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March 24, 2000

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Notice of Ex Parte Presentation

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

RECEIVED

MAR 24 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: *Application of SBC Communications Inc. Pursuant to Section 271 of the
Telecommunications Act of 1996 to Provide In-Region, InterLATA
Services in Texas, CC Docket No. 00-4*

Dear Ms. Salas:

Today, Priscilla Hill-Ardoin and Elizabeth Ham of SBC, and the undersigned representing SBC, met with Commissioner Susan Ness, Jordan Goldstein of Commissioner Ness's office, and Jake Jennings of the Common Carrier Bureau, to discuss OSS issues and hot cuts. The attached materials addressing these issues were distributed at the meeting.

A copy of this letter is enclosed. Please let me know if you have any questions about this matter.

Sincerely,



Austin C. Schlick

cc: Mr. Goldstein (w/out enc.)
Mr. Jennings (w/out enc.)
Ms. Stephens
Ms. Wright
Ms. Farroba, Texas PUC
Ms. Heisler, DOJ
ITS

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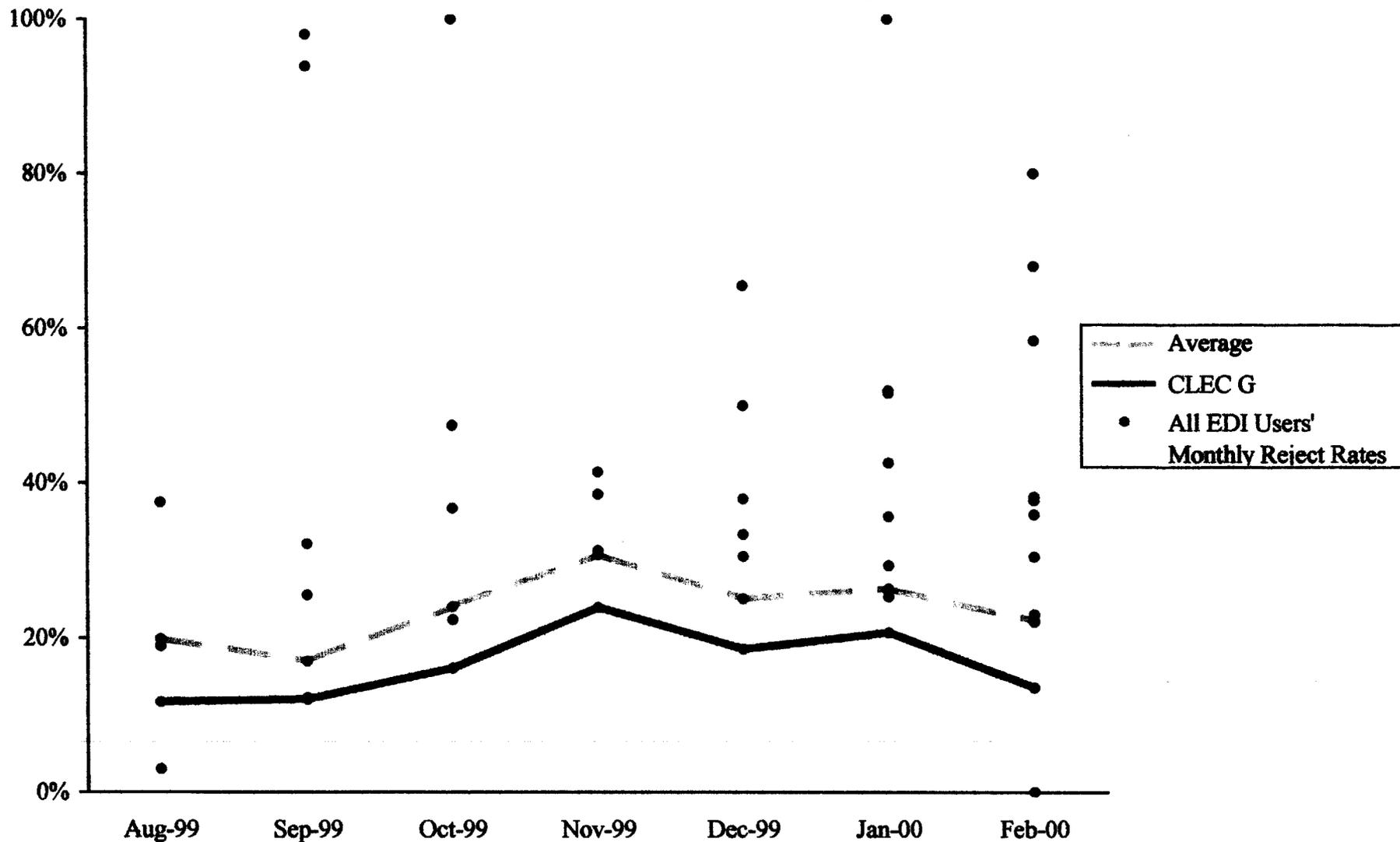
Texas § 271 Application
CC Docket No. 00-4

