

ATTACHMENT B

MODEL COLLOCATION ATTESTATION REPORT

DRAFT

Independent Accountant's Report

SBC Communications Inc. Board of Directors
and
Federal Communications Commission

We have examined SBC Communications Inc.'s (the Company) assertion that the Company has policies and procedures (as described in the attachment) in place as of Month xx, 1999 regarding compliance with the Federal Communications Commission's (FCC) collocation requirements. The FCC's collocation requirements are contained in the FCC's March 31, 1999 First Report and Order and Further Notice of Proposed Rulemaking on Deployment of Wireline Services Offering Advanced Telecommunications Capability (CC Docket No. 98-147). The Company is responsible for the design, distribution and monitoring of such policies and procedures in place upon which the Company's assertion to the FCC is based.

Our examination was made in accordance with standards established by the American Institute of Certified Public Accountants and included both a determination of the existence and distribution of such policies and procedures upon which the Company's assertion is based, as well as such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion.

In our opinion, management's assertion that policies and procedures as described above are in place as of Month xx, 1999 is fairly stated in all material respects.

This report is intended solely for the information and use of the Board of Directors and management of the Company and the FCC and should not be used for any other purpose. Since this report will be filed in documents that are a part of the public record, its distribution is not limited.

Signature of Independent Auditor

Date

ATTACHMENT C

PROMOTIONAL DISCOUNTS FOR RESIDENTIAL UNBUNDLED LOCAL LOOPS

ANALOG 2-WIRE LOOPS

Promotional Loop Discounts			
Zone	Current Price	New Price	Discount (%)
Arkansas			
Zone 1	\$56.25	\$23.50	58.22
Zone 2	\$19.00	\$14.80	22.11
Zone 3	\$14.00	\$11.60	17.14
			Average: 25.01
California			
Zone 1 (Statewide)	\$12.92	\$9.69	25.00
			Average: 25.00
Connecticut			
Zone A	\$9.34	\$7.25	22.38
Zone B	\$14.77	\$12.75	13.68
Zone C	\$17.08	\$12.75	25.35
Zone D	\$19.71	\$12.75	35.31
			Average: 25.03
Illinois			
Zone A	\$2.59	\$2.59	0.00
Zone B	\$7.07	\$5.63	20.37
Zone C	\$11.40	\$8.17	28.33
			Average: 25.03
Indiana			
Zone 1	\$8.03	\$6.23	22.42
Zone 2	\$8.15	\$6.23	23.56
Zone 3	\$8.99	\$6.23	30.70
			Average: 25.06
Kansas			
Zone 1	\$70.30	\$21.40	69.56
Zone 2	\$26.55	\$17.50	34.09
Zone 3	\$19.65	\$17.50	10.94
			Average: 25.00

Michigan			
Zone A	\$9.43	\$8.12	13.89
Zone B	\$12.02	\$8.85	26.37
Zone C	\$14.86	\$10.40	30.01
			Average: 25.02
Missouri			
Zone 1	\$12.71	\$11.00	13.45
Zone 2	\$20.71	\$15.00	27.57
Zone 3	\$33.29	\$13.25	60.20
Zone 4	\$18.23	\$9.20	49.53
			Average: 25.40
Nevada			
Zone 1	\$13.10	\$11.14	14.96
Zone 2	\$18.25	\$12.50	31.21
Zone 3	\$34.75	\$12.50	64.03
			Average: 25.00
Ohio			
Zone B	\$5.93	\$5.34	9.95
Zone C	\$7.97	\$5.34	33.00
Zone D	\$9.52	\$5.34	43.91
			Average: 35.94
Oklahoma			
Zone A	\$49.30	\$23.25	52.84
Zone B	\$27.75	\$19.90	28.29
Zone C	\$20.70	\$18.25	11.84
			Average: 25.01
Texas			
Zone 1	\$18.98	\$10.60	44.15
Zone 2	\$13.65	\$10.60	22.34
Zone 3	\$12.14	\$10.55	13.10
			Average: 25.01
Wisconsin			
Zone 1	\$10.90	\$8.17	25.05
Zone 2	\$10.90	\$8.17	25.05
Zone 3	\$10.90	\$8.17	25.05
			Average: 25.05

ATTACHMENT D

ALTERNATIVE DISPUTE MEDIATION

SBC/Ameritech shall implement in the SBC and Ameritech States a voluntary alternative dispute mediation process to resolve local service carrier-to-carrier disputes, including disputes related to interconnection agreements, as follows:

