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June 12, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ex Parte Submission

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

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

Dear Ms. Salas:

Enclosed for filing please find the following materials requested by the Commission Staff:

Tab 1 provides carrier-specific reject rates for EDI and LEX for October 1999 through April 2000. This is a redacted version of information previously provided in Attachment D to the Supplemental Reply Affidavit of Elizabeth Ham (filed May 19, 2000) and Attachment H to the Reply Affidavit of Elizabeth Ham (filed Feb. 22, 2000). Tab 1 shows that reject rates dropped significantly in April, even as overall LSR volumes continued to increase for both LEX and EDI. The overall reject rate dropped below 20% for EDI, while 37 of the 53 CLECs submitting LSRs via LEX in both March and April improved their reject rates in April.

Tab 2 provides a table of contents to documentation that is available to CLECs that wish to integrate their application-to-application OSS for the purpose of parsing pre-order information or realizing other ordering efficiencies. The table of contents indicates where in the record each item can be found. **Tab 3** provides the items listed in Tab 2 that have not already been filed in this proceeding. CLECs may obtain all of the materials listed in Tab 2 using the SBC CLEC Website, as explained in Accessible Letter CLECSS00-080 (rel. May, 19, 2000), which was provided as Attachment I-1 to the Ham Supplemental Reply Affidavit.

The Commission Staff also requested additional information concerning several other issues, which is provided below.

No. of Copies rec'd 0+2
List A B C D E

End User Address Fields

Accessible Letter CLECSS00-051 (rel. March 29, 2000) notified CLECs that as of May 27, 2000, end users' address information would no longer be required when converting retail or resale services to basic loop, port, and loop with port UNE request types (excluding xDSL loops). Supplemental Affidavit of Elizabeth A. Ham ¶ 24 & Attach. I (filed Apr. 5, 2000). Instead, SWBT now uses the service address from the existing customer service record to update the address fields automatically. This change has been successfully implemented. As a result, CLECs no longer receive address errors (including SD2044, MR0023, MR0024, MR0025, and MR0026) for these types of conversions.

One CLEC has advised that in LEX testing it received some up-front LASR address-related edits (LS0693, LS0695, LS0696, and LS0699) for conversion activity. Under SWBT's new process, no edits will be returned to the CLEC, and the service address will be provided by SWBT from the CRIS database, even if the address information provided by the CLEC is incorrect. This is true whether the CLEC provides a street name with the service address, or leaves the service address fields completely blank. In its testing, however, the CLEC populated service address fields other than the street name (specifically, the street number) while leaving the street name field blank. LASR rejected the LSR back to the CLEC as a fatal error. This feature should not have any significant operational impact, as there should not be any circumstances under which a CLEC's business practices would call for populating the street number without the street name. In the past, edits for this error have very rarely been triggered. (The largest EDI user, for example, had no such errors in April.) Accordingly, no additional programming regarding these edits is planned.

Since implementation of the programming change for conversion activity, there have not been any MOG Fatal address rejects (SD2044) for eligible conversions. There have been some LASR GUI rejects (MR0023 and MR0026), which SWBT has addressed by providing Local Service Center ("LSC") representatives additional training on the May 27 changes and associated procedures.

Some, but not all, CLECs have chosen to take advantage of the new option of omitting address information for conversion orders. The choices of four leading CLECs in Texas are discussed in **Tab 4**.

UNE Platform Trouble Reports

In March and April 2000, performance results showed an increase in the trouble report rate for UNE Platform orders requiring field work (PM 35-11 – Percent Trouble Reports on C Orders Within 10 Days – UNE-P – Field Work). This resulted from an improvement to SWBT's data collection that had the effect of bringing under PM 35-11 certain trouble reports that previously had been recorded as being related to "No Field Work" and thus were reported under PM 35-12 (Percent Trouble Reports on C Orders Within 10 Days – UNE-P – No Field Work). This change was made effective with March data.

Customer Desired Due Dates

As stated in paragraph 189 of the Affidavit of Elizabeth A. Ham (filed Jan. 10, 2000), it was necessary for SWBT to change the customer desired due date ("CDDD") on the firm order confirmation ("FOC") only 3.67% of the time in October 1999. The most recent monthly data (for April 2000) reflect that in April the CDDD changed on only 2.72% of FOCs.

