

KELLOGG, HUBER, HANSEN, TODD & EVANS, P.L.L.C.

SUMNER SQUARE
1615 M STREET, N.W.
SUITE 400
WASHINGTON, D.C. 20036-3209

(202) 326-7900

FACSIMILE:

(202) 326-7999

October 7, 2002

Ex Parte Presentation

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Application by SBC Communications Inc., et al. for Provision of In-Region, InterLATA Services in California, WC Docket No. 02-306*

Dear Ms. Dortch:

On October 4, 2002, at the request of Commission staff, SBC Communications Inc. ("SBC") conducted a tour of Pacific Bell Telephone Company's Local Service Center. The following people participated from the Commission: Pam Arluk, Daniel Shiman, and Jack Yachbes of the Wireline Competition Bureau. The following SBC representatives conducted the tour and presented an overview of Pacific's operations support systems and Local Operations Center: Christopher Lane, Robin Jones, Beth Lawson, John Scarborough, Ginger Henry, Joe Kieren, Connie McGrue, Raquel Flores, Randy Carlsen, Cynthia Timberlake, Clarisa Ang, Wilma Luna, Sandra McCright, Divina Astudillo, Christeen Griggsby, Domenic Cusolito, Greg Unger, Nina Nikolich, and Rebecca Sparks. Attached to this letter are two documents to which SBC representatives referred during the overview.

I am also attaching a recent ruling of Commissioner Geoffrey Brown regarding section 709.2 of the California Public Utilities Code.

Marlene H. Dortch
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Page 2.

In accordance with the Commission's Public Notice in this docket, DA 02-2333 (Sept. 20, 2002), SBC is filing this letter and its attachments electronically through the Commission's Electronic Comment Filing System. Thank you for your assistance in this matter.

Yours truly,



Colin S. Stretch

Attachments

cc: Renée R. Crittendon
Pam Arluk
Daniel Shiman
Jack Yachbes
Tracey Wilson
Lauren Fishbein
Brianne Kucerik
Phyllis White
Qualex International

Attachment 1

Pacific Bell's Operational Support Systems



Presented by:
Beth Lawson

OSS Overview



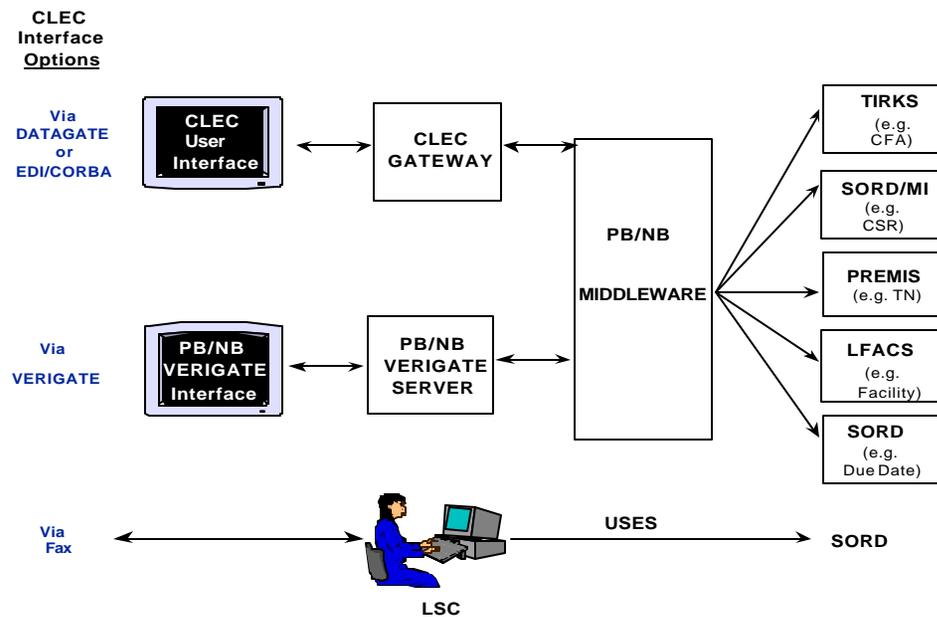
- Pre-Ordering
- Ordering/Provisioning
- Maintenance and Repair
- Billing
- CLEC Training
- CLEC Support
- Change Management Process

