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April 26, 2000

APR 28 2000

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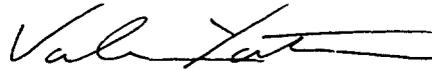
Re: Application by SBC Communications Inc., for Authorization Under Section 271
of the Communications Act to Provide of In-Region, InterLATA Services in
Texas, CC Docket No. 00-65

Dear Ms. Salas:

Enclosed for filing in the above-referenced proceeding are the original, one copy and one
diskette copy of the Comments of NorthPoint Communications, Inc. Also included are five
copies of the submission for distribution to the Commissioners.

Please date stamp the additional copy provided herewith for that purpose and return the
same to the bearer. Thank you for your assistance.

Sincerely,



Valerie Yates

Enclosures

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ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

APR 23 2000
FEDERAL COMMUNICATIONS COMMISSION

In the Matter of)
)
Application by SBC Communications Inc.)
Pursuant to Section 271 of the)
Telecommunications Act of 1996 to Provide) CC Docket 00-65
In-Region InterLATA Services in Texas)

Comments of
NorthPoint Communications, Inc.

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Dated: April 26, 2000

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
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Pursuant to Section 271 of the) CC Docket 00-65
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Provide In-Region InterLATA Services in)
Texas)
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**Comments of
NorthPoint Communications, Inc.**

I. Introduction and Summary

NorthPoint Communications, Inc. (NorthPoint) filed comments urging the Commission to reject Southwestern Bell Telephone (SWBT) Company's previous application to provide in-region, interLATA service in Texas.¹ In those comments, NorthPoint demonstrated that SWBT's application fell short because, on its face, SWBT's attempt to demonstrate compliance with the Telecommunication Act's market opening mandates were facially, and seriously, flawed. For example, in its performance measures, the cornerstone of SWBT's application, SWBT had failed to account for a majority of NorthPoint loop orders and had failed to adequately reflect existing market conditions in Texas.² In SWBT's "refreshed" and second application, SWBT has

¹ See NorthPoint Comments in CC Docket No. 004, filed Jan. 31, 2000; NorthPoint Reply Comments in CC Docket No. 00-4, filed Feb. 22, 2000.

² See NorthPoint Comments in CC Docket No. 00-4 at 7-13; *see also* Comments of the United States Department of Justice at 2.

“cleaned up” its presentation to remove facial errors and obvious inconsistencies from its attempt to demonstrate compliance. But this facelift is just that, a superficial change in the presentation.³ Underlying SWBT’s application, and not reflected in the “performance data” upon which SWBT relies so heavily but which SWBT refuses to reconcile with its own customers, is the continued poor state of affairs in Texas with regard to the provisioning of DSL- capable loops and related support. Because SWBT persists in failing to meet the statutory requirements for the provision of interLATA service, NorthPoint files these comments to urge rejection of SWBT’s second, premature, application.

SWBT’s second try at interLATA authority comes too quickly after its first attempt – indeed so quickly that any claims by SWBT that it has addressed failures identified just four months ago cannot be taken seriously. On DSL issues, SWBT’s Second Application fixes the obvious errors in its performance measurements identified by NorthPoint and other competitive LECs, but SWBT has resisted attempts by its customers, like NorthPoint, to verify the accuracy or reality of the performance reports by engaging in cooperative analysis or third-party tests.⁴ So while these numbers are no longer obviously erroneous, they are no more credible than before and cannot form a sufficient basis to declare that SWBT has met its obligations under the Act.

³ See Letter from James D. Ellis, *et al*, SBC Communications Inc., to Magalie Roman Salas, FCC, in CC Docket No. 00-4 (dated April 5, 2000) (“Second Application”).

Indeed, in its Second Application, SWBT does not even attempt to demonstrate the problems identified by NorthPoint in its previous comments have been cured. In fact, many of the problems with SWBT's DSL ordering capability discussed in NorthPoint's first round of comments continue to plague NorthPoint's DSL loop orders today. SWBT's processes are still highly manual and fraught with delays and errors. These manual processes result in repeated extensions of due dates, missed appointments and failed customer expectations – none of which are captured in SWBT's sparkling performance report. Given this stark duality – between the reality of Texas competition and SWBT's claimed performance – SWBT's refusal to reconcile data cooperatively means that no party, including this Commission, can accurately assess the actual state of affairs in Texas.

Like its last application, SWBT in this application continues to rely on future promises such as the Plan of Record, the Texas DSL Arbitration and line sharing implementation to bridge the significant discrimination gap identified by competitive LECs. But these promises – in addition to being a legally insufficient basis for SWBT's application – are unreliable. Repeated and unilateral delays, course-changes and policy revisions on SWBT's part have pushed the date when the fruits of line sharing, the Plan of Record, and the Texas DSL Arbitration might be obtained into a future that is murky at best.

⁴ By comparison, on the eve of its application for 271 authority, Bell Atlantic-New York engaged in, and continues to engage in, a daily, order-by-order review of NorthPoint loop orders to ensure that Bell Atlantic and NorthPoint are working from the same song sheet. This review has helped immeasurably in understanding and fixing provisioning problems in New York, and has ensured that, regardless of the parties' relative views on the market conditions in New York, everyone has an accurate grasp of the facts. In Texas, the absence of any similar cooperation and the absence of any third-party verification of SWBT's marvelous performance claims leaves this Commission without any basis for evaluating SWBT's proclamation of its own shining success in meeting the Act's requirements.

Because SWBT has failed to demonstrate based on reliable and verified data that its performance is sufficient under the Act, and because SWBT continues to rely on future promises to cure continued discrimination, SWBT's application must be denied.

II. SWBT's New Application Masks Continued Problems, Rather than Demonstrating Changed Performance

A. SWBT Has Not Produced Solutions to NorthPoint's Concerns Over the Manual and Error-Prone DSL Ordering Processes in Texas

As described in NorthPoint's Comments in CC Docket No. 00-4, SWBT maintains a manual ordering process for DSL loops that frustrates competitive LECs and inhibits competition, making robust, commercial and widespread broadband competition impossible in Texas. The attached affidavit of Jessica Lewandowski describes the process and its multiple points of failure. This is the DSL loop ordering process for NorthPoint today. And while SWBT has begun some process changes to implement the Texas DSL Arbitration, the Plan of Record and line sharing, except for some minor improvement in the intervals and reliability for loop qualification, NorthPoint's ordering experience has not changed since SWBT's application four months ago.

Even before SWBT filed its original 271 application, NorthPoint began working to attempt to improve SWBT's processes. Though numerous meetings, letters and conference calls have produced a somewhat clearer view of where SWBT's processes fail, these extensive discussions have yielded no meaningful fixes. (Lewandowski at ¶10-16.) For example, SWBT's initial "solution" to its persistent inability to handle properly NorthPoint's orders was to assign to a single employee the job of "fixing" and catching SWBT errors in the handling of NorthPoint's loops. That employee has since retired, has not been replaced, and her band-aid "fixes" have vanished.

That SWBT's processes are in need of revision is demonstrated by SWBT itself. As a result of the Texas Commission's threat to impose monetary penalties, SWBT in mid-February convened a task force to improve DSL provisioning, and that task force made 54 process improvement recommendations. (Chapman/Dysart ¶¶ 65, 66). None are implemented and final.

The performance data submitted by SWBT as the cornerstone of its application simply fails to reflect these realities. For example, NorthPoint receives invalid rejects of NorthPoint's orders due to manual errors on the part of SWBT's customer service representatives. (Lewandowski at ¶¶5-6, 14). Often these errors force NorthPoint to supplement its order so that SWBT's service representatives can continue to process the order, even if the reject was a SWBT's fault. (Lewandowski at ¶16) This supplement in turn revises the loop installation due date, pushes service delivery farther out, and frustrates long-suffering subscribers awaiting their competitive broadband service. While these system-forced extensions allow SWBT to enjoy extended provisioning intervals, they frustrate NorthPoint's customers and undermine the competitive market, but do not get reflected as a missed due date or delay in SWBT's performance measurements.

The inaccuracy of SWBT's loop qualification data also undermines the integrity of SWBT's performance data. Either on the loop installation due date, or very close to the due date, SWBT often discovers that a loop requires de-conditioning, (e.g. removal of load coils), though it had previously set a due date with the assumption that no de-conditioning was needed. With this discovery, SWBT will reject the loop order back to NorthPoint, requiring that NorthPoint supplement the order with a full ten-day provisioning interval for a conditioned loop. (Lewandowski at ¶14) At the point the order is rejected, it has been pending with SWBT for at least several days. The requirement that NorthPoint supplement the order actually restarts the

clock for the purpose of performance measurements and SWBT's late notice is not tallied as a miss. As a practical matter, this means that the loop is ordered twice: once as a loop without de-conditioning work, and again as a loop requiring de-conditioning work. Double ordering loops is burdensome, slow, and unnecessary; it frustrates customers and competitors alike, but is reflected by SWBT as "timely" in its performance measurements.

