



December 17, 2001

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Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
TW-A325, The Portals  
445 Twelfth Street, SW  
Washington, D.C. 20554

U.S. DEPARTMENT OF JUSTICE  
FEDERAL BUREAU OF INVESTIGATION

Re: In the Matter of Applications for Consent to the Transfer of Control of Licenses and  
Section 214 Authorization from Ameritech Corporation, Transferor, to SBC  
Communications, Inc. Transferee. (CC Docket No. 98-141)

Dear Ms. Salas:

In July of 2001, the Texas PUC adopted changes to the business rules for wholesale performance measures. Prior to implementation in Texas, SBC reviewed those changes with FCC Staff in June 2001. SBC proposes to implement the updates to the Texas business rules in the Ameritech States and Connecticut, effective with January 2002 business, with necessary adaptations to reflect the differences in business conditions in those states versus Texas. In accordance with the SBC/Ameritech Carrier-to-Carrier Performance Plan (the Plan) the Chief of the Common Carrier Bureau (CCB) is to determine whether and when SBC/Ameritech shall implement business rule changes adopted by the Texas state commission in the Ameritech States and in Connecticut<sup>1</sup>. To assist the CCB in deciding how to update the Plan for the other SBC states, SBC provided updated, detailed versions of the Ameritech and SNET business rules, personalized to reflect the business conditions in those states on November 27, 2001. On December 6, 2001, SBC met with the staff of the FCC to review further proposals. Those proposals were filed with the FCC on December 12, 2001. The attached letter addressed to Mark Stone of the Commission details one additional proposal. In order to meet the proposed January 2002 implementation, SBC will need CCB approval by December 21, 2001.

Sincerely,

A handwritten signature in black ink, appearing to read "David G. Cartwright". The signature is fluid and cursive, written over a white background.

Attachment

CC: Mark Stone  
Whitey Thayer

<sup>1</sup> Merger Agreement, Attachment A, paragraph 4.

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List ABCDE

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David G. Cartwright  
Director-Federal Regulatory

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December 17, 2001

Mr. Mark Stone  
FCC Common Carrier Bureau  
Accounting Safeguards Division  
445 Twelfth Street S.W.: Room 6-C365  
Washington, D.C. 20554

Re: Performance Measurements – Version 2.0 Business Rules for Ameritech and SNET

Mark,

In order to assist the CCB in deciding how to update the Plan for the Ameritech States and Connecticut, SBC is providing updated and detailed versions of the Ameritech and SNET business rules, reflecting the business conditions in those states. SBC proposes to implement the version 2.0 changes to the business rules in the Ameritech States and Connecticut, effective with January 2002 business.

On November 16, 2001, representatives of SBC reviewed in detail with you and Whitey Thayer the draft versions of the new business rules for both Ameritech and SNET, including the version 2.0 updates. SBC provided both redlined and “accepted” versions of the edited documents on November 27, 2001.

On December 6, 2001, during the SBC / FCC Performance Measurement “Six Month Review,” Ameritech presented additional edits and clarifications. SBC provided these changes to you on December 12, 2001 in redlined and “accepted” versions.

Below, is one additional modification for SNET.

PM 13c - Add back wording regarding 8.0db loops in the Benchmark section of measure which was mistakenly deleted in the November 16, 2001 submission.

SBC proposes to implement all of these Version 2.0 changes for January 2002’s data reported in February 2002. In order to meet this ambitious target, SBC is already proceeding with its programming for the 2.0 changes listed above and the changes reported in the letter dated November 27, 2001; therefore, we would like the CCB’s approval of a final version by December 21, 2001. Assuming approval is granted by

December 21, 2001, SBC intends to implement all approved changes for January 2002 business. As with implementation of earlier changes to the business rules, if any unforeseen circumstances arise, SBC will notify the CCB. Please let me know if there is any other information you need to aid in your review. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "D. J. Whitey". The signature is written in a cursive style with a horizontal line crossing through the middle of the letters.

Attachments

Cc: Whitey Thayer

**13c. Measurement**

Trouble Report Rate - UNE

**Definition:**

The number of customer trouble reports within a calendar month per 100 UNEs.

