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Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

CC Docket No. 98-141

In re Applications of AMERITECH CORP. )  
Transferor, )  
AND )  
SBC COMMUNICATIONS INC., )  
Transferee, )  
For Consent to Transfer Control of )  
Corporations Holding Commission Licenses )  
and Lines Pursuant to Sections 214 )  
and 310(d) of the Communications Act )  
and Parts 5, 22, 24, 25, 63, 90, 95 and 101 )  
of the Commission's Rules )

NOTIFICATION OF UNRESOLVED ISSUES IN DISPUTE  
REGARDING SOUTHWESTERN BELL CORPORATION'S  
PHASE I PLAN OF RECORD

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February 7, 2000

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Rhythms Links, Inc. (“Rhythms”), MCI WorldCom, Inc. (“MCI WorldCom”), AT&T, Sprint, and NorthPoint Communications, Inc. (“NorthPoint”) (referred to jointly herein as “CLECs”) hereby submit this notification of unresolved issues in dispute regarding Southwestern Bell Corporation’s (“SBC”) Phase I Plan of Record (“POR”). This notification is made pursuant to requirements of the Federal Communications Commission (“Commission”) in Appendix C, paragraph 15c(2) of the SBC/Ameritech merger order.<sup>1</sup> The CLECs request that the Commission decline to approve SBC’s submission, filed concurrently with this notification, regarding its Phase I Plan of Record until SBC fully complies with the procedural requirements of the Merger Order and resolves all disputed issues.

## I. BACKGROUND

On December 6, 1999, SBC made available on its secure websites a Plan of Record discussing the present method of operation (“PMO”) for the operations and support systems (“OSS”) that support pre-ordering and ordering of unbundled network elements (“UNEs”).<sup>2</sup> SBC provided a PMO for each of its four service territories – Pacific Bell/Nevada Bell, Southwestern Bell Telephone, Ameritech Information Systems, and Southern New England Telephone (“SNET”). In addition, SBC provided a description of a unified future method of operation (“FMO”) that it intended to make available across its 13-state region.

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<sup>1</sup> In re Applications of Ameritech Corp., Transferor, and SBC Communications, Inc., Transferee, For consent to Transfer For Consent to Transfer Control of Corporations Holding Commission Licenses and Lines Pursuant to Sections 214 and 310(d) of the Communications Act and Parts 5, 22, 24, 25, 63, 90, 95 and 101 of the Commission's Rules, (rel. October 8, 1999) [“Merger Order”].

<sup>2</sup> Although SBC posted the POR on TCNet in the Ameritech region, it did not indicate that CLECs could file comments regarding the proposal. In its other regions SBC included a notification that CLECs could file comments.

CLECs submitted detailed comments expressing numerous concerns about SBC's Phase I Plan of Record on January 6, 2000. In response, SBC scheduled a workshop on January 19, 2000 to discuss and resolve the CLECs' concerns. At the conclusion of the January 19, 2000 meeting, held in Dallas, Texas, the positions of the CLECs and SBC were far apart, with no agreement reached regarding CLECs' concerns. Part of the reason for the lack of agreement was SBC's insistence that discussions at the workshop could center only on a limited subset of issues that SBC deemed to be "inside the scope of the POR." Therefore, a second set of meetings, for February 1 and 2, 2000, were scheduled also in Dallas, Texas.

On January 28, 2000, shortly before the next workshop, SBC circulated a set of minutes taken by an SBC employee at the January 19, 2000 meeting to some of the CLEC attendees. CLECs had specifically requested the ability to review and correct or add to the minutes prior to the next set of workshops so that all parties had a common understanding of the issues to be addressed. Not only were the minutes circulated too late for CLECs to have a meaningful opportunity to review them, but even a cursory examination revealed numerous substantial discrepancies between various CLEC attendees' notes and representations made in the minutes. For example, CLEC attendees specifically asked that any subject SBC considered to be "outside the scope of the POR" be identified as an open issue. However, when SBC circulated an updated matrix of CLEC issues, subjects considered to be outside the scope of the POR were identified as "resolved." Therefore, to ensure that a full and accurate record would be available to the Commission and all attendees, the CLECs jointly agreed to have a court reporter present to record the entire two-day workshop on February 1 and 2, 2000. SBC initially opposed

the presence of the court reporter, but eventually agreed on the condition that it could have present a second court reporter.

