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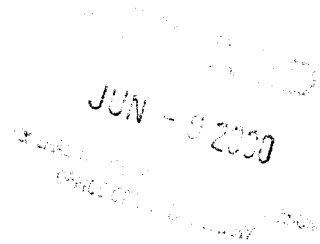
June 9, 2000



Notice of Ex Parte Presentation

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

Re: *Application of SBC Communications Inc. Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in Texas*, CC Docket No. 00-65

Dear Ms. Salas:

On June 8, 2000, Kelly Murray of SBC and the undersigned, representing SBC, discussed claims made by MCI WorldCom about updating PIC information in LIDB. The substance of this discussion is reflected in paragraphs 5-14 of the Supplemental Reply Affidavit of Jan Rogers (filed May 19, 2000) and in the accompanying letter sent by SWBT to MCI WorldCom on May 23, 2000.

The original and one copy of this letter are enclosed. Please let me know if you have any questions about this matter.

Sincerely,

Austin C. Schlick

cc: Mr. Stanley
Ms. Wright
Ms. Stephens
Ms. Nelson, Texas PUC
Ms. Heisler, DOJ
ITS

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May 23, 2000

VIA FAX and US Mail

Mr. Carl Benson
Director
West Carrier Management
2250 Lakeside Boulevard
Richardson, TX 75082

In response to your letter dated May 10, 2000 to Jeff Ulm, attached you will find the document with responses to your LIDB questions. In addition, SBC is available for any discussion MCIW would like to have for further clarification. If you would like to set up a meeting, let me know.

Sincerely,

/s/

Marilynn Y. Williams

Attachment

CC: Jeff Ulm - SBC
Michael Beach - MCIW

ATTACHMENT

Response to MCIW's letter of May 10, 2000 regarding Toll File Guide and SWBT's Line Information Database (LIDB)

1(a) Is the problem that there are delays in typing the Toll guide orders, mistakes in typing the orders, or both?

Answer: The majority of concerns raised by MCIW were the result of delays in processing Toll File Guide portions of service orders, but there were some mistakes, as well. The causes of the delays and mistakes have been addressed at the LSC.

1(b) Are delays in posting the N order causing incorrect PIC information in LIDB as well as "ownership conflicts" and "records not found"? How would a delay in posting of the N order result in an incorrect PIC for some MCI WorldCom customers (e.g., some records show AT&T as the PIC when it should be MCI WorldCom)? Is the cause of these PIC discrepancies typing errors that are then put into the LIDB records? Why is there incorrect PIC codes in LIDB on such a high percentage of MCI WorldCom's orders?

Answer: The problems MCIW identified were due to the following scenarios:

- Toll File Guide orders were not typed in a timely manner by service representatives, thus resulting in delays in updating the LIDB record;
- Some service order typing mistakes by the service representative; and
- Toll File Guide portion of service orders were completed but in error status, thus delaying complete update in LIDB.

These different scenarios resulted in the following:

- Delay in updating the local service provider identifier (also known as Operating Company Number, or OCN) on the LIDB record;
- Record not found, since the conversion of LIDB record ownership was not complete;
- The appearance of delay in updating PIC information in LIDB; and
- Inability to access LIDB records since record ownership transfer was not complete.

1(c) It is not clear from your prior responses exactly what the Toll File Guide is and how it is used. Please describe the

Toll File Guide in more detail and explain all of its uses.

Answer: The Toll File Guide is a portion of the service order process, also called the N order. It is not a published reference guide. When the LSR is correctly completed, SWBT's Operations Support Systems generate a CRIS Toll File Guide service order (N order) with information necessary to update downstream systems, including LIDB. From the CRIS Toll File Guide portion of the service order, information flows to SWBT's Billing Validation Distribution System (BVDS). BVDS extracts the information it needs from the CRIS Toll File Guide portion of the service order and formats the data in LVAS. LVAS subsequently updates LIDB. This process is the same for SWBT retail LIDB records, resale LIDB records and CLEC LIDB records updated through LSR service order process.

1(c)(1) For example, do SWBT reps. look in the guide to determine what PIC code to enter into LIDB? Do any of the errors MCI WorldCom is experiencing result from inaccurate information in the Guide? Is the Guide used for anything other than LIDB updates, i.e. is it used to update PIC information in the switch?

