

/s/ Gordon R. Evans
Vice President Federal Regulatory
Bell Atlantic

/s/ Heather B. Gold
Vice President- Industry Policy
Intermedia Communications

/s/ Robert T. Blau
Vice President Executive and Federal Regulatory
Affairs
BellSouth Corporation

/s/ Priscilla Hill-Ardoin
Senior Vice President – Federal
Regulatory
SBC Communications Inc.

/s/ Richard Metzger
Vice President Regulatory & Public Policy
Focal Communications

/s/ Don Shephard
Vice President, Federal Regulatory
Affairs
Time Warner Telecom

/s/ Alan F. Ciamporzero
Vice President – Regulatory Affairs
GTE Service Corporation

/s/ Melissa Newman
Vice President- Regulatory Affairs
U.S. West, Inc.

/s/ Russell C. Merbeth
Vice President, Legal and Regulatory
Affairs
WinStar Communications, Inc.

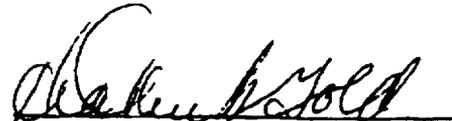
cc: K. Brown
D. Attwood
R. Beynon
J. Goldstein
S. Whitesell
K. Dixon
C. Wright
L. Strickling
R. Atkinson
M. Carey
J. Jackson
J. Jennings

/s/ Gordon R. Evans
Vice President Federal Regulatory
Bell Atlantic

/s/ Robert T. Blau
Vice President Executive and Federal Regulatory
Affairs
BellSouth Corporation

/s/ Richard Metzger
Vice President Regulatory & Public Policy
Focal Communications

/s/ Alan F. Ciamporcero
Vice President - Regulatory Affairs
GTE Service Corporation



/s/ Heather B. Gold
Vice President- Industry Policy
Intermedia Communications

/s/ Priscilla Hill-Ardoin
Senior Vice President - Federal
Regulatory
SBC Communications Inc.

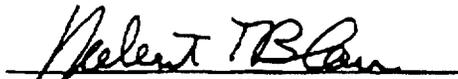
/s/ Don Shephard
Vice President, Federal Regulatory
Affairs
Time Warner Telecom

/s/ Melissa Newman
Vice President- Regulatory Affairs
U.S. West, Inc.

/s/ Russell C. Merbeth
Vice President, Legal and Regulatory
Affairs
WinStar Communications, Inc.

cc: K. Brown
D. Attwood
R. Beynon
J. Goldstein
S. Whitesell
K. Dixon
C. Wright
L. Strickling
R. Atkinson
M. Carey
J. Jackson
J. Jennings

/s/ Gordon R. Evans
Vice President Federal Regulatory
Bell Atlantic


/s/ Robert T. Blau
Vice President Executive and Federal Regulatory
Affairs
BellSouth Corporation

/s/ Richard Metzger
Vice President Regulatory & Public Policy
Focal Communications

/s/ Alan F. Ciamporcero
Vice President - Regulatory Affairs
GTE Service Corporation

/s/ Heather B. Gold
Vice President- Industry Policy
Intermedia Communications

/s/ Priscilla Hill-Ardoin
Senior Vice President - Federal
Regulatory
SBC Communications Inc.

/s/ Don Shephard
Vice President, Federal Regulatory
Affairs
Time Warner Telecom

/s/ Melissa Newman
Vice President- Regulatory Affairs
U.S. West, Inc.

/s/ Russell C. Merbeth
Vice President, Legal and Regulatory
Affairs
WinStar Communications, Inc.

cc: K. Brown
D. Attwood
R. Beynon
J. Goldstein
S. Whitesell
K. Dixon
C. Wright
L. Strickling
R. Atkinson
M. Carey
J. Jackson
J. Jennings

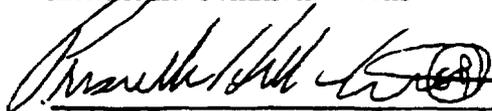
/s/ Gordon R. Evans
Vice President Federal Regulatory
Bell Atlantic

/s/ Robert T. Blau
Vice President Executive and Federal Regulatory
Affairs
BellSouth Corporation

/s/ Richard Metzger
Vice President Regulatory & Public Policy
Focal Communications

/s/ Alan F. Ciamporcero
Vice President – Regulatory Affairs
GTE Service Corporation

/s/ Heather B. Gold
Vice President- Industry Policy
Intermedia Communications



/s/ Priscilla Hill-Ardoin
Senior Vice President – Federal
Regulatory
SBC Telecommunications, Inc.