Pre-Ordering



- Enhanced Verigate (Web-Toolbar)
- EDI/CORBA
- DataGate

CLEC Pre-Ordering Options



Enhanced Verigate



- 13-State GUI (Web-Toolbar Platform)
 - no development required for CLECs
- Commercial volumes
 - August 2002 - 521,465 transactions
 - Cumulative (from 4/00) = 9,430,028 transactions
 - August 2002 - 92 CLECs accessing

Verigate Transactions



September 2001	223,424
October 2001	287,850
November 2001	226,559
December 2001	225,168
January 2002	283,281
February 2002	242,401
March 2002	259,862
April 2002	342,618
May 2002	346,821
June 2002	370,015
July 2002	438,716
August 2002	521,465
Total 12 Months	3,768,180

EDI / CORBA



- 13-state “Gateway” industry standard app-to-app interface
- Can be integrated with CLECs’ systems & with EDI for ordering
- Supports two structural protocols
- Commercial volumes
 - August 2002 – 1,501,733 transactions
 - Cumulative (from 1/00) – 20,674,438
 - August 2002 – 18 CLECs accessing

EDI/CORBA Transactions



September 2001	799,808
October 2001	890,846
November 2001	763,797
December 2001	802,431
January 2002	1,005,298
February 2002	920,072
March 2002	1,221,542
April 2002	1,350,826
May 2002	1,169,118
June 2002	1,035,604
July 2002	1,129,798
August 2002	1,501,733
Total 12 Months	12,590,873

Uniform DataGate

- App-to-App - can be integrated with CLEC negotiation system & EDI for Ordering
- w/LSPOR 5.0 Uniform DataGate provides parsed CSI
- Commercial volumes
 - August 2002 - 256,914 transactions
 - Cumulative (from 1/00) = 1,593,837 transactions
 - August 2002 - one CLEC accessing

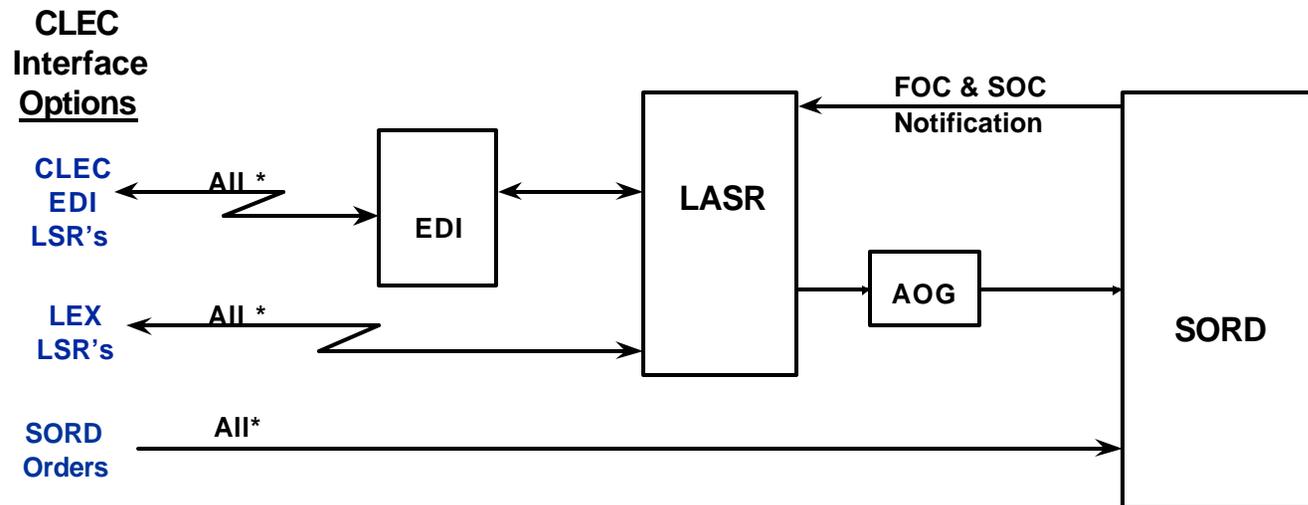
DataGate Transaction Activity

September 2001	6,802
October 2001	9,470
November 2001	11,285
December 2001	12,265
January 2002	19,964
February 2002	46,700
March 2002	57,546
April 2002	87,571
May 2002	277,224
June 2002	332,509
July 2002	365,444
August 2002	256,914
Total 12 Months	1,483,694

