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Ex Parte Presentation FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Magalie Roman Salas, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

RE: In the Matter of Applications for Consent to the Transfer of Control of Licenses and Section 214 Authorizations from Ameritech Corporation, Transferor, to SBC Communications Inc., Transferee.

CC Dkt. No. 98-141

Dear Ms. Salas:

On July 24, 1998, SBC Communications Inc. ("SBC") and Ameritech Corporation ("Ameritech") filed joint applications under sections 214 and 310(d) of the Communications Act of 1934, as amended, requesting Commission approval for the transfer of control to SBC of licenses and authorizations controlled or requested by Ameritech or its affiliates or subsidiaries. After long and detailed negotiations, the Commission Staff and representatives of SBC and Ameritech agreed upon conditions that address concerns raised by Chairman William E. Kennard in a letter to SBC and Ameritech dated April 1, 1999, and that provide additional assurance that the merger will bring immediate and substantial benefit to the public. SBC and Ameritech submitted those conditions in an ex parte presentation filed with the Commission on July 1, 1999. That same day, the Commission invited interested parties to comment on the proposed conditions.

To assist the commenting parties in understanding the application of the conditions, the Commission Staff suggested that SBC and Ameritech prepare two additional documents summarizing some of the information supplied in the July 1, 1999, ex parte submission. First, the Commission suggested that SBC and Ameritech prepare a chart summarizing those conditions relating to the proposed Federal Performance Parity Plan and Operations Support Systems ("OSS"). Second, the Commission suggested that SBC and Ameritech prepare a timetable showing the dates for implementation of all the proposed conditions. To comply with this suggestion, SBC and Ameritech are providing two new attachments to the July 1 ex parte (Addendum 1 and Addendum 2, respectively). Neither of these documents contains new or additional information. Rather, they provide commenting parties with the same information supplied in the July 1, 1999, ex parte filing, but in a different and summary format.

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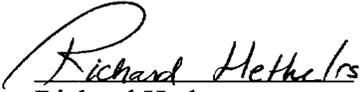
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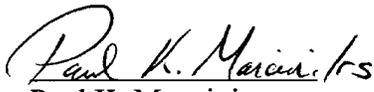
SBC and Ameritech also submit errata to the July 1, 1999, submission (Addendum 3). The errata do not involve material or substantive changes, but simply make clarifying or clerical corrections.

In addition, the errata contain changes to paragraph 2.a. on page 1 of Appendix A, which reflect differences in State commission requirements in California and Nevada relating to the gathering and reporting of performance data, and which also reflect differences in the technical capabilities of the systems in California and Nevada. These changes relate only to paragraph 2.a. of the conditions.

Please let us know if you have any questions about these materials.

Yours Sincerely,

  
Richard Hetke  
Senior Counsel  
Ameritech Corporation

  
Paul K. Mancini  
General Attorney and  
Assistant General Counsel  
SBC Communications Inc.

**ADDENDUM 1:  
SUMMARY OF PERFORMANCE PARITY PLAN AND OSS REQUIREMENTS**

<b>I. Federal Performance Parity Plan</b>		
<b>State</b>	<b>Implement Performance Measurements and Provide 2 Months of Performance Data (§ 2)</b>	<b>Pay Liquidated Damages to CLECs and Make Voluntary Payments to a Public Interest Fund Designated by the Commission (§ 2)</b>
<b>SBC</b> Arkansas Kansas Missouri Oklahoma Texas	August 1, 1999: Performance Measurements 1-2c, 3-5, 8-11, 13-20  November 1, 1999: Performance Measurements 2d, 6, 7, 12	9 months after the Merger Closing Date
California Nevada	August 1, 1999: Performance Measurements 2a, 2d, 5a, 8, 9b, 10a, 10b, 11a, 11b, 14-16, 18-20  November 1, 1999: Performance Measurements 1, 2c, 3a, 3c, 4a, 4b, 5c, 6-7, 9a, 9c, 10c, 11c, 12, 13, 17, and Performance Measurements 2b, 3b, 4c, 5b (following California and Nevada business rules)	9 months after the Merger Closing Date
Connecticut	All Performance Measurements no later than 12 months after the Merger Closing Date	15 months after the Merger Closing Date
<b>Ameritech</b> Illinois Indiana Michigan Ohio Wisconsin	No later than 3 months after the Merger Closing Date: Performance Measurements 2, 3, 8-11, 14, 15, 17, 19, 20  No later than 5 months after the Merger Closing Date: Performance Measurements 1, 4-7, 12, 13, 16, 18	9 months after the Merger Closing Date

