

EX PARTE OR LATE FILED

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

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JUN 28 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Implementation of the Local Competition)
Provisions in the Telecommunications Act)
of 1996)

Petition of Southwestern Bell Telephone Company,)
Pacific Bell, and Nevada Bell for Expedited)
Declaratory Ruling on Interstate IntraLATA)
Dialing Parity or, in the Alternative, Various)
Other Relief)

CC Docket No. 96-98 ✓

File No. NSD L-98-121

**REQUEST FOR LEAVE TO FILE DIALING PARITY PLANS OUT OF TIME AND
REQUEST FOR APPROVAL OF DIALING PARITY PLANS**

Pursuant to Section 1.3 of the Commission's rules, 47 C.F.R. § 1.3, and the
ILP Order,¹ AT&T Corp. ("AT&T") hereby respectfully seeks permission to file the
attached dialing parity plans four business days out of time, and requests that the
Commission approve the attached plans in their entirety.

The Commission's ILP Order directed LECs that did not have a previously
approved dialing parity plan for a particular state to file such plans with that state's

¹ Order, Implementation of the Local Competition Provisions of the
Telecommunications Act of 1996, CC Docket 96-98, FCC 99-54, released March
23, 1999 ("ILP Order").

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regulatory commission no later than April 22, 1999.² That order further directed that in the event a state commission failed to act on a LEC's dialing parity plan by June 22, 1999, the LEC should file that plan with the Common Carrier Bureau by that date.³

AT&T timely filed dialing parity plans in those states in which it did not have previously approved plans. In many cases, however, state commissions did not act on AT&T's plans until the final days before the Commission's June 22, 1999 deadline. Seventeen states approved AT&T's dialing parity plans during the week of June 21st -- indeed, thirteen state commissions acted on or after June 22nd. In addition, several state commissions that have not yet acted on AT&T's dialing parity plans have informed AT&T during the past two weeks that they intend to do so imminently.

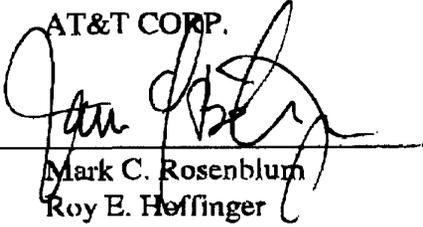
AT&T or its affiliates provide local exchange services in forty-nine states and the District of Columbia. Because of the eleventh-hour rush of state approvals AT&T has had difficulty ascertaining the status of its dialing parity plans in some jurisdictions, and in determining whether those plans would be approved by June 22nd. These difficulties have made it necessary to make the instant filing four days out of time. AT&T respectfully requests that the Commission waive its June 22, 1999 filing date and accept the attached dialing parity plans for its review.

² ILP Order, ¶ 7.

³ Id.

As of the date of this motion, thirteen states have not yet acted on AT&T's dialing parity plans. Copies of the plans that were filed with the relevant state commissions are attached hereto as Exhibits. These plans are substantively identical to the AT&T plans that have been approved in other states, except to the extent that variations in state requirements may have required certain modifications. Pursuant to paragraph 7 of the ILP Order, AT&T hereby respectfully requests that the Commission approve the attached dialing parity plans in their entirety.

Respectfully submitted,

AT&T CORP.
By 
Mark C. Rosenblum
Roy E. Hoffinger
James H. Bolin, Jr.

Its Attorneys

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June 28, 1999

AT&T EXHIBIT 1 -- ARIZONA

Dialing Parity Plan for AT&T Digital Link Service

Dialing Parity Plan for TCG Services

ATTACHMENT A

AT&T Digital Link Service Dialing Parity Implementation Plan

AT&T hereby files this Dialing Parity Implementation Plan in accordance with the Federal Communications Commission Order released on March 23, 1999, in *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, 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*, CC Docket No. 96-98, NSD File No. 98-121. This Plan sets forth AT&T's proposal for providing intraLATA toll dialing parity within the state of Arizona for customers subscribing to AT&T Digital Link Service.

