

1 PUBLIC UTILITY COMMISSION OF TEXAS

2 DOCKET NO. 20226

3
4 PETITION OF ACCELERATED)
CONNECTIONS, INC., D/B/A ACI)
5 CORP. FOR ARBITRATION TO ESTABLISH)
AN INTERCONNECTION AGREEMENT WITH)
6 SOUTHWESTERN BELL TELEPHONE COMPANY))
7 _____)

8 DOCKET NO. 20272

9
10 PETITION OF DIECA COMMUNICATIONS,)
INC., D/B/A, COVAD COMMUNICATIONS)
11 COMPANY FOR ARBITRATION OF)
INTERCONNECTION RATES, TERMS,)
12 CONDITIONS AND RELATED ARRANGEMENTS))
WITH SOUTHWESTERN BELL TELEPHONE)
13 COMPANY)
14 _____)

15
16 Volume I
Pages 1 to 78

17 DEPOSITION OF KEVIN TALBOT

18 Austin, Texas

19 May 13, 1999

20

21

22

23

24

25 George A. Haas, CSR 5939

1 accessible via Verigate for a CLEC?

2 A. That is our target development also.

3 Q. Now, Mr. Phillips was talking about
4 CPSOS being used in Release 2, not just for the
5 prequalification function, but for what he called
6 service order negotiation, that would occur after
7 the LoopQual occurred.

8 Does that sounds right to you?

9 A. Again --

10 Q. You are not that guy?

11 A. I'm not the CPSOS guy, and --

12 Q. Okay.

13 A. Yeah.

14 Q. Let's assume that CPSOS, which is the
15 retail side, says let's assume the same
16 functionality will be provided to CLECs for
17 mechanized service order negotiation, okay? That's
18 what Mr. Phillips told us.

19 A. Okay.

20 Q. Will Verigate be able to support any
21 added functionality in that respect?

22 A. In what respect? Service order
23 negotiation?

24 Q. Yes.

25 A. No.

1 Q. How will that be accomplished if not
2 through Verigate, right? Is there some other
3 system that will be used to accomplish that?

4 A. We need to define -- my hesitation is
5 we need to define what you are talking about for
6 service order negotiation. I don't know what you
7 mean by that. We need to define that.

8 If you are asking me about an
9 enhancement to Verigate/DataGate to provide loop
10 qualification, that development is going to take
11 place and is targeted for the end of 1999, as well.
12 But that is still preorder information, and access
13 to loop detail. That is not service order
14 negotiation.

15 Q. I was going to say I mean what
16 Mr. Phillips means, but you weren't there, and I
17 guess I could say that I didn't fully understand
18 exactly what it was Mr. Phillips was talking about
19 when he said that CPSOS would be --

20 I do recall him agreeing with my
21 characterization of his testimony, which was CPSOS
22 for loop prequal, LoopQual for loop qualification;
23 CPSOS for what he called service order negotiation,
24 and then an ordering system for actual order entry.

25 That's as far as I understood with

1 Mr. Phillips. I did not fully understand. I
2 thought maybe you could help me out as to how
3 Verigate would be used by CLECs to access this kind
4 of third step CPSOS functionality of service order
5 negotiation, but I guess you can't help me on that?

6 A. I can't help you on that. And I can't
7 tell you, not knowing what is meant by service
8 order negotiation. That is not a step that is
9 being looked at or would fit into a preorder system
10 like Verigate or DataGate.

11 Q. If I understand what you are saying,
12 Verigate is now and in the future will be just a
13 system that supports preordering functionality?

14 A. Correct.

15 Q. And that everything else beyond
16 preordering is going to have to be some kind of
17 ordering system functionality that CLECs can
18 access?

19 A. Correct.

20 Q. Is that LEX or not?

21 A. LEX is one of those means.

22 Q. EDI is another?

23 A. It is.

24 Q. Are you aware of other ones besides
25 LEX and EDI?

SWB
January 5, 2000

TABLE OF CONTENTS

DOCKET NO. 20226

**SOUTHWESTERN BELL TELEPHONE COMPANY'S EXPLANATION OF
SUBMITTED PROPOSED LANGUAGE**

	<u>Page</u>
I. SWBT's Proposal Is Based On Award And T2A	2
II. Rhythms' Misapplication Of Term 'Inventory'	3
III. Additional Rhythms' Language Is Not Required In The Award	6
IV. SWBT Will File Additional Comments	6
V. Conclusion	7

Original + 15

cc: Chairman Pat Wood, III, PUC (hand delivered)
Commissioner Judy Walsh, PUC (hand delivered)
Commissioner Brett Perlman, PUC (hand delivered)
Katherine D. Farroba, Arbitrator, PUC (hand delivered)
Rowland Curry, Arbitrator, PUC (hand delivered)
All Parties of Record (via facsimile)

DOCKET NO. 20226

PETITION OF RHYTHMS LINKS, INC
FOR ARBITRATION TO ESTABLISH
AN INTERCONNECTION AGREEMENT
WITH SOUTHWESTERN BELL
TELEPHONE COMPANY

§
§
§
§
§

PUBLIC UTILITY COMMISSION
OF TEXAS

**SOUTHWESTERN BELL TELEPHONE COMPANY'S EXPLANATION OF
SUBMITTED PROPOSED LANGUAGE**

Southwestern Bell Telephone Company ("SWBT") respectfully files this Explanation with the Texas Public Utility Commission ("Commission"), consistent with the joint letter of SWBT and Rhythms Links, Inc. ("Rhythms") that accompanied the filing of Interconnection Agreement language ("Proposed Agreement"), as ordered by the Arbitrators in this docket.

