

APPENDIX I

271 COMPLIANCE REQUIREMENTS MULTIPLE CHECKLIST ITEMS (Appendix B to D.98-12-069)

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271 COMPLIANCE REQUIREMENTS
MULTIPLE CHECKLIST ITEMS

Operations Support Systems (OSS)

Pre-Ordering Functions

Service Address Validation

- Pacific shall demonstrate that it has clear guidelines for address validation. These guidelines should address the discrepancy between addresses that pass SORD, but not E911 validation processes.

Enhanced 911(E911)

Pacific shall institute three system improvements in a cooperative manner with CLCs:

- Integrate E911 data entry into the order entry process for loop with port UNE combinations and stand alone UNE port orders;
- Work with smaller facilities-based CLCs to improve the E911 data entry gateway's ability to meet the needs of those carriers;
- Develop standards for peer-to-peer interface for the entry of E911 data.

Directory Listings and White Pages

Pacific shall make three system and process changes that will enable Pacific to offer non-discriminatory access to directory listings and white pages. Pacific shall demonstrate that:

- it has integrated the ordering of UNE combinations and stand alone UNEs with the processing of directory listings and white pages. This will allow carriers to use one gateway and one electronic Local Service Record (LSR) to order both a resold service and directory listing or a UNE combination and directory listing. All parties agreed that the Change Management Process shall be followed, and Pacific indicated that it would likely roll-out this improvement in the first half of 1999.
- Effective September 1, 1998, Pacific will offer a web-based database which CLCs can use to verify directory listings and white page listings.

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Integration of Pre-Ordering and Ordering Interfaces

- Pacific shall demonstrate that it has provided sufficient documentation such that an independent entity could create an integrated pre-ordering and ordering interface that would be consistent with all relevant business rules.
- Pacific shall demonstrate, either through an independent test consistent with recommendations in the interface testing section or through the actual experience of a CLC that has created an integrated interface, that Pacific has provided the reasonable documentation CLCs require.
- If in either conducting a test or assisting a CLC to implement an integrated interface, Pacific modifies either its business rules or documentation, Pacific shall demonstrate that those changes have been shared with other CLCs.
- Pacific shall make a showing that its side of the interface is fully operational and consistent with published business rules.

Ordering

“Fix-It” Team

- Pacific shall demonstrate that it has actively participated in the “Fix-It” team and its efforts to gather data, recommend and implement corrective actions that will reduce or eliminate rejections of and errors in directory listings, white pages and E911 orders.
- Pacific shall demonstrate that it has implemented corrective actions identified by the team.

Mechanized Rejects and Jeopardy Notices

- Pacific shall implement a fully automated reject and jeopardy notice process for any order that involves a UNE or resold services.

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Automated Firm Order Confirmations (FOCs)

- Pacific shall demonstrate that either it has automated loss notifications or that CARE records provided by Pacific supply CLCs with substantially similar information as contained in a loss notice, in a format that is easily utilized.

Flow Through

Pacific shall demonstrate that it:

- is following flow through principles;
- has defined xDSL compatible loops in cooperation with CLCs, or according to industry standards;
- has submitted a plan for implementing of flow-through for xDSL capable two-wire loops with and without LNP by the end of 1999.
- has implemented flow through for:
 - loop and port combinations;
 - two-wire basic and assured loops with and without LNP;
 - directory service requests;
 - standalone LNP;
 - resale.
- has explored relaxing or eliminating each of the following exceptions to flowthrough: project quantity, supplemental orders, and partial account conversion, for each of the order types listed above to which they apply.
- it has either (1) taken action to significantly relax or eliminate the exceptions to flow through described above or (2) explain why it is not technically feasible or practical to do so. Pacific shall also supply minutes from the quarterly change management meeting where the exception to flow through issue was addressed and resolved.
- Pacific shall make any necessary changes to LEX and EBI to provide real-time processing or orders in a manner equivalent to that employed by Pacific to process its own retail orders.

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Maintenance and Repair

- Pacific shall clearly indicate through any performance data which interface was used to place trouble tickets, and an approximate break-down for resale, unbundled loops, and unbundled network element combinations.
- Pacific shall demonstrate that it has met the needs of facilities - based carriers by following through on scheduling and publicizing any joint meetings with CLCs.

