

BEFORE THE PUBLIC UTILITIES COMMISSION OF CALIFORNIA

Rulemaking on the Commission's Own Motion to Govern Open Access to Bottleneck Services and Establish a Framework for Network Architecture Development of Dominant Carrier Networks.	R.93-04-002
Investigation on the Commission's Own Motion into Open Access and Network Architecture Development of Dominant Carrier Networks.	I.93-04-002
Order Instituting Rulemaking on the Commission's Own Motion Into Competition for Local Exchange Service	R.95-04-043
Order Instituting Investigation on the Commission's Own Motion Into Competition for Local Exchange Service	I.95-04-044

**MOTION OF PACIFIC BELL (U 1001 C) FOR AN ORDER THAT IT IS
IN COMPLIANCE WITH THE §271 REQUIREMENTS OF D.98-12-069 AND
THAT, SUBJECT TO THE COMPLETION OF THE OSS TEST, IT HAS
MET THE REQUIREMENTS OF §271 OF THE TELECOMMUNICATIONS
ACT AND §709.2 OF THE PUBLIC UTILITIES CODE**

J. B. YOUNG
M. E. GARBER
E. KOLTO-WININGER
L. N. CAUSBY
Attorneys for Pacific Bell

140 New Montgomery St., Rm. 1617A
San Francisco, California 94105
Tel: (415) 545-9426
Fax: (415) 974-1999
email: peggy.garber@pactel.com

TABLE OF CONTENTS

Motion Of Pacific Bell (U 1001 C) For An Order That It Is In Compliance With The §271 Requirements Of D.98-12-069 And That, Subject To The Successful Completion Of The OSS Test, It Has Met The Requirements Of §271 Of The Telecommunications Act And §709.2 Of The Public Utilities Code

Attachment A, Pacific Bell's Separate, Cross-Reference Index to Each Compliance Requirement and Supporting Evidence

Attachment B, List of Confidential/Proprietary information Redacted

Pacific Bell's (U 1001 C) Brief in Support of D.98-12-069 Compliance Filing and in Support of Motion for an Order that Pacific Bell Has Met the Requirements of §271 of the Telecommunications Act and §709.2 of the Public Utilities Code

Supporting Affidavits and Attachments

Nelson Cain Affidavit
William Deere Affidavit
Gary Fleming Affidavit
Terri Gleason Affidavit
Curt Hopfinger Affidavit
Gwen Johnson Affidavit
Victoria Murray Affidavit
Sam Tenerelli Affidavit
Chris Viveros Affidavit

BEFORE THE PUBLIC UTILITIES COMMISSION OF CALIFORNIA

Rulemaking on the Commission's Own Motion to Govern Open Access to Bottleneck Services and Establish a Framework for Network Architecture Development of Dominant Carrier Networks.	R.93-04-002
Investigation on the Commission's Own Motion into Open Access and Network Architecture Development of Dominant Carrier Networks.	I.93-04-002
Order Instituting Rulemaking on the Commission's Own Motion Into Competition for Local Exchange Service	R.95-04-043
Order Instituting Investigation on the Commission's Own Motion Into Competition for Local Exchange Service	I.95-04-044
Notice of Intent to File Section 271 Application of SBC Communications Inc. Pacific Bell, and Pacific Bell Communications Inc., for provision of In-Region, InterLATA Services in California.	

MOTION OF PACIFIC BELL (U 1001 C) FOR AN ORDER THAT IT IS IN COMPLIANCE WITH THE §271 REQUIREMENTS OF D.98-12-069 AND THAT, SUBJECT TO THE COMPLETION OF THE OSS TEST, IT HAS MET THE REQUIREMENTS OF §271 OF THE TELECOMMUNICATIONS ACT AND §709.2 OF THE PUBLIC UTILITIES CODE

Pacific Bell, as required by D.98-12-069, submits herewith its Compliance Filing containing evidence of its compliance with each of the requirements in Appendix B to D.98-

12-069 and hereby requests that the Commission find and determine as follows:

1. Pacific Bell has complied with the §271 requirements that the Commission identified in D.98-12-069, as set forth in that decision and Appendix B. thereto, as modified by any subsequent Commission orders in this proceeding or related Commission proceedings;

2. Pacific Bell has satisfied the requirements for providing interLATA telecommunications service in California set forth in section 271 of the Telecommunications Act of 1996 (47 U.S.C. §271);

3. Pacific Bell has satisfied the requirements of section 709.2(c)(1)-(4) of the Public Utilities Code and is directed, subject to appropriate Federal Communications Commission approval of its §271 application, to provide interLATA service in California through its affiliate; and

4. The findings and determinations in paragraphs 1-3 above are subject to and conditioned on the successful completion and performance of Pacific Bell's OSSs, all in accordance with the further orders of the Commission.

This motion is based on the Compliance Brief accompanying this motion, the separate, cross-reference index to each compliance requirement and the supporting evidence, the

supporting affidavits and evidentiary materials, the Notice of Intent to File Section 271 Application for InterLATA Authority in California, dated March 31, 1998 and supporting Draft Section 271 Application, and all of the files and records herein.

Respectfully submitted.

PACIFIC BELL

By: _____
JAMES B. YOUNG
M. E. GARBER
ED KOLTO-WINING
L. NELSONYA CAUSBY

140 New Montgomery Street, Rm.
1617A
San Francisco, California 94105
Tel: (415) 545-9426
Fax: (415) 974-1999
email: peggy.garber@pactel.com

Its Attorneys

Date: July __, 1999