SBC'S FINAL BATCH CUT PROCESS DESCRIPTION

Background and Collaborative Approach

SBC developed its preliminary batch cut proposal based upon the requirements and objectives outlined by the FCC in the *TRO*. As discussed during the collaborative workshops, SBC evaluated its current hot cut processes, anticipated future volumes and looked for ways in which those processes could be improved to make them more efficient, less costly, and better suited to handle the volumes anticipated where SBC is no longer required to offer unbundled access to local circuit switching as a network element.

Consistent with the collaborative approach taken with this issue, SBC realized that to develop the best proposal possible, it would need to consider input from the CLECs that would actually be using the process. Accordingly, SBC did not finalize its batch cut proposal until after the collaborative sessions on the batch cut processes were held in various states across SBC's territories. Based on input received during various collaborative discussions in the Midwest, Southwest and California, SBC then evaluated the input from the CLECs and modified its initial proposal. Although this approach required additional development work for SBC, the end result is a final batch cut proposal that has been tailored to better meet the desires expressed by the CLECs.

For example, SBC modified its proposal in response to CLEC requests to include the FDT option for all three of the proposed processes; SBC has also included IDLC loops in the Defined Batch Process and the Bulk Project offering. As requested, the final proposal also adds "am" and "pm" intervals for IDLC loops included in a defined batch. The final proposal also changed the volumes of orders that CLECs may submit under the various processes. In that regard, SBC 's final proposal removes the 50-line limit that applied to the Enhanced Daily Process as initially proposed; establishes a central office daily maximum of 200 lines for the Defined Batch Process; and lowered the minimum number of lines required for the Bulk Project offering to 20. The final proposal also expands the Defined Batch Process to include orders for enterprise customers with lines
up to the existing project limits which vary by state between 19 and 24 lines. (Assuming that this Commission arrives at a number lower than 24 for the "DSO cutoff," this last change clearly goes beyond what the *TRO* requires,

and thus demonstrates SBC 's willingness to accommodate CLEC concerns where it is practicable to do so, even where SBC could not lawfully be required to do so.)

The volumes in SBC 's batch cut proposal are more than sufficient both to ensure that CLECs can meet the timelines established by the FCC for transitioning the embedded based of UNE-P customers to stand-alone loops and to ensure that SBC can meet the demand for hot cuts associated with CLEC acquisitions of new customers even as those volumes increase. Each type of anticipated incremental demand (i.e. embedded base and new acquisition) was considered. SBC assumed that existing UNE-L volumes will continue and thus focused on this incremental demand.

Proposed Hot Cut Enhancements

- SBC proposes three new hot cut options for CLECs to choose from: the Enhanced Daily Process, the Defined Batch Process, and the Bulk Project offering. Each of these offerings provides different benefits and, together, they will provide CLECs with the tools to successfully handle both the acquisition of new mass market customers and the transition of the CLECs' embedded bases.

Enhanced Daily Process: **New Acquisitions, all customers.**

- The Enhanced Daily Process is designed to support CLECs' acquisition of new customers. As such, it has the shortest intervals of the options and does not include any limitations on the number of orders a CLEC may submit.

- The Enhanced Daily Process applies to all "new acquisitions," *i.e.* all hot cut migrations under existing processes other than for "embedded base conversions, " as described below.

- The Enhanced Daily Process has no daily LSR or line quantity limits, however, end user "project" limits will apply (varies by region).

- This process is available for both FDT and CHC, between 8:00 a.m. and 5:00 p.m., Monday through Friday, excluding holidays.

• Loops provisioned over IDLC can be included within normal business hours.

• Existing standard provisioning intervals for stand-alone voice-grade loops and existing performance standards would continue to apply.

Defined Batch Process: Embedded Base Conversions for "mass market" customers and New Acquisitions.

• The primary purpose of the Defined Batch is to allow CLECs to transition their embedded base of UNE-P customers to the CLEC's own switch.

• The Defined Batch process is available for transitioning a CLEC's embedded base of resold and UNE-P mass market customers (and enterprise customers with up to 24 lines) to the same CLEC's own switch. CLECs also have the option of utilizing the Defined Batch for new customer acquisitions of mass market end user customers (and enterprise customers with up to 24 lines) currently obtaining voice grade service only as an SBC retail customer or as another CLEC's resold or UNE-P customer.

