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April 25, 2000

Ex Parte Submission

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

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. 00-65*

Dear Ms. Salas:

Enclosed for filing under seal please find the following information that updates previously submitted evidence related to the hot cut process:

(1) A combined Reported/Reconciled Results Summary for Performance Measurement 114 (Percent of Premature Disconnects). These results reflect data from Texas CLECs that chose to reconcile hot cut data pursuant to Order No. 4 in Texas PUC Project No. 20400 (issued March 28, 2000), as well as reported data from the remaining CLECs. These results update information for January 2000 provided in paragraph 9 of the Joint Supplemental Affidavit of Candy Conway and William Dysart (filed April 5, 2000) ("Conway/Dysart Supp. Aff."). Paragraph 35 of the Conway/Dysart Supp. Aff. discussed Texas PUC Order No. 4. The chart shows that for the months of December 1999, January 2000, and February 2000, only about 4% of hot cut lines were disconnected prematurely under this measurement.

(2) Reconciled results for Performance Measurement 114.1 (Loop Disconnect/Cross Connect Interval) for the months December 1999 through February 2000. The data in this chart includes only hot cuts for CLECs that chose to reconcile hot cut data pursuant

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to Order No 4. Tab 2 also provides a combined Reported/Reconciled Results Summary for Performance Measurement 114.1 for the same months. This chart includes data from the CLECs that reconciled per the Texas PUC Order, as well as reported data from the remaining CLECs. These charts provide new data for February 2000 and updates the information provided in SBC's March 2, 2000 *ex parte* (for December 1999) and in paragraph 13 of the Conway/Dysart Supplemental Affidavit (for January 2000). Both charts show that for the months of December, January, and February, better than 90% of the reconciled hot cut lines were cut-over within 1 hour, and better than 95% of the lines were cut-over within the Texas PUC's 2-hour benchmark.

(3) The Joint Affidavit of Mark Van De Water and Robert Royer, filed with the Texas PUC on April 21, 2000 in Docket No. 16251. The affidavit provides the agreed-upon results of the Provisioning Process Improvement Group ("PPIG") data reconciliation for December 1999 through February 2000. This information updates the preliminary PPIG results relating to AT&T hot cut outages that was provided in the April 5, 2000 Supplemental filing. *See Conway/Dysart Supp. Aff. ¶ 27.*

(4) A further refinement of the reconciled PPIG data provided in the Van De Walter/Royer affidavit provided in Tab 3. The reconciled SBC/AT&T data is adjusted in light of the Texas PUC's performance measurements, by excluding items already reported in PM 114, or included in a 60-minute provisioning interval.

(5) A manual breakdown of SWBT's "I-30" trouble report for March 2000, providing data on reports received on CHC and FDT conversions within 10 days of installation. This information updates the trouble report information for January and February 2000, provided in SBC's April 5 Supplemental filing. *See Conway/Dysart Supp. Aff. ¶ 20.* The "I-10" report shows that about 1.6% of hot cut lines experienced troubles within 10 days.

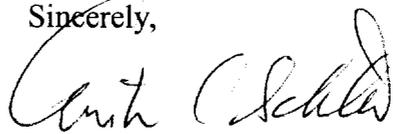
Also attached, as Tab 6, are carrier-specific results for Performance Measurement 9 (Percent Rejects) for the month of March 2000. This attachment updates the information filed in Attachment K to the Supplemental Affidavit of Elizabeth Ham (filed April 5, 2000). It shows that reject rates did not increase significantly in March, even though overall LSR volumes increased by 55-60 percent for both LEX and EDI. Moreover, 8 of the 11 CLECs submitting LSRs via EDI in both February and March improved their reject rates in March.

These materials are being provided at the request of Commission staff. Their disclosure could cause substantial competitive harm to the Texas CLECs whose business information is presented.

Magalie Roman Salas, Esq.
April 25, 2000
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An original and two copies of this letter are enclosed. Please let me know if you have any questions about this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Austin C. Schlick". The signature is written in a cursive style with a large, looping initial "A".