/s/ Don Shephard
Vice President, Federal Regulatory
Affairs
Time Warner Telecom

/s/ Melissa Newman
Vice President- Regulatory Affairs
U.S. West, Inc.

/s/ Russell C. Merbeth
Vice President, Legal and Regulatory
Affairs
WinStar Communications, Inc.

cc: K. Brown
D. Attwood
R. Beynon
J. Goldstein
S. Whitesell
K. Dixon
C. Wright
L. Strickling
R. Atkinson
M. Carcy
J. Jackson
J. Jennings

/s/ Gordon R. Evans
Vice President Federal Regulatory
Bell Atlantic

/s/ Heather B. Gold
Vice President- Industry Policy
Intermedia Communications

/s/ Robert T. Blau
Vice President Executive and Federal Regulatory
Affairs
BellSouth Corporation

/s/ Priscilla Hill-Ardoin
Senior Vice President - Federal
Regulatory
SBC Communications Inc.


/s/ Richard Metzger
Vice President Regulatory & Public Policy
Focal Communications

/s/ Don Shephard
Vice President, Federal Regulatory
Affairs
Time Warner Telecom

/s/ Alan F. Ciamporcero
Vice President - Regulatory Affairs
GTE Service Corporation

/s/ Melissa Newman
Vice President- Regulatory Affairs
U.S. West, Inc.

/s/ Russell C. Merbeth
Vice President, Legal and Regulatory
Affairs
WinStar Communications, Inc.

cc: K. Brown
D. Attwood
R. Beynon
J. Goldstein
S. Whitesell
K. Dixon
C. Wright
L. Strickling
R. Atkinson
M. Carey
J. Jackson
J. Jennings

/s/ Gordon R. Evans
Vice President Federal Regulatory
Bell Atlantic

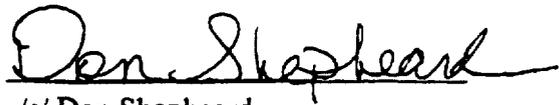
/s/ Robert T. Blau
Vice President Executive and Federal Regulatory
Affairs
BellSouth Corporation

/s/ Richard Metzger
Vice President Regulatory & Public Policy
Focal Communications

/s/ Alan F. Ciamporcero
Vice President - Regulatory Affairs
GTE Service Corporation

/s/ Heather B. Gold
Vice President- Industry Policy
Intermedia Communications

/s/ Priscilla Hill-Ardoin
Senior Vice President - Federal
Regulatory
SBC Communications Inc.



/s/ Don Shephard (AT)
Vice President, Federal Regulatory
Affairs
Time Warner Telecom

/s/ Melissa Newman
Vice President- Regulatory Affairs
U.S. West, Inc.

/s/ Russell C. Merbeth
Vice President, Legal and Regulatory
Affairs
WinStar Communications, Inc.

cc: K. Brown
D. Attwood
R. Beynon
J. Goldstein
S. Whitesell
K. Dixon
C. Wright
L. Strickling
R. Atkinson
M. Carey
J. Jackson
J. Jennings

/s/ Gordon R. Evans
Vice President Federal Regulatory
Bell Atlantic

/s/ Heather B. Gold
Vice President- Industry Policy
Intermedia Communications

/s/ Robert T. Blau
Vice President Executive and Federal Regulatory
Affairs
BellSouth Corporation

/s/ Priscilla Hill-Ardoin
Senior Vice President - Federal
Regulatory
SBC Communications Inc.

/s/ Richard Metzger
Vice President Regulatory & Public Policy
Focal Communications

/s/ Don Shephard
Vice President, Federal Regulatory
Affairs
Time Warner Telecom



/s/ Alan F. Ciamporero
Vice President - Regulatory Affairs
GTE Service Corporation

/s/ Melissa Newman
Vice President- Regulatory Affairs
U.S. West, Inc.