Billing

Pacific can demonstrate compliance by:

- satisfactory billing-performance measures;
- sponsoring focus groups to identify billing issues;
- tracking bill disputes resolved within thirty days and report results to CLCSs;
- sharing dispute logs with respective CLCs;
- advising CLCs within thirty days when a) dispute will be resolved and b) when credit will be issued;
- consolidating bill rounds for small CLCs;
- providing proof that it has resolved the single bill - single tariff problem and has paid any monies due to other carriers.

Change Management

- Pacific shall demonstrate that it is adhering to the change management process developed in the OSS OII as discussed in the collaborative process.

Local Service Center (LSC) Performance and Anti-Competitive Behavior

Pacific shall demonstrate that:

- it has participated in the proposed LSC issue forum;
- LSC representatives have access to appropriate Accessible Letters;

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- it has explored cross-referencing the LSC methods and procedures with the CLEC Handbook when the LSC M&Ps are placed on its internal Web;
- it has notified CLCs that records of first level escalations in the LSC are available upon request;
- what additional training in GUI interfaces LSC Help Desk representatives have received.
- its firewall between wholesale and retail information is effective.

OSS Appendix: Access to Interfaces, Training, and Evaluation

Pacific shall demonstrate that:

- it has adopted the revised OSS Appendix negotiation template attached as Appendix D to the FSR.
- it is offering an MOA covering training independent of the full OSS Appendix.
- it has instituted a training feedback process;
- it has shared the results of EDI operational readiness testing with the CLCs engaged in the test, and shared key learnings from the test with other CLCs.
- has notified CLCs of its two 90-day promotional offerings for OSS access and indicate that Pacific will provide 14-days notice prior to withdrawing the offer.

Interface Testing

Pacific shall:

- submit a detailed test plan with the Commission and interested parties describing the scope and methodology of the test. This test plan shall:
- identify the scope of the test by:
- enumerating the order types and permutations of order types it plans to test;
- delineating the order types which the company believes it does not need to test because it has sufficient commercial volumes and three months worth of performance measures;

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- indicating the end-to-end process it proposes to test and how the proposed test will simulate this end-to-end process;
- showing how specific interfaces will be tested;
- explaining the method for conducting the test and the methodology for compiling and analyzing results;
- describing the benchmarks for evaluating the test;
- comparing its test plan to the Bell Atlantic OSS Evaluation Project Master Test Plan developed in New York;
- providing any other information the company believes is relevant.

Performance Measures

- Pacific shall use the performance measures developed in the OSS OII if these have been adopted by the Commission by the time of its compliance filing.
- If the Commission has not yet adopted performance measures as part of the OSS OII, Pacific's compliance filing shall include three months of data, using the most robust available measures, based on its participation in the OSS OII.
- Pacific shall make its performance measurement reports for its affiliates open to public inspection.

Incentives

- Once the Commission has adopted performance incentives in the OSS OII, Pacific shall demonstrate that it is complying with the mechanism.

Collocation

- Pacific shall demonstrate that it has solicited input from CLCs to clarify the Interconnector's Collocation Service Handbook (Collocation Handbook) to ensure that it is a useful reference tool for collocators.
- Pacific shall place its Collocation Handbook on its web site and apprise all CLCs of that website address.
- Pacific shall institute a revision system that prospectively shows, on each section, the date of the latest change.

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- Pacific shall keep the Handbook on the website up to date. The website shall include a summary of all Handbook changes made over the preceding two months, unless the industry agrees to a longer period of time.
- Pacific shall demonstrate that it is issuing Accessible Letters for all changes in its collocation rules, and sending those Accessible Letters to all collocators.
- Pacific shall provide alternatives to its current physical collocation offerings: common area collocation and cages with less than 100 square feet for those offices where less than 100 square feet is available.
- Pacific shall allow CLCs to sublease collocation space to other carriers, and Pacific will deal directly with sub-leasing carriers for ordering UNEs.
- Pacific shall make every effort to assist carriers who wish to interconnect at adjacent locations.
- As part of any process developed for the Commission to determine whether space is available in particular COs, Pacific shall provide information on space used in that office for provisioning its own ADSL service.
- Pacific shall demonstrate in any walkthrough of an exhausted CO, the location of its own equipment used to provision ADSL service.
- In any CO in which all options for physical collocation offered by Pacific have been exhausted, Pacific shall not be permitted to provide additional space in that CO for any of its affiliates.
- Since amendments to ICAs can be problematic, Pacific shall develop a template for various types of collocation and for cage-to-cage connections, which is readily available to CLCs upon request.
- Pacific shall, within 15 days of a request, provide cage-to-cage connections between collocation cages leased by two or more CLCs.

