

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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OCT - 4 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Joint Application by SBC Communications)
Inc., Southwestern Bell Telephone Company,)
and Southwestern Bell Communications)
Services, Inc. d/b/a Southwestern Bell Long)
Distance for Provision of In-Region,)
InterLATA Services in Arkansas and Missouri)

CC Docket No. 01-194

**JOINT APPLICATION BY SOUTHWESTERN BELL
FOR PROVISION OF IN-REGION, INTERLATA SERVICES
IN ARKANSAS AND MISSOURI**

Reply Appendix

VOLUME 1a

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**JOINT APPLICATION BY SOUTHWESTERN BELL
FOR PROVISION OF IN-REGION, INTERLATA SERVICES
IN ARKANSAS AND MISSOURI
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CC Docket No. 01-194

REPLY AFFIDAVIT OF EDWARD K. ALLIS

STATE OF ARKANSAS)
)
COUNTY OF PULASKI)

I, Edward K. Allis, of lawful age, being duly sworn, depose and state:

1. My name is Edward K. Allis. My business address is 1111 West Capitol, Room 1070, Little Rock, Arkansas 72201. I am the Vice President - Regulatory for Southwestern Bell Telephone Company (SWBT) in Arkansas. I am responsible for the administration of SWBT's regulatory activities in the state and am SWBT's liaison with the Arkansas Public Service Commission (Arkansas PSC) and its Staff. In addition, I supervise the preparation, development and overall administration of SWBT's intrastate tariffs on file with the Arkansas PSC. I also have liaison responsibilities for SWBT's business relationships with non-Bell local exchange carriers in Arkansas. Finally, in terms of negotiations and matters involving

Competitive Local Exchange Carriers (CLECs), I serve as the Arkansas contact for SWBT's negotiating teams when they interact with CLECs in Arkansas.

2. The purpose of my affidavit is to respond to comments made by a number of CLECs in this proceeding on September 10, 2001. My affidavit focuses on allegations made by commenters about pricing issues in Arkansas and the availability of the Arkansas Interconnection Agreement (A2A) rates.
3. Specifically, I will address comments made by AT&T Corp., Inc., ("AT&T"), El Paso Networks, LLC ("El Paso"), WorldCom, Inc. ("WorldCom"), and Navigator Telecommunications, LLC ("Navigator"), as they relate to the pricing of Unbundled Network Elements (UNEs) in Arkansas and to certain issues raised regarding implementation of the A2A and the existence of residential competition in Arkansas.
4. AT&T's claims that supposed uncertainty in Arkansas' UNE rates creates a barrier to competition are unfounded. Comments of AT&T Corp., CC Docket No. 01-194 at 99 (FCC filed Sept. 10, 2001) ("AT&T Comments"). The A2A contains UNE rates that are as certain and final as any that have been approved by the Federal Communications Commission ("FCC)." To be sure, there are some UNE rates in the A2A that are considered interim, but these rates are not the basis of AT&T's stated concerns. The interim rates, and their proposed treatment, are clearly explained in the A2A as being dependent on the prospective actions of the Kansas Corporation Commission ("KCC"). That is, when the KCC makes determinations regarding SWBT-Kansas interim rates, those ordered changes will be incorporated into the A2A as final rates. As explained below, that process has already occurred for dedicated transport entrance facilities. Thus, AT&T's concerns presumably are based on the

Arkansas PSC's statements regarding its price setting authority under state law, and the potential for legal appeals being pursued by SWBT and others. The potential of subsequent legal action is inherent in all regulatory decisions and has no bearing on the legal standard upon which SWBT's application must be judged.

5. SWBT has already described the Arkansas PSC's interpretation of its authority under state law. In fact, that is precisely why SWBT has proposed the adoption of Kansas UNE prices for Arkansas. Despite AT&T's arguments, the A2A is a model interconnection agreement that contains firm, legally binding prices for CLECs that choose to opt into its provisions. As described below, a number of CLECs in Arkansas have already exercised this choice. SWBT is now specifically obligated and legally bound to provide these individual CLECs interconnection at terms, conditions and prices specified in the A2A. Furthermore, by its very terms, the A2A contains commitments on UNE prices that extend for a minimum of eighteen months -- from June 18, 2001, the date the A2A was approved by the Arkansas PSC. Moreover, if SWBT's application for long distance relief is approved by the FCC, the terms, conditions and prices contained in the A2A extend an additional thirty months, until June 18, 2005. (See A2A General Terms and Conditions, ¶ 4.1) Allegations regarding uncertainty are without substance and do not constitute a barrier to entry as suggested by AT&T and El Paso.
6. Other parties complain about SWBT's nonrecurring charges, claiming that they are not TELRIC compliant, too high and generally not to their liking. See Comments of Navigator Telecommunications, LLC., CC Docket No. 01-194 at 3-6 (FCC filed Sept. 10, 2001) ("Navigator Comments") and AT&T (AT&T Comments at 99).