Although the presence of a court reporter significantly facilitated the full and open exchange of issues, CLECs were still hampered by the unduly narrow view taken by SBC as to what topics were or were not allowed to be discussed at the workshop. CLECs made clear that they did not agree with SBC's interpretation of what issues were "inside the scope of the POR" but agreed to move forward with topics SBC identified as appropriate.<sup>3</sup> Thus, working within SBC's limitations, the CLECs suggested a list of 13 specific requests for modifications to SBC's OSS and SBC agreed. SBC indicated it will file an addendum to its Phase I Plan of Record reflecting those areas of agreement, which are briefly summarized below. However, as discussed below, there were numerous significant issues on which agreement could not be reached between the CLECs and SBC. Some of those issues could not be resolved after discussion at the POR workshops, while many other issues could not be resolved due to SBC's insistence that the matters were "outside the scope" of the POR and SBC's refusal to discuss or negotiate on these matters.

## **II. SBC Did Not Comply with Requirements of the Merger Order**

Pursuant to the Merger Order,<sup>4</sup> SBC was required to file a publicly available Plan of Record (Phase I), which must consist of "an overall assessment of SBC's and Ameritech's existing Datagate and EDI interfaces, business processes and rules, hardware capabilities, data capabilities, and differences, and SBC/Ameritech's plan for developing

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<sup>3</sup> Transcript of February 1 Workshop, 82-84 [February 1 Transcript]. Cited excerpts from the transcript are provided at Attachment A.

<sup>4</sup> Merger Order, Appendix C, paragraph 15c(1).

and deploying 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 . . . .” CLECs then have 30 days to request enhancements to SBC’s proposals in the Plan of Record.<sup>5</sup> If any CLEC requested enhancements, Phase II begins, during which SBC is required to work collaboratively with CLECs in a series of workshops to obtain a written agreement on OSS enhancements that should be included in the Phase I Plan of Record, and a plan for development and deployment for the agreed to enhancements. That written agreement must be filed with the Commission within 30 days from the start of Phase 2.

**A. SBC Unduly Limited the Scope of the POR Workshops**

The clear intent of the Commission’s directive regarding the content of SBC’s Phase I POR was a comprehensive “overall” assessment of the current and future state of SBC’s OSS used for pre-ordering and ordering, including technical capabilities, business rules and processes. However, SBC imposed an unduly restricted scope of the Commission requirements, insisting repeatedly that the only allowable topics were enhancements to Datagate and EDI. In other words, any topic not strictly limited to the coding and field changes being made to Datagate and EDI were not allowed. For example, SBC was unwilling to discuss whether and how modifications would be made to front-end systems and graphical interfaces used by CLECS to access SBC’s OSS databases and back-end systems that process inputs made through Datagate and EDI. Thus, CLECs were seriously handicapped in knowing what modifications should be requested for Datagate and EDI, or what the true effect of these modifications would be

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<sup>5</sup> Merger Order, Appendix C, paragraph 15c(1)(B).

because they were precluded from discussing technical aspects of SBC's OSS or overall business procedures or rules for pre-ordering and ordering.

SBC's narrow interpretation of its requirements under the Merger Order was inappropriate and unnecessary. It became clear at several points during the meetings that some SBC personnel present in the room knew the answers to CLEC questions regarding matters "outside the scope of the POR." For example, at the February 1 workshop, in response to a CLEC question regarding an 850 EDI transaction, George Phillips, an SBC subject matter expert sought permission from the SBC representative running the workshop by inquiring "Can I answer the question?" prior to providing an answer.<sup>6</sup> Similarly, Carol Chapman, another SBC subject matter expert inquired "Can I answer his Verigate question?" prior to offering an answer. Other similar exchanges occurred during the meeting.<sup>7</sup> Because SBC imposed an unduly restricted scope on the discussions in the workshops, and thereby prevented CLECs from addressing all of their concerns regarding SBC's OSS, SBC failed to comply with the Merger Order.

#### **B. No written agreement**

SBC indicated to CLECs that it would file an addendum to its Phase I POR by February 7, 2000. However, SBC did not make that addendum available to CLECs for review or signature prior to the February 7 filing date. Thus, CLECs cannot verify whether SBC's filing will accurately and fully reflect agreements reached during the February 2, 2000 workshop. Until CLECs have been allowed to review the POR addendum, then, SBC cannot have fulfilled its obligation to file a written document reflecting agreements reached with CLECs.