Required Action	Date
<b>III. OSS: Enhancements and Additional Interfaces</b>	
Submit an OSS Process Improvement Plan identifying and assessing SBC's and Ameritech's existing OSS and generally identifying the OSS changes that are needed to implement SBC/Ameritech's OSS commitments (§ 8)	Prior to the Merger Closing Date
Develop and deploy commercially ready, uniform application-to-application interfaces (§ 9)	<p><b>SBC and Ameritech States except Connecticut:</b> Within 24 months after the Merger Closing Date (assuming the duration of Phase 2, the collaborative process with CLECs, is no longer than 1 month)</p> <p><b>Connecticut:</b> Within 30 months of the Merger Closing Date (assuming the duration of Phase 2, the collaborative process with CLECs, is no longer than 1 month)</p>
Develop and deploy uniform graphical user interfaces (§ 10)	<p><b>SBC and Ameritech States except Connecticut:</b> Within 24 months after the Merger Closing Date (assuming the duration of Phase 2, the collaborative process with CLECs, is no longer than 1 month)</p> <p><b>Connecticut:</b> Within 30 months of the Merger Closing Date (assuming the duration of Phase 2, the collaborative process with CLECs, is no longer than 1 month)</p>
Offer to develop a method of direct access to SBC/Ameritech's service order processing systems for requesting CLECs (§ 12)	Offer to be available for a period of 30 months after the Merger Closing Date
Offer to develop and deploy enhancements to the existing EBI interface for OSS that support maintenance/repair (§ 13)	<p>Offer to be available for a period of 30 months after the Merger Closing Date</p> <p><b>SBC States except Connecticut:</b> Enhancements are to be developed and deployed within 12 months of a completed contract</p> <p><b>Connecticut and Ameritech States:</b> Enhancements are to be provided in conjunction with the introduction of the EBI interface, or within 12 months of a completed contract, whichever is later</p>
Develop with CLECs, and deploy either (i) a software solution that shall ensure that CLEC submitted local service requests are consistent with SBC/Ameritech's business rules, or (ii) uniform business rules for completing CLEC local service requests, excluding those differences caused by State regulatory requirements and product definitions (§ 14)	<b>All SBC and Ameritech States:</b> Within 30 months after the Merger Closing Date (assuming the duration of Phase 2, the collaborative process with CLECs, is no longer than 1 month)
Negotiate with interested CLECs a uniform change management process (§ 15)	<b>All SBC and Ameritech States:</b> Within 12 months after the Merger Closing Date (assuming agreement with all CLECs)

