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BLUMENFELD & COHEN

SUITE 300

1625 MASSACHUSETTS AVENUE, N.W.  
WASHINGTON, DC 20036

202.955.6300

FACSIMILE 202.955.6460

<http://www.technologylaw.com>

February 14, 2000

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

SUITE 1170

4 EMBARCADERO CENTER  
SAN FRANCISCO, CA 94111

415.394.7500

FACSIMILE 415.394.7505

VIA HAND DELIVERY

Mr. Larry Strickling  
Chief, Common Carrier Bureau  
Federal Communications Commission  
445 12<sup>th</sup> St., N.W., Room 5-C450  
Washington, D.C. 20554

RE: *SBC/Ameritech Merger Conditions in CC Docket No. 98-141*

Dear Mr. Strickling,

On February 7, 2000, a group of competitive local carriers ("CLECs") notified you of numerous issues in dispute regarding Southwestern Bell Corporation's ("SBC's") Plan of Record ("POR") obligations under the Commission's Merger Order.<sup>1</sup> These issues remained unresolved at the conclusion of collaborative workshops in February between CLECs and SBC. On the same day, without providing CLECs an opportunity to review its submission, which purportedly was intended to represent "CLEC agreement," SBC filed with the Commission an Addendum to its POR, a "Summary and Chronology," and a "Revised Timeline and Release" schedule.<sup>2</sup>

CLECs have now had an opportunity to review SBC's filings, and offer the following comments to assist the Commission in assessing how the parties should proceed. The CLECs are requesting that the Commission order additional collaborative meetings to resolve the disputed issues. However, the CLECs wish to emphasize that they expect SBC to proceed with the list of commitments made in the POR Addendum in the interim. It would be counterproductive for SBC to attempt to delay implementing agreed-to items while it addresses disputed issues.

<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"], ¶15.

<sup>2</sup>SBC forwarded an email to CLECs that had attended the POR workshops, but did not include the cover letter in which it asserts that it "made a good faith effort to redirect" disputed issues to other forums. As discussed below, the CLECs strongly disagree with this assertion.

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As an initial matter, the CLECs strongly disagree with the numerous issues SBC contends are outside the scope of the POR. These issues, discussed below, are integrally related and critical to CLECs' ability to utilize SBC's Datagate and EDI interfaces for pre-ordering and ordering advanced services. SBC's extremely narrow interpretation of its obligations under the Merger Order will allow SBC to undercut significantly the conditions the Commission believed were the minimum necessary to ensure CLECs have a fair opportunity to compete.<sup>3</sup>

Second, the CLECs disagree that SBC adequately "redirected" issues it considered to be outside the scope of the POR. In fact, the opposite is true. CLECs requested that SBC provide a written explanation of the forums and procedures in place through which CLECs could obtain resolution of outstanding issues. In many instances, SBC personnel were unable to provide such information, or provided responses that were inadequate. For example, SBC personnel frequently directed CLECs to discuss matters with their account managers, or to seek new negotiations through their interconnection agreements. Such suggestions are wholly inadequate to provide CLECs with a uniform, rapid resolution to disputed issues.

Further, SBC personnel provided incorrect information regarding processes available to CLECs to resolve issues. For example, even though SBC's Addendum acknowledges that Line Sharing is a topic inside the scope of the POR,<sup>4</sup> SBC directed CLECs to address pre-ordering and ordering issues regarding line sharing in the Line Sharing implementation process of SBC.<sup>5</sup> However, as the CLECs indicated in their February 7 filing, the SBC personnel directing the Line Sharing implementation process indicated that the trial would include only manual order processing and *was not* going to address mechanized ordering through Datagate and EDI. SBC should be required to address all pre-ordering and ordering issues in a single forum in which CLECs can effectively participate. It is not acceptable for SBC to shift ordering issues back and forth between different forums, thereby ensuring the disputed issues will be addressed nowhere.

#### **A. SBC'S POR ADDENDUM**

SBC's Addendum identifies 15 items for which CLECs sought modifications to SBC's POR. SBC claims that more than half of these items fell outside the scope of its POR, but SBC addressed them anyway. CLECs are concerned about SBC's characterization because it is directly contrary to CLECs' understanding during the POR

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<sup>3</sup> Indeed, while SBC has committed under the Merger Conditions to enhance EDI and Datagate, it has opposed testing of EDI in California as part of a Master Plan for OSS testing. [See Attachment A at p.2]

<sup>4</sup> SBC Addendum to OSS Plan of Record for Pre-ordering and Ordering of xDSL and Other Advanced Services, filed February 7, 2000, p.6.