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- Pacific shall allow CLCs to augment their collocation space when they reach a 60% utilization rate and shall allow CLCs to begin the application process prior to reaching the 60% utilization rate if the CLC expects to achieve 60% utilization before the process is completed.
- Pacific shall refund nonrecurring charges for cage installation to carriers which surrender their collocation space, if that space is needed by another carrier.
- Pacific shall allow carriers the option of submitting a bond to cover the 50 percent advance payment, in lieu of a check. Pacific would cash the bond if the CLC did not submit the required 50 percent down payment within 30 days of the commencement of construction. Pacific shall file an Advice Letter to make this change to its collocation tariff.
- If CLCs determine some timeframe other than 30 days is acceptable for submitting the check or security bond, Pacific shall change its policy to reflect the shortened time period recommended by CLCs.
- Pacific shall accept applications and payment in advance of its Advice Letter becoming effective. However, no construction work shall commence until the Advice Letter is approved.
- To the extent possible, Pacific shall not fill cages consecutively but fill in cages in a manner that would allow for contiguous growth. However, if other carriers want to collocate in that CO and the unassigned contiguous space is needed, the space will be granted to the first carrier filing an application and submitting the requisite deposit or bond. Pacific shall notify the carrier which requested reservation of contiguous space that the contiguous space is no longer available.
- Pacific shall demonstrate that it completes physical collocation installations within the 120-day provisioning timeframe established in its 175-T tariff, and in accordance with time frames established in its ICAs with CLCs.
- If Pacific falls behind in the physical collocation process, it shall issue weekly status reports to the requesting carrier.

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- Pacific's floor plans shall be provided to CLCs prior to any walktrough and shall include square footage as well as note the location of its equipment used to provide ADSL service and an indication of whether equipment is in use, idle or obsolete.
- Pacific shall post on its web site any CO which Pacific has determined has no space available for physical collocation.
- Pacific shall continue to allow CLCs to collocate RSMs for purposes of accessing UNEs.
- Pacific shall reserve space for dissimilar equipment for no more than five years. Dissimilar equipment shall be limited to switching equipment, MDfs and power.
- Pacific shall reserve space for similar equipment (e.g., transmission equipment) for no longer than 12 months, but only if collocators are also permitted to reserve space for the same length of time.
- Pacific, CLCs and Pacific's affiliates shall all have the right to reserve space for a 12-month planning horizon.
- Any entity, including Pacific Bell, which wants to reserve space shall provide Pacific with a \$2,000 nonrefundable deposit. In the case of CLCs or other non-affiliated companies, the \$2,000 shall be applied against the collocation construction fee. Any entity, including Pacific Bell, which does not use the reserved space within the nine month time-frame will forfeit its deposit. Such forfeitures will be credited against the collocations charges of the next carrier to collocate in that particular CO.

Interconnection Network Element Request (INER) Process

Pacific shall:

- publish the INER process in an Accessible Letter and the CLEC Handbook with the exact processes, timelines, escalation procedures and response detail parameters.
- be required to utilize standardized forms for INER requests from CLCs and for responses from Pacific.

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For INER requests Pacific shall:

- provide “no” responses within 15 days. If Pacific says “no,” citing technical problems, Pacific is required to provide a detailed reason why the request is not technically feasible. Additionally, Pacific can refer the CLC to an alternative to the UNE or interconnection requested with the proviso that if the referral is made, Pacific must be able and willing to provide that alternative in a timely manner. Pacific shall provide details on provision of the suggested alternative within the same 15 days as the “no” response to an INER request.
- provide “yes” responses within 30 days and will include high level cost categories (labor, equipment, etc.) for provision. If wholesale construction is necessary, cost support shall be supplied within an additional 24 days. Any cost support information provided by Pacific shall be in sufficient detail to allow the CLC to negotiate for provision of the UNE.
- Pacific shall develop a generic appendix of generally available UNEs, which obviates the use of INER for those elements. The appendix shall be updated as UNEs become defined.
- Pacific shall require use of the INER process only in cases where UNEs have not been previously defined.
- Pacific shall report to the Commission the number of INERs processed, the time elapsed for each INER processed, the results of the INERs processed and whether the INER resulted in a UNE being provided, by CLC, from the date of this order.
- Pacific shall demonstrate that it has streamlined the INER process by providing the standardized forms, timelines, and notification procedures used in the process.