/s/ Russell C. Merbeth
Vice President, Legal and Regulatory
Affairs
WinStar Communications, Inc.

cc: K. Brown
D. Attwood
R. Beynon
J. Goldstein
S. Whitesell
K. Dixon
C. Wright
L. Strickling
R. Atkinson
M. Carey
J. Jackson
J. Jennings

/s/ Gordon R. Evans
Vice President Federal Regulatory
Bell Atlantic

/s/ Heather B. Gold
Vice President- Industry Policy
Intermedia Communications

/s/ Robert T. Blau
Vice President Executive and Federal Regulatory
Affairs
BellSouth Corporation

/s/ Priscilla Hill-Ardoin
Senior Vice President – Federal
Regulatory
SBC Communications Inc.

/s/ Richard Metzger
Vice President Regulatory & Public Policy
Focal Communications

/s/ Don Shephard
Vice President, Federal Regulatory
Affairs
Time Warner Telecom

/s/ Alan F. Ciamporcero
Vice President – Regulatory Affairs
GTE Service Corporation



/s/ Melissa Newman
Vice President- Regulatory Affairs
U.S. West, Inc.

/s/ Russell C. Merbeth
Vice President, Legal and Regulatory
Affairs
WinStar Communications, Inc.

cc: K. Brown
D. Attwood
R. Beynon
J. Goldstein
S. Whitesell
K. Dixon
C. Wright
L. Strickling
R. Atkinson
M. Carey
J. Jackson
J. Jennings

/s/ Gordon R. Evans
Vice President Federal Regulatory
Bell Atlantic

/s/ Heather B. Gold
Vice President- Industry Policy
Intermedia Communications

/s/ Robert T. Blau
Vice President Executive and Federal Regulatory
Affairs
BellSouth Corporation

/s/ Priscilla Hill-Ardoin
Senior Vice President – Federal
Regulatory
SBC Communications Inc.

/s/ Richard Metzger
Vice President Regulatory & Public Policy
Focal Communications

/s/ Don Shephard
Vice President, Federal Regulatory
Affairs
Time Warner Telecom

/s/ Alan F. Ciamporcero
Vice President – Regulatory Affairs
GTE Service Corporation

/s/ Melissa Newman
Vice President- Regulatory Affairs
U.S. West, Inc.



/s/ Russell C. Merbeth
Vice President, Legal and Regulatory
Affairs
WinStar Communications, Inc.

cc: K. Brown
D. Attwood
R. Beynon
J. Goldstein
S. Whitesell
K. Dixon
C. Wright
L. Strickling
R. Atkinson
M. Carey
J. Jackson
J. Jennings

EXHIBIT C

RECEIVED
APR 27 2000
U.S. DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL

Reconfiguring Special Access Arrangements to Unbundled Network Elements (UNEs)

This document is intended to describe the self-certification criteria required in order for Telecommunication Carriers to reconfigure special access arrangements to Unbundled Network Elements (UNE).

I. Background

The FCC's UNE Remand Order, published in the Federal Register on January 18, 2000 as modified by its November 24, 1999 Supplemental Order, in CC Docket No. 96-98 concluded that ILECs could constrain the ability of telecommunications carriers to reconfigure Special Access arrangements to combinations of loop and transport unbundled network elements (UNEs), except under certain circumstances. Specifically, the FCC concluded that telecommunications carriers who are using special access arrangements to provide a significant amount of local exchange, in addition to exchange access service, to a particular customer could be permitted to reconfigure those special access arrangements to a combination of unbundled loop and transport network elements. In elaborating on what constitutes "significant" local exchange service, the FCC cited with approval a September 2, 1999, joint ex parte filing by Bell Atlantic, Intermedia Communications, Allegiance Telecom, and Time Warner Telecom. The FCC also stated that a telecommunications carrier is providing significant local exchange service if the requesting carrier is providing all of an end user's local exchange service.

In addition to authorizing the reconfiguration of special access circuits under the circumstances specified above, the FCC stated that "in situations where the requesting carrier is collocated and has self-provided transport or obtained transport from an alternative provider, but is purchasing unbundled loops, that carrier may provide only exchange access over those facilities."

Finally, the FCC concluded that requesting carriers must self-certify that they are providing a significant amount of local exchange service over special access arrangements in order for those special access arrangements to qualify for reconfiguration to a combination of unbundled loop and transport. For purposes of certification, internet traffic is interstate and not local in nature. A blank copy of the Certification and Options form can be found in the Forms section.

