

Commingling

Current FCC rules now allow requesting telecommunication carriers to commingle UNEs and combinations of UNEs, with wholesale facilities or services it has obtained from the SBC ILEC (e.g., special access services purchased from an SBC tariff), subject to various limitations and restrictions. To request a commingled arrangement, a CLEC must first have language in its Interconnection Agreement (ICA) with the particular SBC ILEC which language permits commingling and provides the associated terms and conditions. Any commingling is subject to the terms and conditions of the ICA, and the lawful and effective FCC rules and orders, including without limitation 47 C.F.R. § 51.318(b).

One of the restrictions on commingling is found in the FCC's mandatory eligibility criteria adopted in the *Triennial Review Order*. FCC Rule 51.318(b). Commingled arrangements that are subject to that Rule must meet its requirements, and the CLEC must provide the SBC ILEC with certification on a circuit-by-circuit basis that those requirements are met. Please see SBC CLEC on line handbook product and services section under Commingling.

Mandatory Eligibility Criteria

Following is only intended as a summary of the FCC's mandatory eligibility criteria applying to certain commingled arrangements (as well as DS1/DS3 EELs) from FCC Rule 51.318(b), as informed by the *Triennial Review Order* where the FCC adopted and explained those criteria.

FCC Rule 51.318(b) applies to (1) an unbundled DS1 loop in combination, or commingled, with a dedicated DS1 transport facility or service or a dedicated DS3 or higher transport facility or service, or an unbundled DS3 loop in combination, or commingled, with a dedicated DS3 or higher transport facility or service, or (2) an unbundled dedicated DS1 transport facility in combination, or commingled, with an unbundled DS1 loop or a DS1 channel termination service, or to an unbundled dedicated DS3 transport facility in combination, or commingled, with an unbundled DS1 loop or a DS1 channel termination service, or to an unbundled DS3 loop or a DS3 or higher channel termination service (collectively, referred to as the "Included Arrangements").

CLEC (directly and not via an affiliate) must be certified to provide local voice service in the area being served or, in the absence of a state certification requirement, has complied with registration, tariffing, filing fee, or other regulatory requirements applicable to the provision of local voice service in that area.

The following criteria must be satisfied for each Included Arrangement, including without limitation each DS1 circuit, each DS3 circuit, each DS1 EEL and each DS1 equivalent circuit on a DS3 EEL:

- o Each circuit to be provided to each end user will be assigned a local telephone number (NPA-NXX-XXXX) that is associated with local service provided within an SBC local service area and within the LATA where the circuit is located ("Local Telephone Number"), prior to the provision of service over that circuit (and for each circuit, CLEC will provide the corresponding Local Telephone Number(s) as part of the required certification); and

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- Each DS1-equivalent circuit on a DS3 EEL or on any other Included Arrangement, must have its own Local Telephone Number assignment, so that each DS3 must have at least 28 Local voice Telephone Numbers assigned to it; and
- Each circuit to be provided to each end user will have 911 or E911 capability prior to the provision of service over that circuit; and
- Each circuit to be provided to each end user will terminate in a collocation arrangement that meets the requirements of FCC Rule 51.318(c); and
- Each circuit to be provided to each end user will be served by an interconnection trunk that meets the requirements of FCC Rule 51.318(d); and
- For each 24 DS1 EELs, or other facilities having equivalent capacity, CLEC will have at least one active DS1 local service interconnection trunk that will transmit the calling party's Local Telephone Number connection with calls exchanged over the trunk, and the trunk is located in the same LATA as the end user premises served by the Included Arrangement; and
- Each circuit to be provided to each end user will be served by a switch capable of providing local voice traffic.

Examples of Types of Commingled Arrangements

Inasmuch commingling was prohibited by the FCC prior to the *Triennial Review Order*, the absolute and relative demands for commingling and possible types of commingled arrangements are unknown. The SBC ILECs believe among the more common types, which may be requested without a BFR, would be the following:

1. UNE DS0 Loop connected to a channelized Special Access DS1 Interoffice Facility, via a special access 1/0 mux
2. UNE DS1 Loop connected to a non-channelized Special Access DS1 Interoffice Facility
3. UNE DS1 Loop connected to a channelized Special Access DS3 Interoffice Facility, via a special access 3/1 mux
4. UNE DS3 Loop connected to a non-channelized Special Access DS3 Interoffice Facility
5. UNE DS3 Loop connected to a non-concatenated Special Access Higher Capacity Interoffice Facility (e.g., SONET Service)
6. UNE DS1 Dedicated Transport connected to a channelized Special Access DS3 channel termination
7. UNE DS3 Dedicated Transport connected to a non-channelized Special Access DS3 channel termination
8. UNE DS3 Dedicated Transport connected to a non-concatenated Special Access Higher Capacity channel termination (i.e., SONET Service)
9. Special Access DS0 channel termination connected to channelized UNE DS1 Dedicated Transport, via a 1/0 UNE mux
10. Special Access DS1 channel termination connected to non-channelized UNE DS1 Dedicated Transport
11. Special Access DS1 channel termination connected to channelized UNE DS3 Dedicated Transport, via a 3/1 UNE mux