Ordering / Provisioning

- LEX - LSR EXchange System
(WEB-Toolbar)
- EDI - Electronic Data Interchange
- SORD - Service Order Retrieval
and Distribution

CLEC Ordering Options



* NOTE: Denotes all types of orders Resale & UNE

LEX



- 13-state GUI (Web-Toolbar platform) – no development required for CLECs
- Based upon national OBF / LSR guidelines
- Commercial volumes
 - August 2002 - 75,648 service orders
 - Cumulative (from 1/00) - 1,596,832 service orders
 - August 2002 - 81 CLECs accessing

LEX Service Order Activity

September 2001	42,633
October 2001	48,403
November 2001	44,903
December 2001	45,000
January 2002	51,417
February 2002	46,953
March 2002	45,027
April 2002	50,690
May 2002	55,992
June 2002	52,670
July 2002	64,147
August 2002	75,648
Total 12 Months	623,483

EDI



- 13-state “Gateway” app-to-app that can be integrated with DataGate or EDI / CORBA
- Conforms to OBF/TCIF national guidelines
- Commercial volumes
 - August 2002 - 391,735 service orders
 - Cumulative (from 1/00) - 6,082,348 service orders
 - August 2002 - 60 CLECs accessing

EDI Service Order Activity

September 2001	207,968
October 2001	229,471
November 2001	201,312
December 2001	207,950
January 2002	234,925
February 2002	222,949
March 2002	207,970
April 2002	270,056
May 2002	324,442
June 2002	284,996
July 2002	349,606
August 2002	391,735
Total 12 Months	3,133,380

Maintenance and Repair



- EBTA - 13-state GUI system on Web-Toolbar
- EBTA - App-to-App
- TBTA - 7-state GUI system on Web-Toolbar

Maintenance and Repair EBTA GUI/App-to-APP

January 2002	251,779
February 2002	299,078
March 2002	369,738
April 2002	417,665
May 2002	537,358
June 2002	730,543
July 2002	1,021,087
August 2002	1,092,846
Total 8 Months	4,720,094

Billing



- EDI - Electronic Data Interchange
- BDT - Bill Data Tape
- Usage Extract - (Exchange Message Interface)

CLEC Training

- 13-state CLEC OSS Training
 - 11 Classes
 - 19 Workshops
 - 51.5 Total Days for Classes and Workshops
 - CLEC Online Website - CLEC Education Comprehensive Listings, Summary Description and Schedule

CLEC Support



- Local Service Center (LSC)
- Local Operations Center (LOC)
- Account Team
- CLEC OSS Training Organization
- IS Call Center
- Mechanized Customer Production Support Center (MCPSC)
- OSS CLEC Support (OSSCS)
- CLEC Online Website

Change Management Process

- 13-state CMP reviewed by FCC in Arkansas/Missouri 271 application
- Monthly 13-state CMP meetings
- Monthly regional CLEC User Forum meetings
- Versioning
- Test Environment