Methodology: AT&T will provide full 2-PIC (intraLATA toll & interLATA) dialing parity, allowing AT&T Digital Link Service customers to pre-subscribe to one carrier for all interLATA calls and to the same or another carrier for all intraLATA toll calls. One interLATA carrier and one intraLATA carrier may be selected for each trunk subgroup. AT&T will convert all its central offices on a statewide basis. AT&T will provide the capability for pre-subscription; however, subscribers must reprogram their PBX to send their traffic to their selected carrier in order for the pre-subscribed choice to be effective.

Availability: AT&T will provide full 2-PIC dialing parity in each LATA in which AT&T offers AT&T Digital Link Service.

Subscriber Practices: AT&T will inform new AT&T nodal services and AT&T Digital Link Service customers (*i.e.*, customers that subscribe to local and long distance services on the same day) of the dialing parity feature available to them and, upon request, will provide customers a randomly ordered list of carriers available to them in their geographic area. If the new customer does not indicate a preference for an alternate carrier, interLATA and intraLATA toll traffic sent over AT&T Digital Link nodal facilities will be carried over AT&T's network as part of the subscribers' new nodal agreement.

AT&T will utilize competitively neutral business office practices when an existing AT&T Digital Link Service subscriber contacts AT&T to request information on dialing parity or to change to an alternate intraLATA toll and/or interLATA provider. Upon request, AT&T will provide Customers a randomly ordered list of carriers available to them in their geographic area. Existing subscribers who do not affirmatively select an alternative provider will remain with their pre-existing intraLATA toll and interLATA carrier. Unless an existing AT&T Digital Link Service subscriber requests a change to their pre-subscribed interexchange carrier ("PIC") or to their pre-subscribed intraLATA toll carrier ("PTC"), any interLATA and intraLATA toll traffic sent over AT&T Digital Link nodal facilities will continue to be carried over AT&T's network.

AT&T will accept customer-initiated or carrier-initiated requests for alternate interLATA or intraLATA toll carrier on the date of implementation. If all necessary access facilities already exist, the PIC/PTC selection will be processed within three business days. Should the installation of new access facilities (e.g., from the AT&T switch to the LEC access tandem or from the customer premises to the AT&T switch) be required, the PIC/PTC selection will be completed within three business days of the new facilities being fully provisioned and operational. The new facilities will be provisioned within standard provisioning intervals.

At this time, AT&T will not impose charges on its customers for pre-subscribing to an alternate carrier or for changing their PIC/PTC selection.

Carrier Practices: Any interexchange carrier that wishes to be listed as a provider of intraLATA toll or interLATA service at the time of dialing parity implementation shall notify AT&T no later than 30 days prior to dialing parity availability. Access Service Request ("ASR") requirements are available from the AT&T Carrier Service Center. AT&T will implement ASRs that require the installation of new access facilities in accordance with standard provisioning intervals.

Proposed Implementation Schedule: AT&T will implement dialing parity no later than 30 days after the date on which this plan is approved.

ATTACHMENT B

TCG PHOENIX Dialing Parity Implementation Plan

TCG Phoenix ("TCG") hereby files this Dialing Parity Implementation Plan in accordance with the Federal Communications Commission Order released on March 23, 1999, in *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, 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*, CC Docket No. 96-98, NSD File No. 98-121. This Plan sets forth TCG's proposal for providing intraLATA toll dialing parity within the state of Arizona for customers subscribing to TCG services.

Methodology: TCG will provide full 2-PIC (intraLATA toll & interLATA) dialing parity, allowing TCG customers to pre-subscribe to one carrier for all interLATA calls and to the same or another carrier for all intraLATA toll calls. One interLATA carrier and one intraLATA carrier may be selected for each trunk. TCG will convert all its central offices on a statewide basis.

Availability: TCG will provide full 2-PIC dialing parity in each LATA in which TCG provides service.

Subscriber Practices: TCG will inform new TCG local service customers of the dialing parity feature and, upon request, will provide customers a randomly ordered list of carriers available to them in their geographic area.

TCG will utilize competitively neutral business office practices when an existing TCG customer contacts TCG to request information on dialing parity or to change to an alternate intraLATA toll. Upon request, TCG will provide customers a randomly ordered list of carriers available to them in their geographic area. Unless an existing TCG subscriber requests a change to their pre-subscribed intraLATA toll carrier ("PTC"), any intraLATA toll traffic will continue to be carried over TCG's network.