If resolution is not attained upon completion of the dispute resolution process contained in a state commission-approved interconnection agreement, or if the dispute is not subject to resolution under an interconnection agreement, SBC/Ameritech shall, at the option of the other party or parties to the dispute, participate in a mediation process as follows:

a. If a party voluntarily chooses to invoke these mediation procedures, it shall submit a written request for mediation to the appropriate state commission, with a copy to SBC/Ameritech and any other party or parties involved in the dispute. State commissions shall not be required to implement this process or to mediate disputes under the mediation provisions of this Attachment.

b. The written request shall include a statement as to whether the dispute affects service or is otherwise exceptionally time-sensitive. If the dispute affects service or is otherwise exceptionally time-sensitive, the written request shall set forth time requirements for resolution, and the time frames stated herein shall be shortened by agreement of the parties to accommodate the requested time requirements, which may not be less than 3 business days.

c. SBC/Ameritech shall attempt to resolve issues affecting multiple CLECs in the same State through consolidated mediations.

d. The parties to the dispute shall each have a person or persons of authority at the dispute resolution table such that a reasonable resolution could be agreed to at the table. In the event the representative(s) of a party come without the authority to agree to a particular item, that party shall commit to provide a response within no more than 2 business days.

e. Any information shared with another party or parties prior to a mediation session shall be faxed to the other party or parties to the dispute at least 24 hours prior to the next mediation session. A copy shall also be provided to the staff of the appropriate state commission.

f. SBC/Ameritech shall have one contact person for all contacts related to a given dispute.

g. SBC/Ameritech shall attend a face-to-face meeting with the disputing party or parties and the staff of the appropriate state commission within one week of the request for mediation. In the event it is not possible to resolve the issue in one session, the

parties to the dispute shall agree to a meeting schedule and have all relevant decision makers meet with the other party or parties during the scheduled times.

h. SBC/Ameritech agrees that service to end-user customers shall not be disrupted or otherwise affected by the pendency of a mediation proceeding.

i. SBC/Ameritech shall prohibit their regulatory, legal, and/or wholesale personnel from disclosing to their retail staff information regarding customers identified during the mediation process concerning the dispute being mediated. If necessary, SBC/Ameritech regulatory, legal, and/or wholesale personnel may contact the customer regarding service or billing-related issues after they have first notified the opposing party or parties in mediation to discuss the need for such contact and to give such party or parties the opportunity to participate in such contact.

j. SBC/Ameritech shall reduce each resolved issue to writing within 5 business days of the resolution. One of the other parties may also agree to reduce the agreement to writing. All subsequent responses/replies shall be due within 3 business days. If the parties have not reduced the resolved issue to an agreed-upon writing within 14 calendar days of the issue's resolution, they shall notify the staff of the appropriate state commission within 5 business days, and any party may request to resume the mediation. Written resolutions of the issues, once agreed upon by the parties, shall be binding upon the parties; a copy of each agreement shall be submitted to the staff of the appropriate state commission upon execution. If an agreement reached requires an amendment or addendum to a previously approved interconnection agreement, SBC/Ameritech shall file the amendment or addendum for approval by the appropriate state commission within 14 calendar days of reaching the written agreement.

k. Communications during the mediation process shall be confidential. SBC/Ameritech shall facilitate the confidentiality of the mediation process, including execution of a reasonable mediation agreement (provided that the other mediating party also agrees to do so as a condition to participating in the mediation process).

Once issues are resolved by the parties, should another telecommunications carrier in the same State request resolution of the same issue(s), with substantially similar factual circumstances and terms, and with conditions and other contract provisions that are not materially different, SBC/Ameritech shall make the arrangements arrived at through a prior mediation process available to that telecommunications carrier.

Should the appropriate state commission choose not to participate in the mediation process, the parties may mutually agree that a party (not a party to the dispute) may fill the role of the state commission and its staff in the mediation process.