Required Action	Date
<b>III. OSS: Enhancements and Additional Interfaces (continued)</b>	
Provide options for pre-ordering and ordering components used to provide xDSL and other Advanced Services, until the development and deployment of enhancements to existing Datagate and EDI interfaces (§ 16)	<p><b>SBC States except Nevada and Connecticut:</b> Provide access to SBC's Complex Product Service Order System for loop pre-qualification information not later than 6 months after the Merger Closing Date</p> <p><b>Ameritech States:</b> Provide access to Ameritech's existing EDI interface as of the Merger Closing Date</p>
Provide direct access to SORD, and Ameritech's and SNET's equivalent service order processing systems for pre-ordering and ordering xDSL and Advanced Services (§ 16)	Offer to be available for a period of 30 months after the Merger Closing Date
Develop and deploy enhancements to the existing Datagate or EDI interfaces for pre-ordering xDSL and other Advanced Services components, and enhancements to the existing EDI interface for ordering xDSL and other Advanced Services components (§ 16)	<p><b>SBC and Ameritech States except Connecticut:</b> Within 14 months after the Merger Closing Date (assuming the duration of Phase 2, the collaborative process with CLECs, is no longer than 1 month)</p> <p><b>Connecticut:</b> In conjunction with the introduction of uniform OSS interfaces (to occur within 30 months of the Merger Closing Date)</p>
<b>IV. OSS: Waiver of Charges</b>	
Eliminate all charges for use of standard electronic interfaces for accessing OSS (§ 18)	<b>All SBC and Ameritech States:</b> Beginning with the first billing cycle following the Merger Closing Date, for a period of 3 years
<b>V. OSS: Assistance for Small CLECs</b>	
Designate and make available to small CLECs (for a minimum of one year) one or more teams of a sufficient number of OSS experts, provided such small CLECs have contracted for OSS in their interconnection agreements (§ 19)	<b>All SBC and Ameritech States:</b> Within 30 days following the Merger Closing Date
Notify all small CLECs certificated and operating in SBC/Ameritech States of the availability of OSS expert teams (§ 19)	<b>All SBC and Ameritech States:</b> Within 60 days following the Merger Closing Date
Identify and develop training and procedures beneficial to small CLECs operating in the SBC/Ameritech States (§ 19)	<b>All SBC and Ameritech States:</b> Within 90 days following the Merger Closing Date
Notify all small CLECs certificated and operating in SBC/Ameritech States of training and procedures (§ 19)	<b>All SBC and Ameritech States:</b> Within 120 days following the Merger Closing Date
<b>VI. xDSL and Advanced Services Deployment</b>	
Electronic pre-order OSS access to the same loop pre-qualification information on an individual address basis as is available to SBC/Ameritech's retail units (§ 21)	<p><b>SBC States except Connecticut and Nevada:</b> Not later than the Merger Closing Date</p> <p><b>Connecticut, Nevada, and Ameritech States:</b> No later than 22 months after the Merger Closing Date</p>
Electronic pre-order Internet access to the same loop pre-qualification information for xDSL services on a mass market basis as is available to SBC/Ameritech's retail units (§ 22)	<b>All SBC and Ameritech States:</b> Beginning 12 months after the Merger Closing Date

**ADDENDUM 2:  
IMPLEMENTATION TIMELINE**

Date	Required Action
<b>August 1, 1999</b>	Performance Measurements: Implement and provide 2 months of performance data for Performance Measurements 1-2c, 3-5, 8-11, 13-20 in SBC States except California, Nevada, and Connecticut (¶ 2)
	Performance Measurements: Implement and provide 2 months of performance data for Performance Measurements 2a, 2d, 5a, 8, 9b, 10a, 10b, 11a, 11b, 14-16, 18-20 in California and Nevada (¶ 2)
<b>November 1, 1999</b>	Performance Measurements: Implement and provide 2 months of performance data for Performance Measurements 2d, 6, 7, 12 in SBC States except California, Nevada, and Connecticut (¶ 2)
	Performance Measurements: Implement and provide 2 months of performance data for Performance Measurements 1, 2c, 3a, 3c, 4a, 4b, 5c, 6-7, 9a, 9c, 10c, 11c, 12, 13, 17, and for Performance Measurements 2b, 3b, 4c, 5b (following California and Nevada business rules) in California and Nevada (¶ 2)
<b>Prior to the Merger Closing Date</b>	File a collocation tariff and/or offer agreement amendments containing standard terms and conditions for collocation (¶ 4)
	Provide an independent auditor's report(s) on collocation terms and conditions and associated methods and procedures (¶ 5)
	Select an independent auditor to conduct a full collocation compliance audit (¶ 6)
	Negotiate agreements between Advanced Services subsidiar(ies) and ILECs and file them for approval (¶ 29)
	File for any state certifications or approvals necessary for the separate affiliate(s) to provide Advanced Services (¶ 29)
	Incorporate Advanced Services subsidiar(ies) for SBC states (¶ 30)
	Recommend to the Commission an independent auditor to conduct the first annual compliance review (¶ 62)
<b>Merger Closing Date</b>	Provide collocation consistent with the Commission's rules (¶ 3)
	Provide the FCC with an OSS Process Improvement Plan (¶ 8)
	Offer to develop a method of direct access to SBC/Ameritech's service order processing systems for requesting CLECs (¶ 12)
	Offer to develop and deploy enhancements to the existing EBI interface for OSS that support maintenance/repair (¶ 13)
	Provide access to Ameritech's existing EDI interface in Ameritech States (¶ 16)
	Provide direct access to SORD, and Ameritech's and SNET's equivalent service order processing systems for pre-ordering and ordering xDSL and Advanced Services (¶ 16)
	Provide CLECs access to the same loop pre-qualification information available to retail operations, in all SBC States except Connecticut and Nevada (¶ 21)
	Provide Advanced Services through separate affiliates in Ameritech States (¶ 31)