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<sup>6</sup> February 1 Transcript, 118.

### **C. No Change Management Process**

As part of its obligations during the Phase II workshops, SBC was required to obtain written agreement to a change management process, including a 12- month forward-looking view of process changes and deployment schedule.<sup>8</sup> SBC did not fulfill this requirement. Although SBC did indicate that the change management process should be considered by CLECs as an alternative method of resolving concerns, no specific discussion of the process was provided. Indeed, CLECs specifically asked what topics considered to be “outside the scope of the POR” by SBC would be appropriate for the change management process, but SBC could not provide a definitive answer. Further, SBC provided a list of rollout dates for modifications to its OSS, but those dates did not provide a 12-month forecast for OSS implementation as required by the Merger Order because the forecast of rollout dates for modifications to Datagate and EDI ended in December, 2000.

### **III. ISSUES ON WHICH AGREEMENT WAS REACHED**

On the concluding day of the February workshops SBC responded to specific CLEC requests for modifications or commitments to its Phase I POR and agreement was reached on 13 items. Although SBC indicated it would file an addendum with the Commission providing a detailed description of those modifications and commitments, the CLECs will provide a brief summary to ensure the Commission has a consistent understanding of the areas of agreement.

1. **Additional Data Elements in Loop Qualification:** CLECs reiterated that there are numerous data elements to which they require access during the loop

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<sup>7</sup> See, e.g. February 1 Transcript, 196.

qualification process that SBC did not list in its POR.<sup>9</sup> Initially SBC took the position that additional loop makeup data elements should be negotiated through the change management process,<sup>10</sup> but SBC eventually agreed it has in its databases, and can make available, an additional 18 data elements no later than December 2, 2000 to CLECs during the loop qualification process. Although CLECs agreed they will benefit from the availability of additional data elements, they expressed concern that SBC will not commit to make them available on a faster timeframe, because SBC has been on notice since November 3, 1999, that CLECs required this additional data.<sup>11</sup> (See Item 11 below). The list of additional data elements is as follows: 1) presence/location of repeaters, 2) quantity of repeaters, 3) type of repeaters, 4) type of plant (aerial or buried), 5) composition of loop (copper or fiber), 6) portion of loop of each composition type, 7) availability of spare loops, 8) quantity of bridged-taps, 9) number of occurrences of bridged taps, 10) quantity of low pass filters, 11) location of low pass filters, 12) quantity of range extenders, 13) location of range extenders, 14) number of gauge changes, 15) location of pair gain, 16) location of digital loop carrier (“DLC”), 17) quantity of DLC, 18) presence of remote switching unit, and 19) type of remote switching unit.<sup>12</sup> In addition to these discrete data elements, SBC acknowledged its requirement under the Rhythms/Covad arbitration with

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<sup>8</sup> Merger Order, Appendix C, paragraph 15c(2).

<sup>9</sup> Transcript, Feb. 1, 106:12107:6. SBC listed 19 data elements in its POR that it was willing to make available during its loop qualification process. These data elements are scheduled to be available March 18, 2000.

<sup>10</sup> Transcript, Feb. 1, 123:18-124; 135:1-21.

<sup>11</sup> Transcript, Feb. 1, 136:22-137:9.

<sup>12</sup> Transcript, Feb. 1, 140; 142-144:

SBC in Texas to provide electronic access to all records, databases and back-end systems to which internal personnel have access. SBC indicated such capabilities would be available in Texas by April 29, 2000. However, SBC would not discuss how it intends to make the same systems and information available to all CLECs in its 13-state region as required by the UNE Remand Order. Indeed, SBC indicated that steps it must take to comply with the UNE Remand Order were “outside the scope of the POR.”