<sup>5</sup> SBC Addendum to OSS Plan of Record for Pre-ordering and Ordering of xDSL and Other Advanced Services, filed February 7, 2000, p.6; Transcript of February 1-2 OSS xDSL POR Workshop [February Transcript], p.84, 328-331 (Mr. Talbot indicates that action items requested by CLECs will be listed and SBC will respond; at no time did he indicate that some of the items are outside the scope of the POR). [Excerpts of the Transcript are provided as Attachment B].

meetings. Indeed, CLECs agreed to focus on this list of 15 items expressly because SBC agreed they were inside the scope of the POR and were “proper” for discussion.<sup>6</sup> CLECs do not wish to belabor this point; it is encouraging that agreement was reached on some items during the POR meetings. However, SBC’s continued expenditure of time and effort on restricting the scope of its obligations under the Merger Order is discouraging. In an effort to move the POR process forward, the CLECs offer the following clarifications regarding the substance of SBC’s POR Addendum.

**Addendum Item 1.**

SBC’s Addendum accurately describes the outcome of discussions with CLECs in the POR workshops for four of the five sub-items listed. SBC’s statements are accurate for the following sub-items: 1) SBC agreed not to impose a new mandatory tracking number on pre-order requests; 2) SBC will provide a valid value rather than a blank when loop qualification data are missing; 3) SBC identified additional data elements available to internal operations, to which SBC agreed to give CLECs access; and 5) SBC declined to discuss how it will incorporate requirements of the Commission’s UNE Remand Order in the POR process.

SBC’s statement in sub-item 4 is incomplete. SBC states that it will begin providing actual loop makeup information on April 29, 2000 due to requirements of the Rhythms/Covad arbitration in Texas. However, SBC agreed during the workshop that under the requirements of the Commission’s UNE Remand Order and the Rhythms/Covad arbitration, it must and will provide CLECs with access to *all* information and records in all back end systems and databases such as LFACs and LEAD, but only in Southwestern Bell Telephone Company’s (“SWBT’s”) territory beginning on that date.<sup>7</sup> SBC’s Addendum should reflect the commitment to provide access to all data in all backend systems, and identify when SBC will make access to data in back-end systems available to CLECs in all other SBC/Ameritech service areas.

**Addendum Item 2.**

SBC’s Addendum accurately states that SBC agreed not to impose use of a new mandatory tracking number for CLEC loop orders. However, SBC also states that it will make flow-through of orders for DSL-capable loops available on April 29, 2000. SBC should make clear that its commitment is for real-time flow-through, and that the offer was limited to SWBT’s service territory only.<sup>8</sup> Such real-time flow-through capability is required by the award in the Rhythms/Covad arbitration. SBC made no commitment regarding real-time flow-through of orders for any other service region, and contended that flow-through is outside the scope of the POR.

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<sup>6</sup> Notification of Unresolved Issues in Dispute Regarding Southwestern Bell Corporation’s Phase I Plan of Record, February 7, 2000, p.17-18.

<sup>7</sup> February 2 Transcript, p.457 (SBC views LFACs, LEAD and TIRKs are back-end systems); 492-493 (SBC will provide access to all data in backend systems such as LFACs, LEAD and TIRKs beginning April 29, 2000).

<sup>8</sup> February 2 Transcript, p.459.

**Addendum Item 3.**

SBC's statement in the POR Addendum on this issue is unclear. During the February meetings, SBC agreed that once pre-qualification was performed, SBC would flow-through orders for loops of 12,000 feet or less. In order to enable this flow-through, SBC agreed it would eliminate its mandatory loop qualification process for loops that are 12,000 feet or less. These details are not clear from SBC's POR Addendum, and the CLECs request that SBC provide such clarification.

**Addendum Item 4.**

SBC accurately states that it agreed to charge CLECs for loop qualification only when a CLEC requests a loop qualification followed by an xDSL capable loop order. SBC also states that it plans to charge for manual loop qualification on a two-tiered basis. CLECs may request and pay for a "subset" of loop make-up information, or pay a higher charge for "a complete set" of manual loop qualification information. SBC did not provide these details at the POR meeting, so it is not accurate to suggest that the CLECs agreed to this proposal. In addition, SBC's proposal is directly contrary to the requirements of the Rhythms/Covad arbitration award, which requires manual loop qualification information to be provided at no charge until a mechanized loop qualification system is available. Further, the CLECs consider the structure of charges for loop qualification data provided during pre-ordering or ordering of xDSL loops to be within the scope of the POR.

