



Jay Bennett
Executive Director-
Federal Regulatory

SBC Telecommunications, Inc.
1401 I Street, N.W., Suite 1100
Washington D.C. 20005
Phone 202 326-8889
Fax 202 408-4806

June 29, 2004

Via Electronic Submission

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
TW-A325-Lobby
Washington, D.C. 20554

RE: Memorandum of Ex Parte Communication
CC Docket No. 01-338, Review of the Section 251 Unbundling Obligations of
Incumbent Local Exchange Carriers
CC Docket No. 96-98, Implementation of the Local Competition Provisions in the
Telecommunications Act of 1996
CC Docket No. 98-147, Deployment of Wireline Services Offering Advanced
Telecommunications Capability

Ms. Dortch:

On June 28, 2004, John Lenahan, James C. Smith, Jim Lamoureux, Tom Hughes and the undersigned met with Wireline Competition Bureau Chief William Maher, Michelle Carey, Russ Hanser, Jeremy Miller, Robert Tanner and Tom Navin. SBC described OSS enhancements and its voluntary batch hot cut process, all to be effective on July 24, 2004. The attached materials were discussed during the meeting.

We are submitting the original and one copy of this Memorandum to the Secretary in accordance with Section 1.12 of the Commission's rules. Please include a copy of this submission in the record of the above-listed proceedings. Also, please stamp and return the provided copy to confirm your receipt. You may contact me at (202) 326-8889 should you have any questions.

Sincerely,

/s/ Jay Bennett

Attachment

CC: W. Maher
M. Carey
R. Hanser
J. Miller
R. Tanner
T. Navin



Batch Hot Cut Process & OSS Enhancements

June 28, 2004

Basic Hot Cut

- A hot cut is the physical transfer of a customer's loop from the ILEC switch to the CLEC switch
 - Required whether end-user is served via:
ILEC retail line, UNE-P or resale
- The hot cut process consists of:
 - The CLEC requests a time and issues an LSR
 - SBC issues an order and an FOC
 - SBC does preliminary work (e.g., pre-wiring, testing)
 - SBC completes its work on the assigned due date

SBC's Existing Offerings: Frame Due Time & Coordinated Hot Cuts

- SBC offers two alternatives for the provisioning of unbundled “hot cut” loops:
 - Coordinated Hot Cut (CHC) process
 - Communication between CLEC & SBC during the process
 - CLEC initiates start of cutover process
 - SBC confirms completion of cutover with CLEC
 - Frame due time (FDT) process
 - Designated time agreed to by CLEC and SBC
 - Clock initiates start of cutover process

OSS Enhancements (7/24/04 Release)

- Pre-Order and Ordering OSS Enhancements
 - Real time IDLC Validation
 - Schedule Inquiry/Reservation availability
 - 24 hour advance reservations
- Provisioning Website Enhancements
 - A CLEC-specific web-based reporting tool
 - Allows users to view the status of their hot cut orders
 - Enhancement gives CLECs real time testing results
 - Dial Tone/ Automatic Number Identification testing
 - Performed on Due Date minus two

Overview of Batch Hot Cut Process

Enhanced Daily Process: New Acquisitions

- No limitations on the number of LSRs a CLEC may submit
- Existing provisioning intervals continue to apply
- CLECs select due date with reservation tool
- Revised per-line rate structure

Defined Batch Process: Conversions and New Acquisitions

- Batch size:
 - 1 to 100 lines per day, per CLEC, per central office
 - 200 lines per central office per day, for all CLECs
- Standard provisioning interval is thirteen business days
- Cut timeframes:
 - Normal business hours for DSO loops -- 20 lines per hour
 - Out of hours weekday and Saturday cut -- 25 lines per hour

Bulk Projects: New Acquisitions or Embedded Base Conversion

- Available for projects of 100 or more lines

Note: CHC and FDT are available with each offering

Benefits to CLECs

- Expanded provisioning availability
 - off-hours & Saturdays
- Time sensitivity in rates is eliminated
- Rate reductions in most states
- Additional options
 - existing processes remain
- Batch size is 100 lines per day
 - per CLEC, per office
- Predictable and scaleable

Timeframes for Performing Hot Cuts

OPTION	Monday - Friday 12 AM – 6 AM	Monday - Friday 6 AM – 8 AM	Monday - Friday 8 AM – 5 PM	Monday - Friday 5 PM – 12 AM	Saturday 12 AM – 8 AM	Saturday 8 AM – 5 PM
Frame Due Time (“FDT”)			√			
Coordinated Hot Cut (“CHC”)			√			
Batch Hot Cut Enhanced FDT			√			
Batch Hot Cut Enhanced CHC			√			
Batch Hot Cut Defined FDT		√	√			
Batch Hot Cut Defined CHC		√	√	√		√
Batch Hot Cut Bulk FDT	√	√	√	√	√	√
Batch Hot Cut Bulk CHC	√	√	√	√	√	√

Note: Sundays are exempt due to industry number porting constraints

Trap & Trace

- CLECs can capture “test call” info when SBC performs a hot cut
 - Could eliminate the manual notification step that is now done after a CHC
 - Immediate, automated notice at its switch that the cut was complete
 - Reduced interval when the end user cannot receive incoming calls following cut over
 - CLEC could port the customer’s number immediately after completion of the cut without awaiting call from SBC