TCG will accept customer-initiated or carrier-initiated requests for alternate intraLATA toll carriers on the date of implementation. If all necessary access facilities already exist, the PTC selection will be processed within three business days. Should the installation of new access facilities (*e.g.*, from the TCG switch to the carrier or from the customer premises to the TCG switch) be required, the PTC selection will be completed within three business days of the new facilities being fully provisioned and operational. The new facilities will be provisioned within standard provisioning intervals.

At this time, TCG will not impose charges on its customers for pre-subscribing to an alternate carrier or for changing their PTC selection.

Carrier Practices: Any interexchange carrier that wishes to be listed as a provider of intraLATA toll service at the time of dialing parity implementation shall notify TCG no later than 30 days prior to dialing parity availability. Interexchange carriers that wish to offer intraLATA toll service to TCG local customers must establish direct interconnection of its network with the TCG network. Other Access Service Request ("ASR") requirements are available from the TCG Carrier Service Center. TCG will implement ASRs that require the installation of new access facilities in accordance with standard provisioning intervals.

Proposed Implementation Schedule: TCG will implement dialing parity no later than 30 days after the date on which this plan is approved.

AT&T EXHIBIT 2 -- CALIFORNIA

Dialing Parity Plan for AT&T Digital Link Service

Dialing Parity Plan for TCG Services

Teresa Ono
District Manager

795 Folsom St.
Room 2147
San Francisco, CA 94107
(415) 442-2188
FAX (415) 977-6204
ono@att.com

Advice Letter 1647

AT&T Communications of
California, Inc.

April 22, 1999

Public Utilities Commission of the State of California

AT&T Communications of California, Inc. ("AT&T") (U-5002-C) hereby files its Dialing Parity Implementation Plan in accordance with the Federal Communications Commission Order released on March 23, 1999¹. This Plan sets forth AT&T's proposal for providing intraLATA toll dialing parity within the state of California for customers subscribing to AT&T Digital Link Service.

Methodology: AT&T will provide full 2-PIC (intraLATA toll and interLATA) dialing parity, allowing AT&T Digital Link Service customers to pre-subscribe to one carrier for all interLATA calls and to the same or another carrier for all intraLATA toll calls. One interLATA IXC and one intraLATA IXC may be selected for each trunk subgroup. AT&T will convert all its central offices on a statewide basis. AT&T will provide the capability for presubscription, however subscribers must reprogram their PBX to send their traffic to their selected carrier in order for the presubscribed choice to be effective.

Availability: AT&T will provide full 2-PIC dialing parity in each LATA in which AT&T offers AT&T Digital Link Service.

Subscriber Practices: AT&T will inform new AT&T nodal services and AT&T Digital Link Service customers (*i.e.*, customers that subscribe to local and long distance services on the same day) of the dialing parity feature available to them and, upon request, will provide customers a randomly ordered list of carriers available to them in their geographic area.

¹ Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, 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, CC Docket No. 96-98, NSD File No. 98-121

AT&T will utilize competitively neutral business office practices when an existing AT&T Digital Link Service subscriber contacts AT&T to request information on dialing parity or to change to an alternate intraLATA toll and/or interLATA provider. Upon request, AT&T will provide customers a randomly ordered list of carriers available to them in their geographic area. Existing subscribers who do not affirmatively select an alternative provider will remain with their pre-existing intraLATA toll and interLATA carrier. Unless an existing AT&T Digital Link Service subscriber requests a change to their presubscribed interexchange carrier ("PIC") or to their presubscribed interLATA toll carrier ("PTC"), any interLATA and intraLATA toll traffic sent over AT&T Digital Link nodal facilities will continue to be carried over AT&T's network.

AT&T will accept Customer-initiated or carrier-initiated requests for alternate interLATA or intraLATA toll carrier on the date of implementation. If all necessary access facilities already exist, the PIC/PTC selection will be processed within three business days. Should the installation of new access facilities (e.g., from the AT&T switch to the LEC access tandem or from the customer premises to the AT&T switch) be required, the PIC/PTC selection will be completed within three business days of the new facilities being fully provisioned and operational. The new facilities will be provisioned within standard provisioning intervals.

