

**FEDERAL COMMUNICATIONS COMMISSION**  
**Washington, D.C. 20554**

Adopted: October 18, 2001

Released: October 19, 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. On August 13, 2001, the Bureau granted a limited extension of time to allow SBC to provide certain information to the CLECs and for the parties to meet and confer regarding the Business Rules Plan of Record.<sup>4</sup>

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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*").

<sup>2</sup> *Id.* at Appendix C, para. 31.

<sup>3</sup> *Id.* 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).

<sup>4</sup> Letter from Carol E. Matthey, Deputy Chief, Common Carrier Bureau, FCC to Sandra L. Wagner, Vice President, SBC Telecommunications, Inc., DA 01-1915 (rel. Aug. 13, 2001). The information included 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.

On October 5, 2001, SBC submitted a letter detailing its agreement with the CLECs regarding modifications to the timeline for implementing the Business Rules Plan of Record.<sup>5</sup> In its letter, SBC requests a limited extension of time to complete certain activities before starting the Business Rules collaborative sessions. SBC agreed, among other things, to provide the necessary documentation by October 19, 2001, schedule a walk-through with the CLECs shortly thereafter, complete the collaborative sessions by November 16, 2001, and file a revised Business Rules Plan of Record (with a list of any disputed issues) by November 19, 2001. SBC anticipates completing the next phase, i.e., implementation of the Business Rules Plan of Record, within seventeen months of the end of Phase II.<sup>6</sup> The CLECs have orally indicated to Bureau staff that they support the request because an extension would afford SBC time to correct problems with its existing documentation and because SBC plans to complete its deployment according to its original schedule.

Based on the staff's discussions with SBC and the CLECs, I understand that additional time will provide the parties an opportunity to meet and confer regarding SBC's Business Rules Plan of Record. In addition, I understand that both SBC and the CLECs reserve their rights to address issues relating to the deployment schedule that arise in the forthcoming collaborative sessions.<sup>7</sup> Because the parties agree that the additional time 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 November 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>5</sup> Letter from Michelle A. Thomas, Executive Director, SBC Telecommunications, Inc. to Dorothy Attwood, Chief, Common Carrier Bureau, FCC at 1 (Oct. 5, 2001) ("*SBC October 5, 2001 Letter*").

<sup>6</sup> *Id.* SBC basically proposes to maintain the 18-month deployment schedule based on the October 19, 2001 end date of Phase II established in the Bureau's August 13, 2001 letter.

<sup>7</sup> In its letter, SBC states that it reserves the right to argue in the future that the final implementation deadline should change and that the CLECs reserve the right to argue to the contrary. *Id.* at 2.