I.
SWBT'S PROPOSAL IS BASED ON AWARD AND T2A

The language suggested by SWBT at Sections 4.4, 4.5, and 4.6 of the Proposed Agreement is consistent with and based on language contained in the Texas 271 Agreement ("T2A"). Section 4.4 is taken from footnote 176 of the Arbitration Award ("Award"), which cites and quotes Section 8.4 of Attachment 25 of the T2A.

Section 4.5 was taken directly from Section 8.5 of Attachment 25 of the T2A and simply attempts to follow the requirements on page 53 of the Award, where the parties are ordered to "adhere to national or industry-wide accepted standards for spectrum management of xDSL technology as those standards are adopted." Section 4.6 was taken directly from Section 8.6 of Attachment 25 of the T2A and attempts to set a clear deadline for *beginning* the process of conforming with whatever industry or Commission standards are established. It does not require actual compliance within 30 days, only that the process of complying be commenced within 30 days.

Overall, SWBT's proposed sections 4.4, 4.5 and 4.6 reflect the role of the new 271 DSL Working Group and commits the parties to cooperating with that process. This intent is addressed in the Award, at p. 47, where it states: "[T]he best guide for policymakers is the development of an industry-wide consensus on the management of interference, and [the Arbitrators] urge the parties to work toward that objective."

For these reasons, SWBT's proposed language should be adopted.

II. RHYTHMS' MISAPPLICATION OF TERM 'INVENTORY'

Rhythms' proposed 6.2.2 is based on a misapplication of the term 'inventory', at pages 68-70 of the Award. As set forth near the top of page 68, SWBT did conduct 'inventories' of central offices for purposes of loop *pre-qualification*, which is distinct from Loop Qualification. Pre-qualification is free and provides the user with both the theoretical loop length and the 'red, yellow, green' designation familiar to the Commission. That is, pre-qualification is based on calculated estimates. While 'inventory' of general network information is required to create such estimates, this work does not and cannot provide the actual, loop-specific information that is associated with the Loop Qualification process. This is because gathering actual, loop-specific information requires a review of each loop, an extraordinarily time consuming process. The Award confuses the distinction between theoretical and actual loop information (admittedly easy to do) when discussing SWBT's obligations to provide CLECs with Loop Make-up Information.¹ To be clear, it is simply not the case that SWBT performs

¹ The Award, at footnote 244, cites portions of testimony of William C. Deere, the pertinent parts of which is clearly limited to the pre-qualification process. The footnote also cites transcript pages from the June hearing. The discussion at the hearing is not as clear. There, the term 'inventory' is used in the context of more general training on procedures SWBT provides its engineers when it knows that its engineers will begin receiving 'Loop Qualification' requests in greater numbers. This distinction is made clear when one reviews the DPL filed by the parties on May 28, 1999. See the discussion at page 38 of the DPL, specifically SWBT's proposed language at Section IV.C.

some type of 'inventory' by which it gathers *actual* Loop Make-up Information on each loop contained in a central office. In using the phrase 'Loop Make-up' Information, the Award inaccurately describes what actions SWBT takes when it 'inventories' central offices for purposes of pre-qualification, leaving the impression that SWBT 'inventories' *actual* loop information. It does not.

Rhythms' proposed 6.2.2 inaccurately applies the word 'inventory' in seeking to require SWBT to provide actual loop information to Rhythms "for all loops in the central office within three business days" of Rhythms' request. This is simply impossible, assuming the phrase 'Loop Make-up Information' in Section 6.2.2 is defined as it is in Section 6.2.1—that is, it means something more than the information available via the pre-qualification process.² The reason this is impossible is that SWBT does not have actual Loop Make-up Information inventoried for all loops served out of particular central offices.

The ramifications of this misapplication are compounded by the fact that the Award states that SWBT shall receive no compensation for the provision of Loop Make-up Information. With no cost to CLECs for acquiring Loop Make-up Information, Rhythms' proposed language would prompt CLECs to request that SWBT 'inventory' detailed information on each loop in every SWBT central office where collocation occurs. (This is what Rhythms seeks to require in its proposed language.) SWBT would be left with a monumental task for which it would be paid *nothing*, while the CLECs would be unjustly enriched through the use of SWBT's labor for free. (The

² Loop pre-qualification information is available now, although it can be accessed only on a customer by customer basis, through SWBT's Verigate and DataGate systems.

Award acknowledges the difficulty and cost of this process at page 67 and footnote 242.)³

The Award recognizes that such 'inventorying' cannot be required when it states that Rhythms desire for 'blanket' requests for Immediate Loop Make-up details "should not be supported at this time."⁴ It then recites the FCC's *UNE Remand Order*,⁵ which found that LECs such as SWBT could not be required to "catalogue, inventory, and make available to competitors Loop Qualification information" it does not have available to itself.⁶ The FCC went on to state: "If an Incumbent LEC has not complied such information for itself, we do not require the Incumbent to conduct a plant inventory and construct a database on behalf of requesting carriers." (emphasis added) This latter quote forms the basis for the agreed-to language in Section 6.2.3.

For these reasons, Rhythms' proposed language on the 'inventorying' of central offices is inappropriate and should not be included in the Proposed Agreement.