Answer: The answer is "No" to all the above "for example" questions. Again, the Toll File Guide is not a published reference guide, but rather a portion of the service order that migrates end user accounts, changes existing accounts or creates new accounts.

1(d)(1) What causes delays in posting the Toll File Guide?

Answer: See answer to 1(b) for the types of errors that may create a delay in posting the Toll File Guide.

1(d)(2) Is there anything other than LIDB updates that is triggered by posting of the N order?

Answer: Updates to the PIC designation in LIDB are triggered by posting of the "N" order. Posting of the "N" order also triggers creation of the CRIS CSR and the IntraLATA Toll File Guide.

1(d)(3) What are all the consequences of delays in posting of the N order (in addition to delays in updating LIDB)?

Answer: As noted above, posting of the N order triggers creation of the CRIS CSR and the IntraLATA Toll File Guide. Accordingly, these may be delayed if posting the N order is delayed.

1(d)(4) If there is a delay in posting the Toll File Guide, what steps or actions cause the delay to end?

Answer: The LSC Error Resolution Team analyzes and takes appropriate steps to identify and correct errors daily. Although this is a daily practice at the LSC, emphasis has been placed on reviewing errors on the "N" orders, in order to end any delay in posting the Toll File Guide.

1(d)(5) What ensures that the N order will post eventually?

Answer: As described above, the LSC's Error Resolution Team is a dedicated team of service representatives that focuses on timely error resolution and posting of service orders.

1(e) What does SWBT mean by saying in Marilyn William's May 3 e-mail that "the 'C' order was provisioned correctly which is where the PIC change is made."

Answer: The PIC was accurately provisioned in the end office, dial-tone switch on the customer account. Therefore, the end user's PIC is properly designated and customer is routed to the proper PIC when dialing 1+ or 0+ calls.

1(e)(1) Does the C order change the PIC in LIDB, in the switch, or in both?

Answer: In the migration process, the "C" order updates the end-user's PIC selection in the switch. The "N" order, also known as Toll File Guide portion of the service order, updates LIDB. The end user's 1+ and 0+ service is provided using the switch PIC information, not the LIDB PIC information.

1(e)(2) How does SWBT know that the C order was posted correctly?

Answer: Consistent with the process followed in the SWBT Retail offices, the LSC monitors exception reports that would provide a view of orders not yet posted. Also, facilities-based CLECs utilizing SWBT's Interactive Interface for LIDB access can determine if a conversion C order completes when the CLEC views the end user's LIDB record via the Interactive Interface.

2. MCI WorldCom is experiencing a high percentage of LIDB problems which SWBT attributes to delays caused by manual entry. Why is any typing needed on basic UNE-P orders that are supposed to flow through SWBT systems without manual intervention (MOG-eligible orders)?

Answer: Some orders require manual intervention as indicated in Accessible Letter CLECSS99-131. Additional reasons for the manual handling of these service orders could be end user name/telephone number/address don't match, invalid supplemental type, invalid BAN, invalid address and invalid feature activity.

2(a) How many of MCI WorldCom's UNE-P orders (expressed in number of orders and in percent of total MCI WorldCom UNE-P orders processed) in April and May 2000 were handled manually at some point by SWBT? What were the reasons for the manual handling of these orders?

Answer: In April, MCIW submitted a total of 5,086 MOG Eligible (MOGable) orders, of those orders 3,791 orders were Flow Through, for a 74.54% flow through. The total non-MOGable orders were 569. For the month of May (a/o 5-12), MCIW submitted a total of 6,377 MOGable orders. Of those orders 6,098 were Flow Through, for a 96% flow through. The total non-MOGable amount of orders will not be available until month end, so the May numbers should not be taken as final.

2(b) Are SWBT's three service orders designed to post at different times? What is the sequence in which they are supposed to post for UNE-P orders? Is the Service Order Completion (SOC) triggered by the C order or the D order? If the C order posts before the D order, won't the customer be double billed? If the D order posts before the C order, won't the customer lose dial tone?