Expedited Dispute Resolution

- Pacific shall allow a CLC to re-negotiate its ICA to include any or all of the dispute resolution processes in ICAs it has executed with CLCs in California.

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SECTION 271 CHECKLIST ITEMS

ITEM ONE – Interconnection

Trunk Provisioning

Joint and Cooperative Planning Process

- As part of the Joint and Cooperative Planning Process (JCP), Pacific shall meet with individual CLCs to discuss specific projects, forecasting, network architecture details and or plan and initiate projects.
- In the JCP process Pacific and CLCs shall jointly assess forecasts provided. Pacific shall integrate such forecasts with other information in Pacific's construction plans.
- Pacific shall publish sample forms to be used in the JCP for interconnection trunk forecasting ("Local Network Interconnection Trunk Forecast") and network planning ("Pacific Bell CLEC Network Information Sheet"). These forms shall be published in the CLEC Handbook with descriptions and instructions for completion, shall be included in an Accessible Letter to all CLCs, and shall be made available electronically to all CLCs.
- Trunk Group Service Report
- Pacific shall alert CLCs if interconnection trunks are either being over-utilized or under-utilized using the Trunk Group Service Report (TGSR). The following applies to the TGSR process:
- The TGSR process shall be used to provide notification of under- or over- utilized trunk groups. Written responses -- except in blocking situations -- shall be sent within the industry standard (10-20 days). In a blocking situation Pacific shall attempt to call the CLC prior to issuing the TGSR and shall accept trouble tickets at the LOC regarding the trunk blockage. Pacific shall report the resolution of the blockage situation back to the CLC.
- Pacific shall demonstrate that it is enforcing ICA provisions regarding under-utilized trunks as follows:
- Pacific will not enforce ICA provisions regarding taking back under-utilized trunks automatically; it will first consult with CLC or issue TGSR;

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- Pacific shall have a JCP meeting with the CLC to attempt to resolve that TGSR;
- if the CLC has adequate reason for keeping trunks operational, Pacific shall accommodate.

Network Utilization Reports

- Pacific shall provide CLCs with four other network utilization reports, as described below and shall publish sample copies of these reports, in the format presented in the collaborative process, in the CLEC Handbook. Pacific shall inform all CLCs of the availability of the various traffic reports via Accessible Letter.

Pacific shall provide the following:

- the common transport data that it currently provides to the interexchange carriers. This report will be provided on a monthly basis to the CLC via its account manager.
- TIKI reports monthly to all requesting CLCs via their account managers.
- electronic exchange data (DIXC) (on a reciprocal basis) for trunk traffic data on a weekly basis to CLCs who make electronic exchange arrangements.
- ad hoc point-to-point traffic studies for use in JCP meetings as appropriate.

Provisioning Practices

Pacific shall adopt the following business practices to mitigate problems associated with the timely and efficient provisioning of interconnection trunks:

- Pacific shall provide firm order commitments (FOCs) for trunks within 4 business days for augments, and 7 business days for establishing new trunk groups.
- If there is a facility or switching equipment shortage, Pacific shall include a status for a relief date. "Remarks" field of FOC to be expanded to include the cause of the shortage.

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- If no relief date is available, “further status due date” shall be provided.
- Pacific shall discontinue use of “9/9/99” as an indicator of “no relief date.” (e.g. “No digital equipment available at this time.”)
- Remarks portion of the FOC shall state an expected status for the relief date and shall provide a contact name and number for the CLC to review held-order status.
 1. By 5 p.m. on the day that the status is due, Pacific shall re-FOC with current information.
 2. Pacific shall call CLCs on “Held order-denied,” as needed.
 3. Pacific shall meet with CLCs and provide an explanation Pacific’s system of assigning CFA and TCIC numbers so that CLC’s and Pacific’s systems can be “mapped.”
 4. If one-way analog trunks are offered by Pacific and accepted by CLCs, the held order for digital trunks shall maintain its place on the “held order” list pending completion of the switch replacement.
- Pacific shall publish and transmit to all CLCs the Accessible Letter regarding customer not ready (CNR), as in the FSR at page 87.

