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**ORIGINAL**

**EX PARTE OR LATE FILED**

**ORIGINAL** April 6, 2000

**RECEIVED**

APR - 6 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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

Re: EX PARTE -- CC Docket No. 00-4/ Application of SBC Communications Inc.  
Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide  
InterLATA Services in Texas

Dear Ms. Salas:

On April 5, 2000, I spoke by telephone or communicated by voice mail with Dorothy Attwood, legal advisor to Chairman Kennard, Helgi Walker, legal advisor to Commissioner Furchtgott-Roth, Kyle Dixon, legal advisor to Commissioner Powell, and Sarah Whitesell, legal advisor to Commissioner Tristani, as well as Larry Strickling, Jake Jennings, Margaret Egler, Audrey Wright, and Bill Dever of the Common Carrier Bureau concerning SBC's intention to ask the Commission to "restart the clock" on the proceeding listed above. In particular, I noted that SBC has not resolved all necessary issues to open adequately the local market in Texas, as set forth on the attached list which was faxed to each individual, so it would be premature at this time to begin a new section 271 review period.

In accordance with section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, an original and one copy of this memorandum are being filed with your office.

Sincerely,

Keith L. Seat

Attachment

cc: Dorothy Attwood, Helgi Walker, Kyle Dixon, Sarah Whitesell, Larry Strickling, Jake Jennings, Margaret Egler, Audrey Wright, Bill Dever

No. of Copies rec'd 0+1  
List ABCDE

**Status of SBC UNE-P Barriers to Residential  
Local Competition in Texas (as of April 5, 2000)**

<b><u>Issue/Problem</u></b>	<b><u>Status</u></b>
1. Trouble-tickets may be manual for first 24-48 hours	SBC fixed on March 18; some problems remain
2. Required to send full service address on every order, even if simply migrating customers	SBC fix not planned until May 27
3. Unable to get Customer Service Records in "parsed" format to avoid excessive re-keying	Not fixed, although May 27 fix should help limit scope of problem
4. Loss of dial tone from breaking orders into three parts and failing to coordinate them	SBC "investigating" problem
5. LIDB I: Issue re updating customer records with SBC at time of initial order	SBC fixed after filing 271 application; production testing needed
6. LIDB II: Lack of adequate automated processes to update customer records with SBC <u>after</u> initial order	SBC fix contemplated, but not yet scheduled or made; no specs provided
7. Excessive manual handling, including too many manual rejects, and delayed manual rejects	Not fixed
8. Improper rejects of competitors' orders due to SBC's internal databases containing conflicting address data	Not fixed
9. Failure to properly relate multiple customer orders	Not fixed
10. Improper "glue" charges for UNE-Platform	SBC continues to push for charges, but not collecting until Texas PUC resolves

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| 11. SBC performance remedy plan fails to include critical measures, such as change management   | Not fixed |
| 12. SBC performance remedy plan based on number of occurrences, low per occurrence payments, and low per measurement caps insufficient to deter backsliding | Not fixed |
| 13. Insufficiently tested change management   | Not done  |
| 14. Key SBC pre-ordering and ordering interfaces not available for much of the night  | Not fixed |
| 15. Must resend orders transmitted when SBC system is unavailable   | Not fixed |

MCI WorldCom  
April 5, 2000