Austin C. Schlick

cc: Ms. Attwood (w/out enc.)
Mr. Dixon (w/out enc.)
Mr. Goldstein (w/out enc.)
Ms. Walker (w/out enc.)
Ms. Whitesell (w/out enc.)
Mr. Jennings
Ms. Rosenworcel
Mr. Stanley
Ms. Stephens
Ms. Wright
Ms. Nelson, Texas PUC
Ms. Heisler, DOJ
ITS

PM 114 (Percent Premature Disconnects) Reconciled/Reported Results Summary*

Dec-99		No. Of Lines Disconn. Early	Percent Disconn. Early	Percent Disconn. On Time	Jan-00		No. Of Lines Disconn. Early	Percent Disconn. Early	Percent Disconn. On Time		
FDT	1-10 Lines	1918	2	0.10%	99.90%	FDT	1-10 Lines	1262	16	1.27%	98.73%
	11+ Lines	178	0	0.00%	100.00%		11+ Lines	49	0	0.00%	100.00%
	Total Lines	2096	2	0.10%	99.90%		Total Lines	1311	16	1.22%	98.78%
CHC	1-10 Lines	1750	6	0.34%	99.66%	CHC	1-10 Lines	1044	19	1.82%	98.18%
	11+ Lines	377	9	0.00%	100.00%		11+ Lines	50	34	68.00%	32.00%
	Total Lines	2127	15	0.71%	99.29%		Total Lines	1094	53	4.84%	95.16%
Grand Total	1-10 Lines	3668	8	0.22%	99.78%	Grand Total	1-10 Lines	2306	35	1.52%	98.48%
	11+ Lines	555	9	1.62%	98.38%		11+ Lines	99	34	34.34%	65.66%
	Total Lines	4223	17	0.40%	99.60%		Total Lines	2405	69	2.87%	97.13%
Feb-00		No. Of Lines Disconn. Early	Percent Disconn. Early	Percent Disconn. On Time	3 Month Total		No. Of Lines Disconn. Early	Percent Disconn. Early	Percent Disconn. On Time		
FDT	1-10 Lines	2140	103	4.81%	95.19%	FDT	1-10 Lines	5320	121	2.27%	97.73%
	11+ Lines	156	0	0.00%	0.00%		11+ Lines	383	0	0.00%	0.00%
	Total Lines	2296	103	4.49%	95.51%		Total Lines	5703	121	2.12%	97.88%
CHC	1-10 Lines	1563	169	10.81%	89.19%	CHC	1-10 Lines	4357	194	4.45%	95.55%
	11+ Lines	327	85	0.00%	0.00%		11+ Lines	754	128	16.98%	83.02%
	Total Lines	1890	254	13.44%	86.56%		Total Lines	5111	322	6.30%	93.70%
Grand Total	1-10 Lines	3703	272	7.35%	92.65%	Grand Total	1-10 Lines	9677	315	3.26%	96.74%
	11+ Lines	483	85	17.60%	82.40%		11+ Lines	1137	128	11.26%	88.74%
	Total Lines	4186	357	8.53%	91.47%		Total Lines	10814	443	4.10%	95.90%

*Includes data for the CLECs that reconciled per TPUC Order No. 4, plus reported results for remaining CLECs

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PM 114.1 Reconciled/Reported Results Summary*

Dec-99		Cuts		Cuts		Jan-00		Cuts		Cuts	
	No. of Lines	Within 1 Hour	% within 1 Hour	Within 2 Hours	% Within 2 Hours		No. of Lines	Within 1 Hour	% within 1 Hour	Within 2 Hours	% Within 2 Hours
FDT						FDT					
1-10 Lines	1918	1795	93.59%	1848	96.35%	1-10 Lines	1262	1183	93.74%	1205	95.48%
11+ Lines	178	156	87.64%	156	87.64%	11+ Lines	49	35	71.43%	35	71.43%
Total Lines	2096	1951	93.08%	2004	95.61%	Total Lines	1311	1218	92.91%	1240	94.58%
CHC						CHC					
1-10 Lines	1750	1513	86.46%	1650	94.29%	1-10 Lines	1044	911	87.26%	995	95.31%
11+ Lines	377	246	65.25%	344	91.25%	11+ Lines	50	50	100.00%	50	100.00%
Total Lines	2127	1759	82.70%	1994	93.75%	Total Lines	1094	961	87.84%	1045	95.52%
Grand Total*						Grand Total*					
1-10 Lines	3668	3308	90.19%	3498	95.37%	1-10 Lines	2306	2094	90.81%	2200	95.40%
11+ Lines	555	402	72.43%	500	90.09%	11+ Lines	99	85	85.86%	85	85.86%
Total Lines	4223	3710	87.85%	3998	94.67%	Total Lines	2405	2179	90.60%	2285	95.01%
Feb-00		Cuts		Cuts		3 Month Combined		Cuts		Cuts	
	No. of Lines	Within 1 Hour	% within 1 Hour	Within 2 Hours	% Within 2 Hours		No. of Lines	Within 1 Hour	% within 1 Hour	Within 2 Hours	% Within 2 Hours
FDT						FDT					
1-10 Lines	2140	1996	93.27%	2034	95.05%	1-10 Lines	5320	4974	93.50%	5087	95.62%
11+ Lines	156	82	52.56%	94	60.26%	11+ Lines	383	273	71.28%	285	74.41%
Total Lines	2296	2078	90.51%	2128	92.68%	Total Lines	5703	5247	92.00%	5372	94.20%
CHC						CHC					
1-10 Lines	1563	1494	95.59%	1548	99.04%	1-10 Lines	4357	3918	89.92%	4193	96.24%
11+ Lines	327	316	96.64%	327	100.00%	11+ Lines	754	612	81.17%	721	95.62%
Total Lines	1890	1810	95.77%	1875	99.21%	Total Lines	5111	4530	88.63%	4914	96.15%
Grand Total*						Grand Total*					
1-10 Lines	3703	3490	94.25%	3582	96.73%	1-10 Lines	9677	8892	91.89%	9280	95.90%
11+ Lines	483	398	82.40%	421	87.16%	11+ Lines	1137	885	77.84%	1006	88.48%
Total Lines	4186	3888	92.88%	4003	95.63%	Total Lines	10814	9777	90.41%	10286	95.12%