NXX Code Openings

- Pacific shall verify all new NXX code openings with Tru-call in the month following each code opening.
- A single trouble ticket submitted to the LOC shall simultaneously initiate the Tru-call testing and the LOC repair process. If the problem is network translations, it shall be resolved within four hours. CLCs are responsible for providing Pacific with functioning test call numbers with every request for new NXX codes.
- Pacific shall provide positive notification of NXX openings on a real-time basis (i.e. website) within 24 hours of opening. The website shall contain information about new NXX openings at each CO with the date and time the code was opened.
- Pacific shall implement an automated system for opening NXX codes and providing positive notification to CLCs of code openings.
- Pacific and CLCs shall provide a single point of contact for immediate resolution of any problem that would prevent Pacific from performing

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complete testing in conjunction with an NXX code opening. Pacific shall notify the affected CLC within 24 hours if it determines that the CLC has no trunking established to a particular tandem switch.

- Pacific shall notify all CLCs of these changes regarding NXX code openings through Accessible Letters and through updating the CLEC Handbook.

Frame Relay Network-to-Network Interconnection (NNI)

- Pacific shall demonstrate that it is negotiating with, and providing any CLC with frame relay network-to-network interconnection under Sections 251 and 252 of the Act.

ITEM TWO – Unbundled Network Elements

When a CLC purchases a UNE involving access to intellectual property, Pacific shall provide:

- A list of the software vendors;
- A description of the specific license agreements for each type of software, i.e., specific uses, limits on number of users, or number of minutes. Pacific shall contact the switch vendors to determine if the switch vendors want the CLC to sign a nondisclosure agreement to obtain the information.
- At the written request of the CLC, Pacific shall negotiate any necessary RTU agreements for use of the software which parallels that in its own agreement with the vendor. Since Pacific is already recovering this cost in its UNE prices, Pacific shall not charge CLCs for negotiations or the RTU fees.
- Pacific shall demonstrate that it has developed and shared with CLCs a list of the ancillary equipment necessary for CLCs to provide certain UNEs or UNE combinations. Pacific shall also demonstrate that CLCs are able to order and obtain use of the ancillary equipment.
- Pacific shall provide any pieces of equipment which are required to make a UNE function as specified in the CLC's ICA at no charge because any costs associated with providing the UNE are captured in the price.

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- Pacific shall provide ancillary equipment to make a UNE exceed its performance specifications or to combine UNEs. CLCs should pay cost based rates for such equipment.
- Pacific and CLCs shall negotiate any pricing issues relating to the equipment list.
- Pacific shall demonstrate that it has made the extended link UNE — which consists of the loop functionality delivered to a distant central office—available to CLCs.

ITEM THREE – Rights-of-Way

No requirements for this checklist item.

ITEM FOUR – Unbundled Local Loop

Determining Facility Availability and Quality: The K1023 Process

Pacific shall demonstrate that it has:

- made the loop length indicator it has loaded into PREMIS available to CLCs in DataGate and Verigate at the same time;
- offered CLCs the opportunity to identify COs where the CLCs plan to offer xDSL so that it can load the loop length indicator for those COs;
- loaded the indicator for COs where CLCs have indicated they intend to offer xDSL.
- at a minimum, made the manual K1023 process available to CLCs to determine facility availability and to inform the CLC of approximate loop length, presence of pair gain and load coils, and equivalency factors.
- provided a detailed report to the Commission on the prospects for electronic access to loop quality information and the K1023 process. In this report, Pacific shall explain:
- the type of information that it has in APTOS, LFACs and any other system that indicate relevant information on the length, quality and availability of loops.

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- how its marketing and retail representatives make use of this information to determine the availability of loops for its ADSL products.
- the K1023 process, comparing the retail and wholesale processes. Pacific shall note where electronic systems are accessed and the degree of automation.
- how it could provide CLCs with electronic access to APTOS, LFACs and any other relevant system for determining loop quality and availability as well as electronic processing of K1023 requests.