In the face of SWBT's conflicting performance claims, NorthPoint has repeatedly requested cooperation from SWBT to reconcile its order data, to ensure both carriers have the same understanding of the process and the issues that need to be addressed.⁵ Up until this week, SWBT has refused to work with NorthPoint to reconcile data. (Lewandowski at ¶12.) Given the inability to verify SWBT's performance measurements, and the manual intervention that is preventing NorthPoint from properly tracking orders, SWBT's performance measurements are not an adequate barometer of SWBT's compliance with the 271 checklist or the opportunity to compete in Texas. Without verifiable performance measurements, or detailed written process improvement plans with committed implementation dates, NorthPoint cannot address those issues with SWBT that prevent full-blown DSL competition in Texas.

B. Promised Improvements Have Not Yet Materialized and Are Behind Schedule

SWBT relies on promises, rather than results as a supplement to its application vis-à-vis continued discrimination against competitors who require DSL unbundled loops. For example, SWBT argues that implementation of line sharing and the Plan of Record will repair

⁵ NorthPoint has been exchanging daily progress reports on DSL loop orders with Bell Atlantic since September 1999, in order to reconcile data and mutually agree on process improvements. Bell Atlantic was cooperative and willing to implement the reports at NorthPoint's request. As a result of this effort and other contemporaneous work, NorthPoint has seen sustained improvement of its ordering and provisioning processes.

discriminatory treatment of DSL competitive LECs in Texas. But SWBT's own comments suggest that these paper promises will prove unreliable.

1. SWBT Is Delaying CLEC Line Sharing While It Accelerates Its Own DSL Deployment

While SWBT claims in its application that line sharing will be "generally available" to end pervasive discrimination in the provisioning of DSL loops to competitors in Texas by May, SWBT's actions suggest a different story. SWBT witness Chapman points to the timely implementation of the FCC Line Sharing Order as the solution to the lack of parity between SWBT's retail and competitor's DSL service⁶ – a discriminatory situation that has permitted SWBT to accelerate its own deployment while crippling competitors' ability to meet consumer demand in Texas.⁷ In its Second Application, SWBT claims that admittedly deficient "temporary arrangements" (e.g. pervasive discrimination against competitors DSL offerings that result from SWBT's inability to provision stand-alone DSL-capable loops effectively) will be remedied by the general availability of line sharing in Texas by the end of May. (Second Application at 13). But implementation schedules have not been finalized, and recent proposals by SWBT push implementation deadlines to the end of August. The continued delays imposed

⁶ Chapman/Dysart at ¶¶ 8, 10, 32, 35. For example, Ms. Chapman's affidavit states, "As a result of this difference [in line sharing capability] however, CLECs cannot be guaranteed of using an existing, already-tested and trouble free loop for their DSL services. They must deploy a second line that may not yet exist or be hitherto untested." (Ibid. at ¶ 8) SWBT also recognizes that several of the performance measurements do not adequately capture the current DSL installation picture since it is an "apples to oranges" comparison without competitive LEC line sharing. (Ibid. at ¶ 32) Finally, SWBT acknowledges that lack of facilities is a major concern for competitive LECs, but not for SWBT's retail service, because of the competitive LECs' inability to take advantage of line sharing (Ibid. at ¶ 35).

⁷ SWBT claims that it can install "only" 3,000 DSL orders a day in its region, far more than all of the other DSL competitors combined can do in a week. T. Wallack, *Fast DSL Is Slow To Install, Backlogged orders for Internet Access*, San Francisco Chronicle, April 26, 2000.

by SWBT, combined with the failure to meet the FCC's line sharing deadline, bely SWBT's claim that the Commission can rely on future performance, including timely implementation of line sharing, to end the discrimination in Texas.

Indeed, SWBT's "road to line sharing" has been rocky at best. SWBT has only recently unveiled its proposed network architecture for line sharing and it does not include the reasonable menu of options the competitive LECs have requested. (Cruz at ¶¶ 25-27; Lewandowski at ¶ 23.) Moreover, SWBT has only recently unveiled its proposed rates for line sharing. (Lewandowski at ¶23.) These delays, and SWBT's lack of cooperation in designing architecture and rates for line sharing, force delays and last-minute accommodations in competitors' implementation plans and delay the ultimate benefits of line sharing to consumers.

In its most recent attempt to foil competitors' attempts to serve consumers quickly with shared-line DSL, SWBT has announced that it will withdraw its agreement to enter into interim line sharing arrangements with competitive LECs while the competitive LECs and SWBT negotiate and possibly litigate some of the finer points of a final line sharing amendment. SWBT's refusal to enter into interim agreements is a 180-degree change from its policy up to that point. Many competitive LECs, including NorthPoint, were in the process of negotiating interim agreements until SWBT made its unilateral announcement. Now competitive LECs are forced to either take SWBT's unilateral, one-sided (and roundly unacceptable) contract proposal or delay their market entry until arbitration is complete, which could be as much as four or five months from the date an arbitration request is filed. SWBT's "bait and switch" policy on interim line sharing agreements undermines the FCC rules and will unnecessarily delay the arrival of robust residential broadband competition in Texas.

SWBT has admitted that it will not – and does not plan to – abide by its commitment to the Commission to deliver line sharing by May 2000. (Second Application at 13, Cruz at ¶17) SWBT recently unveiled its proposed schedule for line sharing availability throughout its region, and despite its promises to the FCC of a May date, this proposal will not complete line sharing implementation until the end of August 2000.⁸ (Cruz at ¶ 18; Lewandowski at ¶ 27.)

2. OSS Improvements Required by the Plan of Record and Texas DSL Arbitration Are Not Yet Complete

SWBT holds itself out as in compliance with its statutory obligations to provide nondiscriminatory access to OSS by reference to its intention to comply with the Plan of Record. (Chapman/Dysart at ¶97; Cruz at ¶¶32-38) But SWBT cannot be allowed to rely on its ongoing implementation of the Plan of Record so long as competitive LECs continue to suffer from discriminatory pre-order and ordering systems in Texas.

Indeed, the simple fact is: SWBT's current pre-order and ordering processes have been ruled discriminatory. The UNE Remand Order, and the Texas DSL Arbitration: (1) determined that SWBT's current manual loop qualification process was discriminatory and did not provide competitive LECs with a meaningful opportunity to compete; and (2) required SWBT to provide

⁸ SWBT's proposed August schedule is available to competitive LECs that wish to use an incumbent LEC-owned and controlled splitter. Although not clear from its pronouncements, SWBT's claim of readiness by May was only available to competitive LECs purchasing their own splitters and placing the splitters inside their collocation cages. (Cruz at ¶¶ 17-18) Most recently, however, SWBT has announced that it may not even be able to accommodate those competitive LECs that purchase and place their own splitters by June. (Lewandowski at ¶ 26)

real time access, on a pre-order basis, to a full range of actual loop make-up information.⁹

(Chapman/Dysart at ¶ 97.) Until these problems that underlie the determination of discrimination are *actually* remedied, SWBT cannot demonstrate compliance with the Act.

Indeed, SWBT's "implementation" of the Plan of Record itself is a cause of worry. SWBT's pre-ordering and ordering processes have been constantly changing over the past several months as a result of the Plan of Record requirements. These changes have made the new mechanized interfaces unreliable and impossible to use for any significant order volume. For example, beginning March 18, 2000, competitive LECs had the ability to submit mechanized requests for designed loop make-up information through a GUI interface.¹⁰ (Chapman/Dysart at ¶ 97) But, there were serious problems with this software release that caused it to be unusable. (Lewandowski at ¶31.) As a result, NorthPoint has only been able to use this mechanized ability very recently, for only a small number of orders, so it has effectively been unavailable to date.

⁹ See Arbitration Award, *Petition of Rhythms Links, Inc. for Arbitration to Establish an Interconnection Agreement with Southwestern Bell Telephone Company*, Docket No. 20226, *Petition of DIECA Communications, Inc. d/b/a Covad Communications Company for Arbitration of Interconnection Rates, Terms, Conditions, and Related Arrangements with Southwestern Bell Telephone Company*, Docket No. 20272, November 30, 1999 ("Texas Arbitration Award") at page 74. ("The Arbitrators find that competitive parity can only be reached with respect to loops used to provide xDSL services if CLECs are provided with real-time access to actual loop makeup information that they can then use to provide their services to their customers."); *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, Third Report and Order and Fourth Further Notice of Proposed Rulemaking, CC Docket No. 96-98, FCC 99-238 (rel. November 5, 1999) ("UNE Remand Order") at ¶ 428.