ANSWERS: The three-order process and the safeguards built into the process to protect against service disruptions are described at length in affidavit filed with the FCC in its Texas 271 docket, CC Dockets 00-4 and 00-65, in which MCIW is participating. For answers to your questions see the affidavits of Elizabeth Ham and Candy Conway filed on January 10 and February 22, 2000, the Ham and Conway/Dysart affidavits filed on April 5, and the Ham and Noland/Dysart affidavits filed on May 19. SBC would be pleased to sit down and discuss the order process for UNE-P orders in more detail with MCIW if MCIW is interested in doing so.

3. In the May 3 e-mail, SWBT states that "If there is a case where the order does not mog and falls out for manual intervention, it means that all orders (N, C and D) fall out. The LIDB is generated from the Toll File Guide, "N" order.

These orders are all interrelated, therefore, if there is a problem with one this would require manual intervention even for the LIDB order. On the other hand, if the orders mog, no manual intervention would be required."

3(a) Are the Toll File Guide and the "N" order the same thing?

Answer: In relation to the 3-order scenario for Conversion of Resale/Retail to UNE-P, the 'N' order is the toll file guide order and the terms are interchangeable. However, 'N' orders in general depict an order type of a new and are used for many other situations than the conversion to UNE-P scenarios.

3(b) Are LIDB updates operating smoothly for orders that do flow through, (MOG)?

Answer: Yes, as previously indicated, the problems associated with delays in LIDB updates were isolated incidents caused by the LSC and were human errors. Less than 2% of the orders passed by MCIW have encountered problems. There are no system problems related to LIDB updates.

3(c) Is the need for typing caused by orders that fall out in MOG (as opposed to in SORD)?

Answer: The LSC types orders that fall out for manual handling because they are not MOG eligible. SORD errors occur on service orders that already have been typed.

4. SWBT states in its May 5 PUC filing that LIDB's PIC fields "were created for future use by entities that query and can receive Originating Line Number Screening (OLNS) information." Please explain what future use of OLNS, and what entities, SWBT is referring to.

Answer: The "entities" refer to service providers that, in the future, will query SWBT's LIDB for and receive PIC information. That requires a query originator (i.e. an operator services platform) to be able to launch a query for OLNS information and receive PIC information in a response. Currently, no outside entity has requested the capability to request and receive PIC information from SWBT's LIDB. However, SWBT is building the service so that SWBT and other operator service providers, such as MCIW, can access the utilize PIC information and provide better operator services to callers.

5. Please explain all current uses of PIC information in LIDB.

5(a) For example, SWBT's Accessible Letter CLEC99-174 (Nov. 22, 1999) states that PIC in LIDB is used for "secondary IXC selection on 0- calls." Please explain what you mean by secondary IXC selection on 0-calls and how an incorrect PIC information in LIDB would impact such calls.

Answer: The Accessible Letter cited was issued more than six months ago when SWBT was internally trialing the use of PIC information from LIDB for secondary IXC selection on zero minus-dialed calls. This is the service SWBT hopes to offer in the future. When a caller dials zero and asks a local SWBT operator to complete an interLATA call, but the caller is not able to indicate which IXC should handle the call, the trialed service would give SWBT the ability to obtain the subscriber's PIC information from a response to a LIDB query.

5(b) In response to a question whether it is necessary for CLECs to update LIDB for PIC changes, SWBT's Accessible Letter CLECSS99-176 (Dec. 30, 1999) states at page 50 that "the accuracy of the PIC has potential financial impact on the Interexchange Carrier providing the service." Please explain what potential financial impact SWBT was referring to.

Answer: As detailed above, SWBT plans to use PIC information from LIDB to help callers choose an interLATA carrier to complete zero dialed requests to complete interLATA calls in the future. SWBT also would like to offer PIC information to entities that query SWBT's LIDB so other service providers could use the information in providing and routing service.

Only to the extent PIC information is used in the future for such services would there be any financial impact to a PIC carrier (i.e. perhaps an increase in PIC traffic). Again, PIC information in LIDB in no way affects a subscriber's choice of PIC for 1+ and 0+ interLATA calls. That information resides in the end-office, dial-tone switch.