SWBT's proposed additional language at the beginning of Section 6.2.3 is meant to make clear that the language is based on the FCC's *UNE Remand Order*. The language at the end of the section is included to provide cost recovery to SWBT, although no broad requests for information should be permitted under the FCC's *UNE Remand Order*.

³ Rhythms' language adds to the burden by requiring SWBT to conduct such inventories of entire central offices within 60 days of a CLEC's request. Again, this would be an extraordinary task—and one the FCC found could not be required of ILECs (see discussion below).

⁴ See page 69 of the Award.

⁵ In the Matter of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Third Report And Order And Fourth Further Notice Of Proposed Rulemaking; Adopted: September 15, 1999, Released: November 6, 1999, CC Docket No. 96-98 ("*UNE Remand Order*").

⁶ See page 69 of the Award, citing para. 429 of the *UNE Remand Order*.

III.
ADDITIONAL RHYTHMS' LANGUAGE IS NOT REQUIRED IN THE AWARD⁷

The Award requires SWBT to take specific actions with regard to its Datagate and Electronic Data Interface ("EDI") systems, in time frames that are inconsistent with SWBT's Plan of Record filed with the FCC and submitted to the Commission in Project 16251 (attached to Chapman affidavit). As a result, the Award requires SWBT's systems organization to take on inconsistent tasks. This will slow SWBT's systems employees' ability to provide systems improvements as set out in the Plan of Record. SWBT submits that the Proposed Agreement should correspond with the systems improvements set forth in the Plan of Record. This would insure that SWBT's systems work would be more efficiently accomplished. Absent this 'sync-ing up' of systems improvements, SWBT opposes making Texas-only changes to its systems. Further, SWBT opposes Rhythms proposed changes at Section 6.2.5 and 6.3.1, as attempts to *expand* the obligations in the Award beyond Datagate and EDI. There is no basis in the Award for such an expansion of SWBT's obligations. SWBT objects to expanding the number of systems which require Texas-specific enhancements, given its obligations under its Plan of Record. For these reasons SWBT opposes Rhythms' proposed language.

IV.
SWBT WILL FILE ADDITIONAL COMMENTS

On January 6, SWBT anticipates filing comments on the proposed interconnection agreements filed on December 30, 1999, consistent with Proc. R. 22.309. Previously, on December 7, 1999, SWBT sought the right to submit briefs setting forth why a rehearing was appropriate. SWBT continues to seek that relief.

⁷ See Sections 6.2.5 and 6.3.1 of Proposed Agreement.

V.
CONCLUSION

As set forth above, SWBT has submitted language based on the Award and the T2A. SWBT's proposed language should be adopted. Rhythms proposed language, however, is based on a misapplication of the facts in evidence, would unjustly enrich CLECs and is contrary to the FCC's *UNE Remand Order*. For these reasons, Rhythms' proposed language should be rejected.

Respectfully Submitted,

ANN E. MEULEMAN
General Counsel-Austin



Timothy P. Leahy
Senior Counsel
Bar Card No. 24003748

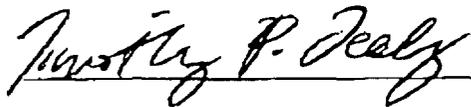
Thomas J. Ballo
David F. Brown
Gary L. Buckwalter
Karen L. Clark
Thomas J. Horn
Mary W. Marks
Kelly M. Murray
J. David Tate
José F. Varela
Garry S. Wann

SOUTHWESTERN BELL
TELEPHONE COMPANY
Legal Department
1616 Guadalupe, Room 600
Austin, Texas 78701
Tel: (512) 870-5717
Fax: (512) 870-3420

CERTIFICATE OF SERVICE

I, Timothy P. Leahy, Senior Counsel, for Southwestern Bell Telephone Company, certify that a copy of this document was served on all parties of record in this proceeding on the 5th day of January, 2000 in the following manner:

By hand delivery, facsimile and/or by U.S. Mail.



Accessible



“xDSL Capable Loops: Current Loop Qualification and Order Processes – Arkansas, Kansas, Missouri, Oklahoma, Texas”

Date: January 4, 2000

Number: **CLEC00-003**

Contact: Southwestern Bell Account Manager

The purpose of this accessible letter is to provide CLECs with an overview of the loop qualification and order processes associated with SWBT’s unbundled xDSL capable loop offerings. This information is intended to inform CLECs of the options currently available to them. It is not intended to be an all-inclusive ordering guide. Additional information can be found in the CLEC Handbook.

Loop Qualification

Loop qualification is currently a manual process. This process, as described herein, is performed prior to the submission of an order. The CLEC also has the option of combining this process with the ordering process. The combined loop qualification and ordering process is described in more detail in the “One-Step Process” section below.

When loop qualification is performed on a pre-order basis, the CLEC faxes or emails the loop qualification request to the Local Service Center (LSC). If a CLEC chooses to use the email option, it must first provide the LSC with a designated email address for loop qualification results. The LSC’s email address for loop qualification requests will be provided to the CLEC at that time. The email option will be available until loop qualification is available to the CLEC via Verigate and DataGate (EDI – Electronic Data Interchange).