EX PARTE DEBATE

Commissioner Susan Ness

March 24, 2000

Although CLECs' EDI Reject Rates Vary Widely, CLECs Can Achieve Low Reject Rates

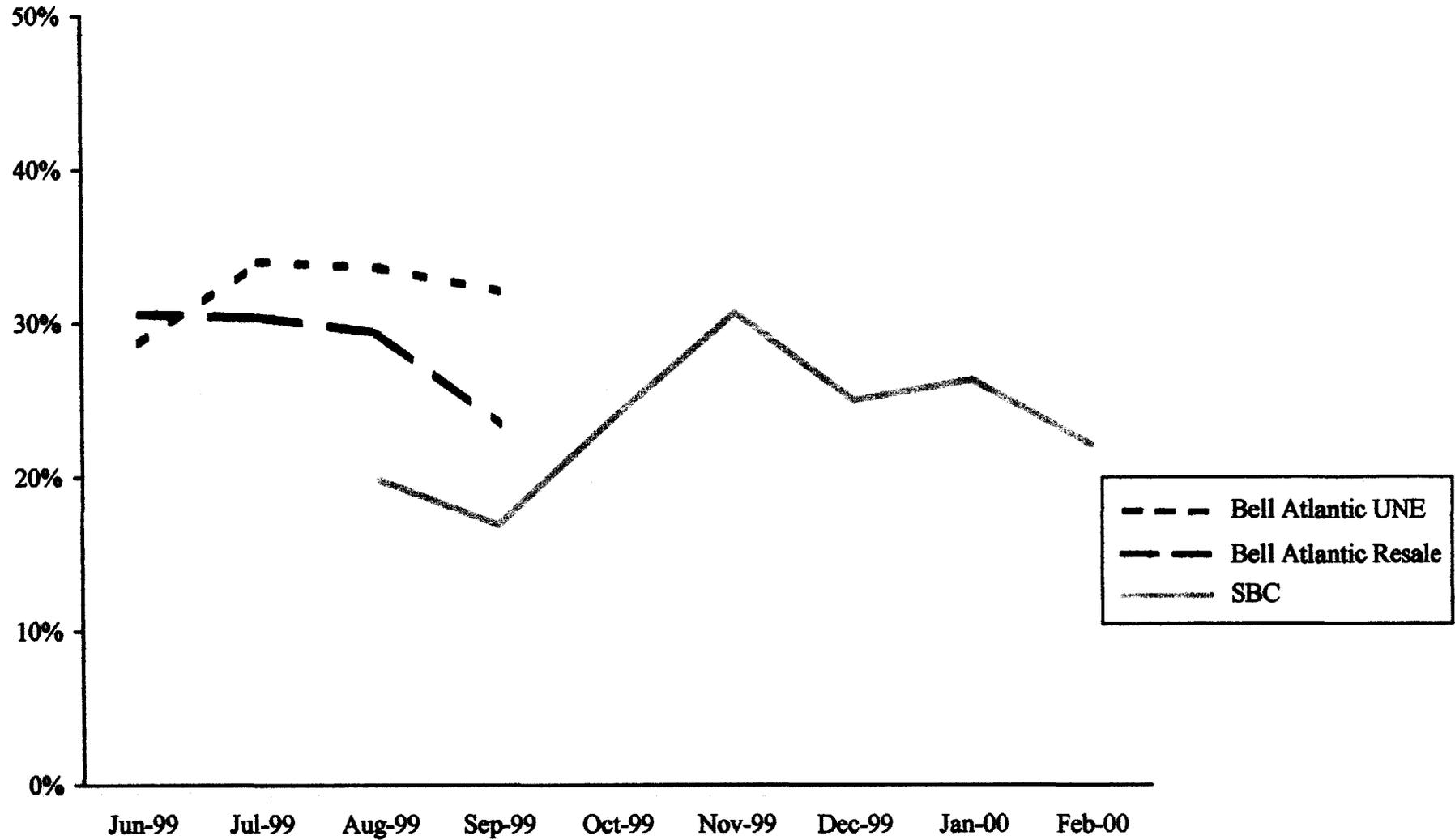


Source : March 10, 2000 ex parte.

