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SBC

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

October 2, 2003

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW, Room TW-A325
Washington, D.C. 20554

Re: SBC-Ameritech Merger Order, CC Docket No. 98-141

Dear Ms. Dortch

SBC Communications Inc. is filing the attached letter sent to Carol Matey, Deputy Chief, Wireline Competition Bureau on October 2, 2003. The attached letter requests the staff approval to shift the implementation date of the Version 3.0 Texas Business Rules, line-splitting disaggregation for SBC Midwest and SBC SNET.

Sincerely

Attachment

cc: William Dever, WCB
Dennis Johnson, WCB

See Letter from Carol E. Matey, Deputy Chief, Wireline Competition Bureau, to Michelle A. Thomas, Executive Director-Federal Regulatory, SBC Telecommunications, Inc., CC Docket No. 98-1414 (filed July 14, 2003). The Texas Business Rules only apply to Ameritech and SNET. California and Nevada follow the California Business Rules.

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FEDERAL COMMUNICATIONS COMMISSION
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October 2, 2003

Ms. Carol E. Mattey
Deputy Chief
Wireline Competition Bureau
Federal Communication Commission
445 Twelfth Street, S.W., Room 5C-450
Washington, DC 20554

RE: SBC-Ameritech Merger Order, CC Docket No. 98-141

Dear Ms. Mattey:

SBC Communications Inc. (SBC) respectfully requests that the Wireline Competition Bureau (WCB) approve modifying the scheduled implementation date for the line splitting disaggregations of the Version 3.0 Texas Business Rules in the SBC Midwest and SBC SNET regions. SBC requests permission to implement these disaggregations effective with December 2003 results reported January 20, 2004 for the provisioning and maintenance measures in the SBC SNET region. SBC also requests that the requirement to report line splitting disaggregations for the maintenance measures scheduled for the September 2003 results in the SBC Midwest region be waived.

On October 17, 2002, the Texas Commission approved modifications to SBC's Texas 271 performance measurements (PMs). Subsequently, SBC filed Version 3.0 PM Business Rules and Implementation Schedules for SBC Midwest and SBC SNET with the WCB on March 13, 2004. On July 14, 2003, the WCB granted SBC's request to apply the Version 3.0 Texas Business Rules.

Per the approved implementation schedule, SBC agreed to implement additional line splitting disaggregations under existing measures in the SBC Midwest and SBC SNET region beginning with September 2003 results which are reported in the October 20th filing. However, during implementation, SBC Midwest and SBC SNET encountered significant programming problems in developing a method for existing systems to identify line splitting services. The effort to collect line splitting data has taken much

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Per the SBC-Ameritech Merger Conditions, PM reporting for SBC Midwest sunsets with September 2003 data reported October 20, 2003.

longer than anticipated.[1] Therefore, with your approval, SBC would like to revise the implementation schedule for identifying and tracking the line splitting disaggregations.

Due to the imminent implementation date, SBC would appreciate your immediate attention to this matter. I am available to discuss this further if you have any questions regarding this request.

Sincerely,

cc: William Dever, WCB
Dennis Johnson, WCB
Pete Young, LB

[1] The difficulty surrounding identification of line splitting for provisioning and maintenance measures is due to having 2 or more CLECs involved in a single transaction. In order to report line splitting for provisioning, a method using project codes to associate the data and voice orders into a unique transaction will be implemented. This is already in effect for SBC Midwest and will be used to report September 2003 results on time for the provisioning measures. A comparable method for maintenance will not be available to SBC Midwest in time to report September 2003 results. Any incidence of trouble on a line splitting account reported by a CLEC will continue to be tabulated in either the analog port or UNE DSL maintenance submeasures.

SBC SNET will have methods in place for both provisioning and maintenance on December 1, 2003. There is no harm to the CLECs in Connecticut since there has been no line splitting activity in the SBC SNET region during 2003.

The above request affects only the "DSL Loops with line splitting" disaggregations for PMs 4c, 5c, 6c, 7c, 8 and 12c. All other changes associated with the Version 3.0 Texas business rules implementation have been completed.