**Addendum Item 5.**

SBC accurately states that it provided clarification regarding the calculation of actual loop length information provided during its loop qualification process. However, the CLECs consider this clarification to be within the scope of the POR.

**Addendum Item 6.**

SBC accurately states that it provided clarification regarding DLRs and DLR-like documents. However, the CLECs consider an explanation of DLRs and DLR-like documents to be within the scope of the POR, especially because these terms are contained in SBC's own POR document.

**Addendum Item 7.**

SBC states that it agreed to maintain and enhance the pre-qualification process it has in place today in the SWBT five-state region and Pacific Bell/Nevada Bell territories. However, SBC's Addendum states that the pre-qualification process will be maintained only for the Datagate interface. No such limitation was made during the POR meeting, and the CLECs expect that the pre-qualification process will be available through any interface used by CLECs, including if necessary, EDI. Additionally, SBC's Addendum

limits its commitment to enhance the pre-qualification process only “as business needs necessitate.” CLECs are unclear what SBC intends by this limiting statement, but reiterate that SBC should commit to enhance its pre-qualification process in response to *CLEC business needs*. In addition, the CLECs submit that SBC’s pre-qualification process, which is part of pre-ordering for xDSL-capable loops is within the scope of the POR.

**Addendum Item 8.**

SBC accurately states that it agreed to unmask two additional data fields in SBC’s pre-qualification mini database. SBC committed to make this mod if available in other areas, expect same modification The two fields to be revealed are Wire Center Code and Design Cable Gauge Makeup. This additional information will be released on March 18, 2000.

**Addendum Item 9.**

SBC accurately states that the CLECs asked for additional information regarding SBC’s Change Management Process. However, the information provided in SBC’s Addendum is inadequate. SBC should provide a detailed description of the way in which CLECs may submit requests for modification through the CMP process, and provide assurances that requests for changes in provisioning advanced services are handled on an expedited basis.

**Addendum Item 10.**

SBC accurately states that CLECs requested that SBC eliminate a new modification to its ordering process that will require CLECs to disclose in the “Type of Service” field whether they will use unbundled loops for residential or business customers. SBC and CLECs did not reach agreement on this issue. SBC acknowledges in its Addendum that SWBT does not currently require CLECs to indicate whether a loop will be used for residential or business customers. However, SBC seeks to make such disclosures mandatory in the future. CLECs consider such information to be competitively sensitive and it is therefore inappropriate for SBC to require such disclosure. At the very least, SBC should make the disclosure optional.

**Addendum Item 11.**

SBC accurately states that the CLECs requested access to Methods and Procedures documents from SBC for pre-ordering and ordering functionality supported in Datagate and EDI. SBC and the CLECs did not reach agreement on this issue. Documentation currently available in SBC website locations and documents is inadequate. CLECs need to have access to documents providing detailed technical descriptions of modifications to SBC’s pre-ordering and ordering processes and systems. The purpose of the POR process is to provide CLECs with sufficient technical detail that they can have input into changes needed to meet their business needs. Without such

information, CLECs have no insight into the possible functions and capabilities SBC can provide. CLECs are surprised that SBC claims it is not writing M&Ps for pre-ordering and ordering systems for advanced services, because M&Ps are a standard part of every ILEC service rollout. To the knowledge of the CLECs, SBC has never rolled out a product without creating a technical M&P document. CLECs would be happy to provide copies of M&P's for other product rollouts to the Commission for review if it would assist in determining the need for CLEC access to such information. CLECs consider such information regarding documentation of SBC's modifications to pre-ordering and ordering systems to be within the scope of the POR.

**Addendum Item 12.**

SBC accurately states that the CLECs requested SBC to provide a copy of minutes from the November 3, 1999 CLEC business needs workshop in Chicago. These minutes were requested to demonstrate that CLECs had asked for access to numerous data elements in the loop qualification process that SBC had omitted from its POR. SBC provided the minutes, but omitted an attachment listing the data elements CLECs had requested at that meeting. Therefore, the CLEC request for minutes documenting its loop qualification information requests is within the scope of the POR.

