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April 23, 2001

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW, Room TWB-204
Washington, DC 20554

RE: In the Matter of Applications for Consent to the Transfer of Control of Licenses and Section 214 Authorizations from Ameritech Corporation, Transferor, to SBC Communications, Inc., Transferee
CC Docket 98-141

Dear Ms. Salas:

On April 17, 2001, the attached letter was sent to Ms. Dorothy Attwood, Chief of the Common Carrier Bureau, and Mr. David H. Solomon, Chief of the Enforcement Bureau. As the letter indicates, AT&T has withdrawn its prior objections to the request by SBC to extend certain release dates for the Uniform and Enhanced OSS Plan of Record developed pursuant to ¶ 28 of the SBC/Ameritech merger conditions.

Two copies of this Notice and the attachment are being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in cursive script that reads "Amy L. Alvarez".

cc: Anthony Dale



Robert W. Quinn, Jr.
Vice President
Federal Government Affairs

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April 17, 2001

Ms. Dorothy Attwood
Chief, Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Mr. David H. Solomon
Chief, Enforcement Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

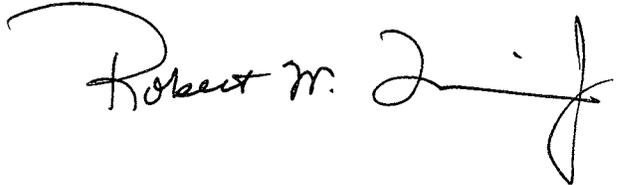
Dear Ms. Attwood and Mr. Solomon:

In a letter dated April 2, 2001, AT&T objected to SBC's request that the release dates for the Uniform and Enhanced OSS Interface Plan of Record releases currently scheduled for completion by September 29 and November 17 of 2001 (April, 20 2002 for SNET), be extended to February 28, 2002 and March 22, 2002, respectively (June 30, 2002 for SNET). In the April 2 letter, AT&T informed the Commission that AT&T and SBC were unsuccessful in reaching a resolution in which AT&T would support SBC's request for postponement of the OSS Implementation Timeline in exchange for SBC mitigating the impact to AT&T of the delay in the releases. Specifically, AT&T sought SBC's agreement to implement a fully mechanized one order process for line splitting (AT&T's use of the high frequency portion of the loop) in the SWBT region.

Further discussions between AT&T and SBC in the following weeks have led to a resolution of the release extension issue. Under this agreement, SBC has committed to provide a single LSR process (via EDI and LEX) for providing line splitting on a UNE-P arrangement in the SWBT region no later than October 20, 2001.

Given SBC's recent commitment to deliver this functionality, SBC's request to extend the Uniform and Enhanced OSS Interface release dates is reasonable and necessary and is not opposed by AT&T. A copy of the SBC-AT&T Settlement Agreement is attached.

Sincerely,

A handwritten signature in black ink that reads "Robert M. Ziff". The signature is written in a cursive style with a large initial "R" and a long horizontal stroke at the end.

cc: Carol Matthey, FCC
Anthony Dale, FCC
Radhika Karmarkar, FCC
Glen Sirles, SBC
Christopher Heimann, SBC

Settlement Agreement Between SBC Communications Inc. and AT&T

Settlement Agreement

This settlement agreement resolves issues between SBC Communications Inc. and AT&T relating to (1) Category IV data under the Uniform and Enhanced OSS Interface Plan of Record; and (2) an extension of the time line for implementing the OSS interface enhancements for pre-ordering and ordering called for in the Uniform and Enhanced OSS Interface Plan of Record.