2. **Elimination of New Mandatory Tracking Number:** SBC had proposed adding a new mandatory field to its ordering systems that required CLECs to obtain and provide a so-called tracking number on xDSL loop orders. The tracking number was to be obtained through SBC’s loop qualification process. Without the number, CLEC orders would either be rejected, or would be forced out of the ordering process for manual lookup of the tracking number.<sup>13</sup> In either case, CLECs would be seriously disadvantaged compared to SBC’s own operations because CLEC orders would not flow through SBC’s ordering system on a mechanized basis. There was also a serious question raised by CLECs whether the tracking number could be obtained through Verigate, the user interface currently used by many CLECs. SBC agreed to eliminate the mandatory tracking number from its ordering system. Thus, SBC assured CLECs that they will be able to place an order for an xDSL loop, and leave the field for the tracking number blank with no negative effects (i.e., the order will not be rejected or dropped out for manual processing).

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<sup>13</sup> Transcript, Feb. 2, 383

3. **Elimination of Loop Qualification Requirements for Some Loops:** CLECs requested that SBC eliminate its mandatory loop qualification requirements for loops that are 12K feet or less in length. SBC agreed to this request and indicated that once a pre-qualification is performed on these loops, an order may flow through immediately. This modification will be made available no later than July, 2000.
4. **Charges for Loop Qualification:** CLECs requested that they only be charged for loop qualification if an order is actually placed. SBC would not commit to such pricing policy, but indicated it is currently planning to adopt such a policy, and would make an affirmative statement in its POR addendum regarding charges for loop qualification.
5. **Definition of actual Loop Length:** CLECs requested clarification of what portion of a loop is included in an actual loop length calculation. SBC clarified that actual loop length comprises the feeder portion of the loop and the distribution portion of the loop up to the customer terminal. The figure does not include the drop wire to a customer's actual premises.
6. **Clarification of the terms DLR and DLR-like:** CLECs requested an explanation of the meaning of the terms DLR and DLR-like as used by SBC in its POR. SBC provided clarification.
7. **Continued Support for Pre-Qualification:** SBC agreed to include an affirmative statement in its addendum to the POR that it will continue to make available a pre-qualification process through Datagate and EDI in any service area where it is currently available.

8. **Additional Data Elements in Pre-Qualification:** SBC agreed to unmask all of the data fields currently available in its pre-qualification mini database. Currently three fields are available: 26-gauge equivalent loop length, red/yellow/green indicator and taper code. SBC will unmask two other fields -- wire center code and design cable gauge makeup -- on March 18, 2000.
9. **Incorporating Reference to Change Management Process:** SBC agreed to include a reference to requirements of the Change Management Process when making requested modifications to its OSS through the POR process.
10. **Methods and Procedures Documents for EDI/Datagate:** CLECs requested detailed documents, often referred to as Methods and Procedures internal in the Bell system, describing precisely what changes are being made to its OSS for the pre-ordering and ordering enhancements in the POR. The information CLECs requested should be much more detailed and broader in scope than the insufficient information regarding modifications to Datagate and EDI that SBC has provided to date on its website. In addition, this document should include a discussion of the exact way in which a CLEC utilizes the system to successfully place a loop order. SBC agreed to provide such a document.
11. **Minutes from November CLEC Meeting:** CLECs requested a copy of minutes from a November 3, 1999 meeting with CLECs be distributed for clarification of two issues. The first was to determine the working definition CLECs and SBC had agreed to regarding a remote switching unit because personnel at the February workshops indicated they were unsure of the definition of an RSU. The second was to verify that CLECs had requested a list of numerous additional loop

qualification data elements in November that were not included in SBC's POR.

Although SBC distributed the minutes, which referenced the list of data elements, that attachment was not provided. Thus, the CLECs are providing that list with this notification as Attachment B.

**12. Layout of Ameritech address fields:** CLECs requested that SBC ensure the layout of specific address fields in Ameritech region will be consistent with those in SBC's other service areas. SBC agreed.

**13. Number of PORs to be issued by SBC:** SBC agreed to make an affirmative statement in its POR addendum indicating that it will issue five PORs related to OSS issues for pre-ordering and ordering for advanced services. An SBC representative had indicated at the January 19, 2000 meeting that SBC intended to issue 13 PORs. CLECs expressed concerns that by dividing OSS issues arbitrarily into 13 different PORs, each with a limited 30-day comment window, it would be impossible for CLECs to make a comprehensive determination whether all of their needs would ever be addressed.

#### **IV. Unresolved Issues**

Although some progress was made at the February workshops, many CLEC issues were not addressed. Some of these issues were discussed, but agreement was not reached. However, the vast majority of issues still in dispute were unresolved because SBC refused to discuss them. SBC insisted throughout the workshop process that many issues directly related to pre-ordering and ordering xDSL capable loops were "outside the scope" of the POR. The most significant unresolved issues are discussed below.

