EXHIBIT D

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Southwest ern Bell



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> 2003 OCT 31 PM 2: 45 PUBLIC UTILITY COMMISSION FILING CLERK

October 31, 2003

Mr. Patrick Tyler Mr. Larry B. Barnes Mr. Nara Srinivasa Mr. Elango Rajagopal Public Utility Commission of Texas 1701 N. Congress Avenue, Room G-113 P.O. Box 13326 Austin, TX 78711-3326

RE: Project No. 27605 - Mass Market Hot Cut Process Project for State Implementation of the Federal Communications Commission's Triennial I eview

Dear Mr. Tyler, Mr. Barnes, Mr. Srinivasa, and Mr. Rajagopal:

Pursuant to Commission Staff's October 21, 2003 Memorandum, as approved by the Commissioners at the October 23, 2003 Open Meeting, SBC Texas hereby submits a proposed strawman mass market "batch cut" process.

SBC Texas offers this batch cut proposal in the interest of facilitating discussions among the parties at the workshops scheduled for November 7 and 13, 2003, even though the absence of a batch hot cut migration process is not impairing the ability of CI ECs to serve mass market end users. SBC has presented this "batch hot cut" proposa in the Midwest region as part of concurrent regional workshops being held in those states and has submitted this proposal in Kansas in response to an invitation for comments by the KCC.

In addition, SBC Texas intends to file a process flow diagram of its current not cut processes on November 3, 2003, in order to provide parties further detail for discussion at the November 7, 2003 workshop.

Very truly yours,

Sperniai David F. Brown **General Attorney**

Attachment

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Mass Market Batch Cut Proposed Process



10/30/03

- The Batch Process provides discounted coordinated hot cut rates for CLEC with multiple end users, multiple addresses and with multiple orders in a single wire center.
- The Batch Cut Process provides CLECs the ability to migrate new customer acquisitions and movement of embedded base of UNE-P or resale.

Scope of Batch - Applies to Mass Market Customers with limited number of analog DS0 POTs Service (plan assumption of 3 or less DS0 POTs lines per end user) like for like service:

- UNE-P to UNE-Loop w/LNP
- Resale to UNE-Loop w/LNP
- SBC Retail to UNE-Loop w/LNP

(Does not include loop service via line splitting, line sharing, Broadband, DS1 and higher rate services).

Batch Process Options:

- a. Daily Batch 2 to 50 Mass Market lines per day, per CLEC, per wire center (CHC) (Normal Due Date Intervals M-F (8 -5) for both CHC/FDT) (FDT will flow business as usual and not be structured within the Batch Cut Process)
- b. Defined Batch 2 to 100 Mass Market lines per day, per CLEC, per wire center (CHC/FDT) 13 business day scheduling required, can be scheduled at any time of day/night six days per week, Sundays are exempt due to industry number porting constraints). Defined batch includes orders which require a specific timeframe and includes loops currently provisioned over IDLC.
- c. Bulk Project 101+ lines Mass Market Customers (CHC) Negotiated due dates with defined timeframe. Allows CLEC the ability to coordinate more orders within a designated time.

The Batch Process will also provide enhanced communication and pre-ordering tools:

*Investigating a pre-order tool to validate when loops are served by IDLC

* Order Flow through verification tool (Scheduler/Provisioning Web Site - providing completion notice for minimal down time) CLEC notification is being assessed to be given for e.g. after every 20 orders for the Defined Batch and Bulk Process Options. CLEC can complete LNP in advance to minimize down time.

* Due Date Reservation Tool for Defined Batch (Due Date Interval Guide identifying criteria of clean orders received by required date to meet date expected).

* Timeline for Defined Batch (13 business days with same criteria of clean orders received by required date to meet date and time expected).

* Defined Rate Structure for Daily, Defined and Bulk Processes.

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PUBLIC UTILITY COMMISSION FILING CLERK

November 3, 2003

Mr. Patrick Tyler Mr. Larry B. Barnes Mr. Nara Srinivasa Mr. Elango Rajagopal Public Utility Commission of Texas 1701 N. Congress Avenue, Room G-113 P.O. Box 13326 Austin, TX 78711-3326

RE: Project No. 27605 - Mass Market Hot Cut Process Project for State Implementation of the Federal Communications Commission's Triennial R view

Dear Mr. Tyler, Mr. Barnes, Mr. Srinivasa, and Mr. Rajagopal:

Attached, please find SBC Texas's process flow diagram of its current hot cut processes. It should provide parties further detail for discussion at the November 7 2003 workshop.

Very truly yours,

for

David F. Brown General Attorney

Attachment

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Existing Hot Cut Process (Pg 1)



Pre-Cut Jeopardy Notification Process - CHC



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Existing Hot Cut Process (Pg 2)