Resolution of Category IV Data Issues

1. **E911/Directory Listing (103, 555).** SBC will enable 911 without requiring the CLEC to pass address on the LSR for a conversion request for PacBell where there are no changes to the service address of the end user account. SBC will allow for the conversion of directory listings without requiring an address when no changes are being made to the listing for PacBell. When changes are being made to the listing address, information will be required. SBC will implement both capabilities no later than the final release implementing the Uniform and Enhanced OSS Interface POR. SBC will eliminate the ECC field requirement as part of the Business Rules Plan of Record.
2. **PIA (711, 354).** Every time SBC returns a PIA, it will provide full refresh of confirmation information. When multiple service orders are associated with the PIA, SBC will send one PIA including all orders.
3. **LOC Interactions (711, 354).** SBC commits to work with the CLECs to define a process that will enable the LOC to handle CLEC inquiries using PON in addition to service order number. Based on these meetings, SBC will adopt a solution that enables a CLEC to communicate with the LOC by referencing PONs rather than service orders. SBC will begin to address the issue of dealing with CLECs on a PON (rather than internal service order number) basis in May 2001.
4. **TOS (466).** SBC restates that it will not require the CLECs to supply or submit TOS on disconnects. SBC also will not require the CLECs to supply or submit TOS on a REQTYPE C. Additionally, SBC will return the first character of TOS on the customer service inquiry on POTS accounts and will do so whenever reasonably possible on other more complex accounts. SBC will clarify DSR documentation to indicate that the TOS field is either a "1" or "2" in the first character, and hyphens in characters 2, 3, 4.

5. **RPON (511).** SBC will modify its proposed RPON process. SBC will use both the NOR field and the RPON field. The RPON field of the first order in a series will contain no value. For example, the NOR field will contain the value of 0115, i.e., order 1 of 15. The RPON field of the remaining orders, 2 through 15, will contain the PON of the first order and the appropriate value in the NOR field - 0215 through 1515. Maximum number of related orders will be determined based upon the definition of project rules related to RPON. The Project field will allow orders that are part of a project to be related to each other.

SUPs regarding order specific changes will not require reissue of the entire group of orders 01 through 15. Changes that affect all orders such as DD or the addition of an order will require reissue of the entire group of orders (i.e., the addition of an order(s), e.g., order number 16, would require reissue of the group of orders to change the value in the NOR field (0116 through 1616)).

Cancellation of an order will not require a reissue of the group of orders. The cancellation of an order will not affect the NOR field, the status of the order will change to cancelled, but the order will remain as part of the group of orders, as a placeholder. A cancelled order would be eliminated from the group of orders only if the entire group of orders were reissued, as in the case of the addition of order number 16 above.

6. **Fielded Completion (251).** SBC will commit to implement Feature/Feature Detail components consistent with the outcome of OBF issue 2155 in the first release reasonable following the initial closure date of the issue, but in no case before the first release following the final release implementing the Uniform and Enhanced OSS Interface POR.
7. **Uniformity in SC fields (424, 486).** SBC will ensure that the State in which the end-user resides is the proper entry for all SC fields including CLLI and CFA.
8. **Complete Community Name Abbreviation (751, 755, 685).** Community names for listing addresses, service address, and directory delivery addresses will be returned on the CSI response. The format for the directory community names may or may not be the same as the format for community name for the service address or listed address. The only community name that may be required for input on a preorder inquiry is the name associated with the service address. PB/NB/AIT utilize abbreviated community names; SWBT and SNET do not. The LSPOR and enhanced Verigate User's Guide will be enhanced to include a complete list of all abbreviated community names.

For PB/NB/AIT, the CLEC may enter the abbreviated or the spelled out community name for preordering based address inquires. SBC will convert this to the needed format (spelled out or abbreviated) in validating the address for ordering.

9. **Dual Service (518).** By the end of 2002, SBC will enhance its UNE-P offering to permit dual service where it has a retail equivalent in parity with that retail offering. SBC will begin this effort in the AIT region.
10. **Fix inside wire EDI/CORBA.** SBC agrees that this functionality will be provided in the FMO.
11. **USOCs (473, 725).** SBC will provide a listing of USOCs in AIT by July 31, 2001 as an interim aid to assist CLECs. SBC will also create a USOC utilization tool, based on discussion with CLECs regarding the nature of that tool, to provide on-line search capabilities for SBC USOCs across its 13-states. SBC will provide this tool by June 30, 2002, unless SBC is required to adopt uniform USOCs in the Business Rules POR proceedings. SBC agrees that CLECs have not waived any claims with regard to this issue in the Business Rule POR.
12. **CFA Tool (242) Inventory by CLLI (the CLLI code of the cage).** SBC will develop a list of CFAs by CLLI as an interim aid to assist CLECs with inventory management by September 30, 2001. SBC will also create a CFA inventory tool. It will be available as a web-based interface to provide on-line search capabilities for CLEC inventory management across the 13-state region. SBC will provide this tool by June 30, 2002.
13. **TN Reservation (501, 502).** SBC will provide a 10-minute interval for holding telephone numbers as a part of the TN inquiry capability. This will insure numbers being viewed by the CLEC are not available for other CLECs during the 10-minute interval.
14. **Uniform Error Codes (728, 730).** SBC will make a reasonable effort to identify service order generation edits common across the regions and, where applicable, will establish common error messages for those situations. The common edits and SBC's position on which error messages can be made common will be discussed in the Business Rules POR collaborative sessions. SBC agrees that the CLECs have not waived any claims with regards to this issue in the Business Rule POR.
15. **Review Complete Jeopardy Code List (148, 728, 734, 778).** SBC agrees to validate the jeopardy codes to ensure completeness and appropriate use of OBF codes where applicable. SBC will discuss the jeopardy codes in the