CLECs Can Achieve Much Lower EDI Reject Rates than the Average

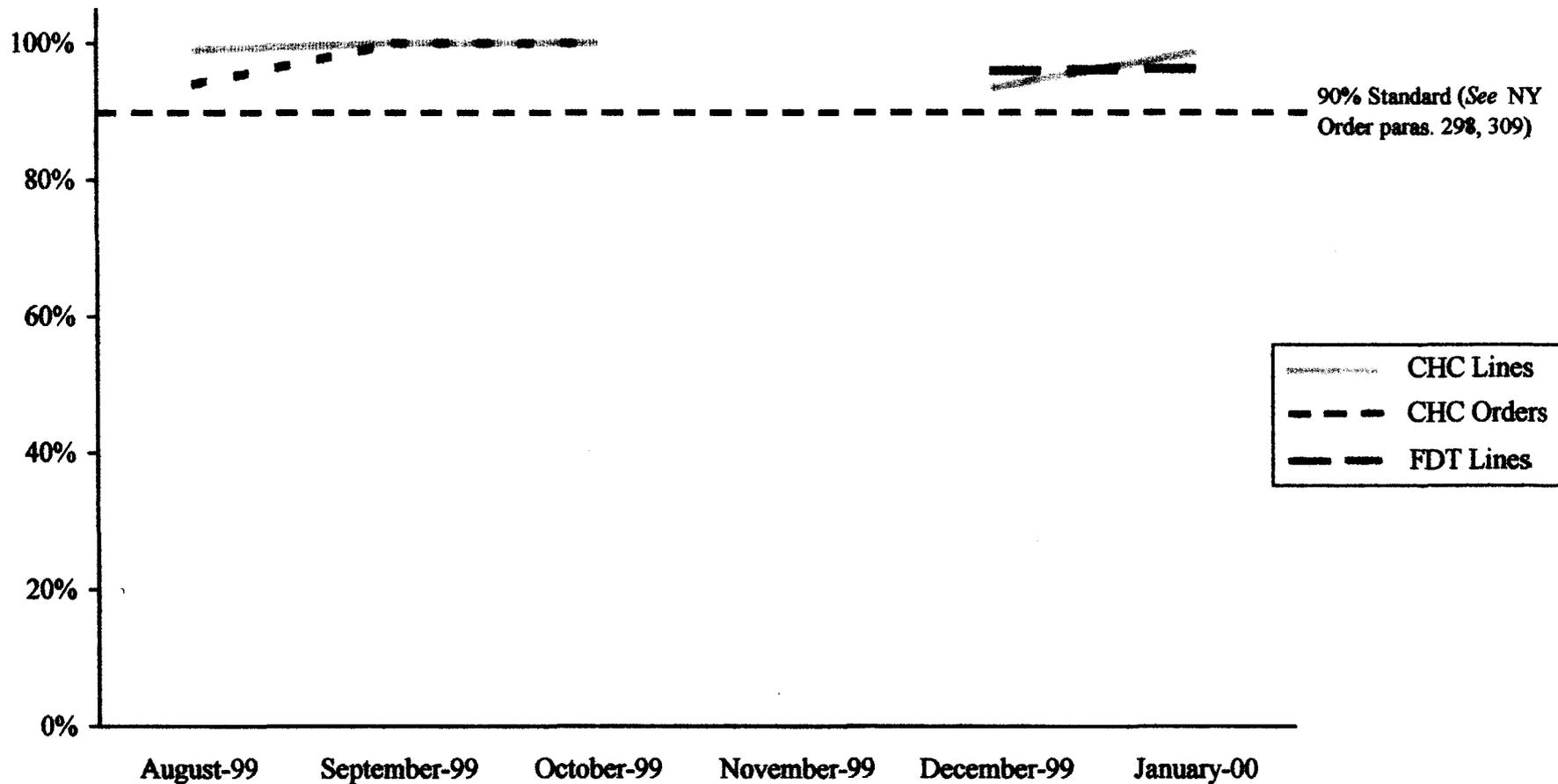
	CLEC G	Average (All CLECs)
<u>August 1999</u>		
# of LSRs	3,550	17,807
# of Rejects	416	3,529
% Rejects	11.7%	19.8%
<u>September 1999</u>		
# of LSRs	4,591	53,557
# of Rejects	553	9,042
% Rejects	12.0%	16.9%
<u>October 1999</u>		
# of LSRs	5,919	28,593
# of Rejects	949	6,860
% Rejects	16.0%	24.0%
<u>November 1999</u>		
# of LSRs	5,731	27,312
# of Rejects	1,367	8,378
% Rejects	23.9%	30.7%
<u>December 1999</u>		
# of LSRs	4,930	31,316
# of Rejects	914	7,816
% Rejects	18.5%	25.0%
<u>January 2000</u>		
# of LSRs	5,913	27,837
# of Rejects	1,215	7,312
% Rejects	20.6%	26.3%
<u>February 2000</u>		
# of LSRs	9,312	45,404
# of Rejects	1,252	10,035
% Rejects	13.5%	22.1%
<u>7 Month Totals</u>		
# of LSRs	39,946	231,826
# of Rejects	6,666	45,660
% Rejects	16.7%	19.7%