Date	Required Action
<b>Merger Closing Date, continued</b>	File tariffs to implement the interim shared transport solution in the Ameritech States (§ 41)
	Withdraw Ameritech's proposal for the FCC to establish a separate transit service rate to be charged in conjunction with shared transport (§ 41)
	Continue providing UNEs in accordance with prior commitment letters (§ 43)
	Implement an alternative dispute resolution process to resolve carrier-to-carrier disputes, including disputes related to existing and effective interconnection agreements (§ 50 & Attachment E)
	Offer to implement MFN provision based on out-of-region agreements (§ 51)
	Offer to implement MFN provision based on in-region agreements (§ 52)
	Make available and offer to negotiate an interconnection or resale agreement covering the provision of interconnection arrangements or UNEs in two or more SBC/Ameritech States designated by the requesting telecommunications carrier (§ 53)
	Continue participation in the Network Reliability and Interoperability Council or a successor organization, if any (§ 55)
	Offer to conduct a trial with one or more interested, unaffiliated CLECs in each of five large cities within the SBC/Ameritech States to identify the procedures and associated costs required to provide CLECs with access to cabling within MDUs and multi-tenant premises, where SBC/Ameritech controls the cables (§ 57)
	Subject to owner approval, install and provide the new cables in a manner that will permit CLECs a single point of interface (§ 58)
Appoint corporate compliance officer to ensure deadlines being met (§ 62)	
<b>First billing cycle that begins after the Merger Closing Date</b>	Eliminate all charges for use of standard electronic interfaces for accessing OSS (§ 18)
<b>30 days following the Merger Closing Date</b>	Designate and make available (for a minimum of one year) one or more teams of a sufficient number of OSS experts, provided such small CLECs have contracted for OSS in their interconnection agreements (§ 19)
	Discount 25 percent off the recurring and nonrecurring charges that otherwise would be applicable for unbundled local loops used to provide Advanced Services in the same relevant geographic area (§ 35)
	Begin an Offering Window period to offer promotional discounted prices on monthly recurring charges for unbundled local loops used in the provision of local service to residential end user customers, ordered after the Merger Closing Date (§ 46)
	Begin an Offering Window period to offer promotional resale discounts on telecommunications services that SBC/Ameritech provides at retail to subscribers who are not telecommunications carriers, where such services are resold to residential end user customers (§ 47)

Date	Required Action
30 days following the Merger Closing Date, continued	Begin an Offering Window period to offer promotional, end-to-end combinations of UNEs to provide CLECs with residential POTS service and residential Basic Rate Interface ISDN service (§ 48)
	Offer to file tariff for enhanced lifeline plan with State commission and copy to FCC (except in Ohio), with conditions comparable to the Ohio Universal Service Assistance plan, to be filed within 60 days of acceptance of the offer (§ 60)
45 days after the Merger Closing Date	Submit preliminary audit requirements to FCC audit staff (§ 62)
2 months after the Merger Closing Date	Submit preliminary audit requirements, including the proposed scope of the audit and the extent of compliance and substantive testing, to the Commission's Audit Staff (§ 6)
60 days following the Merger Closing Date	Notify all small CLECs certificated and operating in SBC/Ameritech States of the availability of OSS expert teams (§ 19)
	Submit plan for compliance with established conditions (§ 62)
3 months after the Merger Closing Date	Implement and provide 2 months of performance data for Performance Measurements 2, 3, 8-11, 14, 15, 17, 19, 20 in Ameritech States (§ 2)
90 days following the Merger Closing Date	Identify and develop training and procedures beneficial to small CLECs operating in the SBC/Ameritech States (§ 19)
120 days following the Merger Closing Date	Notify all small CLECs certificated and operating in SBC/Ameritech States of training and procedures (§ 19)
5 months after the Merger Closing Date	Implement and provide 2 months of performance data for Performance Measurements 1, 4-7, 12, 13, 16, 18 in Ameritech States (§ 2)
6 months after the Merger Closing Date	Provide access to SBC's Complex Product Service Order System for loop pre-qualification information in SBC States except Nevada and Connecticut (§ 16)
	File cost studies to replace interim rates for xDSL-related services in each State that has not already started or completed cost proceedings for these services (§ 24)
	Provide Advanced Services through separate affiliates in SBC States for the embedded base of customers that are providers of Internet services (compliance date can also be 30 days after State approval of all necessary agreements, whichever is later) (§ 31)
	Provide Advanced Services through separate affiliates in SBC States for the embedded base of customers other than those that are providers of Internet services (compliance date can also be 30 days after State approval of all necessary agreements or 30 days after State approval of all necessary agreements, whichever is later) (§ 31)
	File on a quarterly basis, State-by-State Service Quality reports in accordance with the retail service quality reporting recommendations of the NARUC Technology Policy Subgroup (§ 54)
	Begin trial, if requested, to identify procedures and associated costs required to provide CLECs with access to cabling within MDUs and MTUs, for a period of not greater than 1 year, if requested by a CLEC (§ 57)