An original and two copies of this cover letter are enclosed. Please let me know if you have any questions about this matter.

Sincerely,

Austin C. Schlick

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

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	% Reject Rate						
	OCT '99	NOV '99	DEC '99	JAN '00	FEB '00	MAR '00	APR '00
EDI							
CLEC A	36.7%	38.5%	37.9%	42.6%	35.9%	34.1%	29.6%
CLEC B					58.4%	48.6%	60.3%
CLEC C	22.3%	31.2%	25.0%	25.3%	23.0%	21.9%	12.0%
CLEC D						0.0%	
CLEC E						0.0%	80.4%
CLEC F	100.0%						
CLEC G						82.3%	57.1%
CLEC H					68.0%	76.4%	66.1%
CLEC I				100.0%	0.0%	50.0%	47.9%
CLEC J						100.0%	
CLEC K	47.4%	41.4%	30.5%	29.3%	22.0%	31.3%	35.2%
CLEC L			65.5%	51.6%	38.2%	32.0%	33.8%
CLEC M						100.0%	
CLEC N						72.7%	54.6%
CLEC O	16.0%	23.9%	18.5%	20.6%	13.5%	19.6%	10.8%
CLEC P					80.0%	74.0%	66.8%
CLEC Q							
CLEC R			50.0%	35.6%	37.7%	19.9%	21.2%
CLEC S			33.3%	51.9%	30.4%	20.6%	20.8%
CLEC T							91.7%
CLEC U							62.5%
TOTAL	**24.0%**	**30.7%**	**25.0%**	**26.3%**	**22.1%**	**24.4%**	**19.9%**
LEX							
CLEC V						75.0%	58.3%
CLEC W				48.8%	34.7%	27.6%	25.1%
CLEC X	34.6%	35.7%	30.3%	28.6%	34.5%	33.3%	39.3%
CLEC Y	25.0%	80.0%	60.0%	87.5%	0.0%	77.8%	
CLEC Z			43.8%				
CLEC AA				0.0%	15.6%	8.7%	0.0%
CLEC BB	38.1%	45.2%	42.6%	42.5%	37.5%	38.7%	50.0%
CLEC CC				70.3%	42.9%	72.7%	17.4%
CLEC DD	47.8%	42.0%	39.7%	40.7%	39.4%	34.0%	32.0%
CLEC EE	57.9%	43.7%	68.5%	73.1%	65.6%	69.4%	64.9%
CLEC FF					77.1%	77.2%	73.3%
CLEC GG	26.7%	38.2%	35.5%	48.7%	37.0%	32.4%	35.5%
CLEC HH	48.0%	47.0%	42.8%	60.3%	59.1%	59.8%	52.6%
CLEC II			56.9%	17.1%	4.4%	9.5%	4.8%
CLEC JJ				44.8%	63.7%	56.2%	49.6%
CLEC KK					66.7%	50.0%	42.3%
CLEC LL	51.7%	48.0%	60.5%	52.2%	48.7%	52.9%	43.7%
CLEC MM	38.5%	43.4%	21.3%	40.5%	22.8%	42.5%	43.4%
CLEC NN			75.0%	73.5%	54.6%	61.4%	63.6%
CLEC OO				25.0%	27.3%	26.0%	23.3%
CLEC PP			37.8%	36.2%	33.2%	45.6%	39.7%
CLEC QQ	0.0%	42.9%					
CLEC RR	57.5%	58.9%	60.3%	57.6%	41.4%	40.6%	49.3%
CLEC SS				56.8%	37.6%	36.8%	37.4%
CLEC TT					100.0%		
CLEC UU	81.3%	81.8%	65.0%	37.1%	39.3%	13.2%	11.4%
CLEC VV	50.3%	36.5%	35.3%	37.5%	40.0%	35.5%	50.3%
CLEC WW				64.3%	71.4%	80.0%	61.8%