ATTACHMENT E

POTENTIAL OUT-OF-TERRITORY MARKETS

Albany, NY
Albuquerque, NM
Atlanta, GA
Baltimore, MD
Baton Rouge, LA
Birmingham, AL
Boston, MA
Boulder, CO
Buffalo, NY
Cedar Rapids, IA
Charlotte, NC
Cincinnati, OH
Colorado Springs, CO
Denver, CO
Des Moines, IA
Fort Lauderdale, FL
Greensboro, NC
Greenville, SC
Harrisburg, PA
Honolulu, HI
Jacksonville, FL
Las Vegas, NV
Louisville, KY
Memphis, TN
Miami, FL
Middlesex, NJ
Minneapolis-St. Paul, MN
Nashville, TN
Nassau, NY
New Orleans, LA
New York, NY
Newark, NJ
Norfolk, VA
Orlando, FL
Passaic, NJ
Philadelphia, PA
Phoenix, AZ
Pittsburgh, PA
Portland, OR
Raleigh, NC

Richmond, VA
Rochester, NY
Salt Lake City, UT
Seattle, WA
Syracuse, NY
Tampa, FL
Tucson, AZ
Washington, DC
West Palm Beach, FL
Wilmington, DE

ATTACHMENT 2

SUMMARY OF PERFORMANCE PARITY PLAN AND OSS REQUIREMENTS

VII. Carrier Interconnection Performance Plan (Including Performance Measurements)		
State	Implement Performance Measurements and Provide 2 Months of Performance Data (§ 24)	Make Voluntary Payments to the U.S. Treasury (§ 24)
SBC Arkansas Kansas Missouri Oklahoma Texas	November 1, 1999: Performance Measurements shown on Attachments A-2a and A-5a	270 days after the Merger Closing Date
California Nevada	The first day of the first month that begins more than 30 days after the Merger Closing Date: Performance Measurements shown on Attachments A-2b and A-5b, using the California business rules described in Attachment A-2b	
Connecticut	All Performance Measurements no later than 12 months after the Merger Closing Date	15 months after the Merger Closing Date
Ameritech Illinois Indiana Michigan Ohio Wisconsin	No later than 90 days after the Merger Closing Date: Performance Measurements 2, 4-5, 10-13, 15, and 17-19, as shown in Attachments A-2a and A-5a No later than 150 days after the Merger Closing Date: Performance Measurements 1, 3, 6-9, 14, 16, and 20 as shown in Attachments A-2a and A-5a	270 days after the Merger Closing Date

Required Action	Date
III. Advanced Services OSS	
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 (§ 15)	<p>SBC and Ameritech States except Connecticut: Provide, not later than 180 days after the Merger Closing Date, access to the same pre-order interface(s) utilized by SBC/Ameritech's retail operations in those states to obtain theoretical local loop length information, or in the alternative, utilize the same Datagate and/or Verigate pre-order interfaces that are available to unaffiliated telecommunications carriers</p> <p>Ameritech States: Provide access to Ameritech's existing EDI interface as of the Merger Closing Date, 10 business days after 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 (§ 15)	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 (§ 15)	<p>SBC and Ameritech States except Connecticut: Within 14 months after the Merger Closing Date (assuming the duration of Phase 2, the collaborative process with CLECs, is no longer than 90 days)</p> <p>Connecticut: In conjunction with the introduction of uniform OSS interfaces (to occur within 30 months of the Merger Closing Date)</p>
IV. Access to Advanced Services Loop Information	
Provide access to non-discriminatory, electronic pre-order OSS access to theoretical loop length on an individual address basis (§ 20)	<p>All SBC States except Connecticut and Nevada: Not later than the Merger Closing Date</p> <p>Connecticut: No later than 22 months after the Merger Closing Date</p> <p>Nevada: No later than 180 days after it is made available in the SBC/Ameritech Service Area within California</p> <p>Ameritech States: No later than 22 months after the Merger Closing Date</p>
Provide access to non-discriminatory, electronic pre-order OSS access to theoretical loop length on an individual address basis, at no additional charge (§ 20)	All SBC States: 12 months after the Merger Closing Date
VIII. Uniform and Enhanced OSS	
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 (§ 25)	Prior to the Merger Closing Date