• In evaluating the "batch size" for the Defined Batch, SBC assumed that 100 percent of existing UNE-P would migrate to UNE-L under one of two potential migration strategies: either a constant migration over the FCC' 27 month transition timetable or a more accelerated rate of 200 per day, per central office.

- Defined Batch Process line quantity limits are 1 to 100 lines per day, per CLEC, per central office.

- The maximum number of defined batch hot cuts will be 200 lines per central office per day, between 6:00 a.m. and 12:00 a.m., for all CLECs, (e.g., 2 CLECs requesting 100 each; or 4 CLECs requesting 50 each, etc.)

• CLECs that use the Defined Batch process may choose between the FDT process and the CHC process. CLECs may also choose a provisioning time frame that suits their needs:

- The FDT option is available between 8:00 a.m. and 5:00 p.m., Monday through Friday (normal business hours) and between 6:00 a.m. and 8:00 am. Monday through Friday.

- The CHC option is available between 8:00 a.m. and 5:00 p.m. Monday through Friday (normal business hours), between 6:00 a.m. and 8:00 a.m. and 5:00 p.m. to 12:00 a.m. Monday through Friday, and between 8:00 a.m. and 5:00 p.m. Saturday.

• Loops currently provisioned over IDLC ("IDLC loops") that can be migrated to an all copper loop or Universal Digital Loop Carrier ("UDLC") may be included in the Defined Batch Process requests during normal business hours. CLECs will be permitted to chose either AM or PM. (The requested time should correspond to the cutover time for the other lines in the batch.) The AM IDLC requests will be provisioned between 8 a.m. and noon on the day of the cut, and the PM IDLC
requests will be provisioned between 1 p.m. and 5 p.m. on the day of the defined batch cutover.

• Under the Defined Batch process, a single CLEC may submit orders for 1-100 lines per wire center per day. Multiple CLECs may schedule Defined Batches on the same day for the same wire center; however, no more than 200 total lines can be scheduled for hot cuts under the Defined Batch for a single wire center on any given day. (The numbers available are in addition to any hot cuts scheduled under the Enhanced Daily Process or the Bulk Project offering.)

- For instance, two CLECs could each schedule a 100-line Defined Batch cut for a single wire center in the same day; four CLECs could each schedule a 50-line Defined Batch cut; or one CLEC could schedule a 100-line Defined Batch cut while two other CLECs each scheduled a 50-line batch cut for the same wire center.

- A CLEC that wishes to request Defined Batch hot cuts between 6:00 a.m. and 8:00 a.m., Monday through Friday, must submit an order for a minimum of 25 lines and a maximum of 50 lines during this two-hour period.

- Similarly, a CLEC that wishes to request Defined Batch hot cuts between 5:00 p.m. and 12:00 a.m., Monday through Friday, must submit an order for a minimum of 25 lines and a maximum of 100 lines during that time period. CLECs may submit orders for each time period (6:00 a.m. – 8:00 a.m., 8:00 a.m. – 5:00 p.m., and 5:00 p.m. – 12:00 a.m., Monday through Friday), but may not exceed the daily 100 hot cut per CLEC limit.

• The standard provisioning interval for the Defined Batch process is thirteen business days. The thirteen-day interval allows SBC to manage its work force more effectively, which, in turn, allows SBC to minimize the cost of performing the requested hot cuts while ensuring that SBC is able to perform the requested work effectively.

• The cut timeframes for the defined batch process:

- Normal business hours for DSO loops -- 20 lines per hour.

- Out of hours weekday and Saturday cut -- 25 lines per hour.

- IDLC loops, as noted above with have either an AM or PM cutover commitment, during normal business hours.

Sunday. Exempt due to industry number porting constraints.

Bulk Projects: **New Acquisitions or Embedded Base Conversions**

The Bulk Project offering provides CLECs with an additional option for scheduling large volumes of hot cuts. The Bulk Project offering may be used for both new acquisitions and embedded base customers and may be used in instances where the requesting CLEC wishes to arrange for hot cut options that are not available under either the Enhanced Daily Process or the Defined Batch Process. Loops that are currently provisioned over IDLC may be included in Bulk Project requests during normal business hours, Monday through Friday.

• The Bulk Project offering is available for project of 20 or more lines. (The minimum volume requirements are based upon SBC ’s current project definition.)

• CLECs may use the Bulk Project offering to schedule hot cuts in a single wire center or multiple wire centers.

• The intervals for the Bulk Project offering will be negotiated, and will be dependent upon the specific nature of the CLEC request. Sundays are exempt due to industry number porting constraints**.**