**Addendum Item 13.**

SBC accurately states that it agreed to remove the use of parsed address fields from its loop qualification specifications. Instead, SBC will continue the use of concatenated address fields for all future releases until a new set of specifications can be developed for concatenated address fields for the loop qualification process in the Ameritech region.

**Addendum Item 14.**

SBC accurately states that CLECs requested clarification regarding a statement by SBC personnel at the January 19 POR meeting that it would issue 13 PORs. CLECs requested a list of all PORs, when they would be released, and the subject matter of each. Without such information, it would be impossible for CLECs to determine whether all relevant issues would be covered in the POR process. SBC clarified that it intended to issue only five PORs – three in relation to the Commission's Merger Order and two in relation to requirements from state commissions. The CLECs submit that clarification on the total number of PORs and the subjects contained in them is within the scope of the POR and continue to request a detailed list of the subjects that will be addressed in future PORs.

**Addendum Item 15.**

SBC accurately states that CLECs requested information regarding pre-ordering and ordering for line sharing. SBC also accurately states that it provided little detail. However, SBC's Addendum omits important information on this issue. Contrary to the

Addendum, SBC indicated during the POR meeting that line sharing was outside the scope of the POR. CLECs *did not* agree that line sharing should be outside the POR process. Rather, CLECs agreed they would attempt to get such information from SBC's Line Sharing implementation process, given SBC's refusal to address the line sharing issues in the POR process. Since the time of the POR meeting, the request for line sharing issues to be addressed in the POR process have taken on acute importance. CLECs have learned that SBC personnel in the Line Sharing implementation process stated that mechanized pre-ordering and ordering will not be a part of the Line Sharing implementation process. Therefore, CLECs reiterate their requests that such topics be addressed through the POR process.

#### **B. SBC SUMMARY AND CHRONOLGY.**

The CLECs agree that SBC's descriptions of the background and chronology of the POR process provided in sections I to III are reasonable. However, some statements in the remaining sections of SBC's Summary and Chronology require clarification.

The CLECs agree that no progress was made at the January 19 meeting primarily because SBC was attempting to limit unreasonably the scope of the POR. As discussed above, the CLECs did not agree with SBC's unduly narrow interpretation of subjects that were inside the scope of the POR. This disagreement required the parties to schedule an additional two-day workshop in February.

SBC waited until the eve of the February POR meeting to circulate a copy of minutes that an SBC employee had kept during the January 19 meeting. These minutes contained numerous inaccuracies and omissions. Thus, Rhythms arranged for an independent, certified court reporter to be present at the February meetings to create an official record of the proceedings. An additional source of concern for CLECs was an issues matrix that SBC created prior to the February 19 meeting. The matrix attempted to summarize CLEC comments submitted to SBC and the Commission regarding required POR modifications, and provided an SBC response. The matrix also contained a column indicating that numerous issues were "resolved" even before the first POR meeting on January 19. An updated matrix was circulated to CLECs prior to the February meeting. The new matrix contained an inaccurate summary of CLEC comments as well as SBC notations that erroneously indicated issues were "resolved." Therefore, CLECs requested that SBC abandon use of the matrix and not include it with SBC's POR Addendum.

SBC's attempt to narrowly construe the appropriate scope of its obligations under the POR continued to be a serious area of disagreement at the February meetings. However, the CLECs agreed to accept SBC's scope for the POR process because otherwise no progress could be made. By the end of the first day, both parties had agreed on a list identifying 14 modifications or clarifications requested by CLECs. By the end of the second day, SBC had provided feedback on all 14 items. As discussed above, agreement was reached on most of the items.

Throughout the two-day meeting in February, CLECs attempted to determine SBC's position on a number of issues that SBC considered to be "outside the scope of the POR." Those areas were: standard intervals for pre-ordering and ordering; SBC commitments regarding parity of systems and data provided to SBC's internal advanced service operations and CLECs; electronic access to service order status; access to real-time flow-through for pre-ordering and ordering of advanced services; SBC's plans for front-end systems used to access Datagate and EDI (e.g., Verigate and LEX); loop provisioning test results prior to cooperative testing; UNE-P for line sharing; inclusion of UNE Remand requirements in the POR; spectrum management; aggregate planning data; and provision of sample data to facilitate CLEC testing. These outstanding issues were described in the CLECs' notification of disputed issues filed with the Commission on February 7, 2000.

