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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Carol E. Matthey  
Deputy Chief, Common Carrier Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20054

Re: "Project Pronto"  
CC Docket 98-141  
ASD File No. 99-49

Dear Ms. Matthey:

@Link Networks, Inc. ("@Link") requests that the Commission establish the following requirements on SBC's deployment of Project Pronto. These requirements will permit SBC to move forward with this initiative while overcoming the technical limitations that have been of concern to CLECs regarding Project Pronto, and can be readily implemented at reasonable cost. These requirements should be imposed in addition to other requirements that have been suggested and that the Commission may find necessary. The Commission should separately propose these requirements for all ILECs in a rulemaking proceeding to address potential competitive issues that will otherwise arise when ILECs install fiber in the loop and/or DLCs.

Constant Bit Rate. The Commission should require that SBC provide a Constant-Bit Rate ("CBR") class-of-service. A CBR class-of-service would provide to CLECs a guaranteed bandwidth between the CLEC's OCD port and the RT mux ADSL port (both downstream and upstream) without queuing delays or discards. The CBR connection requires the upstream Sustained Cell Rate (SCR) to match the ADSL upstream rate and the downstream SCR to match the ADSL downstream rate. Currently, SBC plans to offer only an unspecified bit rate ("UBR") that will not permit CLECs to provide the full range of DSL services that they are currently providing. UBR also precludes future DSL services such as SDSL and G.shDSL.

- Under a CBR solution, the OC3 bandwidth between the RT mux and the OCD would be consumed at a higher rate than under UBR. For a given number of

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ports, CBR connections will exhaust the OC3 bandwidth faster than UBR connections. To address exhaustion, either an additional fiber with an additional OC3 port will be required, or the OC3 port can be upgraded to an OC12 port. The Alcatel LiteSpan equipment today contains an OC12 card, so the best solution is to upgrade to OC12. The OC12 card's cost is about twice that of the OC3 card. A further cost would be the actual installation and provisioning time to replace an OC3 card with an OC12 card. This cost is approximately 2 man-hours of labor. These costs do not appear to be unreasonable.

- Litespan equipment today supports, at a minimum, both the UBR and CBR classes-of-service. No modification is required to the Litespan equipment to provide CBR. The Litespan equipment also supports 4 Virtual Channel Connections for each ADSL port. This permits each connection to be provisioned as either a UBR or a CBR connection. Both the UBR and CBR Virtual Channel Connections ("VCCs") can be multiplexed into a single Virtual Path Connection between the RT mux and OCD. There is no requirement to dedicate a shelf and/or channel bank to an individual CLEC when providing both CBR and UBR connections. No cost impact, for equipment, installation or provisioning, is experienced to add the CBR class-of-service to this equipment.
- Under CBR class-of-service, performance monitoring and service level agreement ("SLA") adherence requirements are unnecessary. Since CBR connections guarantee that the bandwidth obtained at the ADSL subloop is carried to the OCD interconnection port without delay and discard, there is no requirement to monitor and/or report the traffic statistics of the RT mux and OCD to the CLEC. This results in a major network management cost savings since each CLEC's network management system ("NMS") does not need to be integrated with SBC's NMS and isolated from each other CLEC's NMS.

Virtual Path Connection. SBC should also be required to offer a Virtual Path Connection (VPC) capability between the CLEC's OCD port and the RT mux ADSL port. A VPC would guarantee that the CLEC has sufficient Virtual Channels within the Path to provide multi-service, multi-application capabilities and that each additional service and/or application does not require the ILEC to perform any installation or provisioning functions for the additional service/application to be added. The VPC capability establishes a path between the OCD interconnection port and the ADSL port. 1 VPC is required per ADSL port. The VPC connection should support, at a minimum, 64 Virtual Channel Connections to be configured within the path.

- The Litespan equipment today provides for only 1 VPC from the channel bank of the RT mux to the OCD, and only 4 VCCs over the ADSL port. Software configuration and/or code changes would be required to reallocate the VPC and VCC code space within the machine to support multiple paths and channels. Note that this enhancement is limited to software and that no additional hardware, or

hardware modifications, are required. The Litespan equipment can be modified to support this function. The cost impact of providing this additional capability is dependent on the mechanism used within the Litespan equipment for assigning VPC/VCC values. If the values are user-configurable, then no additional cost is incurred. If the base system software code operating the Litespan machine requires recoding, approximately 6 man-months of development time is required. If the line card driver software code operating the individual ADSL line card requires recoding, approximately 1 man-month of development time is required. Any of these scenarios does not appear to unreasonably burden the cost structure of this suggested solution.