SBC Rejects Fewer Orders than Bell Atlantic



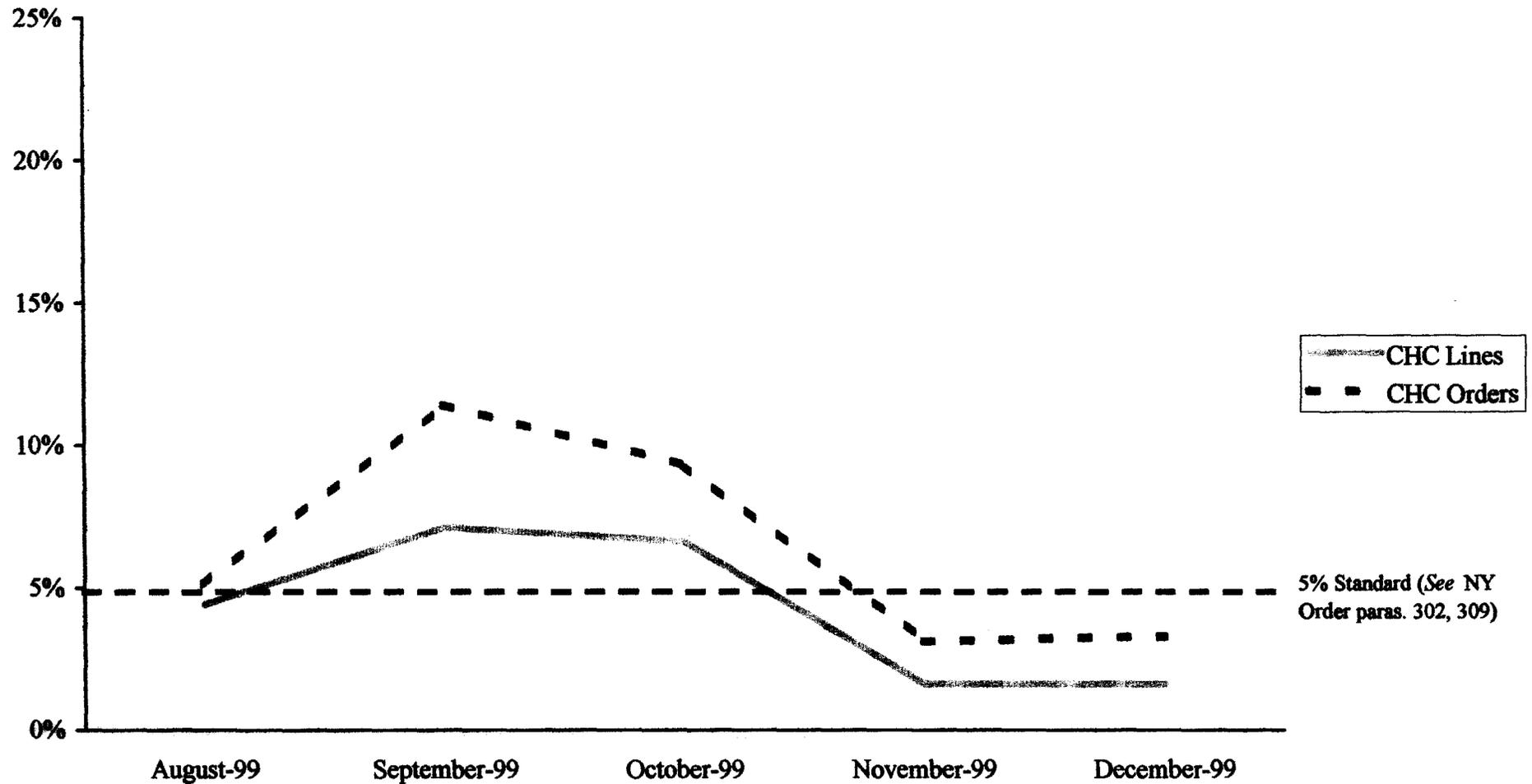
Source: Bell Atlantic UNE: NY Order n. 552; Bell Atlantic Resale: Dowell/Canny Decl. Attach D and Dowell/Canny Reply Decl. Attach. C; SWBT: March 10, 2000 ex parte.