¹⁰ "Designed" loop make-up information is different than actual loop make-up information. Designed data provide information for the standard design for the longest loop in the end user's distribution area. (Cruz at ¶ 37.) Designed data indicates what the loop *should* look like, taking into account industry standards and SWBT standards for outside loop plant. "Actual" loop make-up information uses outside plant records to develop records for specific loops. Instead of a guess, it is information about the actual loop going to a particular end-user premises. Because the performance of DSL is dependent on loop characteristics, it is critical that competitive LECs have access to actual loop make-up information, as opposed to designed data.

SWBT is far from finished with this process. Another round of changes is scheduled to go into effect on April 29, 2000. (Cruz at ¶38, Lewandowski at ¶32.) Inevitably there will be bugs in these new systems too, and it will likely be a few months before competitive LECs know whether these changes will have satisfied the UNE Remand and Texas DSL Arbitration requirements for non-discriminatory access to pre-ordering and ordering processes. Therefore, SWBT cannot use this process as evidence of its current compliance with these obligations, and its further obligation under the Act.

Moreover, several competitive LECs have called into question the adequacy of SWBT's cooperation in the Plan of Record implementation. While there have been numerous meetings and collaboratives as part of the Plan of Record, and some agreements between the parties, the competitive LECs, including NorthPoint, filed a notice of status with the FCC on April 3, 2000 noting that SWBT appears to have acted in bad faith during the process. The competitive LECs recounted a laundry list of problems, including the fact that SWBT had refused to distribute relevant documents prior to important meetings, had seemingly waited until the last minute to prepare for any collaborative session, failed to provide sufficient information and background to its workshop participants, failed to provide requested information and documentation, failed to provide personnel with adequate authority or understanding to address legitimate competitive LEC issues, and reversed its policy on several previously agreed-to issues.¹¹ The competitive LECs have requested FCC intervention and arbitration for a number of key issues in the Plan of

¹¹ See Notification of Final Status of Advanced Services OSS Plan of Record, *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*, CC Docket No.98-141, April 3, 2000 at pp. 8-12. ("Plan of Record Notice") Real-time access to loop make-up information is also required by the SBC-Ameritech merger conditions and the Plan of Record.

Record. SWBT's reliance on the Plan of Record as a basis for assuming future compliance, (Chapman/Dysart at ¶ 97; Cruz at ¶¶ 32- 38) cannot be taken seriously.

C. Advanced Solutions, Inc. Cannot be Used As a Proxy for Compliance with the Act

The Commission cannot rely on the existence of SWBT's affiliate, Advanced Solutions, Inc. (ASI) to ensure that SWBT does not discriminate against DSL competitive LECs. The existence of a separate affiliate only allows the detection of unlawful discrimination to the extent that the affiliate and DSL competitive LECs sell similar types of DSL products that require access to the same unbundled network elements and utilize the same OSS. Where competitors differentiate their service offerings, the separate affiliate's usefulness as a measure of parity is substantially diminished. This is particularly true for NorthPoint, which offers an SDSL service on stand-alone loops, whereas the affiliate's ADSL product is offered primarily on shared lines.

As described in NorthPoint's previous comments, OSS and provisioning differ in significant ways for the two products. SWBT provides loop qualification information in a format that is useful for providers of ADSL service, but not for competitive providers of a differentiated service, such as ADSL. Thus, Lincoln Brown's statement in his Supplemental Affidavit that loop pre-qualification information is available from CPSOS adds no new information, and certainly is not evidence of non-discriminatory access to OSS.¹² Mr. Brown does not state that the loop pre-qualification information available from CPSOS satisfies either the UNE Remand requirement or the Texas DSL Arbitration requirement that SWBT provide

real-time access to loop make-up data, and until those requirements are satisfied, SWBT continues to discriminate in favor of its own ADSL service, whether provided directly or through ASI.

In his supplemental affidavit, Lincoln Brown acknowledges that ASI will not reach a "steady state" until line sharing is available to DSL competitive LECs. (Brown at ¶12.) During the period preceding the "steady state" provisioning of line sharing, SWBT performs all line sharing functions on behalf of ASI, exactly in the manner that SWBT performed line sharing for itself prior to the creation of the affiliate. Because ASI itself is not ordering any line shared loops, does not provision its own services, and is yet to achieve any "steady state" whereby it might prove to be an indicia or benchmark of competitive performance, attempts to rely on the Affiliate are simply premature.¹³

¹² Brown at ¶18. In fact, Mr. Brown stated during the Plan of Record proceedings that CPSOS will be going away and that while CPSOS is available to competitive LECs for pre-ordering, it is used by the affiliate for ordering and order status as well. *See*, Plan of Record Notice at 17-18, and Transcript from Plan of Record Collaborative Session 3, March 28, 2000 at pp. 903-904.

¹³ SWBT's artificial commitment that ASI will order 280 stand-alone loops per month, as a benchmark for the discrimination that competitive carriers suffer in being required to order such loops to deliver service, really means nothing. SWBT does not indicate that these loops are for real customers, will be tested, de-conditioned, and provisioned on a time-sensitive basis, will be provisioned through arms'-length ordering systems, or that they will be used to provide any of the variety of services offered by competitors. Indeed, the fact that SWBT pledges to create what is in effect a hobbled step-child as a barometer of competitor's opportunities in Texas is, in itself, sufficient indication that SWBT has failed to address the significant problems that make stand-alone loop provisioning such a poor substitute for shared-line loops.

III. SWBT Must Complete Fundamental Changes to Its DSL Ordering and Provisioning System Before It Can Be Granted Long Distance Authority

Before it is permitted to provide interLATA service in Texas, SWBT must make fundamental changes to its DSL ordering and provisioning system and complete basic steps required for compliance with the Act.

Specifically:

- (1) SWBT must provide non-discriminatory access to OSS systems that are scalable and eliminate manual processing errors;
- (2) SWBT must implement flow-through for all DSL-capable loops, beginning immediately with all DSL loops shorter than 12,000 feet;
- (3) SWBT must stop “straight-arming” its own customers’ attempts to reconcile SWBT performance claims with actual performance by exchanging and reconciling daily information on loop order status with SWBT;
- (4) SWBT must implement line sharing in a timely manner and in full compliance with the FCC and relevant state commission requirements, including providing DSL competitive LECs with the ability to order line-shared loops under interim terms and conditions, pending resolution of final issues; and
- (5) SWBT must provide real-time, electronic access to actual loop make-up information during pre-ordering.

Finally, and perhaps most importantly, SWBT's process and improvements and OSS capabilities must be subject to third party testing and validation of SWBT's compliance with the requirements described above before SWBT attempts to demonstrate that it has complied with the requirements of the Telecommunications Act.

RESPECTFULLY SUBMITTED,



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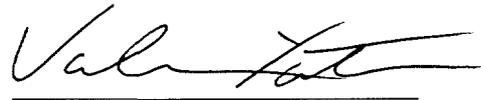
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April 26, 2000

CERTIFICATE OF SERVICE

I, Valerie Yates, do hereby certify that on this 26th day of April, 2000, I caused a copy of the foregoing Comments of NorthPoint Communications, Inc. to be served upon each of the parties listed on the attached Service List by messenger and first class mail, postage prepaid.

A handwritten signature in cursive script, appearing to read "Valerie Yates", written in black ink. The signature is fluid and somewhat stylized, with a long horizontal stroke at the end.

Valerie Yates

* By Messenger

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**Before the
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Telecommunications Act 1996 to Provide)	
In-Region InterLATA Services in Texas)	

AFFIDAVIT OF JESSICA LEWANDOWSKI

1. My name is Jessica Lewandowski. I am a Senior Manager, Local Exchange Carrier ("LEC") Relations for NorthPoint Communications, Inc. My business address is 303 Second Street, San Francisco, CA 94107. I have previously submitted an affidavit before this Commission, in CC Docket No. 00-4, on January 31, 2000.
2. In this Affidavit, I will discuss Southwestern Bell Telephone Company's ("SWBT's") current process for Digital Subscriber Line ("DSL")-capable loop ordering and NorthPoint's attempt to work with SWBT to address serious operational issues and requests for increased mechanization and flow-through of the ordering process. I will also address NorthPoint's operational concerns about and problems it has experienced with the implementation process of line sharing capability in the SBC territory and the implementation of the initial steps in SWBT's Plan of Record.
3. In my previous Affidavit, I described SWBT's ordering process as it existed in January. While the process is generally the same, in this affidavit I will highlight specific points where manual intervention by SWBT's service representatives and provisioning

technicians cause weaknesses in the system and prevent NorthPoint from scaling its orders.

