

FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

Adopted: August 10, 2001  
Released: August 13, 2001

Ms. Sandra L. Wagner  
Vice President, Federal Regulatory  
SBC Telecommunications, Inc.  
1401 I Street, N.W.  
Suite 1100  
Washington, DC 20005

RE: *SBC/Ameritech Merger Order*, CC Docket No. 98-141, ASD File No. 99-49

Dear Ms. Wagner:

This letter addresses the process for developing uniform business rules for completing local service requests submitted by competitive local exchange carriers (“CLECs”) pursuant to the *SBC/Ameritech Merger Order*.<sup>1</sup> As explained below, I grant the request of SBC Communications, Inc.’s (“SBC”) and the CLECs for a limited extension of time to conclude their collaborative sessions.

The *SBC/Ameritech Merger Order* requires SBC to develop jointly with CLECs, and deploy throughout its service territory, uniform business rules for completing CLEC local service requests.<sup>2</sup> Like the requirements for improving SBC’s operations support systems (“OSS”), the requirement to develop and deploy uniform business rules follows a three-phase approach that begins with a publicly-available Plan of Record (“Business Rules Plan of Record”) describing SBC’s overall plan.<sup>3</sup> After completing the Phase I requirements on April 30, 2001, SBC entered into the Phase II collaborative sessions with CLECs and eventually submitted a revised Business Rules Plan of Record and list of open issues on May 30, 2001.

Under the *Merger Conditions*, the Bureau can extend the Phase II collaborative sessions, authorize arbitration of the open issues, or require SBC to implement the Business Rules Plan of Record. Two CLECs, AT&T Corporation (“AT&T”) and WorldCom, Inc. (“WorldCom”), request an extension of time

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<sup>1</sup> Applications of Ameritech Corp., Transferor, and SBC Communications, Inc., Transferee, For Consent to Transfer Control of Corporations Holding Commission Licenses and Lines Pursuant to Sections 214 and 310(d) of the Communications Act and Parts 5, 22, 24, 25, 63, 90, 95, and 101 of the Commission’s Rules, CC Docket 98-141, *Memorandum Opinion and Order*, 14 FCC Rcd 14712 (1999) (“*SBC/Ameritech Merger Order*”), *appeal pending sub nom.*

<sup>2</sup> *SBC/Ameritech Merger Order* at Appendix C, para. 31.

<sup>3</sup> *SBC/Ameritech Merger Order* at Appendix C, para. 31(a) (specifying a deadline of 150 days after the completion of the Phase 2 collaborative sessions required by paragraph 28); *see* Letter from Carol E. Matthey, Deputy Chief, Common Carrier Bureau, FCC to James W. Calloway, Group President – SBC Services, Inc., DA 00-2172 (rel. Sept. 22, 2000) (concluding the Phase 2 collaborative sessions required by paragraph 28).

to hold additional collaborative sessions, and SBC concurs with these requests.<sup>4</sup> In addition, AT&T requests action from the Bureau, including an interpretation of the term “business rule,” clarification of the permissible exclusions from the uniformity requirements, and clarification about the inclusion of certain ordering codes in the Business Rules Plan of Record.<sup>5</sup>

On July 10, 2001, SBC, AT&T, and Worldcom met with the Bureau staff to discuss the status of the Business Rules Plan of Record, the recommendations for moving forward, and the impact of other activities on the process (e.g., the development of uniform and enhanced OSS pursuant to the *Merger Conditions*). At that meeting, SBC and the CLECs agreed upon the need for additional collaborative sessions and the work steps that were needed before reaching final agreement on the Business Rules Plan of Record.

Based on the staff’s discussions with SBC and the CLECs, I understand that additional collaborative sessions will provide an opportunity to further refine the Business Rules Plan of Record. In addition, I understand that, by August 31, 2001, SBC will provide information to the CLECs that is needed for productive discussions of business rules in the on-going collaborative sessions.<sup>6</sup> Moreover, I understand that SBC and the CLECs have resolved several issues raised in AT&T’s letter; in particular, the parties have agreed to working definitions for “business rules” for use in the upcoming collaborative sessions. Because the parties agree that the additional collaborative sessions will facilitate the implementation of SBC’s Business Rules Plan of Record, I grant an extension of time for additional collaborative sessions. Based on this extension, Phase II will end on October 19, 2001.

Please do not hesitate to contact me if I can be of further assistance. You may also contact Anthony Dale in the Common Carrier Bureau at (202) 418-2260 for further information on this matter.

Sincerely,

Carol E. Matthey  
Deputy Chief, Common Carrier Bureau

CC: Robert Quinn, AT&T Corporation  
Dennis Guard, WorldCom, Inc.

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<sup>4</sup> Letter from Robert W. Quinn, Jr., Vice President, AT&T Corporation to Dorothy Attwood, Chief, Common Carrier Bureau, FCC (Jun. 12, 2001) (“*AT&T Letter*”); Letter from Dennis W. Guard, Associate Counsel, WorldCom, Inc. to Dorothy Attwood, Common Carrier Bureau, FCC (Jun. 6, 2001).

<sup>5</sup> *AT&T Letter* at 3-7.

<sup>6</sup> At the July 10, 2001 meeting, SBC and the CLECs explained that certain documents prepared in the process for SBC’s deployment of uniform and enhanced OSS were needed before starting additional collaborative sessions on the Business Rules Plan of Record. These documents include SBC’s Local Service Ordering Requirements, its Local Service Pre-Ordering Requirements, and the “issues list” arising from meetings between SBC and the CLECs in July and August 2001.