These allegations are groundless. Moreover, these allegations are predicated on the CLEC claim that the FCC erred in approving Kansas' nonrecurring charges. Thus, unless the FCC concludes that the Kansas nonrecurring charges approved in its Kansas/Oklahoma Order are not now TELRIC compliant, which is unlikely, the CLECs' complaints must fail. The only issue is whether Arkansas non-recurring costs are equal to or greater than Kansas costs, which SWBT has already demonstrated in the Initial Affidavit of Dale Lundy. (App.A – AR , Tab 14).

7. Navigator's objections similarly miss the point. In a public hearing before the Arkansas PSC (and in its comments), Navigator levied misguided allegations regarding charges for converting end users from resale to the UNE-P, based on their current interconnection agreement that they adopted under section 252(i).¹ Navigator completely ignored the price contained in the A2A for that activity. In the A2A, the current charge for converting from resale to the UNE-P is contained in Appendix Pricing - UNE - AR, Exhibit 1, which states, in part:

When CLEC requests a 2-Wire Analog Loop (i.e., 8db loop) with a 2-Wire Analog Switch Port and the Analog Loop to Switch Port Cross-Connect (REQ type "M"), and these items are in a pre-existing combination in Arkansas (ACT Type "V"), a service order charge will apply but the non-recurring charges for each of these two individual unbundled network elements and the cross connect will be \$0 on an interim basis, subject to true-up. SWBT will apply the appropriate service order charge and the non-recurring charges for any vertical features requested. Following the issuance of a final order by the Kansas Corporation Commission (subject to any stay pending appeal) to set permanent non recurring charges for these elements and the cross connect, the rates established in such proceeding shall immediately apply to this Agreement and the interim rates set forth above in this Exhibit 1 shall be subject to retroactive true-up to the rates established by the Kansas Corporation Commission back to the effective date of this Exhibit 1.

In fact, Navigator is in the process of availing itself of the A2A prices for UNEs as well as for converting to the UNE-P. After an initial attempt to obtain Texas T2A rates in Arkansas, Navigator finally requested the A2A rates on June 29, 2001. SWBT has provided Navigator with a proposed amendment to its interconnection agreement containing the A2A's rates, terms and conditions for the sections being requested by Navigator. Under the existing Navigator/SWBT interconnection agreement, Navigator will receive the A2A rates retroactively to the date of Navigator's request for adoption of certain of the A2A rates, terms and conditions. However, this can only be accomplished when a signed amended interconnection agreement between the parties has been filed with the Arkansas PSC. SWBT and Navigator met on September 14, 2001 to discuss the issues. Once the amendment to its interconnection agreement is executed, Navigator will begin paying the rates specified in the A2A for conversions to the UNE-P. Furthermore, based on Arkansas' commitment to retain all Kansas interim rates until they are finalized by the KCC, Navigator can expect to pay the nominal conversion rate for the time being. At the time the KCC finalizes a price for conversions, the A2A and interconnection agreements that incorporated Appendix Pricing - UNE - AR, Exhibit 1 by amendment will be amended to incorporate the new TELRIC-based rate. According to the terms of the Appendix Pricing - UNE - AR, Exhibit 1, Navigator and SWBT will be subject to true-up provisions for these interim rates.

8. The prospect of the A2A's lower rates for conversion to the UNE-P is evidently having an effect on Navigator's competitive entry strategy. As explained in the Joint Reply Affidavit of Gary Smith and Dave Tebeau, Navigator has recently been

converting a number of its resale customers to UNE based service. Navigator must believe that the A2A will provide the basis for additional facilities based residential competition. Consequently, based on the status of Navigator's negotiations with SWBT, and their ongoing conversion of customers to the UNE-P, the comments submitted by Navigator should be rejected as not reflective of the current business relationship between SWBT and Navigator. Moreover, to the extent Navigator's comments were inaccurate, or are no longer accurate, Navigator should be required to correct the record.