Integrated Digital Loop Carrier (IDLC)

Pacific shall:

- provide CLCs with functioning unbundled loops, using copper or ULDC, where customers must be moved from IDLC loops. Where Pacific provisions this loop to a CLC using ULDC, Pacific shall not require that an INER be filed, since the UDLC technology already exists in the network.
- provide quarterly reports to the Director of the Telecommunications Division on its deployment of IDLC loops so that the Commission can monitor IDLC penetration in Pacific's network. Pacific shall provide the report for three years unless renewed by Commission action.
- demonstrate that the quality of service that is provided to CLCs on UDLC or alternative technology is equivalent to the quality that Pacific's customers receive on IDLC.

Digital Subscriber Lines and Spectrum Management

- Pacific shall alert all CLCs, via Accessible Letter, of the update to its technical publication on xDSL standards in Technical Publication 76730 at page 12.
- Pacific shall adopt national standards, as adopted by ANSI, for the provision of xDSL services.

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- Pacific shall demonstrate in a compliance filing that the spectral management program that it employs to manage the deployment of xDSL services in the network is competitively neutral between Pacific's retail service offering and CLC's service offerings. In its compliance filing, Pacific shall address the following issues:
 - Pacific shall provide test data as well as all supporting data and assumptions used to develop its Binder Group Management process.
 - That the spectral management program that Pacific employs allows the widest possible deployment of xDSL type services;
- Pacific shall provide standardized reporting format to CLCs as to why requests for loops are denied for spectral interference reasons.
- CLCs are responsible for designating the type of xDSL they intend to deploy over the loop at the time they place their order. Pacific shall treat any information communicated by CLCs about xDSL products or services they wish to deploy or any associated orders as proprietary information that is not be shared with any of Pacific's retail operations or its affiliates.

Loop Installation Problems

- Pacific shall implement a process in the LOC to resolve and track problems associated with the initial loop installations and treat those as provisioning, not maintenance problems. The process shall include the following:
 - Pacific shall initiate a split between the maintenance and provisioning groups in the LOC, with the latter handling the loop installation process.
 - If the loop was never functional, Pacific shall resolve the problem using the LOC provisioning process.
 - If the loop is functional during CLC testing but is non-functional after the testing technician leaves, Pacific shall resolve the problem using the LOC provisioning process if the problem was identified on the due date, otherwise it shall be referred to the LOC repair process.
- Pacific shall provide and publish an 800 number for the LOC provisioning process for non-functioning loops at installation.

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- Pacific shall tag the demarcation point for CLC identification, clearly and visibly, at the SNI or equivalent minimum point of entry that contains a minimum of 10 loops.
- Pacific shall update the methods and procedures that define this process in the CLEC Handbook and through Accessible Letter with descriptions and instructions for referring loop installation problems to the LOC.

Loop Technical Specifications

- Pacific shall provide a clear understanding of the use of NC codes for ordering unbundled loops. Toward that end, Pacific shall conduct meetings with industry participants for the purpose of defining loop technical specifications using NC codes and report the results to the Commission.

ITEM FIVE –Local Transport

Pacific shall:

- make a showing that CLCs are able to obtain meet point unbundled transport;
- demonstrate the specific circumstances in which a CLC would be required to negotiate an amendment to its ICA in order to implement meet point unbundled transport;
- demonstrate that it has made higher bandwidth transport services such as Optical Level bandwidths available to CLCs. Even if only available on an Individual Case Basis (ICB), pricing for these services shall be based on TELRIC principles, as required for UNEs.
- demonstrate that it can produce timely, accurate bills for the transport UNE.

ITEM SIX –Unbundled Switching

Pacific shall demonstrate compliance by:

- demonstrating that parties have developed a factor for estimating terminating charges for local calls when a CLC provides unbundled switching.