Required Action	Date
Develop and deploy commercially ready, uniform application-to-application interfaces (§ 26)	<p>SBC and Ameritech States except Connecticut: Within 24 months after the Merger Closing Date (assuming the duration of Phase 2, the collaborative process with CLECs, is no longer than 30 days)</p> <p>Connecticut: Within 30 months of the Merger Closing Date (assuming the duration of Phase 2, the collaborative process with CLECs, is no longer than 30 days)</p>
Develop and deploy uniform graphical user interfaces (§ 27)	<p>SBC and Ameritech States except Connecticut: Within 24 months after the Merger Closing Date (assuming the duration of Phase 2, the collaborative process with CLECs, is no longer than 30 days)</p> <p>Connecticut: Within 30 months of the Merger Closing Date (assuming the duration of Phase 2, the collaborative process with CLECs, is no longer than 30 days)</p>
Offer to develop a method of direct access to SBC/Ameritech's service order processing systems for requesting CLECs (§ 29)	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 (§ 30)	<p>Offer to be available for a period of 30 months after the Merger Closing Date</p> <p>SBC States except Connecticut: Enhancements are to be developed and deployed within 12 months of a completed contract</p> <p>Connecticut and Ameritech States: 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 (§ 31)	All SBC and Ameritech States: Within 30 months after the Merger Closing Date (assuming the duration of Phase 2, the collaborative process with CLECs, is no longer than 30 days)
Begin negotiation with interested CLECs a uniform change management process (§ 32)	All SBC and Ameritech States: Within 30 days after the Merger Closing Date
Develop and offer to state commissions a uniform change management process for acceptance and approval (§ 32)	All SBC and Ameritech States: Within 12 months after the commencement of negotiations (subject to arbitration)

Required Action	Date
IX. Restructuring OSS Charges	
Eliminate all flat-rate monthly charges for access to the Remote Access Facility and the Information Services Call Center, and any manual processing charges for access to standard, non-electronic order processing facilities used for orders of 30 lines or less (§ 35)	All SBC and Ameritech States: Beginning with the first billing cycle following the Merger Closing Date
X. OSS Assistance to Small CLECs	
Designate and make available to small CLECs (for a minimum of 36 months) one or more teams of a sufficient number of OSS experts, provided such small CLECs have contracted for OSS in their interconnection agreements (§ 36)	All SBC and Ameritech States: Within 30 days following the Merger Closing Date
Notify all small CLECs certificated and who have interconnection agreements with SBC/Ameritech operating in SBC/Ameritech states of the availability of OSS expert teams (§ 36)	All SBC and Ameritech States: Within 60 days following the Merger Closing Date
Identify and develop training and procedures beneficial to small CLECs operating in the SBC/Ameritech States (§ 36)	All SBC and Ameritech States: Within 90 days following the Merger Closing Date
Notify all small CLECs certificated with interconnection agreements with SBC/Ameritech and operating in SBC/Ameritech States of training and procedures (§ 36)	All SBC and Ameritech States: Within 120 days following the Merger Closing Date

ATTACHMENT 3

IMPLEMENTATION TIMELINE

Date	Required Action
November 1, 1999	Performance Measurements: Implement and provide 2 months of performance data for Performance Measurements shown on Attachments A-2a and A-5a in SBC States except California, Nevada, and Connecticut (§ 24)
Prior to the Merger Closing Date	Negotiate agreements between Advanced Services subsidiar(ies) and ILECs and file them for approval (§ 5)
	File for any state certifications or approvals necessary for the separate affiliate(s) to provide Advanced Services (§ 5)
	Incorporate Advanced Services subsidiar(ies) for SBC/Ameritech States (§ 5)
	Provide the FCC with an OSS Process Improvement Plan (§ 25)
	File a collocation tariff and/or offer agreement amendments containing standard terms and conditions for collocation (§ 38)
	Select an independent auditor to conduct a full collocation compliance audit (§ 40)
	Recommend to the Commission an independent auditor to conduct the first annual compliance review (§ 66)
Merger Closing Date	Provide Advanced Services through separate affiliates in Ameritech States (§ 6)
	Provide access to non-discriminatory, electronic pre-order OSS access to theoretical loop length on an individual address basis, in all SBC States except Connecticut and Nevada (§ 20)
	Continue providing UNEs under the same terms and conditions that UNEs were made available on January 24, 1999 (§ 53)
	File tariffs and/or offer amendments to interconnection agreements to implement the interim shared transport solution in the Ameritech States (§ 55)
	Withdraw Ameritech's proposal for the FCC to establish a separate transit service rate to be charged in conjunction with shared transport (§ 55)
	Continue participation in the Network Reliability and Interoperability Council or a successor organization, if any (§ 64)
5 business days after the Merger Closing Date	File tariffs necessary for the separate Advanced Services affiliate to provide Advanced Services to customers that are providers of Internet services (§ 6)
10 days after the Merger Closing Date	File with the Secretary of the Commission the independent auditor's report(s) on collocation terms and conditions and associated methods and procedures (§ 39)
	Provide a written offer to amend each CLEC's interconnection agreement to incorporate the unbundled loop discount for carrier-to-carrier promotions (§ 45)
	Provide a written offer to amend each CLEC's interconnection agreement to incorporate the resale discount for carrier-to-carrier promotions (§ 47)
	Provide a written offer to amend each CLEC's interconnection agreement to incorporate carrier-to-carrier promotions for UNE platforms (§ 50)