Business Rules POR collaborative sessions. SBC recognizes that the CLECs have not waived any claims with regards to this issue in the Business Rule POR. SBC agrees to add jeopardy code 1L (Frame Due Time cannot be met) as a valid code.

SBC will not return verbiage with 3B code. SBC agrees to investigate alternate codes to 3B, which will provide more specific information concerning what needs to be corrected.

16. **Address Validation (457).** SBC agrees to return all available alternative addresses in response to an address validation inquiry in preorder. Because of differences in back-end systems, those numbers differ by region: 50 in PB/NB/SWBT, 100 in SNET, all matches in AIT.
17. **Route & Box (438, 425, 563).** SBC agrees that when a Route & Box address is submitted for verification and the response contains an AHN, then the AHN can be used for other address-based inquiries. The validated address returned on the address validation response may be used on subsequent address-based inquiries, such as TN inquiry, even if the address has an AHN.
18. **Route & Box (438, 425, 563).** SBC confirms the usage rules for address including Route & Box will be incorporated in all appropriate documentation.
19. **Validity of CLLI Information (95, 540).** SBC will insure the validity of the CLLI information on a CLLI inquiry by checking a shadow database to determine whether the TN is ported or pooled. This will be used to determine the correct switch for the CLLI look-up and insure the validity of the information if the TN is ported or pooled.
20. **Service Address Fields.** SBC will implement its first proposal on how to parse address information for the directional prefix and suffix.
21. **Order Types (94).** SBC confirms that the same REQTYPEs and activity types that apply to a conversion from Retail to UNE-P also apply to a conversion from Resale to UNE-P. SBC will update its documentation to reflect this fact.
22. **Directory Listings (638).** SBC confirms that a REQTYPE J—directory listing only request—is applicable when processing LSRs for stand alone, facility-based listings. When submitting a directory only request for other products (Resale or UNE—P), the REQTYPE for the product should be used for the directory only request.

23. **Advance to Book (637, 638, 789).** SBC confirms that the Advance to Book directory listing product is available only in AIT and SNET. An LSR with an ADV field is used to process the update to the directory book in advance of the directory due date after the book close date has passed, but before the book delivery date. A DSUP is used in these regions only for the CLEC to trigger the process to complete the directory listing updates.
24. **Directory Listing (775).** CLECs will receive a FOC and a directory completion notification as a part of the uniform FMO across all regions for REQTYPE J. With the final release implementing the Uniform and Enhanced OSS Interface POR, both FOC and directory completion notice will be returned electronically via the LSR processes (EDI and Web-LEX).
25. SBC agrees to return all block values with the pre-order CSI inquiry capability. SBC will eliminate any inconsistency between pre-ordering and ordering with respect to blocking.
26. In addition to the issues the parties agreed to discuss in the BR POR in the above paragraphs, the parties agree to defer the following issues until the BR POR:
 - a. **Blocking Fields (597).** SBC agrees to implement a uniform process for the Blocking field as part of the Business Rules POR. SBC agrees to provide uniform block values and a uniform use of the blocking field across 13 states consistent with OBF guidelines or standards. SBC will return all Block values in the Block field with the pre-order CSI inquiry capability.
 - b. **BAN1 (547).** SBC agrees to implement a uniform process for the use of the BAN1 as part of the Business Rules POR.