The SBC ILECs are, and have been, developing and testing processes to accommodate commingling. CLEC Online will be updated periodically to reflect the

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completion status for testing. Commingling arrangements not included in the list shall be processed via the Bona Fide Request Process. Please refer to the Commingling Arrangement Availability spreadsheet for state specific availability.

Please contact the Local Account Manager with any questions you may have regarding commingling arrangements.

Commingling requests can be for new circuits or to have existing circuits reconfigured to terminate to an appropriate collocation arrangement. Please note that the re-configuration of a special access circuit to a commingled arrangement may trigger termination charges, if any, under the applicable tariffs or contracts.

New Commingling for the Listed Commingled Arrangements

All new commingling activity will require:

- Access commingling order must reflect the unique commingling project ID, NEWCMGL
- Orders must reflect one of the following unique non-billable commingling tracking USOCs, as appropriate:
 - KSTZQ.....Access
 - KSTZW.....Local

All new commingled activity will require the customer to:

- Relate install orders as needed
- On access orders,, use the appropriate project ID

Additional Requirements for Type 4. Above

- ASR submitted electronically via EXACT or Web Access to order the dedicated DS1 transport special access facility.
- LSR submitted to order the UNE DS1 loop – Must be manually faxed to CLEC's NON-ICR fax number.
- PON number of ASR must be cross referenced in the LSR Remarks field.
- PON number of LSR must be cross referenced in the ASR Remarks field.
- Both the LSR and ASR must reflect the unique commingling project ID, NEWCMGL

Reconfiguration of Existing Circuit to Listed Commingling Arrangement

All reconfiguration commingling activity (ASR/LSR) will require:

- Customer and service center coordination
- Orders must reflect one of the following unique commingling project IDs
 - SBCCMGL.....like-for-like reconfiguration/no downtime
 - SBCCMGLCOLLO.....physical change/downtime
- Orders must reflect one of the following unique non-billable commingling tracking USOCs, as appropriate (KSTY2–Access or KSTY1-Local)

All reconfiguration commingled activity will require the customer to:

- Issue disconnect and install orders as needed
- Prior to the access disconnect order; the customer must issue an order to remove the access optional features that are not available with UNEs.
- Relate disconnect and install orders as needed and use correct channel assignments
- Use the appropriate project ID to prevent the order from being rejected

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Note -- Termination liability charges will likely apply when an access circuit is disconnected prior to the expiration of any term and/or volume commitment. The SBC ILECs do not waive or otherwise affect any such termination liabilities by performing the commingling sought by CLEC.

Customer Downtime Associated with Reconfigurations

Customers will NOT experience downtime (provided the request is accurately submitted) on reconfigurations when:

- The reconfiguration is like-for-like, i.e., when the existing circuit sought to be reconfigured already terminates to a 51.318(c) collocation arrangement and no new connection(s) are required
- The reconfiguration is like-for-like, and includes meeting the mandatory eligibility criteria, including a 51.318(c) collocation arrangement which is already part of the existing design.

Customers WILL experience downtime on a reconfiguration when the circuit to be reconfigured was not terminated into a 51.318(c) collocation arrangement or when a new connection must be made, and thus requires the provisioning of a circuit into a 51.318(c) collocation arrangement. The amount of downtime will be determined on an individual case basis.

Repair on Commingled Arrangements

All repairs, trouble tickets, etc associated with a commingled arrangement will be handled by the appropriate centers supporting the segment of the commingled arrangement involved (i.e., Access center will handle Access segments; the Local center will handle UNE segments). The customer is responsible for identifying and reporting the problem to the appropriate center.

ASR Ordering

Information for CLECs unfamiliar with ordering via the Access Service Request can obtain information at: <https://access-os2.sbc.com/waoWeb/>

New customers would open the 'Getting Started' section at the top of the page and the instructions provide the steps on how to begin using the SBC ASR Ordering. The customer would want to become a Registered Customer. Prior to receiving an ID and password, the customer can select "Training" up in the right hand corner.