Upon receipt of the CLEC’s request, the LSC service representative will complete a loop qualification request form and forward it to Outside Plant (OSP) Engineering. OSP Engineering will perform the loop qualification and return it to the LSC who will then forward the results to the CLEC. The loop qualification process will be performed at parity with loop qualification performed on behalf of SWBT retail or any SWBT affiliate that provides xDSL service to end users. The loop qualification information returned to the CLEC will include:

- 26 gauge equivalent loop length

- Actual length of the loop by gauge
- Quantity of bridged taps, load coils and repeaters present on the loop
- Length of the feeder cable (F1) and the distribution cable (F2), respectively
- Existence of fiber in the loop
- Any disturbers currently present in the same and adjacent binder group(s)
- If CLEC has specified a Power Spectral Density (PSD) mask on the request, an indication as to whether the loop currently qualifies for the specified PSD, based on the industry standards or draft standards, whichever are currently published. CLECs are not required to indicate their desired PSD mask on loop qualification requests.
- Tracking number (which must be referenced if an order is placed)

After receiving the loop qualification information, the CLEC may decide whether to place an xDSL capable loop order. The loop make-up information returned will reflect the information contained in SWBT's loop records at the time it was completed. For ordering purposes, the loop qualification is considered valid for 30 calendar days. However, no facilities are reserved. Due to daily changes in the network, the actual loop received, if ordered, may differ somewhat from the loop qualification results.

Ordering

An order is initiated by submitting a Local Service Request (LSR) with the necessary information for an xDSL-capable loop. This includes a tracking number when loop qualification has been performed on a pre-order basis. The CLEC can submit the LSR via fax, the Local Service Request Exchange (LEX) system or EDI.

When there is no loop qualification tracking number on the request, the LSC will suspend order processing until the loop qualification step is performed. The LSC will return a copy of the loop qualification results to the CLEC. If the CLEC chooses the "AS IS" option outlined below, the loop qualification step will not be performed if the pre-qualification results for the requested loop are "Green."

When the existing loop meets the specifications and/or the conditions on the LSR, the service order is issued and the Firm Order Confirmation (FOC) is returned to the CLEC. Conversely, if the existing loop does not meet the specifications and/or conditions specified by the CLEC, the LSR will be rejected. The CLEC then has the option of resubmitting the LSR with revised specifications and/or conditions.

CLECs may change the requested PSD for the loop at any time prior to the FOC being issued. A second loop qualification is not required.

The provisioning intervals for xDSL capable loops, as set forth in the CLEC's interconnection agreement, are different for conditioned and non-conditioned loops. The non-conditioned loop intervals will apply unless the CLEC has requested that conditioning be performed. The conditioned loop interval will apply whenever the CLEC requests that conditioning be performed.

Ordering and Loop Qualification Options

SWBT recognizes that each CLEC has different marketing strategies and business needs. As a result, SWBT has created flexibility in its order processes. CLECs have the option of requesting loop qualification information on a pre-order basis with the "Two-Step Process" or during the order process with the "One-Step Process." These processes are outlined below.

Two-Step Process

Under the Two-Step Process, the loop qualification is requested prior to the issuance of Local Service Request (LSR) (e.g., prior to ordering a loop). Under this "pre-order" process, a CLEC submits a loop qualification request by fax or email to the LSC. This request may be in the form of a spreadsheet and must contain the following information:

- the date of the request;
- the validated end user's address;
- the CLEC's Alternate Exchange Carrier Number (AECN);
- the CLEC's appropriate Billing Account Number (BAN).

