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## **ALTS URGES FCC TO CLARIFY LOOP PROVISIONING RULES**

### ***Lack of Clarity in Loop Provisioning Rules is Depriving Residential Customers of Broadband Connectivity; Minimum Uniform Standards Would Promote Competition***

**WASHINGTON, DC, JULY 10, 2000** – The Association for Local Telecommunications Services (ALTS) today reiterated its request that the Federal Communications Commission (FCC) clarify, interpret and modify its rules governing crucial aspects of loop provisioning by incumbent local exchange carriers (ILECs). ALTS submitted the renewed request in reply comments on its petition urging a ruling on broadband loop provisioning.

“The lack of clarity in loop provisioning rules deprives consumers of broadband connectivity and is limiting timely rollout of new innovative technologies and services,” said John D. Windhausen, Jr., ALTS President. “ILECs are obligated to provide nondiscriminatory access to unbundled loops, but they are misinterpreting the law, foot dragging and gaming the rules in an effort to thwart competition.”

ALTS pointed to the more than 30 organizations that submitted comments in support of ALTS’ request for federally binding minimum standards for loop provisioning. The comments point out what ALTS set forth in its initial petition that CLECs experience continual delay and frustration in obtaining unbundled loops from the ILECs. Obtaining loops is for many carriers the most important step in serving customers, but is often the largest obstacle. Due to the extreme time-to-market sensitivity of the competitive telecommunications industry, provisioning problems hamper CLEC ability to roll-out innovative technologies and services, and deprive American consumers of meaningful competitive choices.

“For each of the performance guidelines sought in the petition, at least one ILEC has demonstrated that the requested performance level is achievable,” said Jonathan Askin, General Counsel of ALTS. “Given the fact that the local network has a fairly uniform structure throughout the country, and that the post-merger network is now largely controlled by only four companies, creating uniform standards for broadband provisioning is a logical progression in Commission policy.”

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ALTS said that the FCC should grant the ALTS petition for declaratory ruling and clarify, interpret and modify its rules governing broadband loop provisioning. Among other things, the Commission should:

- Hold that Rule 51.319 requires ILECs to provide high-capacity loops, including DS-1 and DS-3 level loops, to any requesting CLEC on an unbundled and nondiscriminatory basis;
- Hold that Rule 51.319 requires ILECs to provide entire loops to CLECs providing integrated voice and data services over a shared line;
- Adopt maximum intervals for provisioning UNE loops;
- Require ILECs to provide nondiscriminatory access to subloops and subloop components, including intra-building wiring, wherever possible in a manner that will support provision of multiple services over a shared line;
- Require ILECs to promptly establish reasonable rates for all subloops and subloop components, including intra-building wiring;
- Hold that ILECs must provision special access circuits within the same interval in which they provision these circuits for their own retail services;
- Determine a federal deadline by which all ILEC OSS interfaces must electronically provide all loop information to which the ILEC has access;
- Ensure that all loop de-conditioning charges and other recurring and non-recurring charges adhere to TELRIC principles; and
- Set prima facie federal penalties for ILEC failure to comply with these rules.

ALTS is the leading national industry association whose mission is to promote facilities-based local telecommunications competition. Created in 1987, ALTS has offices in Washington, D.C. and Irvine, California and now represents more than 200 companies that build, own, and operate competitive local networks. For more information on ALTS, contact Crawford Public Relations at 703-318-5460 or visit the ALTS Web site at [www.alts.org](http://www.alts.org).

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