Date	Required Action
9 months after the Merger Closing Date	Pay liquidated damages to CLECs and make voluntary payments to a public interest fund designated by the Commission, in SBC and Ameritech States except Connecticut (§ 2)
10 months after the Merger Closing Date	Submit final collocation audit report to the Commission's Audit Staff (§ 6)
12 months after the Merger Closing Date	Implement and provide 2 months of performance data for all Performance Measurements in Connecticut (§ 2)
	Negotiate with interested CLECs a uniform change management process (assuming agreement with all CLECs) (§ 15)
	Provide electronic pre-order Internet access to the same loop pre-qualification information for xDSL services on a mass market basis as is available to SBC/Ameritech's retail units (§ 22)
	Provide availability of shared transport in Ameritech States under terms and conditions, other than rate structure and price, that are substantially similar to the most favorable terms SBC/Ameritech offers to CLECs in Texas as of July 1, 1999 (§ 42)
	Install local switch for new markets or otherwise obtain switching capability in Miami, Boston, and Seattle (§ 61)
	Provide facilities-based local exchange service to at least one unaffiliated business customer or one non-employee residential customer in Miami, Boston, and Seattle (§ 61)
14 months after the Merger Closing Date	Develop and deploy enhancements to the existing Datagate or EDI interfaces for pre-ordering xDSL and other Advanced Services components, and enhancements to the existing EDI interface for ordering xDSL and other Advanced Services components, in SBC and Ameritech States except Connecticut (assuming the duration of Phase 2, the collaborative process with CLECs, is no longer than 1 month) (§ 16)
15 months after the Merger Closing Date	Pay liquidated damages to CLECs and make voluntary payments to a public interest fund designated by the Commission, in Connecticut (§ 2)
18 months after the Merger Closing Date	Install local switch for new markets or otherwise obtain switching capability in 12 additional markets (§ 61)
	Provide facilities-based local exchange service to at least one unaffiliated business customer or one non-employee residential customer in 12 additional markets (§ 61)
22 months after the Merger Closing Date	Provide electronic pre-order OSS access to the same loop pre-qualification information on an individual address basis as is available to SBC/Ameritech's retail units, in Connecticut, Nevada, and Ameritech States (§ 21)