II. Qualification Criteria

A. Loop and Transport Combinations

Carriers may reconfigure a special access arrangement to a combination of unbundled loop and transport network elements when the special access arrangement

- originates at a customer's premise and terminates at the telecommunications carrier's collocation arrangement, and

- has an equivalent UNE NC/NCI code, and
- one of the following options is met at the time of certification:

Option I

- the telecommunications carrier is the exclusive provider of an end user's local exchange service

Option II

- the telecommunications carrier provides local exchange and exchange access service to the end user customer and handles at least one third of the end user customer's local traffic measured as a percent of total end user customer lines and
- at least 50% of the activated channels on the loop portion of the loop and transport combination have at least 5% local voice traffic individually and
- the entire special access arrangement has at least 10% local voice traffic and
- if a loop/transport combination includes multiplexing (e.g., DS1 multiplexed to DS3 level), each of the individual DS1 circuits meets the above criteria for this option.

Option III

- at least 50% of the traffic on at least 50% of the channels on the loop portion of the special access arrangement is local voice traffic and
- the entire special access arrangement has at least 33% local voice traffic and
- if a loop/transport combination includes multiplexing (e.g., DS1 multiplexed to DS3 level), each of the individual DS1 circuits meets the above criteria for this option.

Switched Access and Local Interconnection Trunking

Where special access arrangements are comprised of a combination of special access circuits, switched access direct trunked transport (DDT) or local interconnection trunks, the switched access direct trunk transport (DDT) and local interconnection trunks must be groomed from special access arrangements prior to initiating the reconfiguration process.

B. Loops Terminating in Collocation Space

Loops that terminate in a collocation space may be purchased as UNEs.

C. Ongoing Qualification

- A telecommunications carrier that has reconfigured a special access circuit to UNEs will take reasonable measures on an ongoing basis to ensure that all certifications remain valid.
- A telecommunications carrier that has certified in accordance with the above criteria will re-certify its continuing compliance with such criteria every six months. The telecommunications carrier will have met this obligation by sending a letter to its account manager indicating that, based on information provided by the customer, it has re-confirmed that all circuits continue to meet the criteria for reconfiguration to unbundled loop and transport. Carriers may not re-certify compliance without

obtaining information from their customers that will permit them to conclude that those customers' circuits continue to meet the certification criteria.

III. Ordering Requirements

SBC will accept requests to reconfigure Special Access arrangements to Unbundled Network Elements (UNEs) using the existing ordering processes for Unbundled Loops and Unbundled Local Transport with the following modifications:

- Telecommunications Carrier (TC)/Competitive Local Exchange Carrier (CLEC) sends to Account Manager a correctly completed Certification Letter and Certification Spreadsheet. See Certification Letter and Certification Spreadsheet in the Forms section.
- All reconfiguration of Special Access arrangements to UNEs will be handled as projects. Due dates for all projects are to be negotiated. TC/CLEC must send a Reconfiguration Project Spreadsheet to the Account Manager. This spreadsheet is IN ADDITION not in lieu of the issuance of the following ASR/LSR/EDI orders. See Reconfiguration Project Spreadsheet. A spreadsheet is to contain information limited to one end user location and collocation cage. For reconfigurations including multiplexing, a spreadsheet is to contain all circuit IDs in the Special Access arrangement (higher speed and all riding circuits).
- TC/CLEC issues ASR to ICSC to disconnect access circuit

IV Billing

- Termination liability, if applicable, will be billed at the time of disconnect on the Special Access circuit. *→ from 12/25/12 to 1/1/13*
- All UNE NRCs in the configuration will apply unless a state commission has ruled otherwise.