In particular, the CLECs disagree with SBC's explanations regarding requests on spectrum management and sample data. SBC has been ordered by both the Commission and the Texas Public Utilities Commission to immediately dismantle its spectrum management system. Such a system has been judged as technically unfounded and strongly anticompetitive. SBC stated that its spectrum management system has not been dismantled, and SBC could not provide any details regarding steps being taken to do so.<sup>9</sup> Additionally, SBC stated it did not intend to certify to regulators that the spectrum management system has been dismantled upon completion. It is critical that the Commission insist that SBC follow through and document the dismantling of its spectrum management system.

Further, CLECs need access to sample data immediately so that they may begin working to design appropriate interfaces to SBC's pre-ordering and ordering systems. Obtaining sample data will provide critical information to CLECs regarding the structure of data fields. In addition, such data will give CLECs valuable insight into the quality and quantity of loop qualification data. The CLEC request for sample data should not be confused with test data, which are provided only after a system is final and complete and used merely to test whether the system operates.

### **C. CLEC Request for Additional Collaboratives**

The CLECs have made some progress in addressing OSS issues for pre-ordering and ordering xDSL loops in collaborative workshops with SBC, and believe that additional workshops will be useful in resolving disputed issues. Therefore, the CLECs request that the Commission extend the period for collaborative workshops for a minimum of three weeks and order SBC to participate in the workshops until all remaining issues identified by the CLECs are resolved. SBC should also be directed to make available both personnel knowledgeable in each subject matter area and personnel with the authority to make commitments and decisions to address CLEC requests. If all outstanding issues cannot be resolved during these additional collaborative meetings, the

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<sup>9</sup> February 2 Transcript, p. 570-572.

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CLECs will likely exercise their right to request arbitration pursuant to the Merger Order.10

Please don't hesitate to contact me if you or your staff should have additional questions or would like to arrange a personal meeting regarding this matter.

Sincerely,

  
Anita Taff-Rice  
Blumenfeld & Cohen  
4 Embarcadero Center  
Suite 1170  
San Francisco, CA 94111  
415-394-7500  
415-394-7505 (facsimile)  
On Behalf of CLECs

Anita Taff-Rice  
Counsel for Rhythms Links, Inc.  
Blumenfeld & Cohen  
4 Embarcadero Center  
Suite 1170  
San Francisco, CA 94111  
(415) 394-7500  
(415) 394-7505 (facsimile)

Lisa Youngers  
MCI Worldcom, Inc.  
1801 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006  
(202) 887-2828

Glenn A. Harris  
Assistant General Counsel –  
Gov't & Industry Affairs  
NorthPoint Communications  
303 Second Street, South Tower  
San Francisco, CA 94107  
503-961-1314  
415-365-6095  
[gharris@northpoint.net](mailto:gharris@northpoint.net)

Jason Oxman  
Covad Communications, Inc.  
600 14<sup>th</sup> Street, N.W.  
Suite 750  
Washington, D.C. 20005  
(202) 220-0409

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10 Merger Order, Appendix C, paragraph 15c(2).

BLUMENFELD & COHEN

Leon Kestenbaum  
Vice President General Regulatory  
Counsel – Federal  
Sprint  
401 9<sup>th</sup> Street, N.W.  
Market Square North  
Washington, D.C. 20004  
(202) 585-1897

Stephen C. Garavito  
AT&T Corp.  
295 N. Maple Avenue  
Room 1131M1  
Basking Ridge, NJ 07920  
(908) 221-8100

cc: Anthony Dale (FCC)  
Johanna Mikes (FCC)  
Robert Atkinson (FCC)  
Marian Dyer (SBC)

A

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

|   |                         |
|---|-------------------------|
| Rulemaking on the Commission's Own Motion to Govern Open Access to Bottleneck Services and Establish a Framework for Network Architecture Development of Dominant Carrier Networks. | Rulemaking 93-04-003    |
| Investigation on the Commission's Own Motion into Open Access and Network Architecture Development of Dominant Carrier Networks.  | Investigation 93-04-002 |
| Order Instituting Rulemaking on the Commission's Own Motion Into Competition for Local Exchange Service.  | Rulemaking 95-04-013    |
| Order Instituting Investigation on the Commission's Own Motion Into Competition for Local Exchange Service.   | Investigation 95-04-011 |

