

FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

March 7, 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*.¹ As explained below, I grant SBC Communications, Inc.’s (“SBC”) request for a limited extension of time to submit a publicly-available Business Rules Plan of Record and to seek comments from CLECs on the plan before starting 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.² 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. The *Merger Conditions* require SBC to submit the Business Rules Plan of Record no later than February 19, 2001, i.e., 150 days after completing the second phase in the development of uniform and enhanced OSS.³

¹ 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.*

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

³ *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).

SBC has requested a limited extension of time in order to complete certain collaborative sessions scheduled as part of its plan to implement uniform and enhanced OSS.⁴ SBC explains that the quality and completeness of the Business Rules Plan of Record depend upon resolving certain issues during the additional collaborative sessions. I understand further that CLECs do not object to the requested limited extension of time. Because the additional time will facilitate SBC's preparation of the Business Rules Plan of Record, I grant SBC's request for additional time. Based on this extension, the applicable deadline under the *Merger Conditions* is March 28, 2001 for submission of the Business Rules Plan of Record.

In addition, Worldcom has requested an additional thirty-day period to comment on SBC's proposed Business Rules Plan of Record. Worldcom explained to the staff that this additional comment period would provide the time needed for CLECs to fully analyze the Business Rules Plan of Record and prepare for the upcoming collaborative sessions. A thirty-day comment period before starting the collaborative sessions would mirror the approach used for the previous collaborative sessions.⁵ I understand further that other CLECs support Worldcom's request and that SBC does not object to such an extension. I therefore grant Worldcom's request. Based on this extension, the Phase 2 collaborative sessions will not begin until April 30, 2001.⁶

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: Dennis Guard, Worldcom, Inc.

⁴ Letter from Sandra L. Wagner, Vice President, SBC Telecommunications, Inc., to Magalie Roman Salas, Secretary, FCC (Feb. 28, 2001).

⁵ See, e.g., *SBC/Ameritech Merger Order* at Appendix C, para. 15(c)(1) (providing a 30-day period for CLECs to analyze and comment on SBC's Advanced Services OSS Plan of Record).

⁶ See *id.* at Appendix C, para. 31(b) (describing Phase 2 collaborative process for Business Rules Plan of Record).