### **A. Access to all SBC Records, Databases and Back-End Systems**

CLECS have requested, and the Texas PUC and the FCC have ordered, that SBC provide CLECs with real-time, mechanized access to all records, databases, and back-end systems available to SBC's own personnel, including LFACs (SBC's primary loop assignment and tracking system), LEAD, and TIRKS. Such information should include aggregate planning data such as percentage of DLC at each wire center. SBC's POR does not discuss access to such records, databases and back-end systems. During the February workshop, SBC indicated it will make such access available to CLECs in Texas, but provided no detail. SBC refused to commit to making such access available in any other state.

CLECs hereby request that SBC identify specifically which databases and back-end systems contain any loop makeup information available to SBC's own personnel, whether engineering or otherwise. In addition, CLECs request that SBC indicate all such information that is available and whether SBC intends to make access available to CLECs directly to those databases, or through population of created databases, and whether SBC will provide electronic real-time access.

### **B. Support for and Modification to CLEC User Interfaces**

Many CLECs expressed concerns that SBC's POR fails to discuss future support or enhancements for graphical user interfaces ("GUI") used by CLECs to access SBC's pre-ordering and ordering systems. Among those GUIs are Verigate, LEX and WebGUI. SBC repeatedly indicated that discussion of such front-end interfaces was "outside the scope of the POR." While SBC suggested that these issues might be discussed in another POR, CLECs believe that changes to these front-end interfaces are inextricably linked to

changes to SBC's DataGate and EDI interfaces and therefore must be discussed in this POR.

### **C. Population of Data**

The POR is deficient in not requiring the updating of relevant databases to incorporate necessary loop makeup data. To the extent the existing databases do not contain loop make-up data (or that data is incomplete) that information should be incorporated or updated in the pertinent databases as manual loop qualifications or engineering queries are performed. Such updates of loop makeup information will be done for Ameritech service regions.

Additionally, SBC indicated that it would not discuss any efforts to transfer loop makeup information currently contained in manual records to automated databases. This topic was considered by SBC to be "outside the scope of the POR."

### **D. Real-Time Flow-Through of CLEC Orders**

CLECs have requested that SBC describe in detail how it will implement a real-time flow-through pre-ordering and ordering system for xDSL loops. SBC did not address this issue in its POR and indicated repeatedly that it is "outside the scope of the POR." During the February workshops, SBC did acknowledge that SBC must make a real-time flow-through system available in Texas as a result of the Rhythms/Covad arbitration. However, SBC would not discuss flow-through for any other service area and did not provide details on its flow-through system for Texas. CLECs are mystified how SBC could consider flow-through to be outside the scope of a POR that is supposed to describe modifications to OSS pre-ordering and ordering systems in order to support mechanized (i.e., flow-through) systems.

### **E. Pre-ordering and Ordering Intervals**

SBC's POR provided limited information on time intervals for critical steps in the pre-ordering and ordering processes. In their comments and again at the workshop, CLECs requested additional discussion and commitments from SBC. However, SBC repeatedly stated that intervals were "outside the scope of the POR." Without commitments regarding pre-ordering and ordering intervals, CLECs will be seriously handicapped. CLECs hereby request that SBC be required to provide at least the following information regarding intervals.

- CLECs request that statistical support data (or at a minimum historical results) be provided for validating the various processing intervals. Inconsistent processes will cause delays in CLEC ordering.
- The POR does not discuss intervals for Firm Order Commitments ("FOCs") or loop order rejections. The FOC is the critical, final step of the ordering process and is used by the CLEC as the basis for scheduling additional work necessary to deliver end user services. FOC delivery intervals must be addressed in the POR, especially in light of CLEC experiences in which SBC issues order rejections as many as five days after giving CLECs a FOC.
- CLECs request that the POR include clear timeline intervals for each step of the pre-ordering and ordering processes including loop qualification.
- Rejects are clearly part of the ordering process, therefore, SBC must be required to discuss this matter in the POR process. Improper or avoidable rejections cause unnecessary delays and work for both CLECs and SBC.