**Exclusions:**

- **Specials and Interconnection Trunks**
- **Excludes UNE Combos captured in the POTS or Specials measurements**
- **Excludes trouble tickets that are coded to Customer Premise Equipment, Interexchange Carrier/Competitive Access Provider, and Informational**
- **Excludes DSL loops > 12Kf with load coils, repeaters, and/or excessive bridged tap for which the CLEC has not authorized conditioning unless coded to the Central Office (i.e. CLEC has indicated on order they will accept the loop "AS IS").**
- **Excludes trouble reports caused by lack of digital test capabilities on 2-wire and IDSL capable loops where acceptance testing is available and not selected by the CLEC.**

**Business Rules:**

Repair reports are entered into and tracked via WFA by trouble ticket.

Reports are counted in the month they post.

**Levels of Disaggregation:**

- **UNEs contained in the SBC SNETCT Access Tariff, and / or agreed to by the parties.**
- **DSL loops with line sharing**
- **DSL loops with no line sharing**

**Broadband service product (Note : Additional disaggregations may be required as necessary in the future)**

**Calculation:**

[Count of network trouble reports  
÷ (Total UNEs ÷ 100)]

**Report Structure:**

Reported for CLEC, all CLECs  
and SBC SNET and SBC SNET  
affiliates

**Benchmark:**

<b>Parity:</b>	<b>Retail Comparison</b>
1. 8.0 dB Loop with Test Access (FW/NFW)	POTS (Bus FW/NFW)
2. 8.0 dB Loop without Test Access (FW/NFW)	POTS (Bus FW/NFW)
3. BRI Loop with Test Access	ISDN/BRI
4. ISDN BRI Port	ISDN/BRI
5. DS1 Loop with Test Access	DS1
6. DS1 Dedicated Transport	DS1
7. Subtending Channel (23B)	DDS
8. Subtending Channel (1D)	DDS
9. Analog Trunk Port	VGPL
10. Subtending Digital Direct Combination Trunks	VGPL
11. DS3 Dedicated Transport	DS3
12. Dark Fiber	DS3
13. DSL Loops – Line Sharing	Parity with ASI SBC SNET Retail
14. DSL Loops – Non-Line Sharing	3% - No Critical z-value applies
15. Broadband DSL– Line Sharing	Parity with ASI SBC SNET Retail
16. Broadband DSL Loops – Non-Line Sharing	3% - No Critical z-value applies

**13c. Measurement**

**Trouble Report Rate - UNE**

**Definition:**

The number of customer trouble reports within a calendar month per 100 UNEs.

**Exclusions:**

- ~~—Specials and Interconnection Trunks~~
- ~~—Excludes UNE Combos captured in the POTS or Specials measurements~~
- ~~—Excludes trouble tickets that are coded to Customer Premise Equipment, Interexchange Carrier/Competitive Access Provider, and Informational~~
- ~~—Excludes loops without test access — BRI~~
- ~~—Excludes DSL loops — 12Kf with load coils, repeaters, and/or excessive bridged tap for which the CLEC has not authorized conditioning unless coded to the Central Office.~~
- ~~—Excludes PTRs~~
- ~~—Excludes trouble reports caused by lack of digital test capabilities on 2-wire and IDSL capable loops where acceptance testing is available and not selected by the CLEC.~~

- Specials and Interconnection Trunks
- Excludes UNE Combos captured in the POTS or Specials measurements
- Excludes trouble tickets that are coded to Customer Premise Equipment, Interexchange Carrier/Competitive Access Provider, and Informational
- Excludes loops without test access — BRI
- Excludes DSL loops > 12Kf with load coils, repeaters, and/or excessive bridged tap for which the CLEC has not authorized conditioning unless coded to the Central Office (i.e. CLEC has indicated on order they will accept the loop "AS IS").
- Excludes trouble reports caused by lack of digital test capabilities on 2-wire and IDSL capable loops where acceptance testing is available and not selected by the CLEC.

**Business Rules:**

Repair reports are entered into and tracked via WFA by trouble ticket.

Reports are counted in the month they post.