6. SWBT stated in the May 5 PUC filing that customers' PICs are updated in the switch when an order completes, and that LIDB has nothing to do with this process. If so, why is it that the current process for submitting PIC change requests is to submit them through LVAS (until LIDB II is implemented)?

Answer: PIC information on the LSR is needed to update PIC selection on the end office switch. PIC information in LIDB is updated from the same information, so no additional entry is required for PIC information specifically for LIDB. As discussed above, SWBT plans to use PIC information obtained in a response to a LIDB query to help a caller to SWBT's operator services select a carrier to complete an interLATA

call. SWBT plans to offer this same information to other operator service providers that query LIDB. PIC information must reside in the LIDB record for the information to be returned on a query. Thus, PIC information is part of the request for information to populate a LIDB record.

Again, however, the PIC information requested for LIDB (in any LIDB update process) does not affect the end user's PIC selection in the end office switch. The subscriber's PIC selection is carried in the end office switch and that is updated from a service order, NOT LIDB.

6(a) How is a process designed for LIDB updates used to update PIC information in the switch?

Answer: There is no process, now or planned, for LIDB updates to be used to update PIC information in the end office, dial tone switch. PIC information for the subscriber's choice of carrier for one-plus and zero-plus dialed calls is always obtained from the end office, dial-tone switch.

6(b) Once LIDB II is implemented, how will this new process affect the processing of PIC change requests?

Answer: Again, LIDB is not associated with PIC change requests. PIC changes are completed in the end office, dial-tone switch from a completed service order, far upstream from any LIDB update. LIDB updates do not affect the subscriber's PIC selection.

7. If the PIC information in LIDB is not currently used at all, why do CLECs need to submit the information needed to change this information in LIDB?

Answer: See answers to Questions 4, 5, and 6, above.

8. Why is SWBT expending resources to update the PIC information in LIDB?

Answer: See answers to Questions 4, 5 and 6, above.

9. In November 1999, WorldCom specifically asked whether PIC changes for LIDB are optional or required. In an e-mail response on Nov. 18, 1999 from Karen Moore of SWBT to Joanne Russell and Roseann Kendall of WorldCom, SWBT stated that "PIC changes are required updates in order to maintain the integrity of the LIDB database." Please explain why these updates are required and what impact there would be on customers, CLECs and IXCs if the updates were not made.

Answer: As noted, the PIC information on the LSR is needed to update PIC selection on the end office switch. PIC information in LIDB is updated from the same information, so no additional entry is required for PIC information specifically for LIDB. However, as discussed above in question 6, SWBT plans to use PIC information obtained in a response to a LIDB query to help a caller to SWBT's operator services select a carrier to complete an interLATA call. SWBT plans to offer this same information to other operator service providers, like MCIW, that query LIDB. Thus, PIC information is used as well to populate a LIDB record.

10) SWBT states in its May 5 PUC filing that "the critical information in LIDB (i.e. OCN and collect and third-number billed call validation information) are updated when the order completes (before posting) and the PIC." Is this information updated before posting of any of the three types (N, C & D) of service orders?

Answer: This question is unclear. SWBT will answer upon clarification by MCIW.

10(a) What triggers this information to be updated?

Answer: See Answer to Question No. 10 above.

10(b) How does SWBT know this information is being updated correctly in a timely fashion?

Answer: See Answer to Question No. 10 above.

10(c) Is there a way for CLECs to check this?

Answer: See Answer to Question No. 10 above.

11. In its May 5 PUC filing, SWBT states that Calling Name information and zip code are not updated until the N order posts. Please describe all administrative and service affecting uses of calling name information and zip code information updated in this way.

Answer: First, Calling Name updates for Calling Name service (CNAM) and ZIP code information in LIDB are updated from the N order. The administrative and service affecting uses of Calling Name information are services that utilize Calling Names. The primary use of Calling Name is Caller ID that delivers the calling subscriber's name for call subscriber to Caller ID service. When the LIDB record exists, as in the case of a migration, seldom does the CNAM change,

therefore, a delay in updating of the LIDB record generally is not service affecting. ZIP code information is used in IntellinumberTM , which is a service used to route a number to the correct business location closest to the caller's location. The routing of the call to this nearest location is based on the 9-digit ZIP of the caller. AIN SCPs get the ZIP from LIDB.