SWBT's DSL Loop Ordering Process

4. NorthPoint's ordering process consists of these steps:
 - NorthPoint submits a DSL loop order through a mechanized interface called Electronic Data Interexchange ("EDI").¹ This order must specify a designated Power Spectral Density ("PSD") mask for the DSL service NorthPoint intends to place on the loop. SWBT requires that NorthPoint order each DSL-capable loop by entering an order code that reflects a permutation of the loop-type, service to be delivered, speed, and loop length;²
 - The EDI gateway system does a very cursory, mechanized review of the NorthPoint order and automatically rejects the order back to NorthPoint for obvious typographical errors or missing information;
 - Once NorthPoint submits a "clean" order through EDI, the order drops out of SWBT's mechanized systems and onto the desk of a SWBT service representative in the Local Service Center ("LSC") for review;
 - A group of service representatives is assigned to review DSL service orders. An order is rejected and sent back to NorthPoint if the service representative finds errors with the order;³
 - SWBT's service representatives then re-type NorthPoint's orders from the EDI ordering interface into SWBT's own loop ordering systems;

¹ As of April 17, 2000, NorthPoint began to use EDI as its ordering interface with SWBT in Texas. The fact that NorthPoint has moved from the mechanized LEX GUI interface to EDI does not affect my discussion of ordering issues that follows. A common misunderstanding is that using EDI makes an order "flow through." This is not the case. Once NorthPoint's loop orders pass through the EDI ordering gateway and the initial mechanized system edits, the order still drops out of SWBT's systems for manual handling and retyping into SWBT's systems.

² Although SWBT claims to have implemented the Texas DSL Arbitration by creating, in the interconnection agreement language, generic xDSL definitions for unbundled DSL loop types (rather than listing separate loop types for each of the PSD standards), NorthPoint's loop ordering process has not changed to reflect the change in contract language. (Chapman/Dysart at ¶92.) SWBT has not made any proposal that would allow NorthPoint to order a single DSL-capable loop.

³ In my previous affidavit I indicated that NorthPoint's orders were being rejected if they did not meet the requirements for a specific DSL type. NorthPoint is now consistently using the "as-is" code on all of its DSL loop orders so that SWBT will not reject an order merely because it is too long for the type of DSL NorthPoint indicated on the order form.

- Once a NorthPoint order passes the service representatives, it sits idle while SWBT's engineers perform a manual loop qualification to review the physical characteristics of the loop and return that information back to the service representatives;
 - The LSC then returns the loop qualification information to NorthPoint via fax or email. If the loop qualification reveals that the particular loop needs de-conditioning (*e.g.*, removal of load coils to enable DSL to be carried on the loop), is served only by fiber, or is too long to support the requested DSL service, then NorthPoint must supplement the order and change the due date, even though the order has already been with SWBT for at least three days.
 - Once SWBT performs the loop qualification, the order begins to move through the provisioning process. SWBT's Local Operations Center ("LOC") is responsible for provisioning the loop.
5. This multi-step process has several points of manual intervention that cause unnecessary rejects and delays in the process. The first point of manual intervention and frequent breakdown in the system is that the LSC service representatives must manually review the order for possible errors. NorthPoint experiences numerous invalid rejects and multiple rejects sent to NorthPoint serially, not simultaneously, during this step. These rejects force NorthPoint to supplement the order, sometimes with multiple supplements, thereby causing delay and moving the order's due date back, sometimes several weeks. SWBT's retail service ADSL orders do not go through the same, painstaking process, thereby giving their orders an advantage.
6. The second point of manual intervention comes when SWBT's service representatives manually re-key every NorthPoint loop order into their own legacy ordering systems. Humans inevitably make mistakes and these errors cause NorthPoint's orders to be rejected, further delaying the orders, despite the fact that SWBT errors are the cause of the reject. Once again, SWBT's retail service representatives have direct access to SWBT's legacy ordering systems and directly enter their orders. SWBT's retail orders do not get re-keyed into the system, thereby greatly reducing the chance of reject.

7. SWBT's manual loop qualification process is the third point of manual intervention and breakdown in the system. While SWBT has begun to phase out the manual loop qualification process for DSL orders, until SWBT has loaded all of its outside plant records into databases, competitive LECs will continue to need some manual loop qualification. Not only does the manual nature of the engineering records research take time, but the LSC returns the loop qualification to NorthPoint via fax or email. As I described in my previous affidavit, NorthPoint has on numerous occasions received the wrong loop qualification or no loop qualification at all. SWBT has recently implemented a new loop qualification procedure that will diminish the required manual intervention in this process. However, in light of the problems with this new process described below, NorthPoint is still currently using the manual loop qualification process.
8. The fifth breakdown in the system comes when NorthPoint's loop order moves to SWBT's LOC, the organization responsible for loop assignment and provisioning. Because the LOC and LSC use different internal systems to track NorthPoint's loop orders, and because the LOC has no mechanized system to communicate problems with NorthPoint's loop order back to the LSC, communication about the status of NorthPoint's loop orders is inefficient and inconsistent. Consequently, when the LOC discovers a problem with a particular loop that it is provisioning for NorthPoint, the LOC does not properly communicate that problem to the LSC, which in turn does not tell NorthPoint. If NorthPoint does receive status on an order, it is usually via a phone call. This makes it impossible to accurately track the status of hundreds of orders NorthPoint currently has pending with SWBT in Texas and prevents NorthPoint from properly communicating the status of orders to its users. As a consequence, some of NorthPoint's customers wait

hours for the appearance of a SWBT loop installation technician, only to be disappointed when no SWBT technician arrives, and no current information on their loop order is available from NorthPoint. These problems are damaging to NorthPoint's reputation and inconvenience NorthPoint's customers.

9. NorthPoint has tried to work with its SWBT account team to address the concerns over the extensively manual and error-prone processes, many of which are the direct cause of the problems NorthPoint raised in its initial filing. By working with SWBT, NorthPoint has clarified some of its original concerns and uncovered new concerns, but has yet to resolve the vast majority of its issues.

NorthPoint's Attempts to Work with SWBT

10. NorthPoint's account team, and other SWBT representatives have agreed with NorthPoint that parts of SWBT's DSL ordering process frequently do not work as designed and acknowledged that NorthPoint has been raising valid issues. Indeed, these SWBT representatives have met with NorthPoint repeatedly, both in person and on conference calls, to try to resolve these issues. Unfortunately, even though both NorthPoint and SWBT have been working to fix the DSL processes since they were implemented in September, a number of problems continue to plague NorthPoint's orders and SWBT has yet to produce a concrete, written plan of action with specific deadlines and verifiable results. In fact, NorthPoint's efforts to find systemic solutions to create a scalable DSL ordering process have been frustrated. The following paragraphs describe NorthPoint's experiences over the past few months and highlight some of the problems NorthPoint has encountered.

11. **SWBT's initial solution came down to a single LSC employee.** When NorthPoint met with several high-level SWBT representatives in February, SWBT acknowledged several problems with the manual handling of DSL orders in the LSC. However, SWBT assured NorthPoint that these problems would be addressed by new policies and procedures implemented by one of the managers of the LSC. Even though many of these "new" policies consisted of phone calls and faxes from this one particular manager and her small group of service representatives informing NorthPoint of order status, rejects and jeopardies and working with NorthPoint on specific escalations, after that meeting NorthPoint worked closely with the single manager assigned to address DSL processes and NorthPoint's orders began to move through the LSC in a more efficient manner. Unfortunately for NorthPoint and for SWBT, this single LSC manager retired from the company and left a gaping hole in SWBT's processes. The improvements that NorthPoint noticed as a result of her individual attention to each order quickly disappeared and NorthPoint is back to square one with the LSC today.

12. **SWBT has refused to work with NorthPoint to reconcile order data.** During its meetings and conference calls with SWBT, NorthPoint has consistently requested an opportunity to reconcile specific orders to try and diagnose and fix operational problems. NorthPoint's proposal was to have both NorthPoint and SWBT closely track orders on a daily or weekly basis for a specific period of time, making note of each event with these orders. NorthPoint and SWBT would then compare notes and learn from each order to

try and mutually diagnose problems.⁴ NorthPoint has successfully used this approach with other incumbent LECs to diagnose order management problems and develop mutual process improvements that result in better customer service provided by both companies.

13. Up until last week, SWBT had refused to work with NorthPoint to reconcile data, instead pointing NorthPoint to the charts and graphs on the SWBT web site. Those charts and graphs are inadequate because they merely provide results which are often incomplete, and no insight into the process itself.