CLEC XX	58.1%	57.6%	37.5%	54.5%	39.5%	34.5%	34.9%
CLEC YY				33.5%	46.2%	42.9%	36.6%
CLEC ZZ					100.0%	100.0%	
CLEC AAA					63.4%	47.2%	45.6%
CLEC BBB					76.2%	68.6%	56.3%
CLEC CCC	60.0%	45.6%	50.1%	44.4%	42.9%	47.6%	45.2%
CLEC DDD	0.0%	33.3%		35.5%	45.7%	30.0%	
CLEC EEE			48.4%	54.5%	16.7%	50.3%	53.1%
CLEC FFF			77.8%	42.8%	42.6%	40.0%	33.5%
CLEC GGG	44.2%	39.6%	40.6%	34.9%	31.7%	14.3%	
CLEC HHH	30.9%	39.0%	42.7%	39.4%	39.9%	38.5%	42.5%
CLEC III			15.4%	71.1%	76.1%	66.7%	33.3%
CLEC JJJ			26.5%	23.3%	28.3%	29.8%	28.2%
CLEC KKK	24.9%	21.9%	24.8%	54.7%	43.8%	45.1%	50.9%
CLEC LLL	23.5%	20.1%	19.9%	20.5%	22.3%	18.7%	16.0%
CLEC MMM				68.6%	58.5%	44.9%	38.8%
CLEC NNN						69.4%	52.3%
CLEC OOO	19.4%	25.9%	18.0%	75.0%			
CLEC PPP					62.1%	68.9%	48.1%
CLEC QQQ	14.8%	18.5%	19.4%	25.8%	27.6%	22.3%	29.2%
CLEC RRR					100.0%		100.0%
CLEC SSS			44.4%	40.0%	50.0%	100.0%	
CLEC TTT				69.2%	70.7%	57.6%	65.0%
CLEC UUU	32.9%	24.8%	29.9%	25.8%	22.4%	24.9%	24.2%
CLEC VVV	31.2%						
CLEC WWW		35.7%	32.3%	36.6%	30.8%	34.0%	20.2%
CLEC XXX		37.3%	49.6%	28.4%	24.5%	63.9%	65.4%
CLEC YYY		66.7%	54.5%	58.2%	43.6%	60.8%	50.0%
CLEC ZZZ		44.7%					
CLEC AAAA			0.0%	60.3%	56.3%	54.2%	42.0%
CLEC BBBB						51.7%	44.0%
CLEC CCCC	30.3%	32.6%	30.6%	26.1%	24.1%	23.1%	25.8%
CLEC DDDD				21.1%	23.9%	18.7%	14.0%
CLEC EEEE			85.7%		54.6%	63.0%	38.9%
CLEC FFFF						100.0%	
CLEC GGGG						100.0%	
CLEC HHHH					66.7%	80.0%	60.0%
CLEC IIII	17.1%	17.0%	9.8%	4.7%	10.0%	17.6%	12.0%
CLEC JJJJ					50.1%	33.3%	33.9%
CLEC KKKK							66.7%
CLEC LLLL							52.4%
CLEC MMMM							74.9%
CLEC NNNN							34.2%
CLEC OOOO							91.7%
CLEC PPPP							86.7%
TOTAL	**42.8%**	**36.4%**	**37.2%**	**40.7%**	**40.1%**	**39.1%**	**37.0%**

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TABLE OF CONTENTS
TO CLEC INTEGRATION MATERIALS

TAB	DESCRIPTION
A	Accessible Letter CLECSS00-080 (May 19, 2000) – Ham Reply Supp. Aff., Attach. I-1
B	CLEC Handbook Section 8.0 Pre-ordering and Ordering Integration (Proprietary) – Not previously filed
C	CLEC Handbook Section 7.0 EDI Interface Guidelines (Proprietary) – Not previously filed
D	T1M1 documents 9M150220 and 9M150203 – 9M150220 was originally filed as Ham Supp. Aff. Attach. C; 9M150203 has not been previously filed
E	LSOR (Proprietary) – Ham Aff. Attach. F
F	LSPOR (Proprietary) – Ham Aff. Attach. F
G	USOC Manual (Proprietary) – Not previously filed
H	USOP Manual (Proprietary) – ToC originally filed as Ham Supp. Aff. Attach. C-2
I	Order Integration Workshop Handouts – Not available until after the first workshop on June 21, 2000
J	CLEC Handbook Section 8.2 Address Validation Parsing (Proprietary) – Not previously filed
K	LSP Access Developers Reference Guide (for DataGate) (Proprietary) – Ham Aff. Attach. F

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