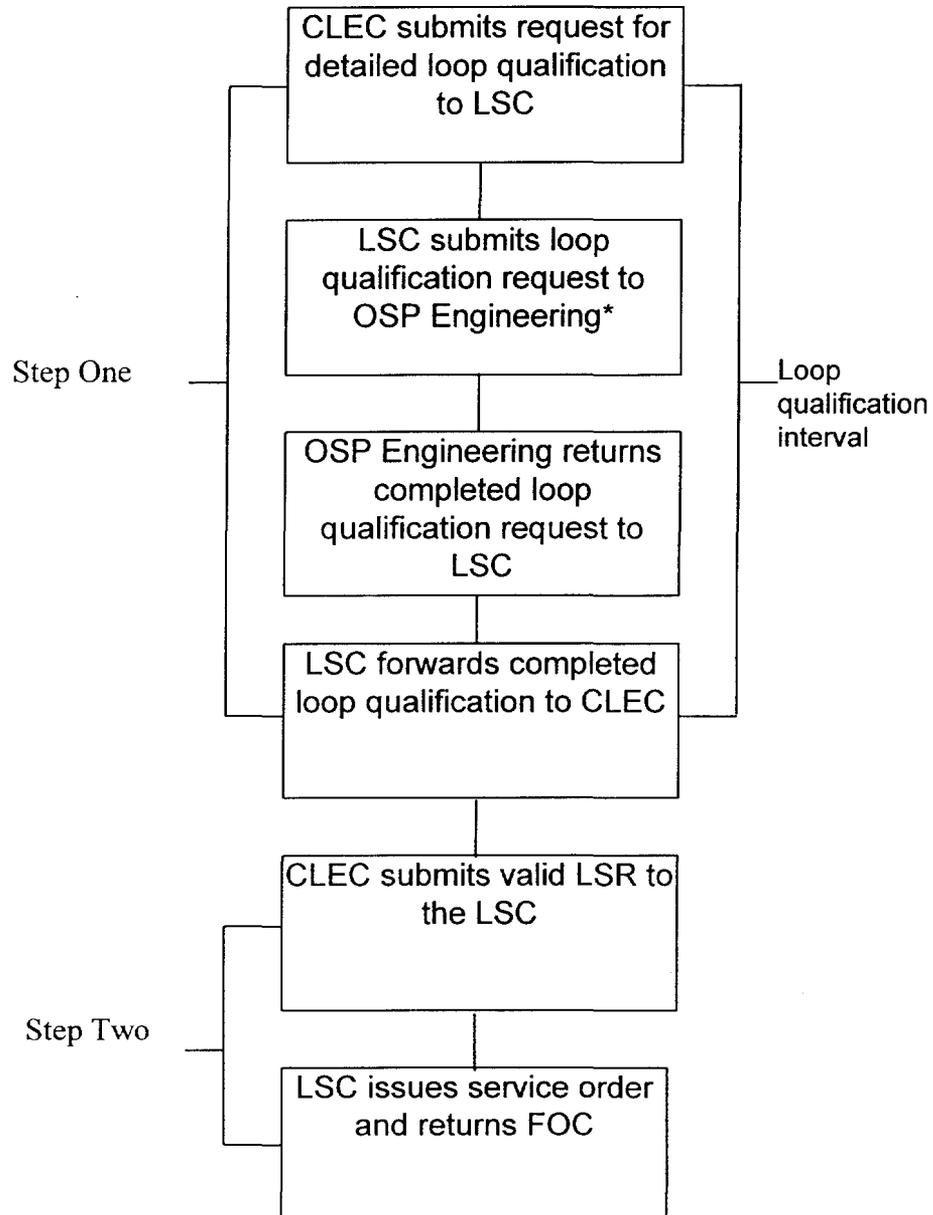
If desired, the CLEC may also choose to specify the Power Spectral Density (PSD) number for which the loop should be qualified. If a PSD is specified, the loop qualification results will indicate whether the requested loop meets the ANSI standards or draft standards for the specified PSD. If the CLEC chooses to order the loop, it may specify any PSD regardless of the PSD specified for the loop qualification. If no PSD number is specified, the loop qualification status returned on the loop qualification will be based on ANSI standard T1.413-1998 for PSD Five (ADSL). SWBT uses PSD Five as a default specification. A loop qualification using PSD Five will return to the CLEC all the information it requires for any PSD number, thus facilitating the provisioning of any xDSL technology the CLEC may want to provide. Again, if the CLEC chooses to order the loop, it may specify any PSD, and no additional loop qualification will be necessary.

SWBT will complete the loop qualification and return the results to the CLEC.

If the CLEC decides to order the loop after evaluation of the loop qualification results, it must note the loop qualification tracking number in the Remarks section of the LSR. This advises the LSC that a loop qualification has already been performed and the service order can be processed immediately.

An illustration of the Two-Step Process follows:

Two-Step Process Loop Qualification Performed on Pre-Order Basis



* Outside Plant Engineering

One-Step Process

A combined one-step loop qualification and xDSL loop order process was developed in response to CLEC requests for a process that did not require completion of separate xDSL loop qualification and xDSL loop requests. At their option, CLECs may combine the loop qualification process with the loop order process using the One-Step process. This process is outlined below:

The CLEC submits an LSR for an xDSL-capable loop via fax, LEX , or EDI. The PSD mask of the technology the CLEC plans to deploy is indicated on the LSR. If no prior loop qualification is indicated in the Remarks section of the LSR, the LSC will automatically initiate a loop qualification request.

SWBT will complete the loop qualification and return the results to the CLEC.

If the loop qualification results indicate the loop meets the specifications indicated by the CLEC on the LSR, the xDSL capable loop order will be issued. No further CLEC input is required and a Firm Order Confirmation ("FOC") will be sent to the CLEC.

If the loop does not meet the specifications indicated by the CLEC, the LSR will be rejected. The CLEC then has the option of canceling the request if the loop does not meet its needs, or supplementing the LSR to revise the specifications. Such supplementing does not "restart" the loop qualification process. However, SWBT operations cannot start the provisioning process on a loop that does not meet a CLEC's specifications until it receives further direction from the CLEC.

"AS IS" Option:

As part of this one-step process, SWBT has provided the CLECs the option of specifying on the LSR that the CLEC wants the loop "as is" regardless of the results of the loop qualification. This is done by using the SPEC code "UALNQX"¹ on the LSR. This eliminates the need for CLECs to send supplemental LSRs in cases where the loop may not meet current industry standards or draft standards but the CLEC knows, prior to viewing the completed loop qualification results, that it wants SWBT to provision the order. (The CLECs may be able to make this judgement based on the pre-qualification results.)

If the CLEC specifies "as is" on the LSR, SWBT will perform a pre-qualification upon receipt of the LSR. If the pre-qualification result is "Green," SWBT will issue a service order immediately and will return the FOC to the CLEC. No loop qualification will be performed. If the pre-qualification result is "Yellow" or "Red," a loop qualification will be performed and the order will be processed using the standard one-step process as described above.