14. **SWBT has inconsistent policies on mitigating delays in orders due to SWBT's error.**

As discussed in NorthPoint's first round of comments, NorthPoint's orders are often delayed due to errors in SWBT's databases or errors by SWBT's service representatives. For example, if SWBT's loop qualification for a particular loop order did not indicate that the loop needed conditioning for DSL service, but upon testing of the loop, the SWBT technician discovered that the loop did need conditioning, NorthPoint would be required to supplement the order and restart the clock on that order with new a due date ten days out, even though the order had been in SWBT's system for at least five days.

15. As discussed above, sometimes SWBT's service representatives make mistakes retyping orders into SWBT's systems, which causes the orders to be rejected back to NorthPoint. In addition, SWBT's practice of identifying errors in a serial fashion, rather than identifying all errors at one time, causes unnecessary delays. For example, NorthPoint's order may be rejected initially for an incomplete address, but after NorthPoint corrects

⁴ NorthPoint has been exchanging daily progress reports on DSL loop orders with Bell Atlantic since September 1999, in order to reconcile data and mutually agree on process improvements. Bell Atlantic was cooperative and willing to implement the reports at NorthPoint's request. As a result of this effort and other contemporaneous work, NorthPoint has seen sustained improvement of its ordering and provisioning processes.

the order and re-submits it, the order may be subsequently rejected for a “pairgain only” or no facilities because the end user is served exclusively by fiber.⁵ As defined in SWBT’s own practices, SWBT’s service representative should have reviewed the entire order at once, and returned it once with all of the errors identified so that NorthPoint would only supplement the order once. This policy is consistently ignored by SWBT service representatives.

16. For each reject, NorthPoint must supplement the order and push the due date farther out. Once NorthPoint supplements an order, this “restarts the clock” for performance measurements and as long as SWBT meets the new due date, these orders are not counted as misses, even if they are provisioned weeks after the original due date. This occurs even if the reject was invalid and due to SWBT’s error.⁶ NorthPoint has requested expedited “supplemental” provisioning intervals and a revised order supplement process if rejects and jeopardies are due to SWBT’s database or manual errors. SWBT has thus far refused.

17. **SWBT continues to provide flow-through processes for its own ADSL-capable loops, but not for other types of DSL loops.** As discussed in NorthPoint’s opening comments, SWBT’s original 271 application notes that SWBT has implemented flow-through processes for ADSL-capable loops under 12,000 feet. This type of loop makes up the

⁵ NorthPoint should be informed of a “pairgain only” situation during the prequalification process by receiving a “Red” indicator. However, NorthPoint has had several orders indicate green or yellow on prequalification, but turn out to be unsuitable for DSL because no copper is available. This makes it very difficult to set customer expectations and the customer will often cancel service rather than receive a slower speed DSL service on fiber.

vast majority of its own retail orders, but a very limited number of Competitive Local Exchange loop orders. By implementing flow-through ordering for its retail services, SWBT has acknowledged that flow through is the most efficient in providing service because a flow-through process eliminates all manual intervention and potential system breakdown.

18. In meetings with NorthPoint, SWBT has stated its intention to expand flow-through capability to all DSL loops under 12,000 feet, regardless of DSL type. As of this filing, SWBT is still providing flow-through treatment for ADSL loops only, while competitive LEC's SDSL and IDSL orders require a manual process.

19. **Particular SWBT proposals for process improvements are not properly designed.**

In its opening comments, NorthPoint stated that SWBT was unilaterally changing the due date on NorthPoint's loop orders, without informing NorthPoint until after the original due date was missed. In fact, it often times took a proactive call on the part of NorthPoint's representatives to find out the status of a particular order. Meanwhile, NorthPoint's end user customer wasted his or her time waiting for the SWBT technician who never showed up.

20. As discussed above, SWBT and NorthPoint identified the source of this problem during subsequent meetings. Because the LOC, SWBT's provisioning center, uses different internal systems to track a competitive LEC's loop order it could not communicate jeopardies with an order to the LSC. The LSC, in turn, does not communicate order status to NorthPoint, including revised due dates, in a timely and efficient manner. This

⁶ When we brought this problem to SWBT's attention, SWBT acknowledged that NorthPoint should not have to supplement an order, and move the due date, when it is a SWBT-caused error. Unfortunately, due to poor training of LSC representatives, NorthPoint has found that it must

situation happens whenever SWBT discovers a problem with the assigned loop or determines that the equipment in the field does not match the records in SWBT's loop inventory systems.

21. To address this issue, as of March 17, 2000, SWBT has begun sending a technician out to provision a loop on Plant Test Date, which is at least one day before the due date.

SWBT's data indicates this should result in improvement in meeting due dates.

NorthPoint also believes that this may be true, since this is the process improvement instituted by Pacific Bell, SWBT's affiliate company, over six months ago. NorthPoint has found that this practice does improve the provisioning process because the fact that the incumbent LEC's technician often finds problems with the order before the due date provides more opportunity for the LSC and the LOC to communicate those problems to NorthPoint ahead of the due date, so that NorthPoint can set proper customer expectations.

22. This process change has had an unintended result, however, that SWBT has thus far refused to correct. This process has resulted in increased "no access" jeopardies.

NorthPoint communicates with its end users to expect the incumbent LEC's technician on the loop installation due date. Because the SWBT technician is now going out prior to due date, the end user customer is not likely to be expecting that visit and consequently the technician may not be able to obtain access to complete his or her work. Unlike SWBT, Pacific Bell automatically sends its technician back out on the due date if there was a "no access" situation on the plant test date. SWBT has refused to take this step.

Instead, SWBT insists that NorthPoint supplement the order due to the no access

supplement every order upon reject or the LSC will not properly process the order. This has been especially true since SWBT's only manager that understood DSL has now left.

condition, which moves the due date farther out.⁷ This problem could be easily remedied by SWBT if SWBT used the same processes as its affiliate, Pacific Bell.

Line Sharing

23. I have also been involved in NorthPoint's implementation of line sharing in Texas.

SWBT and competitive LEC's representatives have been meeting weekly to address operational issues with the implementation of line sharing throughout the SBC 13-state region. During the process, SWBT's policies and process have been slow to take shape and are constantly changing. Just in the past month we have received new or different proposals on ordering processes, network architecture, test access and interim pricing.

24. SWBT has not provided competitive LECs with a final schedule for line sharing

availability in its region, including in Texas. I understand that SWBT has informed this Commission, in its April 5 filing, that it plans to have line sharing "generally available" to competitive LECs by the end of May. As a competitive LEC's representative to these operational discussions, I do not believe that will be possible.

25. Prior to last week, SWBT had claimed that it would have one specific type of line sharing

available to competitive LECs throughout its region by June 6. With this type of line sharing the competitive LEC purchases its own splitter and puts that splitter in its own collocation space within SWBT's central office. Under this configuration, SWBT need only use central office cross connects to connect the competitive LEC's splitter to the incumbent LEC's main distribution frame and voice switch. This line sharing configuration requires the least amount of work on the part of SWBT. SWBT's proposal to only have this type of line sharing ready by June 6, 2000, is a hollow promise because,

⁷ Unfortunately, this supplement process restarts the clock on SWBT's performance measurements and gives SWBT a reprieve on particularly problematic orders.

during initial discussions before this Commission, this method was identified as the least desirable configuration for line sharing according to both incumbent LECs and competitive LECs. The competitive LECs have consistently requested other configurations be available to them in a timely manner.

26. Ironically, on April 19, 2000, SWBT informed the competitive LECs during an operational discussion that it currently is not sure if it will be able to make the June 6, 2000, date even for the competitive LEC-owned splitter configuration.
27. In addition, there are further delays for the line sharing configuration in which the competitive LEC uses a SWBT-owned and controlled splitter, which SWBT must purchase and place in an incumbent LEC's area of the central office. SWBT recently issued a proposal under which line sharing would not be generally available in its region until the end of August. This schedule is attached to my affidavit as Attachment A. This schedule would not have line sharing generally available until the end of August, not May as previously suggested. Worse yet, SWBT has not committed to this proposal.
28. Therefore, for either line sharing configuration, competitive LEC-owned splitter or incumbent LEC-owned splitter, SWBT has not confirmed that it will have line sharing available by the Commission's June deadline, much less by the end of May as stated in its April 5 filing.
29. The uncertainty in deployment schedule, network configuration, interim pricing and other terms and conditions have made it very difficult for NorthPoint to create a business plan for its services offered over line-shared loops. As a result, SWBT has significantly impeded NorthPoint's ability to offer choice and innovative services to Texas consumers.