**CERTIFICATION PURSUANT TO FEDERAL COMMUNICATIONS
COMMISSION'S *SUPPLEMENTAL ORDER*
DATED NOVEMBER 24, 1999 IN CC DOCKET NO. 96-98**

_____ (“Carrier”) hereby certifies that it is requesting that the following special access circuits be reconfigured as a combination of unbundled loop and transport network elements. Pursuant to the FCC’s *Supplemental Order*, in support of its request, Carrier also hereby certifies that the specifically identified circuits provide a significant amount of local exchange service, in addition to exchange access service, to [insert end user customer(s) name and address] via those circuits. By “a significant amount of local exchange service,” Carrier certifies that each of the identified circuits meet one of the following certification options:

Option 1

1. The carrier is the exclusive provider of the end user’s local exchange service

Option 2

1. Carrier handles at least one third of the identified customer’s local traffic; and
2. On the loop portion of the UNE loop-transport service, at least 50 percent of the activated channels have at least 5 percent local voice traffic individually and,
3. For the entire facility, at least 10 percent of the traffic is local voice traffic.
4. If the unbundled loop/transport combination includes multiplexing (e.g. DS1 multiplexed to DS3 level), each of the individual DS1 circuits meets the above criteria for this option.

Option 3

1. At least 50% of the channels are used to provide local dial tone service and at least 50% of the traffic on each of those local dial tone channels is local voice traffic
2. The entire loop facility has at least 33% local voice traffic and
3. If a loop/transport combination includes multiplexing (e.g. DS1 multiplexed to DS3 level), each of the individual DS1 circuits meets the above criteria for this option.

Carrier must certify that the requisite information is true for each circuit, and must indicate which Option applies to which circuit. In order to rely on one of the foregoing Options, Carrier must provide the following information for that Option. Carrier may submit the information in the format provided with this Certification, or may submit the information in a different format, as long as it is acceptable to SBC. Carrier's Certification is applicable to all information submitted in support of the Certification. Certifications and/or certification information submitted incorrectly, incompletely or in a form not acceptable to SBC will cause the Certification to be rejected.

For Option 1:

1. Facility Identification Number of each circuit
2. Customer Name and Address for each circuit

For Option 2:

1. Facility Identification Number for each circuit
2. Customer Name and Address for each circuit
 - Total customer lines at the address
 - Total lines provided by Carrier at the address
3. Number of active channels on the loop portion of each circuit
 - State the number of channels carrying at least 5% local voice traffic
4. Certify that at least 10% of each facility carries local voice traffic

For Option 3:

1. Facility Identification Number for each circuit
2. Customer Name and Address for each circuit
3. Number of active channels on the loop portion of each circuit
4. Number of channels providing local dial tone service on the loop portion of each circuit
5. Percentage of traffic on each local dial tone channel that is local voice traffic
6. Certify that at least 33% of the loop facility carries local voice traffic

This certification is made by Carrier through its authorized representative _____, whose title is _____, and who is fully competent to make this Certification, and who has personal knowledge of the facts stated in the Certification and attachments, and attests that they are true and correct.

EXECUTED THIS ____ DAY OF _____, 2000 BY:

[FULL LEGAL NAME OF CARRIER]

Authorized Representative of [Full Legal Name of Carrier]

Certification Accepted/Rejected by [SBC Entity]

Reasons for Rejection: _____

Option 3				
Does at least 50% of traffic on channels on loop of facility local voice traffic?	Does the entire special access arrangement have at least 33% local voice traffic?		If facility includes multiplexing, do each of the DSL circuits meet the conditions?	
	Yes	No	Yes	No
Number of Active channels carrying 5% local voice traffic				
No				

Reconfiguring Special Access Arrangements to Unbundled Network Elements (UNEs)

This document is intended to describe the self-certification criteria required in order for Telecommunication Carriers to reconfigure special access arrangements to Unbundled Network Elements (UNE).

I. Background

The FCC's UNE Remand Order, published in the Federal Register on January 18, 2000 as modified by its November 24, 1999 Supplemental Order, in CC Docket No. 96-98 concluded that ILECs could constrain the ability of telecommunications carriers to reconfigure Special Access arrangements to combinations of loop and transport unbundled network elements (UNEs), except under certain circumstances. Specifically, the FCC concluded that telecommunications carriers who are using special access arrangements to provide a significant amount of local exchange, in addition to exchange access service, to a particular customer could be permitted to reconfigure those special access arrangements to a combination of unbundled loop and transport network elements. In elaborating on what constitutes "significant" local exchange service, the FCC cited with approval a September 2, 1999, joint ex parte filing by Bell Atlantic, Intermedia Communications, Allegiance Telecom, and Time Warner Telecom. The FCC also stated that a telecommunications carrier is providing significant local exchange service if the requesting carrier is providing all of an end user's local exchange service.