ASSIGNED COMMISSIONER'S RULING

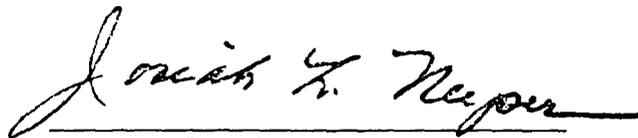
On November 24, 1999, MCI WorldCom and Sprint Telecommunications Inc. (Moving Parties) filed a motion seeking "clarification" of my September 23, 1999 Assigned Commissioner's Ruling (ACR) that advised the parties that the Electronic Data Interchange (EDI) for pre-ordering would not be included in the Master Test Plan for Pacific Bell's (Pacific) Operations Support System (OSS). The Moving Parties request that I detail when the EDI for pre-ordering will be tested.

In response, Pacific urges that the motion be denied on procedural and substantive grounds. Pacific maintains that the Moving Parties' motion is a "procedurally defective" challenge to the holding of the ACR rather than a request for clarification of it. The company asserts that the Moving Parties do not raise any issues that have not already been considered. Moreover, Pacific insists that for Section 271 approval, it only needs to test the interfaces upon which it is relying. Pacific Response at 3.

Pacific has directly stated that for the purposes of its Section 271 request, it will be relying on DataGate, the company's application-to-application interface, not EDI. Pacific further contends that through the testing of DataGate it will be able to demonstrate that it has met its pre-ordering obligations. Since Pacific and the competitive local exchange carriers (CLECs) have established joint testing procedures for the introduction of interfaces, I expect that as soon as CLECs begin using EDI the joint procedures will dictate the appropriate test date for it. Consequently, I find no need to revisit my September 23, 1999 ruling.

Thus, **IT IS RULED** that the Moving Parties' motion for clarification of the Assigned Commissioner's Ruling of September 23, 1999 is denied.

Dated February 11, 2000, at San Francisco, California.



Josiah L. Neeper  
Assigned Commissioner

**CERTIFICATE OF SERVICE**

I certify that I have by mail this day served a true copy of the original attached Assigned Commissioner's Ruling on all parties of record in this proceeding or their attorneys of record.

Dated February 11, 2000, at San Francisco, California.

  
Evelyn P. Gonzales

**N O T I C E**

Parties should notify the Process Office, Public Utilities Commission, 505 Van Ness Avenue, Room 2000, San Francisco, CA 94102, of any change of address to insure that they continue to receive documents. You must indicate the proceeding number on the service list on which your name appears.



1           MR. TALBOT:    I appreciate that that's  
2    where we would like to come from collaboratively.

3           Let's get started.  I know what we  
4    were struggling with on the 19th was a way to get  
5    started.  Today we are still doing that.

6           MS. STORCH:    In your comment, I appreciate  
7    that.

8           MR. TALBOT:    I think we need to try to work  
9    towards this and see if it flushes out things and  
10   work out toward where with can we talk about the  
11   resolution of my issue, so we start to make some  
12   progress about this.

13           Can I get concurrence this is where we  
14   want to start and this is the scope and we'll start  
15   to talk about other items that will be out of  
16   scope?

17           MS. STORCH:    You asked for can we agree  
18   that this is the scope.  The answer is no.  We  
19   don't -- I don't believe it is the scope, but I  
20   accept the fact that that is what you are going to  
21   define as the scope and that's what we are going to  
22   talk about.

23           MS. TAFF-RICE:   I agree with that.

24           MR. TALBOT:    Okay.  Given that, one of the  
25   things that -- let's just walk through, maybe

1 request for that specific location.

2 MR. BAROS: Kevin, if I could make a  
3 suggestion, is that okay?

4 MR. TALBOT: Yes.

5 MR. BAROS: We targeted 6:00 and we are  
6 going on 7:00.

7 In the interests of getting out by  
8 7:00. I understood you to say you understood  
9 Rhythms's request relative to this tracking number  
10 and you heard all the other CLECs support that  
11 request that maybe SBC take that and come up with  
12 the policy decision on your position whether you  
13 can support that or not in this POR and even  
14 deliver that to us in the morning, allowing us  
15 tonight to go through the list of the action items  
16 and summarize where we have been for the day. Is  
17 that workable?

18 MR. TALBOT: That's great. That's where I  
19 wanted to go. I just wanted to let the last of the  
20 comments get discussed. I want to give everybody  
21 their chance here.