*Includes data for the CLECs that reconciled per TPUC Order No. 4, plus reported results for remaining CLECs

SWB AND AT&T

April 21, 2000

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PUBLIC UTILITY COMMISSION
REGISTRATION CLERK

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PROJECT NO. 20400

SECTION 271 COMPLIANCE § PUBLIC UTILITY COMMISSION
MONITORING OF SOUTHWESTERN §
BELL TELEPHONE COMPANY § OF TEXAS

**JOINT AFFIDAVIT OF
MARK VAN DE WATER AND ROBERT ROYER**

Page(s)

Joint Affidavit

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cc: Donna Nelson, General Counsel, PUC (hand delivered)
Nara Srinivasa, TIA, PUC (hand delivered)
Rick Guzman
All parties of record

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PROJECT NO. 16251

**INVESTIGATION OF SOUTHWESTERN § PUBLIC UTILITY COMMISSION
BELL TELEPHONE COMPANY'S §
ENTRY INTO THE TEXAS INTERLATA § OF TEXAS
TELECOMMUNICATIONS MARKET §**

PROJECT NO. 20400

**SECTION 271 COMPLIANCE § PUBLIC UTILITY COMMISSION
MONITORING OF SOUTHWESTERN §
BELL TELEPHONE COMPANY § OF TEXAS**

**JOINT AFFIDAVIT OF
MARK VAN DE WATER AND ROBERT ROYER**

Robert J. Royer and Mark Van de Water being first duly sworn, depose and state as follows:

My name is Robert J. Royer. I am employed as a SWBT Account Manager on the AT&T Account Team. In that position I am responsible for Ancillary Services and Maintenance/Repair.

My name is Mark Van de Water. I am employed with AT&T as Manager-Business Products, OSS and Negotiations. In that position, I have responsibility for negotiating and implementing OSS requirements and interfaces and resolving operational issues for AT&T Business Services products.

**PROVISIONING PROCESS IMPROVEMENT GROUP (PIIG)
FOR UNE-L SERVICES**

The PPIG for UNE-L was formed in September, 1999 to investigate and reconcile data related to unexpected service outages which occurred during the provisioning process of UNE-L and UNE- L with LNP for TCG . The results of the UNE-L PPIG data reconciliation for December, 1999 through February, 2000 are attached to this affidavit in two parts. The first represents the service outage root cause analysis for these data separated into 27 categories as described in the

left column of Attachment 1.¹ The second is a summary sheet for the same months and is identified as Attachment 2.

A previous Joint Affidavit of Mark Van de Water and Robert J. Royer was filed on December 16, 1999 and transmitted data from previous months plus detailed information on the reconciliation process.

Further affiants sayeth not.

¹ Because the Attachments contain CLEC specific confidential information that is designated Highly Sensitive Confidential, they are being filed under seal and provided only to Commission Staff.

VERIFICATION

STATE OF TEXAS §.

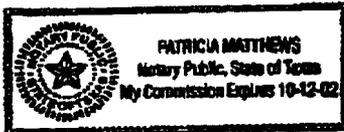
COUNTY OF DALLAS §

I, Robert J. Royer, of lawful age, being duly sworn, now state: that I am authorized to provide the foregoing statement on behalf of Southwestern Bell Telephone Company, that I have read the foregoing statement and the information contained in the foregoing is true and correct to the best of my knowledge and belief.



Robert J. Royer
Southwestern Bell Telephone Company
Account Manager-Industry Markets

SUBSCRIBED AND SWORN TO BEFORE ME this 19th day of April, 2000.