<b>Date</b>	<b>Required Action</b>
<b>24 months after the Merger Closing Date</b>	Develop and deploy commercially ready, uniform application-to-application interfaces in SBC and Ameritech States except Connecticut (assuming the duration of Phase 2, the collaborative process with CLECs, is no longer than 1 month) (§ 9)
	Develop and deploy uniform graphical user interfaces in SBC and Ameritech States except Connecticut (assuming the duration of Phase 2, the collaborative process with CLECs, is no longer than 1 month) (§ 10)
	Have collocated facilities (physical, virtual or otherwise) in 10 wire centers in market that can be used to offer facilities-based local services to customers served by those wire centers in Miami, Boston, and Seattle (§ 61)
	Offer facilities-based local exchange services to all business and residential customers served by wire centers in market where collocated in Miami, Boston, and Seattle (§ 61)
	Offer local exchange service by combination of resale, UNEs, and facilities-based service to all business and residential customers that are within (1) local service area of incumbent RBOC within the MSA and (2) incumbent service area of a Tier 1 ILEC serving at least 10% of access lines in the MSA in Miami, Boston, and Seattle (§ 61)
<b>30 months after the Merger Closing Date</b>	Develop and deploy commercially ready, uniform application-to-application interfaces in Connecticut (assuming the duration of Phase 2, the collaborative process with CLECs, is no longer than 1 month) (§ 9)
	Develop and deploy uniform graphical user interfaces in Connecticut (assuming the duration of Phase 2, the collaborative process with CLECs, is no longer than 1 month) (§ 10)
	Develop with CLECs, and deploy either (i) a software solution that shall ensure that CLEC submitted local service requests are consistent with SBC/Ameritech's business rules, or (ii) uniform business rules for completing CLEC local service requests, excluding those differences caused by State regulatory requirements and product definitions (assuming the duration of Phase 2, the collaborative process with CLECs, is no longer than 1 month) (§ 14)
	Develop and deploy enhancements to the existing Datagate or EDI interfaces for pre-ordering xDSL and other Advanced Services components, and enhancements to the existing EDI interface for ordering xDSL and other Advanced Services components in Connecticut (§ 16)
	Install local switch for new markets or otherwise obtain switching capability in last 15 markets (compliance date may instead be 60 days after authorization to provide interLATA service to 60% of access lines, whichever is later) (§ 61)
	Provide facilities-based local exchange service to at least one unaffiliated business customer or one non-employee residential customer in last 15 markets (compliance date may instead be 60 days after authorization to provide interLATA service to 60% of access lines, whichever is later) (§ 61)
	Have collocated facilities (physical, virtual or otherwise) in 10 wire centers in market that can be used to offer facilities-based local services to customers served by those wire centers, in 12 additional markets (§ 61)
	Offer facilities-based local exchange services to all business and residential customers served by wire centers in market where collocated, in 12 additional markets (§ 61)

<b>Date</b>	<b>Required Action</b>
<b>30 months</b> after the Merger Closing Date, continued	Offer local exchange service by combination of resale, UNEs, and facilities-based service to all business and residential customers that are within (1) local service area of incumbent RBOC within the MSA and (2) incumbent service area of a Tier 1 ILEC serving at least 10% of access lines in the MSA, in 12 additional markets (§ 61)
<b>42 months</b> after the Merger Closing Date	Have collocated facilities (physical, virtual or otherwise) in 10 wire centers in market that can be used to offer facilities-based local services to customers served by those wire centers, in last 15 markets (compliance date may instead be 1 year + 60 days after authorization to provide interLATA service to 60% of access lines) (§ 61)
	Offer facilities-based local exchange services to all business and residential customers served by wire centers in market where collocated, in last 15 markets (compliance date may instead be 1 year + 60 days after authorization to provide interLATA service to 60% of access lines) (§ 61)
	Offer local exchange service by combination of resale, UNEs, and facilities-based service to all business and residential customers that are within (1) local service area of incumbent RBOC within the MSA and (2) incumbent service area of a Tier 1 ILEC serving at least 10% of access lines in the MSA, in last 15 markets (compliance date may instead be 1 year + 60 days after authorization to provide interLATA service to 60% of access lines) (§ 61)

<b>Timing Dependent on External Factors</b>	
<b>Date</b>	<b>Required Action</b>
Within 12 months of a completed contract	Develop and deploy enhancements to the existing EBI interface for OSS that support maintenance/repair in SBC States except Connecticut (§ 13)
Within 12 months of a completed contract (or in conjunction with the introduction of the EBI interface, whichever is later)	Provide enhancements to the EBI interface in Connecticut and Ameritech States (§ 13)
Prior to providing Advanced Services in a State where SBC/Ameritech does not provide Advanced Services on the Merger Closing Date	Incorporation and establishment of a separate Advanced Services affiliate (§ 30)
30 days after State approval of all necessary agreements with the affiliated incumbent LEC	Provide Advanced Services through separate affiliates in SBC States for new activation of customers. For new activation of customers that are not providers of Internet services, compliance can also be met 30 days after State approval of any certification required by the State (§ 31)