Date	Required Action
10 business days following the Merger Closing Date	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 (§ 15)
	Provide access to Ameritech's existing EDI interface in Ameritech States (§ 15)
	Offer to develop a method of direct access to SBC/Ameritech's service order processing systems for requesting CLECs (§ 29)
	Offer to develop and deploy enhancements to the existing EBI interface for OSS that support maintenance/repair (§ 30)
	Provide collocation consistent with the Commission's rules (§ 37)
	Offer to implement MFN provision based on out-of-region agreements (§ 42)
	Offer to implement MFN provision based on in-region agreements (§ 43)
	Offer to negotiate an interconnection and/or resale agreement covering the provision of interconnection arrangements, services, and/or UNEs in two or more SBC/Ameritech States (§ 44)
	Implement an alternative dispute resolution process to resolve carrier-to-carrier disputes, including disputes related to existing and effective interconnection agreements (§ 54 & Attachment D)
	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)
First billing cycle that begins after the Merger Closing Date	Eliminate all flat-rate monthly charges for access to the Remote Access Facility and the Information Services Call Center, and extra manual processing charges for access to standard, non-electronic order processing facilities used for orders of 30 lines or less (§ 35)
30 days after the Merger Closing Date	Provide new activations of all non-xDSL Advanced Services through separate affiliates in Ameritech States (compliance can be met 30 days after Commission and/or state commission approval of necessary tariffs, whichever is later) (§ 6)
	Begin negotiation with interested CLECs a uniform change management process. Twelve months after the commencement of negotiations, develop and offer to state commissions a uniform change management process for acceptance and approval, and implement those aspects of the uniform change management process that are consistent with state commission rulings, agreed-to with the CLEC participants, and feasible (§ 32)
	Designate and make available to small CLECs (for a minimum of 36 months) one or more teams of a sufficient number of OSS experts, provided such small CLECs have contracted for OSS in their interconnection agreements (§ 36)
	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)

Date	Required Action
30 days after the Merger Closing Date, continued	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 (§ 48)
	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 (§ 51)
	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 (§ 61)
	Offer, at the state commission's option, to extend Ameritech's Universal Service Assistance Lifeline plan until January 6, 2003, in Ohio (§ 61)
First day of the first month that begins more than 30 days after the Merger Closing Date	Performance Measurements: Implement and provide 2 months of performance data for performance measurements shown on Attachments A-2b and A-5b in California and Nevada, using the California business rules described in Attachment A-2b (§ 24)
45 days after the Merger Closing Date	Independent auditor to submit preliminary audit requirements to FCC audit staff (§ 66)
60 days after the Merger Closing Date	Notify all small CLECs certificated and who have interconnection agreements with SBC/Ameritech operating in SBC/Ameritech States of the availability of OSS expert teams (§ 36)
	Independent auditor to 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 (§ 40)
	Offer generic interconnection and resale terms and conditions covering the SBC/Ameritech Service Area in all SBC/Ameritech States (§ 44)
	Submit plan for compliance with established conditions (§ 65)
90 days after the Merger Closing Date	Provide non-discriminatory access to loop make-up information that is available in SBC/Ameritech's records, in response to address-specific written requests (§ 20)
	Reasonably classify all SBC/Ameritech wire centers as either urban or rural wire centers, in consultation with state commissions should the state commission choose to engage in such consultation (§ 22)
	Implement and provide 2 months of performance data for Performance Measurements 2, 4-5, 10-13, 15, and 17-19, as shown on Attachments A-2a and A-5a, in Ameritech States (§ 24)
	Identify and develop training and procedures beneficial to small CLECs operating in the SBC/Ameritech States (§ 36)
	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, in SBC/Ameritech States except California and Nevada (§ 62)
	Continue to report ARMIS data required by the Commission separately for each operating company, and make service quality data based on NARUC report available on an SBC/Ameritech website or to state commissions in SBC/Ameritech States (§ 63)