22 I think at this point in time, unless  
23 there are other comments you want to make around  
24 tracking number, I very much appreciate the fact  
25 that we all kind of met our goal here. We wanted

1 to talk. Really, I guess I give all of you credit  
2 for the fact that whether you really liked it in  
3 the beginning or not, we really had a good  
4 conversation actually throughout the day in terms  
5 of the scope and enhancements and now kind of  
6 talking about the preorder and order planning we  
7 put out available to you.

8 Thank you. I appreciate that. That's  
9 what we really wanted to do.

10 I think at this point in time we are  
11 ready to close for the day. I think we are ready  
12 to close around this concept. We have some action  
13 items. Let's summarize those. We'll get that  
14 summary in our record. We also need to talk at the  
15 end of this record, or off of the record, we need  
16 to make sure we talk about how we are now going to  
17 get this transcript to everybody and those kinds of  
18 things.

19 Before we do that, what we want to do  
20 is summarize those action items. The biggest key  
21 points we have here is that SBC will overnight look  
22 at the preordering enhancement requests that have  
23 been made. Tomorrow morning we'll provide feedback  
24 from that in terms of, again, what we have been  
25 able to look at that could be included in the

1       preordering enhancements.

2                       The second thing that just happened is  
3       around ordering. It looks like the big issue we  
4       have for ordering is the tracking number. At this  
5       point in time, the proposal from the CLEC community  
6       would be, for what we provided for enhancements for  
7       ordering, that tracking is not an enhancement you  
8       want to have for that. I said that for ordering,  
9       but you also mean for preordering. In that case  
10      you are saying tracking number in total is of  
11      concern and something you want some feedback on  
12      relative to the preorder and order process.

13                      I think again, in this case, what I'd  
14      like to suggest is that SBC will analyze that over  
15      the evening, and tomorrow morning we need to be  
16      able to provide some feedback on those items.

17                      To me, that's again, what I think  
18      would be fair. I think that's the collaborative  
19      process here, and I think it's working us toward,  
20      again, the fact that I think that we talked about  
21      scope, we talked about enhancements, and now we are  
22      clear on what enhancement requests you are making  
23      on top of the enhancements we provided in the POR.

24                      MS. TAFF-RICE: Kevin, I have some other  
25      things, those two are certainly very pressing.

1 This is just my list.

2 MR. TALBOT: Hang on just a second.  
3 Before we do that. That's one thing I did want to  
4 clarify. Those are our biggest points.

5 Who would disagree with that so far,  
6 to get some closure for today?

7 No disagreements.

8 Let's do that next. Make sure we get  
9 our other action items here. I know we have  
10 several of them. Maybe the easiest thing to do is  
11 rewrite them up here or make sure we summarize what  
12 items we have.

13 MS. TAFF-RICE: In addition to the two you  
14 mentioned. I would see a third one related, and  
15 this is really Joan's request, that she's  
16 requesting that SBC come up with perhaps a  
17 compromise there would be no loop qualification  
18 required on loops of 12 K or less; therefore there  
19 would be no tracking code required for loops on --  
20 loops that are 12 K or less. And that she would  
21 not be charged for loop qualification on those  
22 loops.

23 In addition, if you could clarify, I  
24 know it was stated today, it seems to be the plan  
25 at the moment that you would charge for loop

1 flow through was for SWBT.

2 MR. TALBOT: That's right. I'm sorry.

3 MS. TAFF-RICE: Can I ask for  
4 clarification?

5 When you use the term flow through,  
6 can you explain what you mean by that?

7 MR. TALBOT: Yes. In this case, this would  
8 be with regard to an xDSL loop request. In this  
9 case, where you submitted that order to us, what  
10 flow through means is that we want to take an order  
11 in, do any editing, any qualifications, anything we  
12 need to do to that, do that in such a manner that  
13 we can create the service order and flow that fully  
14 through to the provisioning process without it  
15 stopping for any manual intervention.

16 It's going on through, and again,  
17 there is not a service rep in our service center  
18 who is having to interject into that process.

19 MS. TAFF-RICE: Does the concept of flow  
20 through include access to all of the back office  
21 systems that you have, such as LFACS and LEADS and  
22 TIRKS, which is also a requirement of the Texas  
23 order?