At this time, AT&T will not impose charges on its customers for pre-subscribing to an alternate carrier or for changing their PIC/PTC selection.

Carrier Practices: Any interexchange carrier that wishes to be listed as a provider of intraLATA toll or interLATA service at the time of dialing parity implementation shall notify AT&T no later than 30 days prior to dialing parity availability. Access Service Request ("ASR") requirements are available from the AT&T Carrier Service Center. AT&T will implement ASRs that require the installation of new access facilities in accordance with standard provisioning intervals.

Proposed Implementation Schedule: AT&T will implement dialing parity no later than 30 days after the date on which this plan is approved.

AT&T also provides local exchange service via resale of Pacific Bell services. There is currently no technically practicable means for AT&T to provide dialing parity on this service until that capability is offered by Pacific Bell. AT&T therefore proposes to implement dialing parity to its local resale customers 30 days after implementation by Pacific Bell.

Other than requesting approval of AT&T's dialing parity plan, no other action is sought from the California Public Utilities Commission ("Commission") by this Advice Letter. No tariff sheets have been submitted with this Advice Letter. This filing will not increase any existing rate or service, cause the withdrawal of service, or conflict with any of AT&T's other schedules or rules.

In compliance with General Order 96-A, copies of this Advice Letter are being mailed to interested parties requesting such information.

Anyone may protest this Advice Letter to the Commission. The protest must set forth the specific grounds on which it is based, including such items as financial and service impact. The protest must be made in writing and received within 20 days of the date this Advice Letter was filed with the Commission. A copy of the protest must be mailed to the Utility on the same date it is mailed or delivered to the Commission. The address for mailing or delivering the protest to the Commission is:

Telecommunications Division
505 Van Ness Avenue, Room 3203
San Francisco, California 94102-3298

Sincerely,

Teresa Ono

cc: Requesting Parties Service List

April 22, 1999

Mr. John Leutza
Director, Telecommunications Division
California Public Utilities Commission
505 Van Ness Avenue, Room 3203
San Francisco, California 94102

Re: TCG Los Angeles (U-5462-C) – Advice Letter No. 47
TCG San Diego (U-5389-C) – Advice Letter No. 45
TCG San Francisco (U-5454-C) – Advice Letter No. 46

Dear Mr. Leutza:

TCG Los Angeles (U-5462-C), TCG San Diego (U-5389-C) and TCG San Francisco (U-5454-C) ("TCG") hereby files this Dialing Parity Implementation Plan in accordance with the Federal Communications Commission Order released on March 23, 1999¹. This Plan sets forth TCG's proposal for providing intraLATA toll dialing parity within the state of California for customers subscribing to TCG services.

Methodology: TCG will provide full 2-PIC (intraLATA toll and interLATA) dialing parity, allowing TCG customers to pre-subscribe to one carrier for all interLATA calls and to the same or another carrier for all intraLATA toll calls. One interLATA interexchange carrier ("IXC") and one intraLATA IXC may be selected for each trunk. TCG will convert all its central offices on a statewide basis.

Availability: TCG will provide full 2-PIC dialing parity in each LATA in which TCG provides service.

Subscriber Practices: TCG will inform new TCG local service customers of the dialing parity feature and, upon request, will provide customers a randomly ordered list of carriers available to them in their geographic area. If the new customer does not indicate a preference for an intraLATA Primary Interexchange Carrier ("PIC"),

¹ Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, 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, CC Docket No. 96-98, NSD File No. 98-121

they will be required to place intraLATA toll calls on a 1010XXX basis until they select a carrier on a presubscribed basis.

TCG will utilize competitively neutral business office practices when an existing TCG customer contacts TCG to request information on dialing parity or to change to an alternate intraLATA toll. Upon request, TCG will provide customers a randomly ordered list of carriers available to them in their geographic area. Unless an existing TCG subscriber requests a change to their presubscribed intraLATA toll carrier ("PTC"), any intraLATA toll traffic will continue to be carried over TCG's network.