Plan of Record

30. I have also been involved in the incremental changes to SWBT's pre-ordering and ordering processes as a result of SWBT's implementation of the Plan of Record. On March 18, 2000, SWBT significantly changed the way in which NorthPoint uses SWBT's pre-ordering and loop qualification processes ("March 18th release"). The intent of the March 18th release was to provide competitive LECs with a mechanized, pre-order format to request "designed" loop qualification information.⁸ If competitive LECs wanted a more comprehensive and accurate loop qualification performed, the system was designed so that NorthPoint could request a manual loop qualification using the same ordering interface.

31. SWBT's March 18th release had several major, service affecting problems. In his Affidavit, Rod Cruz dismisses many of these problems and only mentions SWBT's failure to properly anticipate initial order volumes. NorthPoint experienced at least two additional, major problems:

- The March 18th release initially rejected almost every NorthPoint loop order. After March 18, 2000, the new mechanized interface was indicating that almost every loop was erroneously identified as "pairgain only," which means that there is no available copper to serve the end user. This is a "Red" condition in SWBT's processes and SWBT's service representatives were rejecting these orders. Once

⁸ "Designed" loop make up information is different than actual loop make-up information. Designed data provide information for the standard design for the longest loop in the end user's distribution area. (Cruz at ¶ 37.) Designed data indicates what the loop *should* look like, taking into account industry standards and SWBT standards for outside loop plant. "Actual" loop make-up information uses outside plant records to develop records for specific loops. Instead of a guess, it is information about the actual loop going to a particular end-user premises. Because the performance of DSL is dependent on loop characteristics, it is critical that competitive LECs have access to actual loop make-up information, as opposed to designed data.

this problem was fixed, NorthPoint had to resubmit several end-user orders which were erroneously rejected. This was very difficult for NorthPoint to track and resulted in delays and miscommunication to several NorthPoint end users.

- The March 18th release instituted a new, pre-ordering process for requesting loop qualification information, but the system does not work. It allows competitive LECs to request the high-level designed loop information, but competitive LECs cannot use this new system to request the more detailed and accurate actual loop qualification information. Unfortunately, once SWBT put the March 18th release into effect, it immediately dismantled the previous process allowing competitive LECs to request manual loop qualification on the loop order form. NorthPoint was stuck in a standard catch-22 situation because the new process did not work, but the old process had been dismantled. Once NorthPoint escalated this problem, SWBT put the previous process back in place. NorthPoint is now stuck with the previous, inefficient method of requesting manual loop qualification on the order form, instead of being able to take advantage of the new pre-ordering process for manual loop qualification.

32. These problems have made SWBT's systems even more unreliable and error-prone.

Even as we discuss solutions to the new problems with their OSS, SWBT points to yet another promised fix to the preordering process due on April 29, 2000. From NorthPoint's perspective, there is no basis to think this April release will solve the current problems. In fact, it is likely that, at least initially, this new release will merely create new problems. NorthPoint cannot adequately track order status and communicate problems with our end users until these problems are fixed. It will be quite some time

before NorthPoint can understand and analyze SWBT's new processes to see if they will satisfy SWBT's obligation of non-discriminatory access to its OSS.

Dated: April 26, 2000

Jessica Lewandowski
Jessica Lewandowski

ATTACHMENT A

Deployment Plan Line Sharing / POTS-Splitters
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Central/West Texas						
CLLI	Exchange				Installation Due Date	Ready for Service
AUSTTXGR06T	AUSTIN				30-May-00	6-Jun-00
AUSTTXHIDS0	AUSTIN				30-May-00	6-Jun-00
MDLDTXOXDS0	MIDLAND				30-May-00	6-Jun-00
ODSSTXEMDS0	ODESSA				30-May-00	6-Jun-00
LBCKTXPSCG0	LUBBOCK				30-May-00	6-Jun-00
AMRLTXFLDS0	AMARILLO				30-May-00	6-Jun-00
LBCKTXSWCG0	LUBBOCK				30-May-00	6-Jun-00
BGSPTXBSDS0	BIG SPRING				30-May-00	6-Jun-00
ODSSTXLICG0	ODESSA				13-Jun-00	20-Jun-00
LBCKTXFRDS0	LUBBOCK				13-Jun-00	20-Jun-00
AMRLTX0215T	AMARILLO				13-Jun-00	20-Jun-00
ELPSTXMACG0	EL PASO				13-Jun-00	20-Jun-00
ELPSTXEADS0	EL PASO EAST				13-Jun-00	20-Jun-00
ELPSTXHADS0	EL PASO				13-Jun-00	20-Jun-00
AUSTTXJOCG0	AUSTIN JOLLYVILLE				13-Jun-00	20-Jun-00
ELPSTXNECG0	EL PASO				13-Jun-00	20-Jun-00
ELPSTXNODS0	EL PASO				20-Jul-00	27-Jul-00
AUSTTXHOCG0	AUSTIN				20-Jul-00	27-Jul-00
AUSTTXTECG0	AUSTIN				20-Jul-00	27-Jul-00
ELPSTXYSDS0	EL PASO				20-Jul-00	27-Jul-00
ELPSTXSECG0	EL PASO				20-Jul-00	27-Jul-00
LBCKTXPADS0	LUBBOCK				20-Jul-00	27-Jul-00
ELPSTXSHDS0	EL PASO				20-Jul-00	27-Jul-00
AUSTTXRRDS0	ROUND ROCK				20-Jul-00	27-Jul-00
AUSTTXFIDS0	AUSTIN				20-Jul-00	27-Jul-00
PLVWTPVDS0	PLAINVIEW				20-Jul-00	27-Jul-00
AUSTTXWADS0	AUSTIN WALNUT				20-Jul-00	27-Jul-00

AUSTTXFADS0	AUSTIN				20-Jul-00	27-Jul-00
AUSTTXCVDS0	CEDAR VALLEY				20-Jul-00	27-Jul-00
AUSTTXEVDS0	AUSTIN				20-Jul-00	27-Jul-00
AMRLTXEVDS0	AMARILLO				20-Jul-00	27-Jul-00
ABLNTXORCG0	ABILENE				20-Jul-00	27-Jul-00
WACOTX01CG0	WACO				20-Aug-00	27-Aug-00
ABLNTXOWDS0	ABILENE				20-Aug-00	27-Aug-00
PAMPTXPPDS0	PAMPA				20-Aug-00	27-Aug-00
WACOTXPRDS0	WACO				20-Aug-00	27-Aug-00
HLBOTXJUDS0	HILLSBORO				20-Aug-00	27-Aug-00
TMPLTXDNCG0	TEMPLE				20-Aug-00	27-Aug-00
WACOTXSWDS0	WACO SWIFT				20-Aug-00	27-Aug-00
AUSTTXMCDS0	MANHACA				20-Aug-00	27-Aug-00
WACOTXHEDS0	WACO				20-Aug-00	27-Aug-00
AUSTTXPFDS0	PFLUGERVILLE				20-Aug-00	27-Aug-00

Deployment Plan
Line Sharing /POTS-Splitters

South Texas					Installation	Ready
CLLI	Exchange				Due Date	for Service
SNANTXDIDS2	SAN ANTONIO DIAMOND				30-May-00	6-Jun-00
CRCHTXTECG0	CORPUS CHRISTI TERMINAL				30-May-00	6-Jun-00
SNANTXTADS1	SAN ANTONIO				30-May-00	6-Jun-00
CRCHTXWYDS0	CORPUS CHRISTI				30-May-00	6-Jun-00
SNANTXPECG0	SAN ANTONIO				30-May-00	6-Jun-00
SNANTXCACG0	SAN ANTONIO CAPITOL				13-Jun-00	20-Jun-00
SNANTXWACG0	SAN ANTONIO WALNUT				13-Jun-00	20-Jun-00
CRCHTXTUCG0	CORPUS CHRISTI				13-Jun-00	20-Jun-00
SNANTXWEDS0	SAN ANTONIO WETMORE				13-Jun-00	20-Jun-00
SNANTXCUCG0	SAN ANTONIO CULEBRA				13-Jun-00	20-Jun-00
NBRNTXNBCG0	NEW BRAUNFELS				13-Jun-00	20-Jun-00
SNANTXFRCG0	SAN ANTONIO FRATT				20-Jul-00	27-Jul-00
SNANTXBACG0	SAN ANTONIO BABCOCK				20-Jul-00	27-Jul-00
LARDTXLADS0	LAREDO				20-Jul-00	27-Jul-00
SNANTXLECG0	SAN ANTONIO				20-Jul-00	27-Jul-00
SNANTXUCDS0	UNIVERSAL CITY				20-Jul-00	27-Jul-00
BWLTXLIDS0	BROWNSVILLE				20-Jul-00	27-Jul-00
MCALTXMUCG0	MCALLEN				20-Jul-00	27-Jul-00
SNANTXGECG0	SAN ANTONIO				20-Jul-00	27-Jul-00
SGINTXSGDS0	SEGUIN FRANKLIN				20-Jul-00	27-Jul-00
EDBGTXEBCG0	EDINBURG				20-Jul-00	27-Jul-00
PHRRTXPHCG0	PHARR				20-Jul-00	27-Jul-00
MSSNTXMIDS0	MISSION				20-Jul-00	27-Jul-00
HLNNTXHG03T	HARLINGEN				20-Aug-00	27-Aug-00
SNANTXSLDS0	SAN ANTONIO SHAVANO				20-Aug-00	27-Aug-00
SNANTXMADS0	SAN ANTONIO MARTINEZ				20-Aug-00	27-Aug-00
SNANTXMCDS0	SAN ANTONIO MEDICAL CENTER				20-Aug-00	27-Aug-00