Line Splitting

No later than October 20, 2001, SBC shall enable for the Southwestern Bell region a single LSR process (*via EDI and LEX*) for providing line splitting (AT&T's use of the high frequency portion of the loop) on a UNE-P arrangement. This process will break apart the UNE-P and provide a coordinated delivery of stand-alone elements routed through AT&T's collocation arrangement so that AT&T may install its splitter and equipment to support advanced services.

Extension of Time and Other Terms

SBC and AT&T agree that, except as set forth above, this stipulation is entered into to resolve, and does resolve, differences between the companies

regarding disposition of Category IV disputed issues within the context of the POR proceedings. SBC and AT&T agree not to assert a claim or maintain a position in any subsequent Uniform and Enhanced OSS Interface POR and Business Rules POR-related arbitration proceeding that is inconsistent with the agreements reached herein.

AT&T also agrees not to raise, through the Change Management Process, the Business Rules Plan of Record, or otherwise, any challenge or dispute relating to any actual or alleged variance by SBC from industry guidelines or standards, including those of the Ordering and Billing Forum, which has been disclosed in any of the Category I, II, III, or IV data provided pursuant to the Uniform and Enhanced OSS Interface Plan of Record. This agreement extends not only to the industry guidelines or standards issues that AT&T actually raised with the Uniform and Enhanced OSS Interface Arbitration Panel, but also to any other industry guidelines or standards issue it could have raised.

Unless otherwise indicated, the resolutions of issues set forth in the Category IV data issues section of this agreement shall be implemented no later than the final release implementing the Uniform and Enhanced OSS Interface POR. Any documentation changes that are required will be made in conjunction with the final uniform LSOR and LSPOR publication. Signing this settlement agreement does not constitute an admission by any signatory to this agreement that SBC's OSS are compliant with its obligations under Section 251 or Section 271 of the Federal Telecommunications Act of 1996, and the parties hereto are not prohibited from taking any position regarding SBC's OSS in a 251 or 271 proceeding pursuant to the Act. It shall be a violation of this settlement agreement to argue in any 251 or 271 proceeding that AT&T's signature on this agreement constitutes an admission that SBC's OSS are section 251 or 271 complaint, or that AT&T has waived its rights to challenge the OSS as non-compliant with the obligations of section 251 or 271.

AT&T further agrees to file a letter with the FCC to indicate support for SBC's position that the release dates for the Uniform and Enhanced OSS Interface POR releases presently scheduled for completion by September 29 and November 17 of 2001 (April, 20 2002 for SNET), should be extended to February 28, 2002 and March 22, 2002, respectively (June 30, 2002 for SNET). This letter will state that SBC's request to extend these release dates is reasonable and necessary in light of its commitments. SBC may share this letter with any relevant arbitrator or Arbitration Panel. SBC agrees that this letter will constitute the support of modification to the POR implementation schedule which was referenced in the SBC and AT&T U&EPOR Stipulation, entered into on January 21, 2001, a copy of which is attached.

The information contained in the Category IV data issues section of this settlement will become part of the Category IV issues matrix. SBC will provide AT&T a draft of the revised Category IV issues matrix upon conclusion of a

settlement agreement. This draft will be finalized with the concurrence of both parties. If, after discussion, the matrix or final technical documentation does not accurately reflect the changes agreed to in the numbered paragraphs, AT&T retains the right to arbitrate that issue at a later time pursuant to the arbitration procedures set forth in this POR.

SBC Communications Inc.

AT&T Corp.

Signature

Signature

Name (Print)

Name (Print)