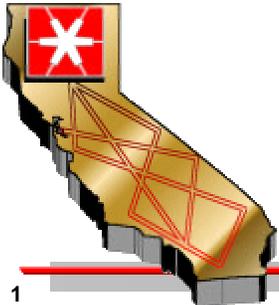
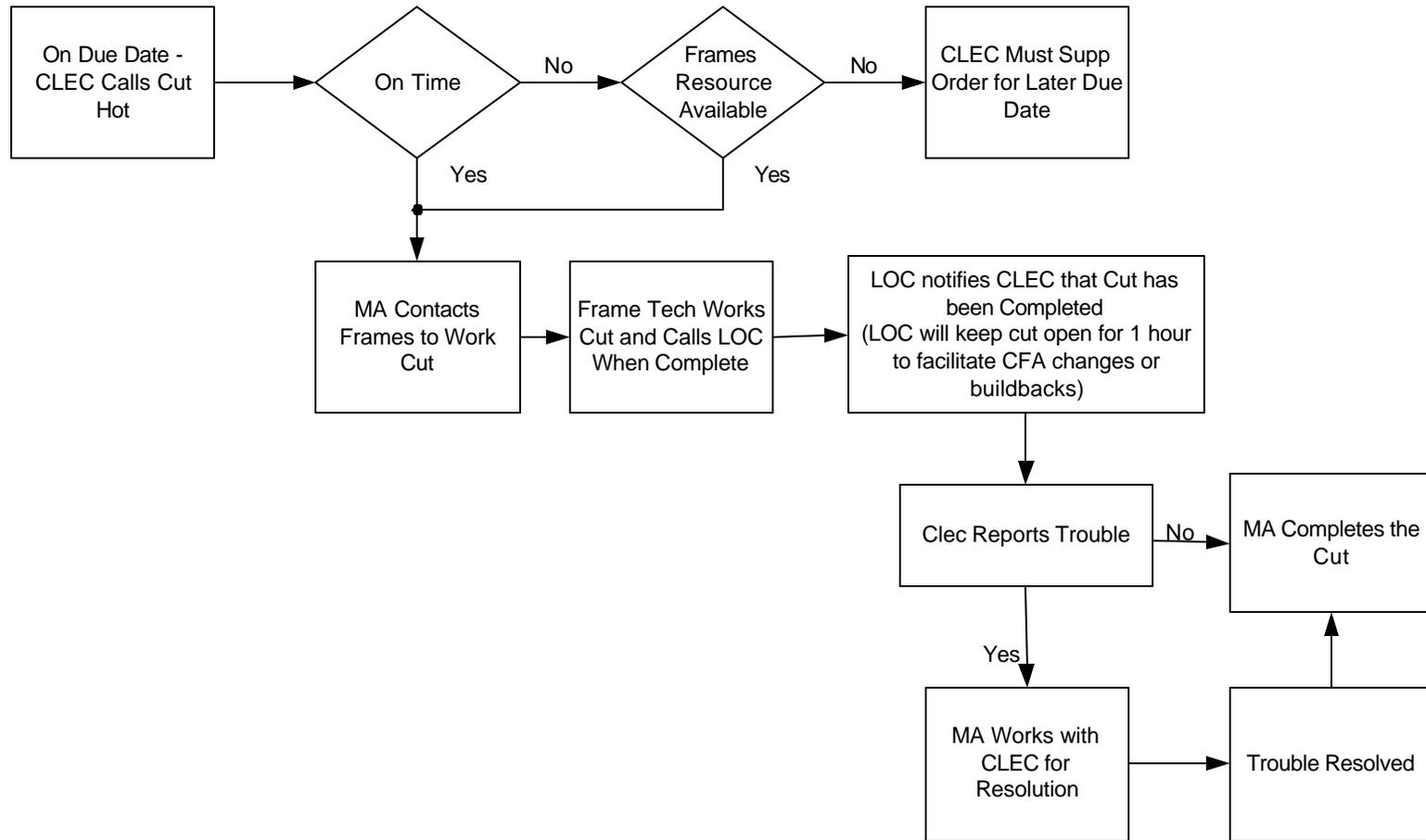
OSS Demo



- Enhanced Verigate – WEB GUI
- LEX – WEB GUI
- EBTA – WEB GUI
- CLEC Online Website

Attachment 2

TBCC: Day Of Cut Process



Attachment 3

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Rulemaking on the Commission's Own Motion to Govern Open Access to Bottleneck Services and Establish a Framework for Network Architecture Development of Dominant Carrier Networks.	Rulemaking 93-04-003
Investigation on the Commission's Own Motion into Open Access and Network Architecture Development of Dominant Carrier Networks.	Investigation 93-04-002
Order Instituting Rulemaking on the Commission's Own Motion Into Competition for Local Exchange Service.	Rulemaking 95-04-043
Order Instituting Investigation on the Commission's Own Motion Into Competition for Local Exchange Service.	Investigation 95-04-044