24 MR. TALBOT: Let's talk about that. It's  
25 not flow through, but it's access to the back end.

1 through the preordering VariGate or LEX part of the  
2 system?

3 MR. TALBOT: No. Flow through is talking  
4 about ordering. It's the CLEC experience to us  
5 around process in that order. That is separate and  
6 distinct from something you would do ahead of  
7 somebody's request to us.

8 MS. RUSSELL: Joann Russell, MCI Worldcom.

9 My understanding is correct, the  
10 ordering piece you are proposing to do on 4-29 will  
11 be Southwestern Bell, Pacific Bell, Nevada Bell,  
12 but the flow through will only be for Southwestern  
13 Bell; is that correct?

14 MR. TALBOT: Correct. What we are saying  
15 is we are doing everything we can to meet the other  
16 influences for the commitment. That's what we  
17 think we can commit to in terms of development and  
18 time frame.

19 MS. TAFF-RICE: Just one more point of  
20 clarification.

21 If a CLEC in Texas were looking at LEX  
22 today to do ordering functions, would LEX be  
23 enhanced along in that 4-29 time frame for flow  
24 through?

25 MR. TALBOT: Yes.

1 MS. TAFF-RICE: The next thing we should  
2 move into then -- we have already addressed two of  
3 the four sub areas, and that being UNE remand and  
4 aggregate data.

5 MR. TALBOT: So we have addressed all the  
6 out of scope ones then?

7 MS. TAFF-RICE: Yes, by my count.

8 MR. MAGNA: Yes.

9 MS. TAFF-RICE: I'd like to take up  
10 spectrum management next.

11 MR. TALBOT: Okay.

12 MS. TAFF-RICE: I'll work from the bottom  
13 up on the matrix. CLEC comment was the SFS, which  
14 is another name for binder group management, at  
15 least in the SWBT areas, system of binder group  
16 management should be dismantled. SSF bill system  
17 binder group management will be dismantled.

18 Can you provide any other information.  
19 That sounds like it hasn't been done.

20 MS. CHAPMAN: We have begun the process on  
21 that.

22 What is the deadline? Are we to the  
23 deadline?

24 MR. PHILLIPS: The wording should probably  
25 be is being dismantled, and the target is the

1 deadline. I don't know off the top of my head what  
2 the deadline is.

3                   Whatever the deadline is.

4                   MS. CHAPMAN: It will be complete in  
5 accordance with the line sharing order. They had a  
6 specific deadline as far as for the SWBT regions  
7 where there is some specific stuff where there was  
8 an arbitration award, that's been complied with.  
9 As far as the other regions in Pacific, we'll meet  
10 the deadline in the line sharing order.

11                   MS. TAFF-RICE: Can you briefly tell me  
12 what you mean when you say dismantled? What  
13 physically has been done? Has the D1/D2 been taken  
14 out?

15                   MR. PHILLIPS: Specific to the region.  
16 Each region had differences.

17                   MR. TALBOT: Give me an example of one of  
18 them, of what we did.

19                   MR. PHILLIPS: I think what we can say  
20 about that is there is a team that is addressing  
21 that under the auspices of, I think, the line  
22 sharing order, and they are addressing that from  
23 the specifics that were outlined in that order and  
24 the dates that were outlined in the order, so it's  
25 more of a process in California than it was in the

1 five states, but I think our answer is we are going  
2 to meet the requirements specified in the order by  
3 the dates specified in the order.

4 MS. TAFF-RICE: Am I right in assuming  
5 from that comment there was no binder group  
6 management in Ameritech regions?

7 MS. CHAPMAN: Yes.

8 MS. TAFF-RICE: When this is dismantled,  
9 whenever that deadline is -- and I would appreciate  
10 if someone could tell us when that is -- will there  
11 be a certification to the FCC or state agency?

12 MR. PHILLIPS: It would be whatever the  
13 constraints of that order will be.

14 MS. TAFF-RICE: I appreciate anything you  
15 can tell us when it's done.

16 MR. TALBOT: It's hard in this forum.

17 I wonder, could we -- can you make  
18 that request to the account manager and have them  
19 provide that?

20 MS. TAFF-RICE: I don't think the account  
21 manager would know that information, honestly.  
22 This is a systemwide -- I think you know from the  
23 arbitration what went into it.

24 MR. TALBOT: How about this: Take it to  
25 the line sharing meeting tomorrow, Thursday/Friday,