VCTATXVICG0	VICTORIA				20-Aug-00	27-Aug-00
ALICTXALDS0	ALICE				20-Aug-00	27-Aug-00
KGVLTXKVDS0	KINGSVILLE				20-Aug-00	27-Aug-00
SNANTXEDDS0	SAN ANTONIO EDISON				20-Aug-00	27-Aug-00
BEVLTXBVDS0	BEEVILLE				20-Aug-00	27-Aug-00
CRCHTXCADS0	CORPUS CHRISTI CALLEN				20-Aug-00	27-Aug-00
EGPSTXEPDS0	EAGLE PASS				20-Aug-00	27-Aug-00
UVLDTXUVDS0	UVALDE				20-Aug-00	27-Aug-00
SNANTXLSRS1	LEON SPRINGS				20-Aug-00	27-Aug-00

Deployment Plan
Line Sharing / POTS-Splitters

Houston					Installation	Ready
CLLI	Exchange				Due Date	for Service
HSTNTXJACG0	HOUSTON JACKSON				30-May-00	6-Jun-00
HSTNTXHUDS0	HOUSTON HUDSON				30-May-00	6-Jun-00
HSTNTXSUDS0	HOUSTON SUNSET				30-May-00	6-Jun-00
HSTNTXBUDS0	HOUSTON BUFFALO				30-May-00	6-Jun-00
HSTNTXALDS0	HOUSTON ALIEF				30-May-00	6-Jun-00
HSTNTXNACG0	HOUSTON NATIONAL				30-May-00	6-Jun-00
HSTNTXPRCG1	HOUSTON PRESCOTT				30-May-00	6-Jun-00
HSTNTXBADS0	HOUSTON BAMMEL				30-May-00	6-Jun-00
HSTNTXAIDS0	HOUSTON AIRLINE				30-May-00	6-Jun-00
HSTNTXHODS0	HOUSTON HOMESTEAD				30-May-00	6-Jun-00
HSTNTXBRCG0	HOUSTON BARKER				30-May-00	6-Jun-00
HSTNTXMOCG0	HOUSTON MOHAWK				13-Jun-00	20-Jun-00
HSTNTXFADS0	HOUSTON FAIRBANKS				13-Jun-00	20-Jun-00
SPRNTXNODS0	SPRING NORTH				13-Jun-00	20-Jun-00
HSTNTXLACG0	HOUSTON LANGHAM CREEK				13-Jun-00	20-Jun-00
HSTNTXAPCG0	HOUSTON APOLLO				13-Jun-00	20-Jun-00
HSTNTXCHRS0	HOUSTON CHANNELVIEW				13-Jun-00	20-Jun-00
GLTNTXSOCG0	GALVESTON SOUTHFIELD				13-Jun-00	20-Jun-00
TBLLTXKLCG0	TOMBALL KLEIN				13-Jun-00	20-Jun-00
HSTNTXOVDS0	HOUSTON OVERLAND				13-Jun-00	20-Jun-00
HSTNTXEERS0	HOUSTON EAST ELLINGTON				13-Jun-00	20-Jun-00
BUMTTXTECG0	BEAUMONT TERMINAL				13-Jun-00	20-Jun-00
BUMTTXTWDS0	BEAUMONT TWINBROOK				13-Jun-00	20-Jun-00
HSTNTXMCD0	HOUSTON MEDICAL CENTER				13-Jun-00	20-Jun-00
HSTNTXSACG0	HOUSTON SATSUMA				20-Jul-00	27-Jul-00
HSTNTXOXCG0	HOUSTON OXFORD				20-Jul-00	27-Jul-00
HSTNTXUNCG0	HOUSTON UNDERWOOD				20-Jul-00	27-Jul-00

HSTNTXGPDS0	HOUSTON GREENSPOINT				20-Jul-00	27-Jul-00
BUMTTXUNDS0	BEAUMONT UNIVERSITY				20-Jul-00	27-Jul-00
PTARTXWORS0	PORT ARTHUR WOODLAWN				20-Jul-00	27-Jul-00
HSTNTXMICG0	HOUSTON MISSION				20-Jul-00	27-Jul-00
HSTNTXWACG0	HOUSTON WALNUT				20-Jul-00	27-Jul-00
PTARTXYUDS0	PORT ARTHUR YUKON				20-Jul-00	27-Jul-00
NDLDTXNDDS0	NEDERLAND				20-Jul-00	27-Jul-00
HSTNTXLPDS0	HOUSTON LA PORTE				20-Jul-00	27-Jul-00
HSTNTXPACG0	HOUSTON PARKVIEW				20-Jul-00	27-Jul-00
SPRNTXSOCG0	SPRING SOUTH				20-Jul-00	27-Jul-00
HSTNTXCACG1	HOUSTON CAPITOL				20-Jul-00	27-Jul-00
ORNGTXORDS0	ORANGE				20-Jul-00	27-Jul-00
HSTNTXORCG0	HOUSTON ORCHARD				20-Jul-00	27-Jul-00
RSBGTXRRDS0	RICHMOND-ROSENBERG				20-Jul-00	27-Jul-00
HSTNTXGRCG0	HOUSTON GREENWOOD				20-Jul-00	27-Jul-00
HSTNTXGLCG0	HOUSTON GLENDALE				20-Jul-00	27-Jul-00
HSTNTXWLCG0	HOUSTON WEST ELLINGTON				20-Jul-00	27-Jul-00
HSTNTXADCG0	HOUSTON ADLINE				20-Jul-00	27-Jul-00
HSTNTXBWCG0	HOUSTON BLUERIDGE WEST				20-Jul-00	27-Jul-00
HSTNTXPERS1	HOUSTON PEARLAND				20-Jul-00	27-Jul-00
HSTNTXDPCG0	HOUSTON DEER PARK				20-Jul-00	27-Jul-00
GLTNTXSHDS0	GALVESTON SHERWOOD				20-Aug-00	27-Aug-00
TBLTBTBDS0	TOMBALL				20-Aug-00	27-Aug-00
HSTNTXRECG0	HOUSTON REPUBLIC				20-Aug-00	27-Aug-00
HSTNTXFRCG0	HOUSTON FRIENDSWOOD				20-Aug-00	27-Aug-00
TXCYTCTCDS0	TEXAS CITY				20-Aug-00	27-Aug-00
HSTNTXCLCG1	HOUSTON CLAY				20-Aug-00	27-Aug-00
ALVNTXALCG0	ALVIN				20-Aug-00	27-Aug-00
HSTNTXWECG0	HOUSTON WESTFIELD				20-Aug-00	27-Aug-00
BYCYTXBYDS0	BAY CITY				20-Aug-00	27-Aug-00
CLEVTXCLDS0	CLEVELAND				20-Aug-00	27-Aug-00
CNTRTXCNDS0	CENTER				20-Aug-00	27-Aug-00
HNVITXHNS0	HUNTSVILLE				20-Aug-00	27-Aug-00
CYPRTXCYDS0	CYPRESS				20-Aug-00	27-Aug-00
HSTNTXNECG0	HOUSTON NEPTUNE				20-Aug-00	27-Aug-00

