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July 8, 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

Dear Ms. Dortch:

Today a copy of the attached Accessible Letter was electronically provided to Michelle Carey. The letter, which SBC released yesterday, describes SBC's OSS enhancements and voluntary batch hot cut process. These offerings will be effective on July 24, 2004.

In accordance with FCC Rule 1.1206(b)(1) of the Commission's rules, this letter is being filed electronically with your office for inclusion in the public record. Please contact me at (202) 326-8889 should you have any questions.

Sincerely,

/s/ Jay Bennett

Attachment

CC: M. Carey



Date: **July 7, 2004**

Number: **CLECALL04-112**

Effective Date: **July 24, 2004**

Category: **All**

Subject: **(BUSINESS PROCESSES) Batch Hot Cut Process for Coordinated Hot Cut**

Related Letters: **N/A**

Attachment: **Yes**

States Impacted: **All States**

Issuing SBC ILECS: **SBC Illinois, SBC Indiana, SBC Ohio, SBC Michigan, SBC Wisconsin, SBC California, SBC Nevada, SBC Arkansas, SBC Kansas, SBC Missouri, SBC Oklahoma, SBC Texas and SBC Connecticut (collectively referred to for purposes of this Accessible Letter as "SBC 13-State")**

Response Deadline: **July 14, 2004**

Contact: **CLEC User Forum Mailbox at sbccuf@camail.sbc.com**

Conference Call/Meeting: **N/A**

The purpose of this Accessible Letter is to announce new, voluntary Batch Hot Cut (BHC) Process Options associated with Coordinated Hot Cuts (CHC), Frame Due Time (FDT) and Integrated Digital Loop Carrier (IDLC) cutovers. SBC 13-State is making these processes available to realize the benefits of the industry discussions over the past year surrounding batch hot cuts. SBC 13-State feels that moving forward with a uniform multi-regional voluntary offering of these process options is in the best interest of its CLEC customers, their end users, and SBC 13-State. These process options will be available effective July 24, 2004, in the entire service territory of SBC in California, Midwest region and Southwest region. Nevada will be added at a later date and in Connecticut a comparable process will be implemented upon request.

While the existing CHC and FDT options will remain in place, new batch hot cut options will now include an:

Enhanced Daily Process: -

- For New Customer Acquisitions - Change in carrier using SBC 13-State's switch.
 - UNE-P to UNE-L w/LNP different CLEC
 - Resale to UNE-L w/LNP different CLEC
 - SBC Retail to UNE-L w/LNP

For additional information including details on applicable hours, quantities, process flow charts, etc., please see SBC's CLEC-On-Line at <https://clec.sbc.com/clec/> by July 21, 2004 under title: Batch Hot Cut. (If CLEC-On-Line is updated sooner an Accessible Letter will advise).

Defined Batch Process:

- Embedded Base Migrations - Same customer and carrier, new switch
 - UNE-P to UNE-L w/LNP same CLEC
 - Resale to UNE-L w/LNP same CLEC
- New Customer Acquisitions¹

¹ This option will not apply to Michigan, based on the Michigan Public Service Commissions (MPSC's) June 29, 2004 Order in Case No. U-13891 that requires modification to SBC's proposal to comply with the requirements of MPSC

- UNE-P to UNE-L w/LNP different CLEC
- Resale to UNE-L w/LNP different CLEC
- SBC Retail to UNE-L w/LNP

For additional information including details on applicable hours, quantities, process flow charts, etc., please see SBC's CLEC-On-Line at <https://clec.sbc.com/clec/> by July 21, 2004 under title: Batch Hot Cut. (If CLEC-On-Line is updated sooner an Accessible Letter will advise).

Bulk Project Process:

- New Customer Acquisitions
- Embedded Base Migrations
- Migrations of 101 plus lines
- Migrations of a single end user with 20 + lines

Orders for the Bulk project process will have negotiated due dates, flexible scheduling and will include coordinated hot cut and frame due time orders, as well as requests for high order volume conversions. Sunday due dates will be exempt due to industry number porting constraints

For additional information including details on applicable hours, quantities, process flow charts, etc., please see SBC's CLEC-On-Line at <https://clec.sbc.com/clec/> by July 21, 2004 under title: Batch Hot Cut. (If CLEC-On-Line is updated sooner Accessible Letter will advise).

The existing applicable Regional processes for: pre-cut jeopardy notification, throwback (loop with LNP) and completion for E911/CNAM/LIDB/directory listings will remain in place and be applicable to the above BHC processes.

The new tools listed below will also be implemented with the batch hot cut offerings. The reservation tool will allow CLECs to self select and then reserve a conversion time (provided via a reservation identification number) for their batch hot cut orders. The IDLC validation tool will allow CLECs to query on line the type of facility servicing the end user. Detailed information about these tools can be found on SBC's CLEC-On-Line web site at <https://clec.sbc.com/clec/> by July 21, 2004 under title: Batch Hot Cut.

- Pre-order Reservation Tool
- Pre-order Integrated Digital Loop Carrier (IDLC) Validation Tool
- Provisioning Web Site (PWS) enhancements (i.e. provide CLECs the ability to view real-time order completion)

The above options will be available on Request Type A and B, Activity V and are designed for voice only Mass Market Customers served by Voice Grade loops.

The new options will be provided at state-specific per line rates, based on the process used and the time and day of the cutover.² Because the options are new, carriers who wish to utilize them must amend their Interconnection Agreement (ICA). Any CLEC that places orders using any of the BHC processes outlined that has not executed an ICA amendment, will be deemed to have agreed to all rates, terms and conditions of SBC 13-State's offering as set forth in its proposed amendment. CLECs should contact their Account Manager to incorporate the amendment into their interconnection agreement. A copy of the proposed "Optional Batch Hot Cut Process

service quality rule 58. SBC Michigan is filing a federal court challenge to the legality of the MPSC Order of June 29, 2004 in Case No. U-13891 and this offering are without wavier of SBC Michigan's legal challenge and subject to revision at the conclusion of that challenge.

² Michigan prices are interim per MPSC June 29, 2004 Order and will be subject to true-up.

Amendment," and state specific prices can be found on the SBC's CLEC-On-Line at <https://clec.sbc.com/clec> by July 21, 2004 under title: Batch Hot Cut. (If CLEC-On-Line is updated sooner an Accessible Letter will advise).

Please contact your Account Manager with questions. CLECs may send comments on this Accessible Letter to the CUF Mailbox through July 14th.