**ASSIGNED COMMISSIONER'S RULING ON CONCLUDING
THE CALIFORNIA PUBLIC UTILITIES CODE
SECTION 709.2 INQUIRY**

On September 19, 2002, in Decision (D.) 02-09-050, this Commission issued its assessment of Pacific Bell's (Pacific) compliance with 47 U.S.C. § 271(c)(2) (Section 271). Included with the evaluation of Section 271 was the Commission's analysis of Pacific's satisfaction of California Public Utilities (Pub. Util.) Code § 709.2. The Commission affirmatively made only one of the four § 709.2(c)

determinations that are required before it can implement any orders authorizing or directing competition in intrastate interexchange telecommunications. The decision found that Pacific had “failed to show that there is no substantial possibility of harm to the competitive intrastate interexchange telecommunications market by its long distance entry in California.” D.02-09-050, *mimeo.*, at 261. It further found that the two remaining determinations could not be made on the existing record.

As I stated on September 19, the Commission intends to move forward and promptly complete its § 709.2(c) appraisal. There is no value in having this chapter of the Section 271 docket remain open and unresolved beyond the end of this quarter. Thus, I believe that it is now imperative to assess the record developed in this proceeding and determine whether or not there is a need to further augment it in order to conclude the § 709.2(c) inquiry.

Considering and reviewing the volume of data that has already been submitted in this matter on the § 709.2(c) issue, my preliminary evaluation is that the beneficial effect of further proceedings or additional rounds of briefings will be significantly outweighed by the time and resources that will be consumed in the process. D.02-09-050 affirmed existing mechanisms, such as federal and state commission auditing requirements and the performance incentive plan, to protect the California local exchange and interexchange telecommunications markets, and specifically crafted additional safeguarding measures in response to the problems and concerns identified in the § 709.2(c) inquiry. I believe that these mechanisms and safeguards sufficiently mitigate current and potential harm to the intrastate interexchange telecommunications market and make it possible for the Commission to proceed now and make the outstanding necessary determinations under § 709.2(c).

To assist the Commission in this regard, I would like the parties to consider the existing record, and address the following issues:

- 1.) Are further proceedings required before the Commission concludes its § 709.2(c) appraisal? If so, what outstanding issues need to be addressed?
- 2.) Can the performance incentives as well as the existing and specifically crafted § 709.2(c) safeguards mitigate present and potential competitive harms? If not, what additional measures are needed?
- 3.) How long should continuing safeguards, such as the joint marketing protections, be applied to Pacific?
- 4.) Do the determinations that the Commission makes pursuant to § 709.2(c) constitute discrete findings at the point of Pacific's entry into the intrastate interexchange telecommunications market or ongoing obligations?

Thus, **IT IS RULED** that:

1. The interested parties shall address the above-stated issues on or before the close of business, October 15, 2002.
2. Responses shall not exceed twenty pages double-spaced.
3. Commenters shall also electronically mail their submissions to the service list.

Dated October 4, 2002, at San Francisco, California.

/s/Geoffrey F. Brown

Geoffrey F. Brown
Assigned Commissioner

CERTIFICATE OF SERVICE

I certify that I have by mail this day served a true copy of the original attached Assigned Commissioner’s Ruling on Concluding the California Public Utilities Code Section 709.2 Inquiry on all parties of record in this proceeding or their attorneys of record.

Dated October 4, 2002, at San Francisco, California.

/s/ Antonina V. Swansen
Antonina V. Swansen

N O T I C E

Parties should notify the Process Office, Public Utilities Commission, 505 Van Ness Avenue, Room 2000, San Francisco, CA 94102, of any change of address to insure that they continue to receive documents. You must indicate the proceeding number on the service list on which your name appears.

The Commission’s policy is to schedule hearings (meetings, workshops, etc.) in locations that are accessible to people with disabilities. To verify that a particular location is accessible, call: Calendar Clerk (415) 703-1203.

If specialized accommodations for the disabled are needed, e.g., sign language interpreters, those making the arrangements must call the Public Advisor at (415) 703-2074, TTY 1-866-836-7825 or (415) 703-5282 at least three working days in advance of the event.