HSTNTXSERS0	HOUSTON SEABROOK				20-Aug-00	27-Aug-00
LBRTTXLBDS0	LIBERTY				20-Aug-00	27-Aug-00
PNHRTXPNDS0	PINEHURST				20-Aug-00	27-Aug-00
NCGDTXNCDS0	NACOGDOCHES				20-Aug-00	27-Aug-00
SPLDTXSPDS0	SPLENDORA				20-Aug-00	27-Aug-00
HSTNTXRIDS0	HOUSTON RIVERSIDE				20-Aug-00	27-Aug-00
TXCYTXLMDS0	TEXAS CITY-LA MARQUE				20-Aug-00	27-Aug-00
AGTNTXDARS0	ANGLETON				20-Aug-00	27-Aug-00
BRHMTXBRDS0	BRENHAM				20-Aug-00	27-Aug-00
CLUTTXLJDS0	CLUTE-LAKE JACKSON				20-Aug-00	27-Aug-00
HSTNTXIDCG0	HOUSTON IDLEWOOD				20-Aug-00	27-Aug-00
HSTNTXEHCG0	HOUSTON EAST HOUSTON				20-Aug-00	27-Aug-00

Deployment Plan
Line Sharing / POTS-Splitters

Dallas/Ft Worth (North)						Installation	Ready
CLLI	Exchange					Due Date	for Service
FTWOTXCRDS0	FORT WORTH ARLINGTON					30-May-00	6-Jun-00
DLLSTXRNDS0	DALLAS RICHARDSON-1					30-May-00	6-Jun-00
MCKNTXLIDS0	MCKINNEY					30-May-00	6-Jun-00
WCFLTXCF0G0	WICHITA FALLS					30-May-00	6-Jun-00
WCFLTXNICG0	WICHITA FALLS					30-May-00	6-Jun-00
DLLSTXRECG0	DALLAS RENNER					30-May-00	6-Jun-00
DLLSTXLADS0	DALLAS LAKESIDE					30-May-00	6-Jun-00
DLLSTXFBCG0	DALLAS FARMERS BRANCH					30-May-00	6-Jun-00
DLLSTXADCG0	DALLAS ADDISON					30-May-00	6-Jun-00
DLLSTXEMDS0	DALLAS EMERSON					30-May-00	6-Jun-00
FTWOTXBUCG0	NORTH RICHLAND HILLS					30-May-00	6-Jun-00
DLLSTXTA03T	DALLAS TAYLOR					30-May-00	6-Jun-00
FTWOTXEUCG0	FORT WORTH EULESS					30-May-00	6-Jun-00
DLLSTXDIDS0	DALLAS DIAMOND					13-Jun-00	20-Jun-00
DLLSTXFLDS0	DALLAS FLEETWOOD					13-Jun-00	20-Jun-00
FTWOTXAXCG0	FORT WORTH WEDGEWOOD					13-Jun-00	20-Jun-00
DLLSTXGPCG0	DALLAS GRAND PRAIRIE					13-Jun-00	20-Jun-00
DLLSTXNMCG0	DALLAS NORTH MESQUITE					13-Jun-00	20-Jun-00
FTWOTXARCG0	ARLINGTON					13-Jun-00	20-Jun-00
TYLRTXS0DS0	TYLER					13-Jun-00	20-Jun-00
LGVWTXPL03T	LONGVIEW					13-Jun-00	20-Jun-00
LGVWTXGRDS0	LONGVIEW					13-Jun-00	20-Jun-00
DLLSTXM0SDS0	DALLAS MESQUITE					13-Jun-00	20-Jun-00
DLLSTXWHCG0	DALLAS WHITEHALL					13-Jun-00	20-Jun-00
FTWOTXPECG0	FORT WORTH PERSHING					13-Jun-00	20-Jun-00
FTWOTXKECG0	FORT WORTH KENNEDALE					13-Jun-00	20-Jun-00
MNPLTXPADS0	MOUNT PLEASANT					13-Jun-00	20-Jun-00
FTWOTXWACG0	FORT WORTH WALNUT					20-Jul-00	27-Jul-00

ALLNTXSADS0	ALLEN				20-Jul-00	27-Jul-00
DLLSTXDACG0	DALLAS DAVIS				20-Jul-00	27-Jul-00
FTWOTXGLCG0	FORT WORTH GLENDALE				20-Jul-00	27-Jul-00
DLLSTXDVCG0	DALLAS DUNCANVILLE				20-Jul-00	27-Jul-00
MRSHTXWEDS0	MARSHALL				20-Jul-00	27-Jul-00
TYLRTXLYCG0	TYLER				20-Jul-00	27-Jul-00
DLLSTXFRCG0	DALLAS FRANKLIN				20-Jul-00	27-Jul-00
DLLSTXMCCG0	DALLAS MIDCITIES				20-Jul-00	27-Jul-00
FTWOTXEDCG0	FORT WORTH EDISON				20-Jul-00	27-Jul-00
DLLSTXNODS0	DALLAS NORTHLAKE				20-Jul-00	27-Jul-00
DLLSTXRODS0	DALLAS ROSS AVENUE				20-Jul-00	27-Jul-00
DLLSTXRICG2	DALLAS RIVERSIDE				20-Jul-00	27-Jul-00
DLLSTXFEDS0	DALLAS FEDERAL				20-Jul-00	27-Jul-00
RKWLTXPADS0	ROCKWALL				20-Jul-00	27-Jul-00
FRSCTXCODS0	FRISCO				20-Jul-00	27-Jul-00
FTWOTXATCG0	FORT WORTH ATLAS				20-Jul-00	27-Jul-00
DLLSTXDSDS0	DALLAS DESOTO				20-Jul-00	27-Jul-00
FTWOTXTEDS0	FORT WORTH TERMINAL				20-Jul-00	27-Jul-00
DLLSTXMECG0	DALLAS MELROSE				20-Jul-00	27-Jul-00
FTWOTXBERS0	FORT WORTH EAGLE MNTN LAKE				20-Jul-00	27-Jul-00
DLLSTXEVD0	DALLAS EVERGREEN				20-Jul-00	27-Jul-00
FTWOTXCEDS0	FORT WORTH SAGINAW				20-Jul-00	27-Jul-00
FRSCTXESDS0	FRISCO				20-Jul-00	27-Jul-00
RONKTXWODS0	ROANOKE				20-Jul-00	27-Jul-00
FTWOTXBND0	FORT WORTH BURLESON				20-Jul-00	27-Jul-00
DLLSTXCHDS0	DALLAS CEDAR HILL				20-Jul-00	27-Jul-00
FTWOTXECCG0	FORT WORTH EDGECLIFF				20-Jul-00	27-Jul-00
DLLSTXSUDS0	DALLAS SUNNYVALE				20-Aug-00	27-Aug-00
FTWOTXBRS0	FORT WORTH MANSFIELD				20-Aug-00	27-Aug-00
PARSTXSUDS0	PARIS				20-Aug-00	27-Aug-00
CLBNTXMIDS0	CLEBURNE				20-Aug-00	27-Aug-00
WTFRTXLYDS0	WEATHERFORD				20-Aug-00	27-Aug-00
FTWOTXWSDS0	WHITE SETTLEMENT				20-Aug-00	27-Aug-00
CRSCTXTRDS0	CORSICANA				20-Aug-00	27-Aug-00
FTWOTXBBDS0	FORT WORTH BENBROOK				20-Aug-00	27-Aug-00

FTWOTXMADS0	FORT WORTH MARKET				20-Aug-00	27-Aug-00
FTWOTXJECG0	FORT WORTH JEFFERSON				20-Aug-00	27-Aug-00
FTWOTXCIDS0	WESTLAND				20-Aug-00	27-Aug-00
GNVLTXGLDS0	GREENVILLE				20-Aug-00	27-Aug-00
DLLSTXHACG0	DALLAS HAMILTON				20-Aug-00	27-Aug-00
FTWOTXLWDS0	FORT WORTH LAKE WORTH				20-Aug-00	27-Aug-00
TRRLTXJODS0	TERRELL				20-Aug-00	27-Aug-00
DESNTXHODS0	DENISON				20-Aug-00	27-Aug-00
WXHCTXWEDS0	WAXAHACHIE				20-Aug-00	27-Aug-00
DLLSTXLNDS0	DALLAS LANCASTER				20-Aug-00	27-Aug-00
DLLSTXDND0	DALLAS DANIELDALE				20-Aug-00	27-Aug-00
GSVLTXHODS0	GAINESVILLE				20-Aug-00	27-Aug-00
DLLSTXEXDS0	DALLAS EXPRESS				20-Aug-00	27-Aug-00
FRNYTXHIRS0	FORNEY				20-Aug-00	27-Aug-00
RDOKTXHORS0	RED OAK				20-Aug-00	27-Aug-00
GRBYTXRADS0	GRANBURY				20-Aug-00	27-Aug-00
MNWLTXFADS0	MINERAL WELLS				20-Aug-00	27-Aug-00
DLLSTXRYDS0	DALLAS RYLIE				20-Aug-00	27-Aug-00
MCKNTXWE	MCKINNEY ????				20-Aug-00	27-Aug-00