9. Sprint raised two equally inappropriate issues in its comments. First, Sprint points to alleged behavior on the part of SWBT that it claims was strategically designed to cause CLECs to withdraw from the facilities based competition arena. Additionally, Sprint asserts that SWBT's A2A does not offer commercially reasonable terms. Comments of Sprint Communications Company L.P., CC Docket No. 01-194 at 3 and 9 (FCC filed Sept. 10, 2001) ("Sprint Comments"). To the contrary, the A2A does offer commercially reasonable terms. It incorporates the same terms, conditions and rates that are contained in the K2A which was reviewed by the FCC as part of its approval of SBC's Kansas/Oklahoma 271 application. As the Initial Affidavits of Dale Lundy (App. A – AR, Tab 14) and Tom Makarewicz (App.A – AR, Tab 15) establish, costs in Arkansas are equal to or higher than their Kansas counterparts, and therefore the UNEs are priced somewhat lower than what Arkansas cost-based rates would otherwise be. In and of itself, this should allay concerns by Sprint or others as they relate to commercially reasonable terms.

10. Sprint cites problems that were supposedly experienced by other CLECs in Arkansas, i.e., Navigator and Alltel. In both cases, no credible evidence was ever submitted by those parties in the Arkansas 271 proceedings. Navigator did not participate in the Arkansas 271 proceedings, except to make a statement during the public hearing. Its comments raised, for the first time, an issue regarding the installation of DS1 UNEs that not even SWBT was made aware of, and that is not borne out by SWBT's performance measures. The record indicates that SWBT's performance in this area is exemplary and not reflective of Navigator's claims. The Reply Affidavit of William R. Dysart provides additional evidence showing the fallacy of Navigator's comments. As noted above, although Navigator has complained about the level of charges to convert from resale to the UNE-P during the public hearing portion of the Arkansas 271 proceedings, Navigator never raised the billing issues that Sprint is now alleging. As with Navigator, Alltel's evidence during the Arkansas proceedings was decidedly anecdotal and never established a link between its alleged problems and SWBT's performance. Finally, Alltel's complaints about rates only concerned the same rates they had negotiated and proposed to the Arkansas PSC in Docket No. 99-015-U as complying with § 252(d), a moot position in light of the Arkansas PSC's decision not to set prices.

11. Furthermore, the FCC should be skeptical of Sprint's assessment of alleged problems experienced by other CLECs of which it presumably has limited knowledge. Other than repeating the anecdotal information offered by Alltel and Navigator, Sprint has no first hand information on which to base its comments and those comments should be evaluated with this in mind.

12. Sprint's assertions that SWBT has offered no evidence that its prices in Arkansas are consistent with TELRIC principles should also be rejected out of hand. Sprint (See Sprint Comments at 26). Similar allegations were made by WorldCom (see WorldCom at 27-28) and should likewise be rejected. As explained in its August 20, 2001 filing, SWBT has adopted prices from the K2A, i.e., prices that have already been found to be within the range of reasonableness of TELRIC prices. The initial Affidavits of Tom Makarewicz and Dale Lundy contain their analyses and comparisons of both Arkansas and Kansas recurring and nonrecurring costs. Those comparisons illustrate that Arkansas TELRIC costs are equal to or higher than their Kansas counterparts. This relationship is key to the adoption by the Arkansas PSC of UNE rates from the K2A. As the FCC found in approving Verizon's Massachusetts 271 application, "As the Commission noted in the *SWBT Kansas/Oklahoma Order*, under appropriate circumstances, a BOC's UNE rates will be entitled to a presumption of TELRIC compliance if they are adopted in whole from another state whose rates have been found to comply with TELRIC, and if costs are demonstrated to be at or above the costs in the state whose rates were adopted." Memorandum Opinion and Order ¶ 22, Application of Verizon New England Inc., et al., For Authorization to Provide In-Region, InterLATA Services in Massachusetts, CC Docket No. 01-9, FCC 01-130 (rel. Apr. 16, 2001).