- SBC should be required to provide a description of the reject process that clearly defines each step and the responsibilities of each party in clearing the reject.
- During both of the November 1999 meetings, the CLECs requested access to order status capabilities comparable to, or the same as, the capabilities offered to CLECs in the Pacific Bell region through the Provisioning Order Status ("POS") system. The Plan of Record is silent regarding this specific CLEC request. SBC declined to discuss order status functionality at the workshop, thus no agreement was reached as to the capabilities SBC will make available to CLECs.

#### **F. Parity**

In their comments and at the workshops, CLECs requested a detailed explanation of the way in which SBC supports pre-ordering and ordering for its internal ADSL operations, and/or its advanced services affiliates. SBC personnel acknowledged that SBC's internal DSL operations utilized pre-ordering and ordering systems different than those used by CLECs. However, the personnel indicated they had no additional information regarding parity of pre-ordering and ordering systems and considered such information to be "outside the scope of the POR." Without CLECs having such information, SBC could provide systems or capabilities that are not at parity with service provided to SBC Affiliates. CLECs request that the POR establish a process for providing information on systems used by SBC's internal operations and/or advanced services affiliate, and information regarding performance measures for internal versus CLEC systems.

### **G. Spectrum Management**

CLECs have requested, and the Texas PUC and FCC have ordered SBC to dismantle its binder group management/selective feeder separation (“BGM/SFS”) system.

However, SBC personnel at the workshops indicated that SBC’s BGM/SFS system has not been dismantled. SBC should be required to immediately complete the dismantling of its system and to certify to the Commission and state regulators exactly what steps were taken to remove all designations, software modifications, and other changes implemented for or associated with SBC’s BGM/SFS system.

### **H. Line Sharing**

CLECs requested in their comments and during the workshops that SBC provide information on the ways in which it would support ordering for line-sharing. CLECs believe this topic is appropriate because the Commission’s line sharing order will become effective prior to the closing of Phase II of the POR. SBC declined to provide any details, stating that line sharing was “outside the scope of the POR” and further indicated that OSS issues related to line sharing should be raised in SBC’s multiple line sharing user forums.

However, SBC representatives in the initial meeting of the line sharing forum held on January 25, 2000 indicated that the trial would address only operational issues, and not OSS. Further, the line sharing trial will utilize manual ordering systems. In minutes from the January 25, 2000 meeting, SBC stated: "L/S needs to be made available regardless if OSS issues are in place. To the extent that this trial ends May 1 and the deadline is 6/6, we will work with you and not hold up until the OSSs are due. Hopefully the OSS’s are ready to go, but we don't think we want to hold up getting the

central offices equipped waiting for the OSSs." Further, SBC stated in the minutes, "Trial will probably be manual. Billing components, flow through. A finite number of orders manageable by service reps that are walking it through the systems."

SBC must be required to address fully in its POR all OSS issues related to ordering in a line-sharing environment. If CLECs cannot successfully place an order, they will clearly be precluded from fully exercising their rights to line share under the Commission's order.

### **I. Sample Data**

The CLECs requested that SBC provide sample data from its existing loop qualification process for 100 addresses in all 13 states. Such data will greatly facilitate CLEC implementation of SBC's modifications to Datagate and EDI for several reasons. At the February 2, 2000 workshop, SBC refused to supply such sample data. Thus, the CLECs request that the Commission direct SBC to supply such sample data as quickly as possible, as a requirement for completing Phase II.

### **V. Conclusion**

The CLECs have made some progress in addressing OSS issues for pre-ordering and ordering xDSL loops in workshops with SBC. However, many unresolved issues remain, largely due to the unduly narrow scope SBC imposed on the POR process. CLECs believe these unresolved issues are not yet appropriate for arbitration because they have not been fully discussed. Therefore, the CLECs hereby request that the Commission order SBC to continue with additional workshops to resolve all remaining issues. SBC should also be directed to make available personnel knowledgeable in each subject matter area and to make available personnel with the authority to make

commitments to address CLEC requests. If after this process there remain unresolved issues, CLECs reserve the right to request arbitration pursuant to the Merger Order.<sup>14</sup>

Respectfully submitted

On Behalf of CLECs

A handwritten signature in black ink that reads "Anita Taff-Rice" followed by a stylized monogram "ATC".

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<sup>14</sup> Merger Order, Appendix C, paragraph 15c(2).

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