SBC Has Consistently Performed Hot Cuts Within the Benchmark Interval*



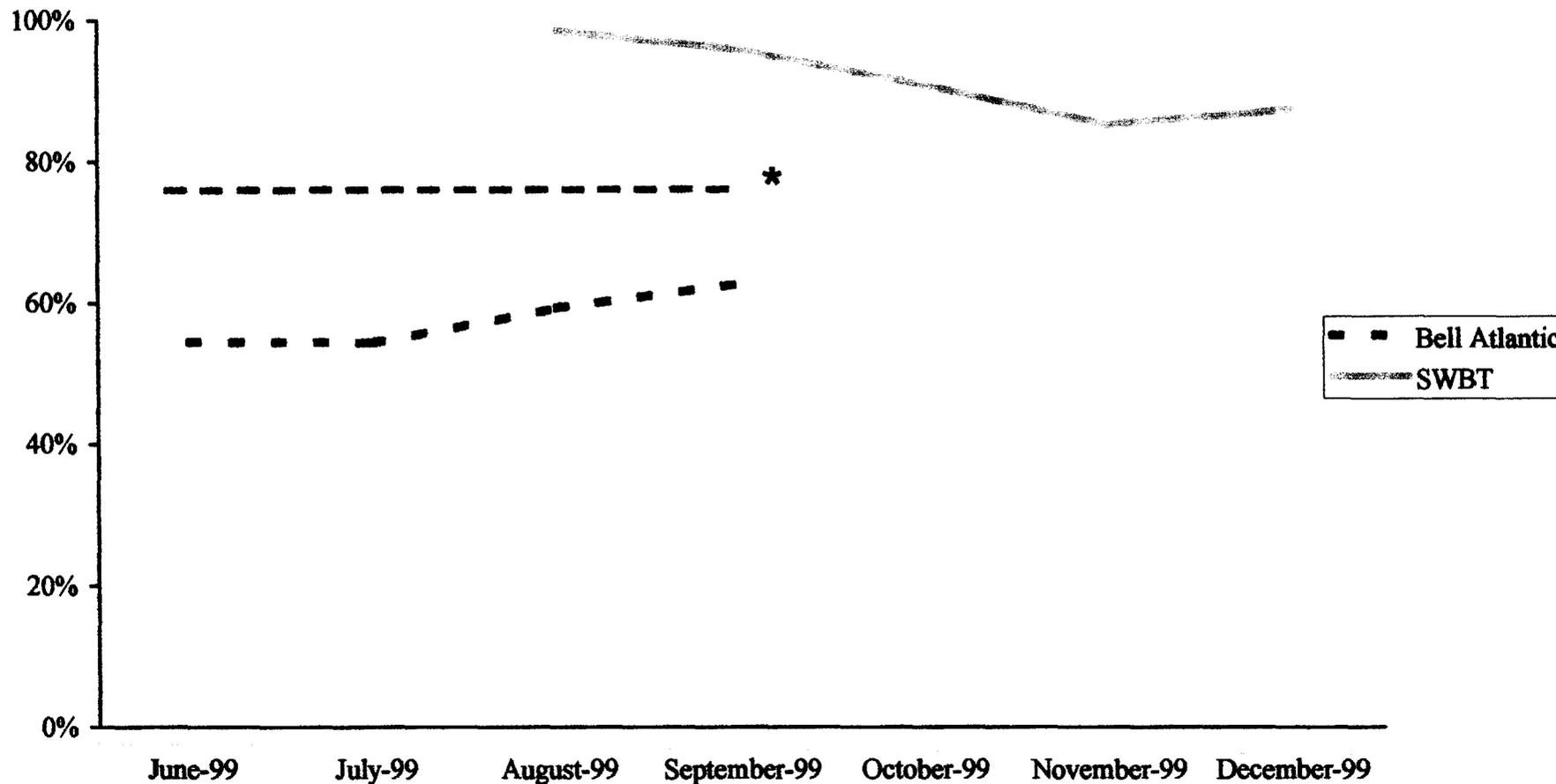
* The % of time the SWBT technician completes the cross connect to the CLEC facilities within 120 minutes (Performance Measurement 114.1) (Business Rules, Dysart Aff. Attach. K at 10).