TCG will accept customer-initiated or carrier-initiated requests for alternate intraLATA toll carriers on the date of implementation. If all necessary access facilities already exist, the PTC selection will be processed within three business days. Should the installation of new access facilities (e.g., from the TCG switch to the IXC or from the customer premises to the TCG switch) be required, the PTC selection will be completed within three business days of the new facilities being fully provisioned and operational. The new facilities will be provisioned within standard provisioning intervals.

At this time, TCG will not impose charges on its customers for pre-subscribing to an alternate carrier or for changing their PTC selection.

Carrier Practices: Any interexchange carrier that wishes to be listed as a provider of intraLATA toll service at the time of dialing parity implementation shall notify TCG no later than 30 days prior to dialing parity availability. Interexchange carriers that wish to offer intraLATA toll service to TCG local customers must establish direct interconnection of its network with the TCG network. Other Access Service Request ("ASR") requirements are available from the TCG Carrier Service Center. TCG will implement ASRs that require the installation of new access facilities in accordance with standard provisioning intervals.

Proposed Implementation Schedule: TCG will implement dialing parity no later than 30 days after the date on which this plan is approved.

Other than requesting approval of TCG's dialing parity plan, no other action is sought from the California Public Utilities Commission ("Commission") by this Advice Letter. No tariff sheets have been submitted with this Advice Letter. This filing will not increase any existing rate or service, cause the withdrawal of service, or conflict with any of TCG's other schedules or rules.

In compliance with General Order 96-A, copies of this Advice Letter are being mailed to interested parties requesting such information.

Anyone may protest this Advice Letter to the Commission. The protest must set forth the specific grounds on which it is based, including such items as financial and service impact. A protest must be made in writing and received within 20 days of the date this Advice Letter was filed with the Commission. The address for mailing or delivering a protest to the Commission is:

Telecommunications Division
505 Van Ness Avenue, Room 3203
San Francisco, California 94102-3298

A copy of the protest must be mailed to the Utility on the same date it is mailed or delivered to the Commission. The address for mailing or delivering notices to TCG is:

Teresa Ono
AT&T Communications of California, Inc.
795 Folsom Street, Room 2147
San Francisco, California 94107

Sincerely,

Ana Bataille
Regulatory Affairs

cc: Requesting Parties Service List

AT&T EXHIBIT 3 -- GEORGIA

Dialing Parity Plan for AT&T Digital Link Service

Dialing Parity Plan for TCG Services

AT&T Digital Link Service Dialing Parity Implementation Plan

AT&T hereby files this Dialing Parity Implementation Plan in accordance with the Federal Communications Commission Order released on March 23, 1999, in Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, 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, CC Docket No. 96-98, NSD File No. 98-121. This Plan sets forth AT&T's proposal for providing intraLATA toll dialing parity within the state of Georgia for customers subscribing to AT&T Digital Link Service.

Methodology: AT&T will provide full 2-PIC (intraLATA toll & interLATA) dialing parity, allowing AT&T Digital Link Service customers to pre-subscribe to one carrier for all interLATA calls and to the same or another carrier for all intraLATA toll calls. One interLATA IXC and one intraLATA IXC may be selected for each trunk subgroup. AT&T will convert all its central offices on a statewide basis. AT&T will provide the capability for pre-subscription, however subscribers must reprogram their PBX to send their traffic to their selected carrier in order for the presubscribed choice to be effective.

Availability: AT&T will provide full 2-PIC dialing parity in each LATA in which AT&T offers AT&T Digital Link Service.

Subscriber Practices: AT&T will inform new AT&T nodal services and AT&T Digital Link Service customers (*i.e.*, customers that subscribe to local and long distance services on the same day) of the dialing parity feature available to them and, upon request, will provide customers a randomly ordered list of carriers available to them in their geographic area. If the new customer does not indicate a preference for an alternate carrier, interLATA and intraLATA toll traffic sent over AT&T Digital Link nodal facilities will be carried over AT&T's network as part of the subscribers' new nodal agreement.