13. The Arkansas PSC approved the A2A on June 18, 2001. Since that time, twelve CLECs have opted into the approved A2A, thereby sealing SWBT's legally binding obligation to provide the terms, conditions and prices contained therein. Those CLECs are: VarTec Telecom, Inc., A-Tech Telecom, Inc., Southern Telcom

Network, Inc., Sage Telecom, Inc., Max-Tel Communications, Inc., Vantage Telecom LLC, SBC Advanced Solutions, Inc., Valuelinx Corporation, Talk America, Inc., NationNet Communications Corporation, Ganesa Telecommunications, Inc., and Northeast Telecom, Inc. Therefore, the FCC should be very skeptical when it evaluates Navigator's allegations regarding the "illusory promise" of the A2A. None of the CLECs that have opted into the A2A have echoed Navigator's concerns regarding "undisclosed charges and other hidden pitfalls." Navigator (See Navigator Comments at 6). That is a sentiment apparently unique to Navigator and is utterly unsupported by any evidence in this record.

14. Moreover, on September 18, 2001, the Arkansas PSC issued Order No. 19 in Docket No. 00-211-U (See Allis Reply Attachment A). By that order, the Arkansas PSC has approved necessary modifications to the A2A. For example, Order No. 19 directs SWBT to incorporate Version 2.0 of the Performance Assurance Plan Business Rules into the A2A. Order No. 19 also approves revisions to certain UNE prices that were changed from interim to final status by order of the KCC. SWBT had committed that it would incorporate UNE price changes from Kansas when that state's interim prices became final. In Docket No. 97-SCCC-149-GIT, the KCC approved final prices for dedicated transport entrance facilities for DS1, DS3, OC3 and OC12. KCC's Order on Reconsideration at Attachment A at 3-5, Joint Application of Sprint Communication Company, L.P., United Telephone Company of Kansas, United Telephone Company of Eastern Kansas, United Telephone Company of South Central Kansas, and United Telephone Docket No. 97-SCCC-149-GIT Company of Southeastern Kansas for the Commission to Open a Generic Proceeding on

Southwestern Bell Telephone Company's Rates for Interconnection, Unbundled Elements, Transport and Termination, and Resale, Kansas Corporation Commission, Docket, No. 97-SCCC-149-GIT (Feb. 19, 1999). On August 2, 2001, SWBT in Arkansas filed these revisions with the Arkansas PSC, proposing their incorporation into the A2A (See App. C – AR, Tab 91). The UNE price revisions proposed by SWBT are decreases compared to the interim prices they replace. Finally, Order No. 19 gives approval to the UNE zone changes that were included in the A2A submitted to the FCC on August 20, 2001. SWBT filed those revisions with the Arkansas PSC on August 14, 2001. (See Allis Reply Attachment B). Those zone changes promote consistency between the zone definitions in the K2A and A2A. Notably, the CLEC-favorable zone changes will be conferred on all CLECs in Arkansas, whether they have opted into the A2A or retained their existing interconnection agreements. No CLEC objected to the zone change amendment when it was put out for comment by the Arkansas PSC. Northeast Telecom and Sage have filed the zone change amendment to their A2As with the Arkansas PSC, memorializing SWBT's legally binding commitment. Notice of Amendment to A2A Interconnection Agreement By Sage Telecom, Inc., File to Receive and Store Various Reports Required of Utility Companies by The Commission; Application Of Southwestern Bell Telephone Company for Authorization to Services Pursuant to Section 271 of the Telecommunications Act of 1996 and for Approval of the Arkansas 271 Interconnection Agreement to Provide In-Region InterLata Services Pursuant to Section 271 of the Telecommunications Act of 1996 and for Approval of the

Arkansas 271 Interconnection Agreement, Arkansas Public Service Commission,
Docket No. 86-033-A (Oct. 2, 2001).

15. In conclusion, no CLEC has raised any issues in this proceeding that warrant rejection of Arkansas' 271 application. SWBT has satisfactorily addressed any concerns regarding Arkansas UNE prices and their compliance with the FCC's TELRIC principles. Furthermore, the A2A has been selected by a number of CLECs in Arkansas, formalizing the legally binding commitments contained therein. SWBT's 271 application has been shown to be in compliance with the federal competitive checklist and therefore should be approved.

I state under penalty of perjury that the foregoing is true and correct.

Executed on October 2, 2001.

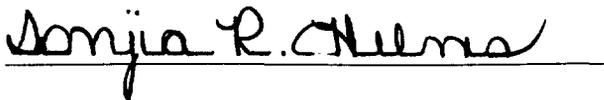


Edward K. Allis

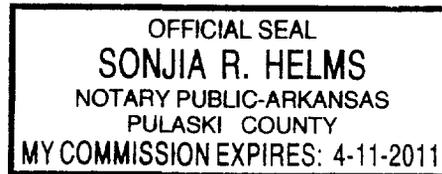
STATE OF ARKANSAS)

COUNTY OF PULASKI)

Subscribed and sworn to before me on the 2nd day of October 2001.