<b>Timing Dependent on External Factors</b>	
<b>Date</b>	<b>Required Action</b>
3-12 months after the FCC determines that time line sharing is technically feasible and in a manner that permits multiple CLECs to have access to a high frequency channel riding over the same loop as an SBC/Ameritech incumbent LEC-provided voice-grade service, and national industry standards are developed and equipment meeting those standards to provide such line sharing becomes available at commercial volumes	Offer to provide line sharing to unaffiliated providers (§ 33)
Within 30 days of notice from the Common Carrier Bureau	Submit documentation addressing any written concerns from the Chief of the Common Carrier Bureau regarding compliance with the Commission's pricing rules for UNEs including all recurring and non-recurring charges (§ 44)
3 years from the date a qualifying resold service is installed and operational	Promotional period for resale discounts (promotional period may instead last through the period during which the resold service remains in service at the same location and for the same carrier, whichever is shorter) (§ 47)
3 years from the date a promotional UNE platform is installed and operational	Promotional period for promotional UNE platform (promotional period may instead last during the period in which the UNE platform remains in service at the same location and for the same carrier, whichever is shorter) (§ 48)
First day after closing on which interLATA services provided in SBC/Ameritech State, or when local exchange service provided to residential customers outside regions	No minimum monthly or minimum flat rate charge on interLATA services provided to any in-region or out-of-region residential customer in the U.S. (except those imposed by government entities or voluntary, optional calling plans) (§ 59)

<b>Annual Obligations</b>	
<b>Date</b>	<b>Required Action</b>
March 15 of each calendar year in which SBC/Ameritech subject to obligations	File annual compliance report (§ 62)
September 1 of year following calendar year covered by the audit	File final audit report (§ 62)
60 days after submission of final audit	Meet with audit staff regarding changes to audit program (§ 62)

ERRATA

Appendix A

Throughout the document: Delete “these conditions” and insert in lieu thereof “these Conditions”

¶ 1, line 8: Delete “above” and insert in lieu thereof “below”

¶ 2.a., lines 7-14: Delete “Notwithstanding anything to the contrary in this paragraph 2(a), in California, SBC/Ameritech shall implement performance measurements 2, 13, and 17, and provide 2 months of performance data on these measures by November 1, 1999; and shall resolve minor differences in the business rules for performance measurements 1, 3a, 4c, 8, 9a, 16, and 20 by November 1, 1999, either by (i) changing the California business rules to be compliant with the Plan, or (ii) obtaining a waiver from the Chief of the Common Carrier Bureau permitting SBC/Ameritech to utilize the California business rules for these performance measures in California” and insert in lieu thereof “Notwithstanding anything to the contrary in this paragraph 2(a), in California and Nevada, SBC/Ameritech shall implement performance measurement 2d and provide 2 months of performance data on these measures by August 1, 1999; shall implement performance measurements 1, 2c, 3a, 3c, 4a, 4b, 5c, 9a, 9c, 10c, 11c, 13 and 17, and provide 2 months of performance data on these measures by November 1, 1999; and shall implement performance measurements 2b, 3b, 4c, and 5b following the California and Nevada business rules and provide 2 months of performance data by November 1, 1999, or obtain a waiver from the Chief of the Common Carrier Bureau permitting SBC/Ameritech to follow the state commission mandated business rules for these performance measurements in California and Nevada”

¶ 2.c., line 8: Delete “CLCEs” and insert in lieu thereof “CLECs”

¶ 9, line 5: Delete “(e.g.” and insert in lieu thereof “e.g.”

¶ 11, line 2: Delete “follows.” and insert in lieu thereof “follows:”

¶ 13, line 1: Delete “shall develop” and insert in lieu thereof “shall offer to develop”

¶ 16.c., line 16: Delete “follows.” and insert in lieu thereof “follows:”

¶ 18, lines 6-7: Delete “beginning with the first billing cycle following the Merger Closing Date” and insert in lieu thereof “starting with the first billing cycle that begins after the Merger Closing Date”

¶ 24, line 8: Delete “When the cost proceedings” and insert in lieu thereof “When cost proceedings”

¶ 26, line 4: Delete “a” and insert in lieu thereof “at”

¶ 33, line 1: Delete “it becomes” and insert in lieu thereof “the Commission determines that it is”

¶ 33, line 6: Insert “national” before “industry”

¶ 34.c., line 10: Delete “SBC/Ameritech” and insert in lieu thereof “SBC”

¶ 35, line 3: Delete “Paragraph 16” and insert in lieu thereof “Paragraph 16.c.”