SBC-Caused Outages For Coordinated Hot Cuts Meet the New York Order's Standard



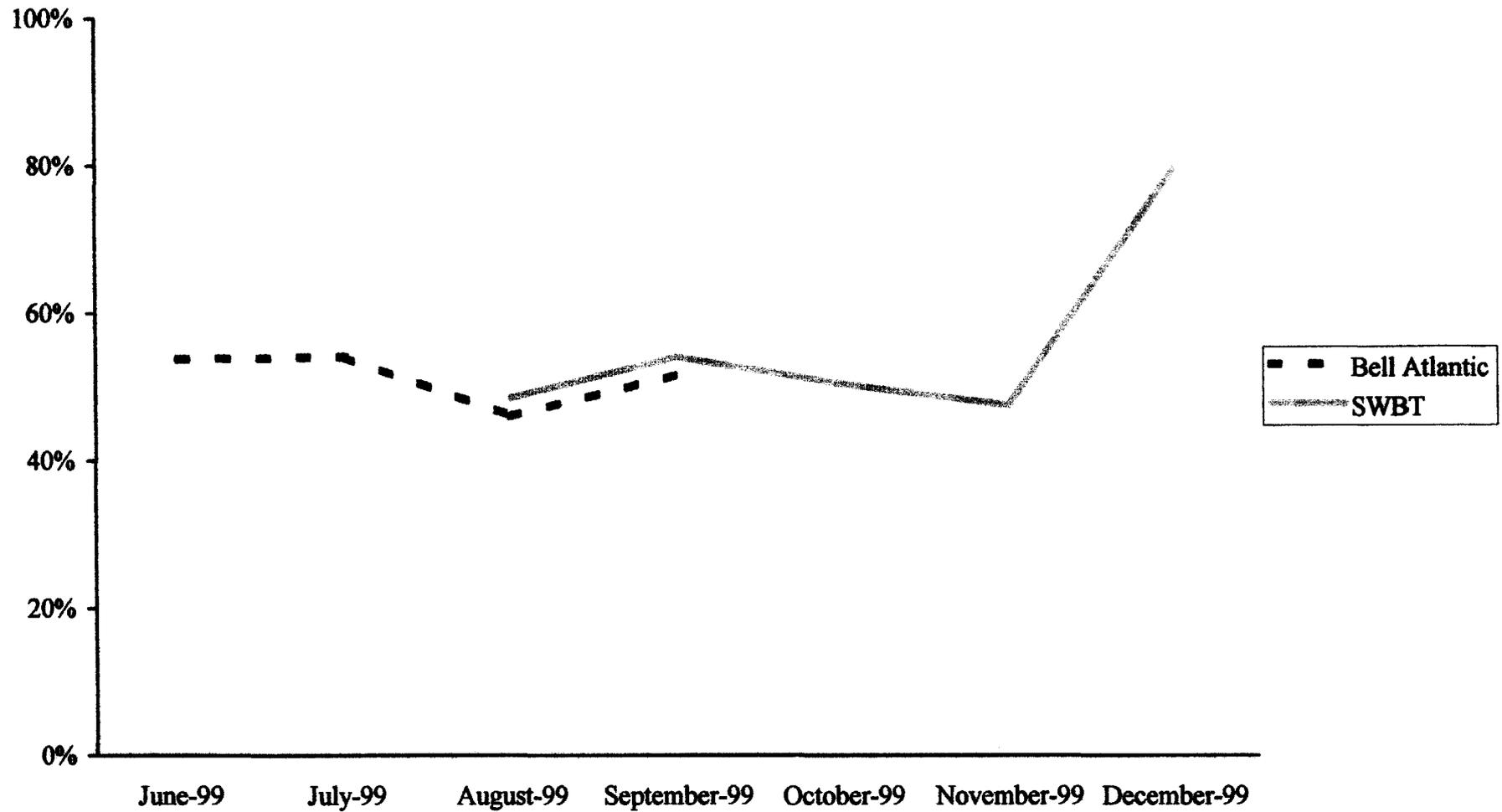
Source: Conway Reply Aff. and Attach. A.

SBC's UNE Flow Through is Better than Bell Atlantic's



* Bell Atlantic's 75% adjusted flow-through for UNEs, reflecting manual intervention (See NY Order n.516).

SBC's Resale Flow Through is Better than Bell Atlantic's



Source : Bell Atlantic: Dowell/Canny Decl. Attach. D and Dowell/Canny Reply Decl. Attach C; SWBT: Ham Aff. Attach. X-2 and Ham Reply Aff. Attach. F.