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- demonstrating that it has made unbundled switching available to CLCs as a legal and practical matter;
- providing custom routing functions which CLCs have requested which are technically feasible, as required by the FCC.
- allowing CLCs' traffic from dedicated transport facilities to overflow to Pacific's shared transport network;
- conducting any technical trials, which staff determine are necessary, of Switching Options B and C and 2-PIC in conjunction with staff and CLCs and provide the results of those technical trials to the Director, Telecommunications Division;
- not re-instituting the conditions in its 8/21/97 letter for instances involving collapsing switches;
- informing a CLC of the number of VTEs available to CLCs in the new switch in cases where a CLC retains its VTE in the analog switch, when the new digital switch is installed;
- allowing CLCs with VTEs in the analog switch to reserve a VTE in the new digital switch, at no charge. If VTEs are in short supply in the digital switch, the CLC will have the option of installing its footprint in the digital switch before the VTE is given to another CLC;
- not charging CLCs the cost of the footprint in a dial-with-dial switch replacement;
- developing M&Ps for ordering and provisioning unbundled switching, on a standalone basis or in combination with other UNEs.

ITEM SEVEN – Nondiscriminatory Access to 911 and E911, Directory Assistance Services, and Operator Call Completion Services.

See OSS Pre-Ordering Section.

ITEM EIGHT – White Pages

See OSS Pre-Ordering Section.

ITEM NINE – Access to Telephone Numbers

No requirements for this checklist item.

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ITEM TEN – Access to Databases

- Pacific shall demonstrate that AIN is available as a legal and practical matter;
- Unless no CLC follows through with ordering AIN SCE functionality, Pacific must prove that the processes it has developed for AIN deployment are fair and nondiscriminatory. The best method of proof is to be able to chronicle the process used to provide particular CLCs with the functionalities they want;
- Pacific shall demonstrate that it has improved its communication with CLCs so that CLCs are fully informed about changes in Pacific's service offerings;
- Pacific shall not charge CLCs for regulatory costs associated with making AIN capabilities available;
- Pacific shall make the Bellcore AIN services which can be supported by Pacific's network infrastructure available to CLCs.
- Pacific shall demonstrate that the process improvements it implemented have prevented SS7 problems, similar to those reported by MediaOne and Nextlink, from occurring;
- Pacific shall demonstrate that it has maintained the process improvements in place and make any further improvements needed to prevent reoccurrence of SS7 problems;

ITEM ELEVEN – Number Portability

- For after hour cuts, CLCs shall be allowed to call off a cut, without charges, until 3 p.m. the day of the cut;
- Until three months after California's largest MSAs are converted to LNP (March/ April, 1999), FDT shall be monitored, and Pacific shall demonstrate that it performs adequately;
- Because the FDT process will be replaced with the 10-digit trigger process, Pacific shall prove that the 10-digit trigger is effective. Pacific shall provide substantive data that 10-digit trigger is functional and providing parity treatment;

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- Since it will remain in use after LNP implementation, focus shall remain on the TBCC process. Pacific shall prove – with three months of data and on-going performance measures -- that TBCC performs adequately and will continue to perform adequately. Specifically, CLCs shall be assured that Pacific does not make the cut without waiting for the CLC’s “all clear” phone call;
- Pacific shall not charge RCF tariff rates for CLCs remaining on INP longer than 90 days;
- Pacific shall adhere to the recommendations issued by the OP/I Subcommittee of the LNP Task Force regarding the issues referred to OP/I from the collaborative process;
- Pacific shall provide CLCs with the collaboratively adopted matrix shown on page 133 of the FSR, without changes.

ITEM TWELVE – Dialing Parity

No requirements for this checklist item.

ITEM THIRTEEN – Reciprocal Compensation

No requirements for this checklist item.

ITEM FOURTEEN – Resale

- Pacific shall provide evidence that, from the date of the Final Staff Report, that it has not violated the FCC’s and the CPUC’s rules regarding promotional offerings;
- Pacific shall state clearly in the text of each Advice Letter or Memorandum Notice whether the particular promotion is available to resellers;
- For promotions in effect for more than 90 days, Pacific shall state clearly on each of its retail tariff sheets that the promotion is available for resale;
- For promotions in effect for more than 90 days, Pacific shall include the appropriate 175-T tariff sheet in each advice letter covering a promotional offering for resellers;

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- Pacific shall indicate on the 175-T tariff sheet the specific rate(s) or charge(s) that resellers will pay;
- In cases involving bundles of both telecommunications and non-telecommunications services, Pacific shall offer the telecommunications portion for resale and clearly specify which components of the retail offering are available for resale;

In cases where Pacific extends a promotion, the Memorandum Notice shall specify the total length of time the promotion will have been in effect, including the extension.

(END OF APPENDIX I)