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December 2, 2004

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TWB-204
Washington, DC 20554

RE: CG Docket No. 02-386, Rules and Regulations Implementing Minimum
Customer Account Record Exchange Obligations on all Local and
Interexchange Carriers

Dear Ms. Dortch:

SBC Communications ("SBC") respectfully submits this *ex parte* in the above-referenced proceeding in response to the *ex parte* presentation of BellSouth filed on October 29, 2004. In its *ex parte*, BellSouth discussed the need for information exchange requirements for local-to-local carrier changes and urged the Commission to expeditiously issue a Further Notice of Proposed Rulemaking in order to develop a complete record to support the adoption of minimum standards. SBC supports BellSouth's proposal that a Further Notice be issued to address this problem.

Today, our customers' ability to choose a local service provider is diminished when they are unable to move their service from one local service provider to another in a reasonable amount of time. The competitive local market is jeopardized as well if customers can't move back and forth between carriers because the old local service provider is not releasing the customer's telephone number and loop facilities to the newly selected local provider.

SBC has discussed this problem with a number of Public Service Commissions' staff in our Midwest region. The Michigan Public Service Commission staff has held collaborative meetings between local service providers to initiate the development of migration rules. The Texas and Illinois Commissions have also implemented rules to help the consumers migrate their services in a timely and seamless manner.

SBC urges the Commission to issue a Further Notice of Proposed Rulemaking to explore the problems that local service providers have with obtaining access to customer account information when customers switch providers.

If you have any questions, please contact the undersigned at 202-326-8843.

Sincerely,

/s/ Toni R. Acton

cc: J. Keithley
L. Boehley
E. McMahon