Notary Public



Allis AR Reply Affidavit – Attachment A

SEP 10 2 56 PM '01

ARKANSAS PUBLIC SERVICE COMMISSION

FILED

IN THE MATTER OF THE APPLICATION OF)
SOUTHWESTERN BELL TELEPHONE)
COMPANY FOR AUTHORIZATION TO)
PROVIDE IN-REGION INTERLATA SERVICES)
PURSUANT TO SECTION 271 OF THE)
TELECOMMUNICATIONS ACT OF 1996 AND)
FOR THE APPROVAL OF THE ARKANSAS)
INTERCONNECTION AGREEMENT)

DOCKET NO. 00-211-U
ORDER NO. 19

ORDER

By this Order the Commission will address the August 2, and August 14, 2001 filings by Southwestern Bell Telephone Company (SWBT) and the Motion to include Arkansas data in an audit of SWBT related to Loop Maintenance Operations System (LMOS) issues in flow-through performance filed by AT&T Communications of the Southwest, Inc. (AT&T) on August 16, 2001.

On August 2, 2001, SWBT filed an A2A Unbundled Network Element (UNE) schedule of prices which revises the entrance facility rates for DS1, DS3, OC3, and OC12 to incorporate changes made by the Kansas Corporation Commission in its Docket No. 97-SCCC-149-GIT. On August 14, 2001, SWBT filed a revised Attachment 6-UNE Pricing Appendix which changes the UNE zones, as defined in SWBTs Local Exchange Tariff, to move Rate Group 3 from UNE Zone 2 (suburban) to UNE Zone 3 (urban). The August 14th filing reclassifies eleven SWBT exchanges into the urban zone with lower UNE rates and requests Commission approval to implement the rate zone revision. SWBT recognized that this Commission has determined that it lacks jurisdiction to set UNE rates and SWBT has indicated that, as a result of that decision, it has elected to adopt UNE

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rates from another state. (See Response Affidavit of Edward K. Allis, p. 5, Transcript filed May 4, 2001, volume I, p. 370).

On August 24, 2001, the General Staff of the Arkansas Public Service Commission (Staff) filed Comments which state that the change in the UNE zone classifications may encourage facilities-based competition in communities outside of Little Rock and recommends approval of SWBT's August 14, 2001 filing. In addressing the changes to the entrance facilities' rates contained in SWBT's August 2, 2001 filing, Staff states that, during the term of the A2A, the potential exists for additional changes in the A2A and absent some public notice, the changes would not necessarily be publicly available and could result in customer discrimination. Staff cites Section 252(h) of the Federal Telecommunications Act of 1996 which requires state commissions to make agreements approved under Section 252(e) available for public inspection and copying. Staff also notes that Section 252(i) of the 1996 Act requires that local exchange carriers make services and network elements approved under that section available to other requesting telecommunications carriers upon the same terms and conditions. Staff therefore recommends that SWBT be required to provide notice to the Commission of any changes in the rates, terms and conditions of the A2A. Staff recommends that the notice be accomplished through a letter filing in Docket No. 86-033-A, referencing this docket. Staff also states that Commission approval of a filing in Docket No. 86-033-A is not necessary.

In addition to addressing the SWBT August filings, Staff's comments state that the Texas Public Utility Commission (TPUC) has approved Version 2.0 of the Business Rules for the T2A and that this Commission has relied on the TPUC review process of the Business Rules and has

indicated a desire to apply those revisions to interconnection agreements in Arkansas. Therefore, Staff recommends that the Commission direct SWBT to file Version 2.0 of the Business Rules, together with any future revisions adopted by the TPUC, in Docket 86-033-A and order that all revisions to the Business Rules be applied to all existing A2As to be effective on the same date that they become effective for the T2A.

On August 23, 2001, SWBT filed its Response to Staff's Comments. In its Response SWBT states that it "does not object to filing in this docket the compliance filing it made in Texas docket (Project 20400) on June 15, 2001, in compliance with the TPUC's Order dated June 1, 2001." SWBT does not object to filing Version 2.0 of the Business Rules in Docket 86-033-A, nor does it object to those revisions having the same effective date as the T2A and being applicable to all existing A2As. SWBT also "supports applying Version 2.0 performance measurements (which were included within that compliance filing) to all existing A2As." However, SWBT objects to filing or implementing revisions for which there is no mutual agreement between the parties and which SWBT has appealed or otherwise challenged. SWBT states that, "[B]y filing its June 15, 2001 Compliance filing in Texas in this docket, SWBT does not wave any of its rights or positions on those issues in either this or the Texas docket."