Date	Required Action
120 days after the Merger Closing Date	Notify all small CLECs certificated with interconnection agreements with SBC/Ameritech and operating in SBC/Ameritech States of training and procedures (§ 36)
150 days after the Merger Closing Date	Implement and provide 2 months of performance data for Performance Measurements 1, 3, 6-9, 14, 16, and 20, as shown in Attachments A-2a and A-5a, in Ameritech States (§ 24)
180 days after the Merger Closing Date	Provide Advanced Services through separate affiliates in SBC/Ameritech States for the embedded base of Advanced Services customers that are providers of Internet services (compliance date can also be 30 days month after state approval of all necessary agreements, or 30 days after Commission approval of any necessary tariffs, whichever is later). If such services are determined to be intrastate and state certification is required, the obligation shall apply 30 days after state approval of any required certification (§ 6)
	Provide Advanced Services through separate affiliates in SBC/Ameritech States for the embedded base of Advanced Services customers that are not providers of Internet services (compliance date can also be 30 days after state approval of any necessary certification, tariffs, or any other required state authorization; or 30 days after state approval of all necessary agreements, whichever is later). The transition period may be prolonged in Connecticut as a consequence of state-law restrictions (§ 6)
	Order facilities and/or services needed to provide Advanced Services in SBC/Ameritech States through separate affiliates utilizing the same interfaces as unaffiliated providers of Advanced Services (§ 6)
	Provide access to the same pre-order interface(s) utilized by SBC/Ameritech's retail operations to obtain theoretical local loop length information, or in the alternative, utilize the same Datagate and/or Verigate pre-order interfaces that are available to unaffiliated telecommunications carriers, in SBC/Ameritech States except Connecticut (§ 15)
	File cost studies and proposed rates for conditioning xDSL loops in each SBC/Ameritech State that has not already started or completed cost proceedings for these services (§ 21)
	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 not greater than 12 months, if requested by a CLEC (§ 57)
	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, in California and Nevada (§ 62)
270 days after the Merger Closing Date	Transfer any non-xDSL Advanced Services provided by Ameritech on a retail or wholesale basis in the Ameritech States prior to the Merger Closing Date to a separate affiliate, in Ameritech States (compliance can be met 30 days after state approval of all necessary agreements with the affiliated incumbent LEC, or 30 days after approval of any tariffs necessary for the separate affiliate to provide such services, whichever is later) (§ 6)
	Obligation to begin making voluntary payments to the U.S. Treasury, in SBC and Ameritech States except Connecticut (§ 24)
10 months after the Merger Closing Date	Independent auditor to submit final collocation audit report to the Commission's Audit Staff (§ 40)

Date	Required Action
12 months after the Merger Closing Date	Provide access to non-discriminatory, electronic pre-order Internet access to theoretical loop length based upon a zip code of end users in a wire center, at no additional charge (§ 20)
	Implement and provide 2 months of performance data for all Performance Measurements in Connecticut (§ 24)
	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 August 27, 1999 (§ 56)
	Install local switch for new markets or otherwise obtain switching capability in Boston, Miami, and Seattle (§ 59)
	Provide facilities-based local exchange service to 3 unaffiliated business and/or non-employee residential customers in Boston, Miami, and Seattle (§ 59)
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 90 days) (§ 15)
15 months after the Merger Closing Date	Obligation to begin making voluntary payments to the U.S. Treasury, in Connecticut (§ 24)
18 months after the Merger Closing Date	Install local switch for new markets or otherwise obtain switching capability in 12 additional markets (§ 59)
	Provide facilities-based local exchange service to 3 unaffiliated business and/or non-employee residential customers in 12 additional markets (§ 59)
22 months after the Merger Closing Date	Provide non-discriminatory, electronic pre-order OSS access to theoretical loop length on an individual address basis, in Connecticut and Ameritech States (§ 20)
24 months after the Merger Closing Date	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 30 days) (§ 26)
	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 30 days) (§ 27)
	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 Boston, Miami, and Seattle (§ 59)
	Offer facilities-based local exchange services to all business and residential customers served by wire centers in market where collocated in Boston, Miami, and Seattle (§ 59)
	Offer local exchange service to all business and residential customers that are within (i) local service area of incumbent RBOC within the MSA and (ii) incumbent service area of a Tier 1 ILEC serving at least 10% of access lines in the PMSA in Boston, Miami, and Seattle (§ 59)