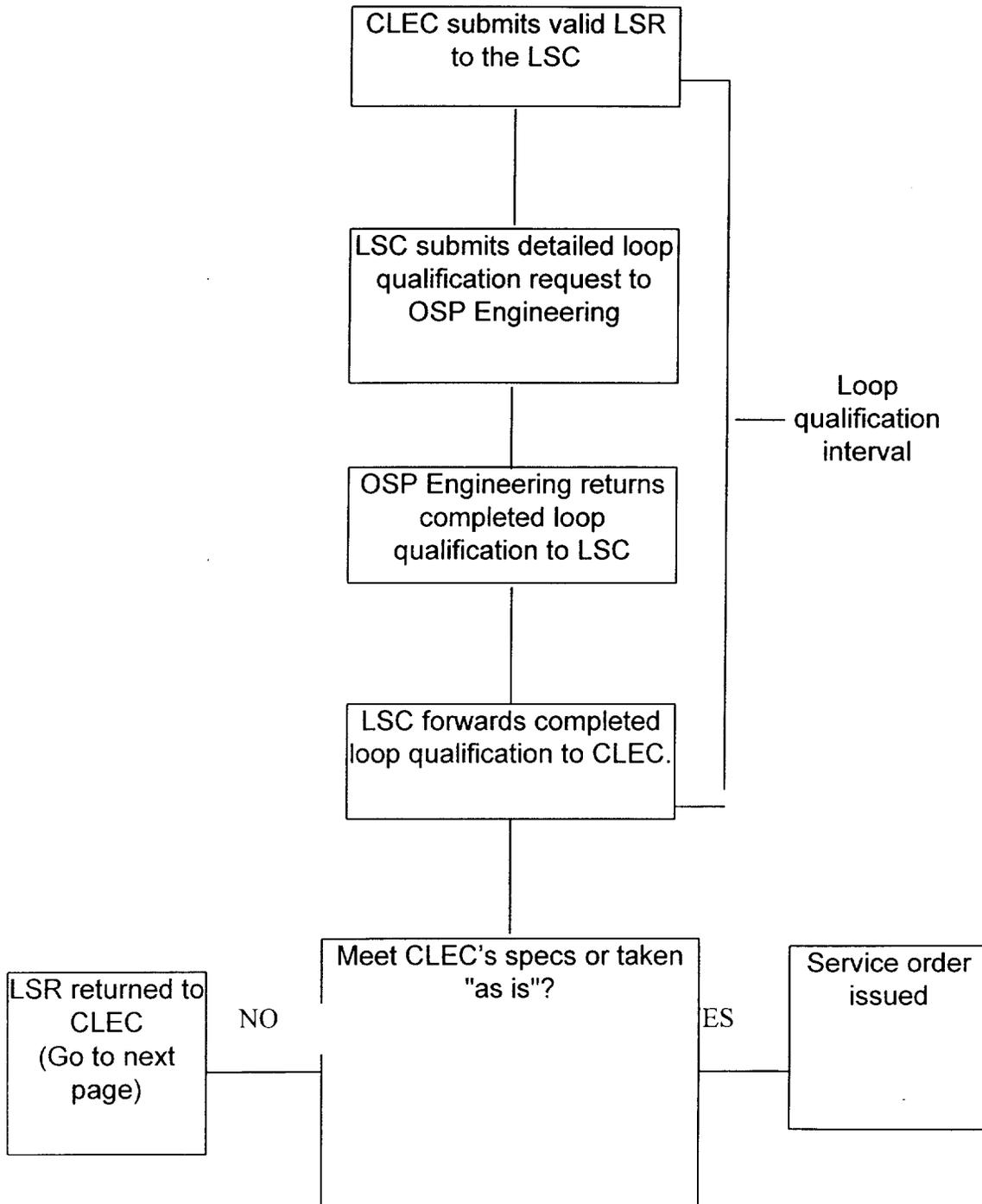
CLECs have an additional option for xDSL loops used to provision PSD #5 (ADSL). CLECs that are interested in this option should contact their LPAT account manager. If the CLEC chooses this option, all of the CLEC's PSD #5 xDSL capable loop requests will be processed in this manner. At the CLEC's direction, SWBT will immediately begin the provisioning process for any PSD #5 request specifying a

¹ This SPEC code is what is used today. Additional SPEC codes may be added in the future to provide more options to the CLECs.