My commission expires:

10-12-02

VERIFICATION

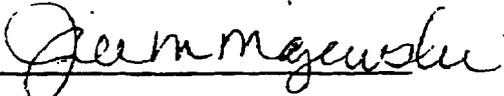
STATE OF ARIZONA §
 §
COUNTY OF MARICOPA §

I, Mark Van de Water, of lawful age, being first duly sworn, now state: that I am authorized to provide the foregoing statement on behalf of AT&T; that I have read the foregoing statement and the information contained in the foregoing is true and correct to the best of my knowledge and belief.



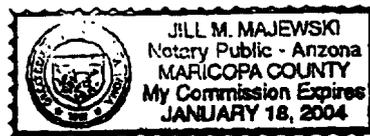
Mark Van de Water
Manager-Business Products
AT&T Local Services and Access
Management

SUBSCRIBED AND SWORN TO BEFORE ME this 20 day of April, 2000.



My commission expires:

1/18/04



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I-10 Reports For UNE Loops (Texas)

	CHC			FDT			Combined		
	Number of I-10 Reports	CHC Base	% I-10 Reports for CHC	Number of I-10 Reports	FDT Base	% I-10 Reports for FDT	Number of I-10 Reports	Combined Base	Combined % I-10 Reports
March	29	1998	1.45%	39	2119	1.84%	68	4117	1.65%

Performance Measurement 9. Percent Rejects

CLEC		MARCH '00		
		# REJECT	# LSRS	% REJECT
	EDI			
CLEC A		--	--	34.1%
CLEC B		--	--	48.6%
CLEC C		--	--	21.9%
CLEC D		--	--	
CLEC E		--	--	76.4%
CLEC F		--	--	50.0%
CLEC G		--	--	31.3%
CLEC H		--	--	32.0%
CLEC I		--	--	19.6%
CLEC J		--	--	74.0%
CLEC K		--	--	19.9%
CLEC L		--	--	20.6%
CLEC M		--	--	0.0%
CLEC N		--	--	0.0%
CLEC O		--	--	82.3%
CLEC P		--	--	100.0%
CLEC Q		--	--	100.0%
CLEC R		--	--	72.7%
TOTAL		17255	70794	24.4%
	LEX			
CLEC A		--	--	27.6%
CLEC B		--	--	33.3%
CLEC C		--	--	77.8%
CLEC D		--	--	8.7%
CLEC E		--	--	38.7%
CLEC F		--	--	72.7%
CLEC G		--	--	34.0%
CLEC H		--	--	69.4%
CLEC I		--	--	32.4%
CLEC J		--	--	59.8%
CLEC K		--	--	9.5%
CLEC L		--	--	56.2%
CLEC M		--	--	50.0%
CLEC N		--	--	77.2%
CLEC O		--	--	52.9%
CLEC P		--	--	42.5%
CLEC Q		--	--	61.4%
CLEC R		--	--	26.0%
CLEC S		--	--	45.6%
CLEC T		--	--	
CLEC U		--	--	40.6%
CLEC V		--	--	36.8%
CLEC W		--	--	
CLEC X		--	--	13.2%
CLEC Y		--	--	35.5%
CLEC Z		--	--	80.0%
CLEC AA		--	--	34.5%
CLEC BB		--	--	42.9%
CLEC CC		--	--	100.0%
CLEC DD		--	--	47.2%
CLEC EE		--	--	68.6%
CLEC FF		--	--	47.6%

CLEC GG	--	--	50.3%
CLEC HH	--	--	30.0%
CLEC II	--	--	40.0%
CLEC JJ	--	--	14.3%
CLEC KK	--	--	38.5%
CLEC LL	--	--	66.7%
CLEC MM	--	--	29.8%
CLEC NN	--	--	45.1%
CLEC OO	--	--	18.7%
CLEC PP	--	--	44.9%
CLEC QQ	--	--	
CLEC RR	--	--	68.9%
CLEC SS	--	--	22.3%
CLEC TT	--	--	
CLEC UU	--	--	100.0%
CLEC VV	--	--	57.6%
CLEC WW	--	--	24.9%
CLEC XX	--	--	
CLEC YY	--	--	34.0%
CLEC ZZ	--	--	63.9%
CLEC AAA	--	--	60.8%
CLEC BBB	--	--	
CLEC CCC	--	--	54.2%
CLEC DDD	--	--	23.1%
CLEC EEE	--	--	18.7%
CLEC FFF	--	--	63.0%
CLEC GGG	--	--	80.0%
CLEC HHH	--	--	17.6%
CLEC III	--	--	33.3%
CLEC JJJ	--	--	75.0%
CLEC KKK	--	--	69.4%
CLEC LLL	--	--	51.7%
CLEC MMM	--	--	100.0%
CLEC NNN	--	--	100.0%
Total	25074	64205	39.1%