¶ 35, line 7: Delete “including of the Surrogate” and insert in lieu thereof “including 25 percent off of the Surrogate”

- ¶ 35, lines 5-6: Delete “SBC/Ameritech’s incumbent LEC shall provide” and insert in lieu thereof “SBC/Ameritech’s incumbent LEC shall, 30 days after the Merger Closing Date, provide”
- ¶ 38, line 1: Delete “Advance” and insert in lieu thereof “Advanced”
- ¶ 41, line 4: Delete “offered” and insert in lieu thereof “offer”
- ¶ 44, line 3: Delete “changes” and insert in lieu thereof “charges”
- ¶ 45, line 7-8: Delete “CLECs’ requests for carrier-to-carrier promotions” and insert in lieu thereof “CLECs’ requests for the carrier-to-carrier promotions required by these conditions.”
- ¶ 46.a., line 6: Delete “Paragraph 58” and insert in lieu thereof “Paragraph 61”
- ¶ 46.c., line 2: Delete “closed” and insert in lieu thereof “closes”
- ¶ 46.f., line 5: Delete “finding by a state commission” and insert in lieu thereof “finding by the Commission or a state commission.”
- ¶ 47, line 2: Insert “telecommunications carriers” before “promotional”
- ¶ 47.c., line 6: Delete “Section XXII” and insert in lieu thereof “Paragraph 61(c)(2).”
- ¶ 48.c., line 5: Delete “Paragraph 44” and insert in lieu thereof “Paragraph 46”
- ¶ 48.e., line 1: Delete “FCC” and insert in lieu thereof “Commission”
- ¶ 48.e., line 3: Delete “finding by a state commission” and insert in lieu thereof “finding by the Commission or a state commission.”
- ¶ 51, line 1: Delete “Out-of-Region-Agreements” and insert in lieu thereof “Out-of-Region Agreements”
- ¶ 57.f., line 3: Delete “interconnection agreement” and insert in lieu thereof “interconnection agreements”
- ¶ 59.b., line 5: Delete “Section XXII” and insert in lieu thereof “Paragraph 61”
- ¶ 59.b., line 8: Delete “Section XXII” and insert in lieu thereof “Paragraph 61”
- ¶ 59.c., line 2: Delete “own charges) imposed” and insert in lieu thereof “own charges) associated with a voluntary, optional calling plan or imposed”
- ¶ 59.c., line 3: Delete “imposed by federal” and insert in lieu thereof “imposed by a federal”
- ¶ 68, line 5: Delete “Section 63” and insert in lieu thereof “Paragraph 64”
- ¶ 69, line 15: Delete “Section 17(a)(7)” and insert in lieu thereof “Paragraph 49”

## **Attachment A**

- ¶ 8, line 5: Delete “Attachment A-4” and insert in lieu thereof “ Attachment A-5”
- ¶ 8, line 6: Delete “Attachment A-5” and insert in lieu thereof “ Attachment A-4”
- ¶ 8(Tier 2), line 8: Delete “Attachment A-4” and insert in lieu thereof “Attachment A-5”
- ¶ 8(Tier 2), line 8: Delete “Attachment A-5” and insert in lieu thereof “Attachment A-4”
- ¶ 8(Tier 3), line 7: Delete “Attachment A-4” and insert in lieu thereof “Attachment A-5”
- ¶ 8(Tier 3), line 8: Delete “Attachment A-5” and insert in lieu thereof “Attachment A-4”

## **Attachment A-2**

- 9c Measurement, Business Rules, line 4: Delete “10 days” and insert in lieu thereof “30 days”

### **Attachment A-3**

Page 5: Methods for Which the Reporting Dimensions are Averages or Means:  
Insert “Step 3: Multiply the total number of data points by the percentage calculated in the previous step and the per occurrence dollar amount taken from the Liquidated Damages Payments Table to determine the applicable liquidated damages payments for the given month for that measure.”

### **Attachment A-4**

Second heading: Delete “Tier-2 Measures” and insert in lieu thereof “Tier-2 and Tier-3 Measures”

### **Attachment A-5**

On the page between Attachment A-4 and Attachment A-6, insert heading “Attachment A-5”

### **Attachment E**

Line 1: Delete “In the Ameritech States,”

Line 1: Delete “implement an ADR” and insert in lieu thereof “implement in the SBC and Ameritech States an ADR”