The Commission concurs with the reasoning in Staff's Comments, the Commission also understands SWBT's reluctance to file contested revisions to Version 2.0 of the Business Rules or the Performance Measurements. In the Consultation Report issued December 21, 2000, this Commission acknowledged that there are aspects of compliance with the Section 271 checklist which are regional in nature and, therefore, the Commission indicated a willingness to await the

outcome of an ongoing Texas review. (Consultation Report issued December 21, 2000 at p. 9). This Commission also noted that the operational support system functions employed in Arkansas are the same as those employed in other states. (*Id* at 17).

While the Commission agrees that SWBT should not, and will not, be required to waive any objections it may have to the Business Rules or Performance Measurements adopted by the TPUC as a result of a filing with this Commission, this Commission also believes that a uniform application of the Business Rules and Performance Measurements is appropriate on a regional basis. Therefore, changes in the Business Rules or Performance Measurements which are adopted by the TPUC should be filed with this Commission, as recommended by Staff, to be effective concurrently with the dates the changes become effective and applicable to the T2A. If SWBT challenges changes to the Business Rules or Performance Measurements before the TPUC and the changes are allowed to take effect pending a review, appeal or other disposition of the issue, SWBT should file those changes with this Commission and make the changes applicable to the A2As. If, on the other hand, the application of any proposed changes is stayed by the TPUC pending review or appeal, such a stay should be applicable to the application of the changes to the A2A. SWBT will not be assumed to have waived any objections to such changes as a result of filing such changes with this Commission.

On August 16, 2001, AT&T filed a request to include Arkansas data in a TPUC audit which will address issues related to the quality of SWBT's Loop Maintenance Operations System (LMOS) and SWBT's assessment of performance. The TPUC has indicated that it will include data from sister states upon requests by a state commission. On August 22, 2001, SWBT responded to AT&T's

Motion arguing that SWBT has engaged Ernst & Young to perform an audit of the LMOS system in conjunction with SWBT's application for interLATA authority in Arkansas. In essence, SWBT argues that inclusion of Arkansas data in the TPUC review is unnecessary and duplicative. SWBT indicates that, "if the Commission should determine that it is appropriate to review Arkansas data in conjunction with the Texas audit, SWBT will comply provided the Texas audit is not utilized as a means to delay SWBT's pending Joint Application at the FCC." On August 23, 2001, Staff filed its Response to AT&T's Motion. Staff states that it has participated in the TPUC's last six month review of SWBT's business rules and performance measures and that Staff continues to participate in these reviews. Staff states that it would help Staff's participation if Arkansas data were included in the upcoming audit. The Commission finds that it is in the public interest to include Arkansas data in the TPUC review.

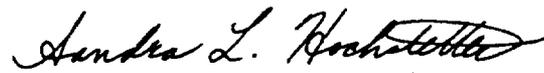
It is therefore ordered, that:

1. SWBT shall file Version 2.0 of the Business Rules and Performance Measurements, together with any future revisions made effective by the TPUC, with this Commission in Docket 86-033-A;
2. Revisions of the Business Rules and Performance Measurements filed this Commission shall have the same effective date as the T2A;
3. SWBT shall provide notice of any changes in the rates, terms and conditions of the A2A through a filing in Docket No. 86-033-A;
4. The General Staff will notify the TPUC that Arkansas desires that Arkansas-specific data be included in the upcoming Texas review; and

5. To the extent this Commission has jurisdiction to approve the SWBT filing of August 14, 2001, the filing is approved.

BY ORDER OF THE COMMISSION.

This 18 day of September, 2001



Sandra L. Hochstetter, Chairman



Betty C. Dickey, Commissioner



Lavenski R. Smith, Commissioner



Diana K. Wilson
Secretary of the Commission

I hereby certify that the following order issued by the Arkansas Public Service Commission has been served on all parties of record this date by U.S. mail with postage prepaid, using the address of each party as indicated in the official docket file.



Diana K. Wilson

Secretary of the Commission

Date

9-18-01