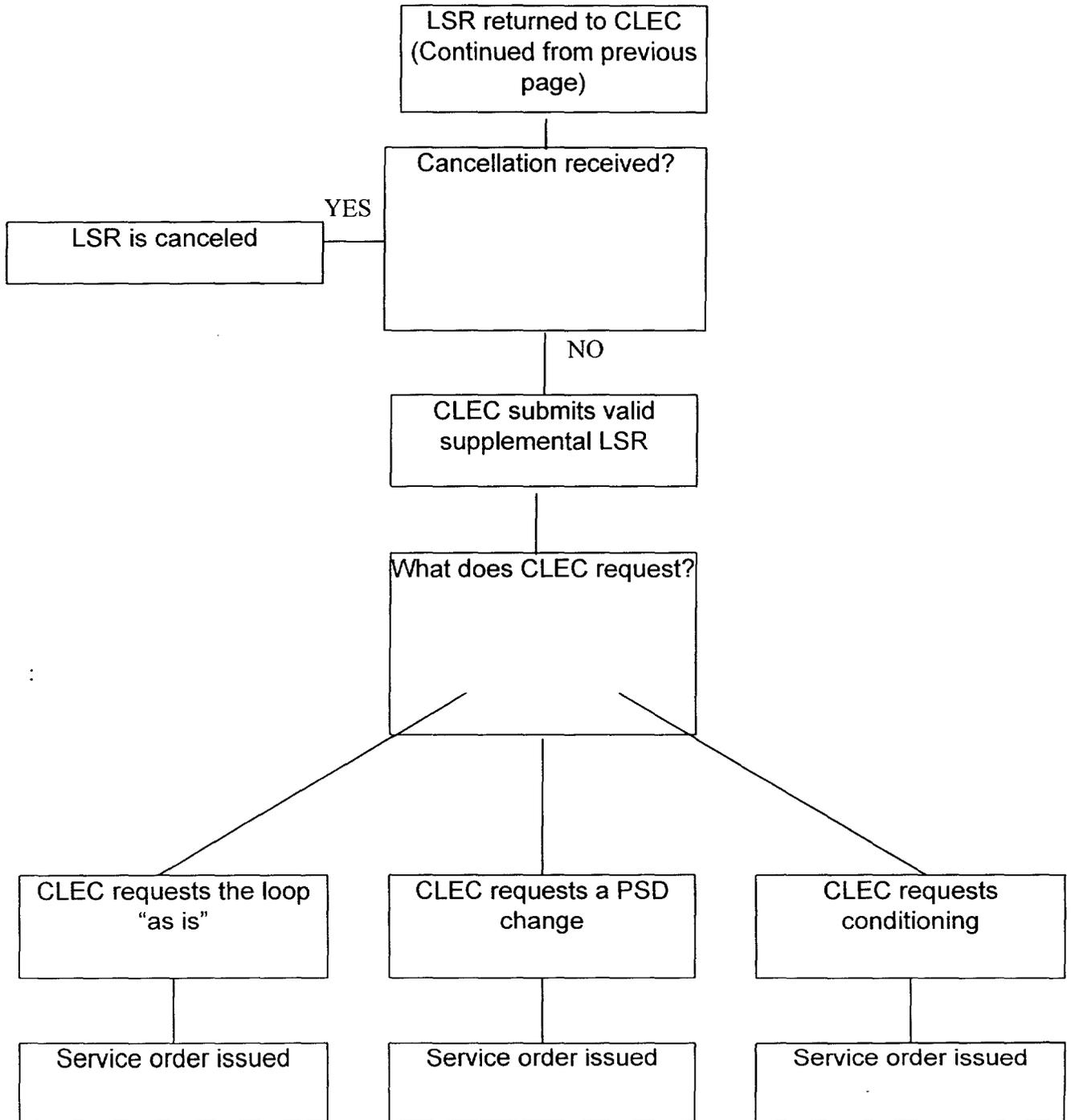
loop that meets the minimum qualification standards if the pre-qualification result is “Green.” Should the CLEC choose this option, the CLEC will still receive a loop qualification report, although SWBT operations will create the report *concurrently* with the provisioning of the loop.

An illustration of the One-Step Process follows:

One-Step Process Loop Qualification Performed During Order Process

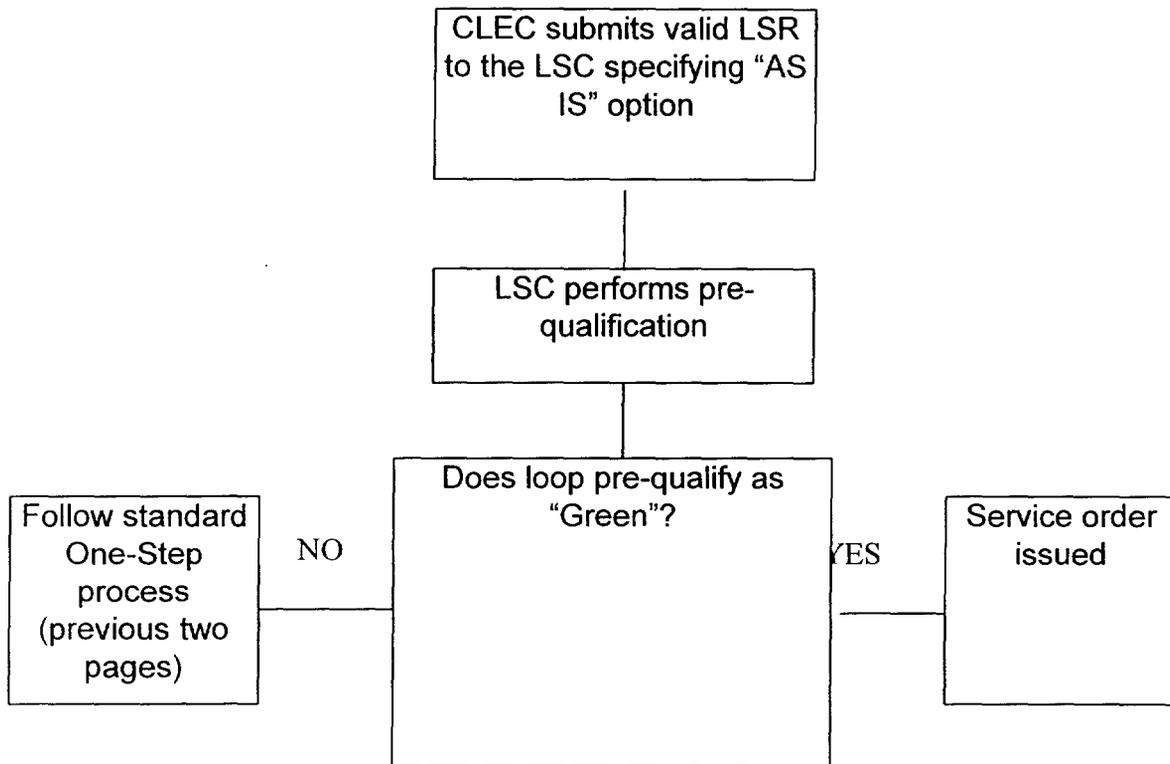


**One Step Process
(continued)**



An illustration of the One-Step Process with the "AS IS" option follows:

One-Step Process with "AS IS" Option



LSR Requirements for xDSL Capable Loops

The ordering requirements for unbundled loops are contained in the Local Service Ordering Requirements (LSOR). The NC, NCI, and SPEC codes are contained in the Carrier Coding Guide. The following information contains the xDSL specific codes currently documented in these guides. The information below is provided for illustrative purposes only and is subject to change. The LSOR and Carrier Coding Guide should be consulted to determine the available coding options when ordering an xDSL Capable Loop.