- Under this VPC solution, coordinated provisioning of channel connections between SBC and the CLEC would be eliminated. Once the VPC is initially configured at the time of subscription, each channel configuration is performed solely by the CLEC and no SBC involvement for this configuration is required. A substantial cost savings for the customer, and a simplified, faster provisioning cycle for the customer will be achieved.

@Link stresses that SBC should be required to provide both CBR and VPC capabilities. This will accommodate the full range of technical capabilities that CLECs will use in providing a complete range of services. While this approach to addressing the anticompetitive issues otherwise associated with Project Pronto increases the cost of the Litespan equipment somewhat, provisioning and maintenance costs are reduced. Over time, the time and labor savings of operations will far outweigh the initial capital cost increases of the equipment.

@Link strongly disagrees with the statement by SBC that shelf capacity of the LiteSpan equipment would impose any limitations on the type of CBR and VPC solution that @Link proposes. SBC states that “in a multi-carrier, shared environment, deployment is complicated by the fact that (in the LiteSpan NGDLC software release 10.1, for example) a virtual path must be assigned to a single shelf within the remote terminal” and that “this would require dedication of an entire shelf – one-third of the LiteSpan ADSL capacity – to a single CLEC using the CBR service.”<sup>1</sup> The UBR and CBR classes-of-service are configured on a per channel basis, and these channels are carried within the single VPC across the NGDLC. Therefore, there is currently no need to dedicate one shelf per CLEC to provide CBR. However, although this limited CBR capability exists today under Project Pronto, SBC should be required to make the software changes described above to permit SBC to offer one VPC per port, which would result in the availability of approximately 1,120 VPCs per remote terminal.

Continued Availability of Project Pronto Loop Elements. In recent meetings with CLECs concerning the terms and conditions under which SBC would make Project Pronto network elements available as UNEs, SBC has taken the position that it will only

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<sup>1</sup> Letter from SBC to Carol E. Matthey, CC Docket No. 98-141, June 2, 2000, page 12 –13.

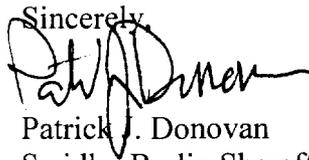
make various loop facilities available as a "special" temporary offering, and not as UNEs. Presumably, SBC plans as early as the next two and one-half or three years to transfer ownership to its advanced services affiliate of some Project Pronto loop equipment that is the subject of its current waiver request in this proceeding.

@Link cannot emphasize strongly enough the complete infeasibility from the perspective of the business plans of CLECs to have various Project Pronto loop facilities available for only a limited period. CLECs cannot be expected to invest substantial amounts in service provisioning arrangements premised on only a temporary availability of essential network elements. Without a more realistic commitment on SBC's part, the alleged competitive benefits of Project Pronto are totally illusory. The network elements that @Link will need among others are: an OCD port, an OCD cross-connect (VP XCONN), a CBR VPC from OCD to RT mux, a RT mux cross-connect (VP XCONN), a RT mux ADSL port, and a copper subloop are required. CLECs will need these in a combined form.

Accordingly, in addition to other conditions of any waiver granted to SBC in connection with Project Pronto, the Commission should require SBC to make available permanently the loop facilities underlying Project Pronto regardless of whether they are the subject of its pending waiver request. @Link believes that the best way to do this would be to require SBC to offer to amend its interconnection agreements with CLECs to offer the above and other loop elements as UNEs on a permanent basis. This will assure that Project Pronto is implemented in a way that will genuinely support the availability of competitive advanced services.

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As a further requirement, the Commission should make clear that DLCs and remote terminals in the loop are not justifications for denying a CLEC's request for the capability to provide DSL services to customers over those loops. SBC can provide that capability in several ways. SBC could upgrade to Project Pronto with our requested CBR and PVC requirements or provide a copper loop. In this way, where SBC has not upgraded remote terminals to Project Pronto, CLECs will not be denied the ability to provide DSL services.

Sincerely,  


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