FORM OF IMPLEMENTATION ON  
THE HEELS OF ANOTHER
- INCREASES POSSIBILITY OF  
SLAMMING/SLIDING

**IMPACT ON NETWORK AND OSSs  
EXTENSIVE (AND EXPENSIVE)**

- PROGRAMMING AND RE-PROGRAMMING OF 996 SWITCHES
- EXISTING SWITCH LOGIC (FULL PIC2) REMOVED AND SELECTIVE PIC 2 TRANSLATIONS APPLIED
- THEN, SELECTIVE PIC2 REMOVED AND FULL PIC2 APPLIED

## **REQUIRED NETWORK ACTIVITY:**

- **REMOVE AND REPLACE CALL SCREENING INDICATORS FOR TOLL CALL TYPES FROM TRANSLATION TABLES**
  - 34 HOURS PER 5ESS X 2
  - 30 HOURS PER DMS X 2, ETC.
  - **59,707 TOTAL HOURS OF NETWORK PROGRAMMING**

- OSSs PREVIOUSLY DESIGNED TO OPEN DIALING PARITY BY STATE
- OSSs MUST ALLOW PIC2 ON ACCOUNTS BASED ON NPA/NXX AND DETERMINE IF NPA/NXX IS IN 16 AFFECTED LATAs.
- OSSs MUST REJECT PIC2 ORDERS FOR NPA/NXXs IN OTHER 23 LATAs.

**SOME OF THE AFFECTED OSSs AND BILLING SYSTEMS:**

SORD	EASE	CRIS
INEXS	STARWRITER	CESAR
BOSS	VERIGATE	MARCH
APTOS	LEX/LASR	CABS
FACS/SOAC	EDW	

**APP. \$4-8M OF NEW INCREMENTAL  
EXPENSE:**

NETWORK	\$2.8M
SYSTEMS	\$1.0M
NOTIFICATION	
TRAINING	\$1-2M

## **CONFLICTS WITH APPROVED STATE PLANS**

- **APPROVED PLANS (CA, NV & KS, PENDING IN TX), DESIGNED TO COINCIDE WITH INTERLATA RELIEF**
- **LEGISLATION/REGULATION REFLECTS WHAT'S BEST FOR CONSUMERS**
- **LOSE "FLASH-CUT" CAPABILITY**

## **COST RECOVERY**

- **SBC LECs WILL PURSUE COST RECOVERY (SECOND REPORT & ORDER)**