

POR at 71 (emphasis added). The "Additional Collaborative Process" consists of the various rounds of collaborative discussions on all of the Phase 3 data as well as the dispute resolution process.⁴

SBC's active participation in the Additional Collaborative Process did indeed significantly delay the implementation of the Plan. Throughout the Additional Collaborative Process, the CLECs asked SBC to explain and provide detailed analyses of its present and planned OSS interfaces. The CLECs raised literally hundreds of issues in the Phase 3 collaborative discussions on Category I, II, and III data (the process flows). Hundreds of additional issues were raised in the Phase 3 collaborative discussions on Category IV data (data elements). These requests required SBC to research the feasibility of the requests or provide detailed explanations of functions, both of which consumed much time. Subject matter experts who otherwise would have been working on development activities were required instead to spend time researching and responding to these issues. SBC was also required to make documentation updates to support the clarifications. These updates, which took considerable time to complete, have to be reflected in both SBC's internal and external documents so that processes will be implemented correctly and training will be accurate.

⁴ See POR at 77 ("In order to facilitate implementation of the Uniform and Enhanced OSS POR, SBC/Ameritech and the participating CLECs have agreed to an additional collaborative process: (1) to develop and provide to the CLECs additional detail concerning the present methods of operation throughout SBC/Ameritech's 13 state region, and (2) to finalize documentation concerning the uniform future method of operation ("Additional Collaborative"). As detailed in Section III(I)(1) (Future Method of Operation, Implementation Phase Work Plan, Document Finalization), this process will entail multiple phases involving the provision by SBC/Ameritech of FMO and FMO data, collaborative meetings, and CLEC customer acceptance of such data.")

The time and resources consumed in connection with responding to the numerous CLEC requests for additional research and explanation and updating documentation justify a modification to the Implementation Phase Work Plan, even if SBC did not actually modify its Plan in response to those requests. Indeed, the Plan of Record allows SBC to request additional time even if it does not agree to add functionality to the Plan of Record.

In fact, the Additional Collaborative Process took far more time than expected. For example, the Plan of Record, as amended by the September 22, 2000 letter to the FCC, provided that the collaborative discussions on Category IV data would run from January 3, 2001 through February 9, 2001. In fact, the Category IV collaborative discussions began on January 10, 2001, and ended on March 7, 2001, about one month after they were scheduled to conclude.

Moreover, many of the issues raised by the CLECs in the Category I, II, and III collaborative discussions and in the Category IV discussions were requests for additional functionality. In response to these issues, SBC agreed to increased levels of functionality or otherwise to change its approach in numerous ways. In more than forty areas, SBC modified its plan to accommodate the CLECs' requests. These modifications, all of which have caused SBC to alter its planning, included changes in such areas as data validation and mapping techniques, use of a rural route and box field for certain address functions, use of the "LUC" field, the structure and use of Provider Initiated Activity, and the creation of flow-through processes for Loop with Number Portability requests.

Notwithstanding the best efforts of this Panel, the dispute resolution procedure established for the Additional Collaborative Processes also tied up significant resources and caused a delay in implementation. Pursuant to the Plan of Record, issues that were raised in arbitration were to be resolved within 20 business days of the date the CLECs identified the

issues to be arbitrated.⁵ The CLECs' statement of issues was submitted December 14, 2000. The schedule in the Plan of Record assumed that a decision would be issued by January 16, 2001. In fact, as the Panel knows, the decision was issued to the parties on March 5, 2001, almost 7 weeks later.

While this effort has been going on, state and federal regulatory activity have also generated new OSS requirements for SBC to implement. For example, as far during 2001 revisions, in certain regions, have either been implemented or planned to the ordering of advanced services, the loop qualification process, and line splitting. Responding to these new requirements has consumed resources that otherwise could have been devoted to implementing the Plan of Record. Thus, these new requirements have also had an impact on the timetable for implementation of the Plan of Record that was not, and could not reasonably have been, contemplated when that timetable was prepared.

The magnitude of the effort to implement the Plan of Record is immense. SBC estimates that, in total, over 200 software programs, over 6000 software edits, approximately 75 enhanced or new on-line screens, and several new software and system interfaces must be developed for each of the four SBC regions to implement the Uniform and Enhanced OSS Interface Plan of Record. In addition, as a result of the magnitude of change involved, a rigorous and extensive testing cycle is required to ensure that the releases are of a high quality. Tens of thousands of test cases must be executed and validated before the releases are used by SBC and the CLECs to

⁵ The POR states that SBC was to submit its detailed statement on the CLECs' issues 5 business days after receipt of the CLECs' statement; the CLECs were to respond to SBC's statement 5 business days after receipt of SBC's statement; and the decision was to be issued within 10 business days after submission of the CLECs' response. POR at 77

process pre-order and order transactions. Hundreds of employees have been dedicated to completing these tasks. Many of them are working 12 hour days and six or seven day weeks, and have been doing so for months.


For all of the reasons set forth above, the cumulative length of the delays has been significant and compels SBC to request additional time. Despite its best efforts, SBC is simply unable to meet the dates for the pre-order and order releases identified above. Therefore, SBC requests the Panel to modify the Implementation Phase Work Plan to establish new implementation dates so that the pre-order and order releases called for by the Plan of Record that are presently scheduled for completion by September 29 and November 17, 2001 (April 20, 2002 for SNET), would be extended to February 18, 2002 and March 22, 2002, respectively (June 30, 2002 for SNET). Those dates, which AT&T supports and, to date, no CLEC has opposed, are the earliest reasonable dates and provide the bare minimum amount of time needed for successful implementation of these releases in light of the circumstances.

Respectfully submitted,

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CERTIFICATION

The undersigned, Glen Sirles, certifies under penalty of perjury that the facts set forth in the foregoing "SBC's Detailed Statement Of Position In Support Of Request For Modification Of Implementation Phase Work Plan" are true and correct.

Dated: May __, 2001

Glen Sirles

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