AT&T will utilize competitively neutral business office practices when an existing AT&T Digital Link Service subscriber contacts AT&T to request information on dialing parity or to change to an alternate intraLATA toll and/or interLATA provider. Upon request, AT&T will provide Customers a randomly ordered list of carriers available to them in their geographic area. Existing subscribers who do not affirmatively select an alternative provider will remain with their pre-existing intraLATA toll and interLATA carrier. Unless an existing AT&T Digital Link Service subscriber requests a change to their presubscribed interexchange carrier ("PIC") or to their presubscribed interLATA toll carrier ("PTC"), any interLATA and intraLATA toll traffic sent over AT&T Digital Link nodal facilities will continue to be carried over AT&T's network.

AT&T will accept Customer-initiated or carrier-initiated requests for alternate interLATA or intraLATA toll carrier on the date of implementation. If all necessary access facilities

already exist, the PIC/PTC selection will be processed within three business days. Should the installation of new access facilities (e.g., from the AT&T switch to the LEC access tandem or from the customer premises to the AT&T switch) be required, the PIC/PTC selection will be completed within three business days of the new facilities being fully provisioned and operational. The new facilities will be provisioned within standard provisioning intervals.

At this time, AT&T will not impose charges on its customers for pre-subscribing to an alternate carrier or for changing their PIC/PTC selection.

Carrier Practices: Any interexchange carrier that wishes to be listed as a provider of intraLATA toll or interLATA service at the time of dialing parity implementation shall notify AT&T no later than 30 days prior to dialing parity availability. Access Service Request ("ASR") requirements are available from the AT&T Carrier Service Center. AT&T will implement ASRs that require the installation of new access facilities in accordance with standard provisioning intervals.

Proposed Implementation Schedule: AT&T will implement dialing parity no later than 30 days after the date of the Order in which this plan is approved.

TCG Dialing Parity Implementation Plan

TCG hereby files this Dialing Parity Implementation Plan in accordance with the Federal Communications Commission Order released on March 23, 1999, in Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, 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, CC Docket No. 96-98, NSD File No. 98-121. This Plan sets forth TCG's proposal for providing intraLATA toll dialing parity within the state of Georgia for customers subscribing to TCG services.

Methodology: TCG will provide full 2-PIC (intraLATA toll & interLATA) dialing parity, allowing TCG customers to pre-subscribe to one carrier for all interLATA calls and to the same or another carrier for all intraLATA toll calls. One interLATA IXC and one intraLATA IXC may be selected for each trunk. TCG will convert all its central offices on a statewide basis.

Availability: TCG will provide full 2-PIC dialing parity in each LATA in which TCG provides service.

Subscriber Practices: TCG will inform new TCG local service customers of the dialing parity feature and, upon request, will provide customers a randomly ordered list of carriers available to them in their geographic area.

TCG will utilize competitively neutral business office practices when an existing TCG customer contacts TCG to request information on dialing parity or to change to an alternate intraLATA toll. Upon request, TCG will provide customers a randomly ordered list of carriers available to them in their geographic area. Unless an existing TCG subscriber requests a change to their presubscribed intraLATA toll carrier ("PTC"), any intraLATA toll traffic will continue to be carried over TCG's network.

TCG will accept customer-initiated or carrier-initiated requests for alternate intraLATA toll carriers on the date of implementation. If all necessary access facilities already exist, the PTC selection will be processed within three business days. Should the installation of new access facilities (e.g., from the TCG switch to the IXC or from the customer premises to the TCG switch) be required, the PTC selection will be completed within three business days of the new facilities being fully provisioned and operational. The new facilities will be provisioned within standard provisioning intervals.

At this time, TCG will not impose charges on its customers for pre-subscribing to an alternate carrier or for changing their PTC selection.

Carrier Practices: Any interexchange carrier that wishes to be listed as a provider of intraLATA toll service at the time of dialing parity implementation shall notify TCG no later than 30 days prior to dialing parity availability. Interexchange carriers that wish to offer intraLATA toll service to TCG local customers must establish direct interconnection of its network with the TCG network. Other Access Service Request (“ASR”) requirements are available from the TCG Carrier Service Center. TCG will implement ASRs that require the installation of new access facilities in accordance with standard provisioning intervals.

Proposed Implementation Schedule: TCG will implement dialing parity no later than 30 days after the date of the Order in which this plan is approved.