In addition to authorizing the reconfiguration of special access circuits under the circumstances specified above, the FCC stated that "in situations where the requesting carrier is collocated and has self-provided transport or obtained transport from an alternative provider, but is purchasing unbundled loops, that carrier may provide only exchange access over those facilities."

Finally, the FCC concluded that requesting carriers must self-certify that they are providing a significant amount of local exchange service over special access arrangements in order for those special access arrangements to qualify for reconfiguration to a combination of unbundled loop and transport. For purposes of certification, internet traffic is interstate and not local in nature. A blank copy of the Certification and Options form can be found in the Forms section.

II. Qualification Criteria

A. Loop and Transport Combinations

Carriers may reconfigure a special access arrangement to a combination of unbundled loop and transport network elements when the special access arrangement

- originates at a customer's premise and terminates at the telecommunications carrier's collocation arrangement, and

- has an equivalent UNE NC/NCI code, and
- one of the following options is met at the time of certification:

Option I

- the telecommunications carrier is the exclusive provider of an end user's local exchange service

Option II

- the telecommunications carrier provides local exchange and exchange access service to the end user customer and handles at least one third of the end user customer's local traffic measured as a percent of total end user customer lines and
- at least 50% of the activated channels on the loop portion of the loop and transport combination have at least 5% local voice traffic individually and
- the entire special access arrangement has at least 10% local voice traffic and
- if a loop/transport combination includes multiplexing (e.g., DS1 multiplexed to DS3 level), each of the individual DS1 circuits meets the above criteria for this option.

Option III

- at least 50% of the traffic on at least 50% of the channels on the loop portion of the special access arrangement is local voice traffic and
- the entire special access arrangement has at least 33% local voice traffic and
- if a loop/transport combination includes multiplexing (e.g., DS1 multiplexed to DS3 level), each of the individual DS1 circuits meets the above criteria for this option.

Switched Access and Local Interconnection Trunking

Where special access arrangements are comprised of a combination of special access circuits, switched access direct trunked transport (DDT) or local interconnection trunks, the switched access direct trunk transport (DDT) and local interconnection trunks must be groomed from special access arrangements prior to initiating the reconfiguration process.

B. Loops Terminating in Collocation Space

Loops that are terminate in a collocation space may be purchased as UNEs.

C. Ongoing Qualification

- A telecommunications carrier that has reconfigured a special access circuit to UNEs will take reasonable measures on an ongoing basis to ensure that all certifications remain valid.
- A telecommunications carrier that has certified in accordance with the above criteria will re-certify its continuing compliance with such criteria every six months. The telecommunications carrier will have met this obligation by sending a letter to its account manager indicating that, based on information provided by the customer, it has re-confirmed that all circuits continue to meet the criteria for reconfiguration to unbundled loop and transport. Carriers may not re-certify compliance without

obtaining information from their customers that will permit them to conclude that those customers' circuits continue to meet the certification criteria.

III. Ordering Requirements

SBC will accept requests to reconfigure Special Access arrangements to Unbundled Network Elements (UNEs) using the existing ordering processes for Unbundled Loops and Unbundled Local Transport with the following modifications:

- Telecommunications Carrier (TC)/Competitive Local Exchange Carrier (CLEC) sends to Account Manager a correctly completed Certification Letter and Certification Spreadsheet. See Certification Letter and Certification Spreadsheet in the Forms section.
- All reconfiguration of Special Access arrangements to UNEs will be handled as projects. Due dates for all projects are to be negotiated. TC/CLEC must send a Reconfiguration Project Spreadsheet to the Account Manager. This spreadsheet is IN ADDITION not in lieu of the issuance of the following ASR/LSR/EDI orders. See Reconfiguration Project Spreadsheet. A spreadsheet is to contain information limited to one end user location and collocation cage. For reconfigurations including multiplexing, a spreadsheet is to contain all circuit IDs in the Special Access arrangement (higher speed and all riding circuits).
- TC/CLEC issues ASR to ICSC to disconnect access circuit

IV Billing

- Termination liability, if applicable, will be billed at the time of disconnect on the Special Access circuit. *→ from 1/25/01*
- All UNE NRCs in the configuration will apply unless a state commission has ruled otherwise.