Date	Required Action
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 in Connecticut (§ 15)
	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 30 days) (§ 26)
	Develop and deploy uniform graphical user interfaces in Connecticut (assuming the duration of Phase 2, the collaborative process with CLECs, is no longer than 30 days) (§ 27)
	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 30 days) (§ 31)
	Install local switch for new markets or otherwise obtain switching capability in last 15 markets (compliance date may instead be 2 months after authorization to provide interLATA service to 60% of access lines, whichever is later) (§ 59)
	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 (§ 59)
	Offer facilities-based local exchange services to all business and residential customers served by wire centers in market where collocated, in 12 additional markets (§ 59)
	Provide facilities-based local exchange service to 3 unaffiliated business and/or non-employee residential customers in last 15 markets (compliance date may instead be 2 months after authorization to provide interLATA service to 60% of access lines, whichever is later) (§ 59)
	Offer local exchange service to all business and residential customers that are within (i) local service area of incumbent RBOC within the MSA and (ii) incumbent service area of a Tier 1 ILEC serving at least 10% of access lines in the PMSA, in 12 additional markets (§ 59)

Date	Required Action
42 months after 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 14 months after authorization to provide interLATA service to 60% of access lines) (§ 59)
	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 14 months after authorization to provide interLATA service to 60% of access lines) (§ 59)
	Offer local exchange service to all business and residential customers that are within (i) local service area of incumbent RBOC within the MSA and (ii) incumbent service area of a Tier 1 ILEC serving at least 10% of access lines in the PMSA, in last 15 markets (compliance date may instead be 14 months after authorization to provide interLATA service to 60% of access lines) (§ 59)

Timing Dependent on External Factors	
Date	Required Action
Prior to providing Advanced Services in a state where SBC/Ameritech does not provide Advanced Services on the Merger Closing Date	Establish and incorporate a separate Advanced Services affiliate (§ 5)
30 days after state approval of all necessary agreements with the affiliated incumbent LEC	Provide Advanced Services through a separate affiliate in SBC States for new activation of customers that are providers of Internet services. Compliance can also be met 30 days after Commission approval of any necessary tariffs, whichever is later. If such services are determined to be intrastate, and state certification is required to provide new activations of Advanced Services to customers that are providers of Internet services, the obligation shall apply 30 days after state approval of any certification that the state deems required (§ 6)
	Provide Advanced Services through a separate affiliate in SBC States for new activations of Advanced Services to customers that are not providers of Internet services. Compliance can also be met 30 days after: state approval of any certification that the state deems required for the separate Advanced Services affiliate, or approval of any federal or state tariffs necessary for the separate Advanced Services affiliate, whichever is later (§ 6)
3 days after state approval of any certification that the state deems required for the separate Advanced Services affiliate to provide Advanced Services in that state	File any federal or state tariffs necessary for the separate Advanced Services affiliate to provide Advanced Services to customers that are not providers of Internet services, in SBC States (§ 6)
3 days after obtaining all necessary certifications, authorizations, and/or approvals to provide new activations of an Advanced Service through a separate affiliate in a state	File tariff changes with the Commission and/or state Commission to terminate the offering of new activations by the incumbent LEC, and cease pro-active marketing or sales of new activations from the tariffs of the incumbent LEC (§ 6)

Timing Dependent on External Factors	
Date	Required Action
180 days after electronic, pre-order OSS access to theoretical loop length is made available in the SBC/Ameritech Service area within California	Provide non-discriminatory, electronic pre-order OSS access to theoretical loop length on an individual address basis in Nevada (§ 20)
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 (§ 30)
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 (§ 30)
36 months from a date a qualifying unbundled local loop is installed and operational	Promotional period for unbundled local loop discounts (promotional period may instead last through the period during which the loop remains in service at the same location and for the same carrier, whichever is shorter) (§ 46)
36 months from a 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) (§ 48)
36 months 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) (§ 51)
First day after the Merger Closing Date 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) (§ 60)

Annual Obligations	
Date	Required Action
March 15 of each calendar year in which SBC/Ameritech subject to obligations	File annual compliance report (§ 65)
September 1 of year following calendar year covered by the audit	File final audit report (§ 66)
60 days following submission of final audit	Meet with audit staff regarding changes to audit program (§ 66)