SPEC Codes

The SPEC code field on the LSR enables the CLEC to indicate the level of qualification desired and authorize any desired conditioning.

If the CLEC requests a qualified loop, SWBT will only issue an order if the loop qualification results indicate that the loop meets the minimum standards for the designated spectrum management class as specified by Power Spectral Density (PSD) mask. If the CLEC requests a non-qualified loop, SWBT will issue an order even if the loop qualification results indicate that the loop does not meet the minimum standards for the designated spectrum management class. The minimum qualification standards for the spectrum management class are based on the most current version of ANSI T1E1.4 – Spectrum Management for Loop Transmission Standards.

A request for a non-qualified loop will not affect SWBT's internal loop assignment process. It is merely an indication to SWBT of the CLEC's minimum requirements for an acceptable loop. The non-qualified specification does not mean that the CLEC requires a non-qualified loop. It merely means that the CLEC desires the loop to be provisioned even if it does not meet the parameters set forth for its specified PSD based upon the current ANSI standard or draft standard(s). When this option is chosen, SWBT will provide a qualified loop to the CLEC, if one is available, for the specified end user address. If a qualified loop is not available for the specified address, SWBT will provide a non-qualified loop.

The following SPEC codes may be used on initial requests and at any time after the loop qualification process has been performed.

SPEC Code	Usage
UALM13 (PSD#5 Only)	<p>xDSL Capable Loop capable of supporting SWBT's high-speed ADSL tariff offering. The loop order will be processed if loop meets the minimum standards for SWBT's high speed ADSL tariff offering without conditioning. If the loop does not meet these standards, the LSR will be rejected back to the CLEC.</p> <p>Note: CLEC may deploy high-speed offerings without using this SPEC code. It is only used to indicate the CLEC's desire to apply the higher qualification standard utilized by SWBT when qualifying loops for its high speed tariff offering.</p>

SPEC Code	Usage
UALM32	<p>xDSL Capable Loop which meets the minimum qualification standards for the requested PSD. The loop order will be processed if the loop meets minimum qualification standards without conditioning. If the loop does not meet minimum qualification standards for the requested PSD, the LSR will be rejected back to the CLEC.</p> <p>Note: This use of this SPEC code does not limit the speed the CLEC may deploy over the requested loop. It is only used to indicate the CLEC's desire to apply the minimum qualification standard for the specified spectrum management class when qualifying loops.</p>
UALNQX	<p>xDSL Capable Loop that does not meet minimum qualification standards for requested PSD.</p> <p>NOTE: If CLEC specifies this option prior to receiving a loop qualification, it will not be given the opportunity to evaluate the loop qualification results of a non-qualified loop prior to the issuance of a service order. If the pre-qualification results for the loop are "Green," an order will be issued immediately and no loop qualification will be performed. If the loop qualification results are "Yellow" or "Red," an order will be issued upon completion of the loop qualification even if loop exceeds industry standard length or has load coil. Cancellation charges will apply if CLEC determines after evaluating the loop qualification results that the loop will not support CLEC's desired xDSL technology.</p> <p>When used on a supplemental request, this SPEC code indicates CLEC is requesting a non-qualified loop "as is" (without conditioning).</p> <p>Note: This use of this SPEC code does not limit the speed the CLEC may deploy over the requested loop. It is only used to indicate the CLEC's desire not to apply the minimum qualification standard for the specified spectrum management class when qualifying loops. Even when this SPEC code is used, SWBT will provide a qualified loop if one is available.</p>

The following SPEC codes are dependent on the loop qualification results and can only be used after the CLEC receives loop qualification results. **They may not be used on initial requests unless the CLEC has requested a loop qualification on a pre-order basis (the Two-Step process):**

SPEC Code	Usage
UALRLX	xDSL Capable Loop and removal of load coils. (Applicable if completed loop qualification results indicate that removal of load coils is an available conditioning option.)
UALRTX	xDSL Capable Loop and removal of bridged tap. (Applicable if completed loop qualification results indicate that removal of bridged tap is an available conditioning option.)
UALRRX	xDSL Capable Loop and removal of repeater. (Applicable if completed loop qualification results indicate that removal of repeater is an available conditioning option.)
UALRLT	xDSL Capable Loop and removal of load coil and bridged tap. (Applicable if completed loop qualification results indicate that removal of load coils and bridged tap are available conditioning options.)
UALRTR	xDSL Capable Loop and removal of bridged tap and repeater. (Applicable if completed loop qualification results indicate that removal of bridged tap and repeater are available conditioning options.)
UALRLB	xDSL Capable Loop and removal of load coil, bridged tap, and repeater. (Applicable after loop qualification results provided)
UALRLR	xDSL Capable Loop and removal of load coil and a repeater (Applicable after loop qualification results provided)