Date

Date

1801525

SBC AND AT&T U&E POR STIPULATION

Resolution of Issues

1. Flow Through – In the Ameritech region, SBC will establish processes for mechanical flow through of orders for Local Number Portability (LNP) and Loop with LNP for conversions "as specified" for simple residence and business accounts. This flow through capability will be implemented no later than end of June 2002. This stipulation shall not limit or modify any parties' rights and obligations pursuant to current agreements concerning flow through made in the Ameritech states, nor any party's rights to participate in prioritization efforts addressing introduction of additional flow through enhancements.
2. Non-Coordinated Loop Cut-over Process – In the Ameritech region, SBC will implement a non-coordinated frame due time hot cut loop cut-over process. The methods and procedures necessary for such a process will be established in collaboration with CLECs by February 28, 2001, as set forth in Ameritech's stipulation in Investigation into Ameritech Wisconsin Operational Support Systems before the Public Service Commission of Wisconsin, 6720-TI-160. SBC will implement the resultant process as soon as possible consistent with a quality implementation, but no later than July 15, 2001. Once SBC implements the LNP and Loop with LNP flow through discussed in paragraph 1, above, orders that specify the FDT process will also flow through.
3. Light Address Validation – Across its 13 State region, SBC will implement no later than end of June 2002 a procedure to ensure that, when a CLEC submits a migration order utilizing the end user's telephone number, the telephone number provided is associated with the account the CLEC intends to transfer. This procedure will utilize a portion of the end user's address contained on SBC's existing customer service record. This procedure will be implemented in a manner that allows those CLECs not wishing to make use of the

procedure to omit the end user's address from the order. AT&T agrees that this agreement will constitute settlement of any outstanding change requests regarding changes to the method used by SBC to validate the telephone number and/or address on migration orders, such as the CR(s) submitted by AT&T in California .

4. Directory Listing Edits – SBC will work cooperatively with CLECs to identify directory listing database edits that cause service orders to require manual intervention after order completion in Ameritech and SWBT regions, and which require CLEC input to resolve. SBC will then work with CLECs to identify those circumstances where such manual intervention and associated CLEC involvement can be avoided by the creation of additional “up-front” order edits, or the modification of existing edits. The CLECs and SBC will work to establish a mutually agreeable schedule for the implementation of these additional ordering edits and/or modification of existing edits, the first phase of which will be implemented no later than the end of June 2002.
5. 3 Order Process-SBC restates that it presently has no plans to utilize a 3 Order Process in any region other than SWBT. Further, it is not anticipated that a 3 order process will be necessary in any region other than SWBT. Should any of these plans change, the proposed plans will be presented and fully discussed through the Change Management Process, where CLECs will have full opportunity to understand the reasons for such a choice and the implications of alternatives.
6. Due Date Reservation Query/Retain Listing on Partial Migration. SBC and AT&T have not reached substantive agreement on due date reservation query or retention of directory listings on a 13-state basis, but have agreed that any resolution of the issue will occur, if at all, outside the POR proceeding.

7. Available Due Date Query-SBC agrees that it does not plan to impose any additional requirements on CLECs to enter a full service address to obtain pre-ordering information, except as provided in the Plan of Record and that Plan's Category I, II, III and IV documentation, as it exists on the effective date of this Stipulation.
8. Address Database Synchronization. SBC and AT&T have not reached substantive agreement on address database synchronization on a 13-state basis, but have agreed that any resolution of the issues will occur, if at all, outside the POR proceeding.

SBC and AT&T have not reached agreement committing AT&T to support a modification to the POR implementation schedule. SBC and AT&T agree, however, that in the event SBC applies for a modification to the implementation schedule in the POR for the App-to-App & GUI Pre-Order/Order Release ("POR Release"), and AT&T supports the application, then if the application is granted, the implementation dates agreed to in paragraphs 1 and 3 shall be moved up in time to be included in the POR Release.

SBC and AT&T agree that this stipulation is entered into in order to resolve differences between the companies regarding disposition of ten Category I, II and III Disputed Issues, within the context of the POR proceedings. These Disputed Issues are identified in the November 28, 2000 SBC CLEC OSS Issues List as numbers 76, 90, 135, 150/151, 252, 253, 318, 329, 351, and 400. SBC and AT&T agree not to assert a claim or maintain a position in any subsequent POR-related arbitration proceeding that is inconsistent with the agreements reached herein. Signing this settlement agreement does not constitute an admission by any signatory to this agreement that SBC's OSS are compliant with its

obligations under Section 251 or Section 271 of the Federal Telecommunications Act (“Act”) of 1996, and parties hereto are not prohibited from taking any position regarding SBC’s OSS in a 251 or 271 proceeding pursuant to the Act. It shall be a violation of this settlement agreement to argue in any 251 or 271 proceeding that AT&T’s signature on this agreement constitutes an admission that SBC’s OSS are section 251 or 271 compliant, or that AT&T has waived its rights to challenge the OSS as non-compliant with the obligations of section 251 or 271.