**Levels of Disaggregation:**

- ~~—UNEs contained in the UNE price schedule, and / or agreed to by the parties.~~
- ~~—DSL loops with line sharing~~
- ~~—DSL loops with no line sharing~~
- ~~—Broadband service product (Note : Additional disaggregations may be required as necessary in the future~~

- UNEs contained in the UNE SBC SNET CT Access Tariff price schedule, and / or agreed to by the parties.
- DSL loops with line sharing
- DSL loops with no line sharing

Broadband service product (Note : Additional disaggregations may be required as necessary in the future)

**Calculation:**  
 [Count of network trouble reports  
 ÷ (Total UNEs ÷ 100)]

**Report Structure:**  
 Reported for CLEC, all CLECs  
 and SWBT-SBC SNET and SWBT  
SBC SNET affiliates

**Benchmark:**

<u>Parity:</u>	<u>Retail Comparison</u>
1. <u>8.0 dB Loop with Test Access and</u>	<u>POTS (Res/Bus FW)</u>
<u>8.0 dB Loop without Test Access (FW)</u>	
1a. <u>8.0 dB Loop with Test Access and</u>	
<u>8.0 dB Loop without Test Access (NFW)</u>	<u>POTS (Res/Bus NFW)</u>
2. <u>5.0 dB Loop with Test Access and</u>	
<u>5.0 dB Loop without Test Access</u>	<u>Parity with SWBT</u>
<u>POTS Business</u>	
3. <u>BRI Loop with Test Access</u>	<u>ISDN/BRI</u>
4. <u>ISDN BRI Port</u>	<u>ISDN/BRI</u>
5. <u>DS1 Loop with Test Access</u>	<u>DS1</u>
6. <u>DS1 Dedicated Transport</u>	<u>DS1</u>
7. <u>Subtending Channel (23B)</u>	<u>DDS</u>
8. <u>Subtending Channel (1D)</u>	<u>DDS</u>
9. <u>Analog Trunk Port</u>	<u>VGPL</u>
10. <u>Subtending Digital Direct Combination Trunks</u>	<u>VGPL</u>
11. <u>DS3 Dedicated Transport</u>	<u>DS3</u>
12. <u>Dark Fiber</u>	<u>DS3</u>
13. <u>DSL Loops Line Sharing</u>	<u>Parity</u>
14. <u>DSL Loops Non Line Sharing</u>	<u>3% (No Critical z-value</u>
<u>applies</u>	

Broadband service product (Note : Additional disaggregations may be applied as required as necessary in the future.

<u>Parity:</u>	<u>Retail Comparison</u>
<del>1. 8db loops</del>	<del>Parity with SWBT POTS Business</del>
<del>1. 8.0 dB Loop with Test Access (FW/NFW)</del>	<del>POTS (Bus FW/NFW)</del>
<del>2. 8.0 dB Loop without Test Access (FW/NFW)</del>	<del>POTS (Bus FW/NFW)</del>
<del>2. 5.0 dB Loop with Test Access and</del>	
<del>5.0 dB Loop without Test Access</del>	<del>Parity with SWBT POTS Business</del>
<del>3. BRI Loop with Test Access</del>	<del>ISDN/BRI</del>
<del>4. ISDN BRI Port</del>	<del>ISDN/BRI</del>
<del>5. DS1 Loop with Test Access</del>	<del>DS1</del>
<del>6. DS1 Dedicated Transport</del>	<del>DS1</del>
<del>7. Subtending Channel (23B)</del>	<del>DDS</del>
<del>8. Subtending Channel (1D)</del>	<del>DDS</del>
<del>9. Analog Trunk Port</del>	<del>VGPL</del>
<del>10. Subtending Digital Direct Combination Trunks</del>	<del>VGPL</del>
<del>11. DS3 Dedicated Transport</del>	<del>DS3</del>
<del>12. Dark Fiber</del>	<del>DS3</del>
<del>13. DSL Loops – Line Sharing</del>	<del>Parity with ASI or SWBT SBC SNET</del>
<u>Retail</u>	
<del>14. DSL Loops – Non-Line Sharing</del>	<del>3% - No Critical z-value applies</del>
<del>15. Broadband DSL – Line Sharing</del>	<del>Parity with ASI or SWBT Retail SBC</del>
<u>SNET Retail</u>	
<del>16. Broadband DSL Loops – Non-Line Sharing</del>	<del>3% - No Critical z-value applies</del>