

1 without such conditions applied?

2 MR. ASHBY: Objection, calls for a legal
3 opinion.

4 MR. BOWEN: I am not asking for a legal
5 opinion; I am asking for a lay opinion.

6 THE WITNESS: A. My lay opinion is no. The
7 merger conditions were voluntary conditions that the
8 SBC made with the FCC in order to facilitate the
9 merger.

10 MR. BOWEN:

11 Q. So SBC wrote those conditions?

12 A. We voluntarily agreed to them.

13 Q. Did you write them?

14 A. I don't know. I was not in the merger
15 condition or in the merger talks.

16 Q. Will you agree with me that the merger
17 conditions are not supposed to supercede or substitute
18 for other obligations of Ameritech?

19 A. I don't know.

20 Q. You don't, okay. Have you ever read this
21 large Merger Conditions Order of the FCC?

22 A. No, not all of it.

1 Q. Have you read any of it?

2 A. Some of the OSS.

3 Q. We will have to share. I only have one
4 copy of this.

5 MR. BINNIG: Steve, so the record is clear,
6 what you are going to show her is Appendix C to the
7 FCC's order approving the SBC/Ameritech merger; is
8 that correct?

9 MR. BOWEN: Not right off. I was going to
10 show you some of the text in the order too, but I will
11 get to that. Just for the record, this is the FCC
12 Decision 99-279 in the merger docket CC Docket Number
13 98-141 issued -- I'm sorry, adopted October 6, 1999,
14 released October 8, 1999.

15 Q. I am going to hand this to you,
16 Ms. Jacobson, and again the usual FCC convention of
17 numbering paragraphs, I am going to ask you to read a
18 paragraph from page 357 of the Order that I have
19 highlighted here today for the record.

20 A. I'm sorry, from Paragraph 357? Okay,
21 this one. "All of the conditions that we adopt today
22 are merger specific and not determinative of the

1 obligations imposed by the Act or our rules on
2 SBC/Ameritech or any other telecommunications
3 carrier."

4 Q. Okay, thank you. Now, is it correct that
5 or would you agree that the merger conditions that are
6 the source of the PORs are not intended to limit the
7 authority of state commissions to impose or enforce
8 requirements that go beyond those adopted in this
9 Order?

10 A. That's true.

11 Q. And then you mentioned the conditions
12 themselves. Those were attached to that Order as an
13 attachment; were they not?

14 A. I believe they were.

15 Q. Let me ask you to read for the record the
16 first two sentences of Footnote 2 on the conditions,
17 which I believe is Appendix C to that Order. Could
18 you read for the record the first two sentences of
19 Footnote 2?

20 A. "The intent of these conditions is to
21 address concerns raised by the proposed merger. To
22 the extent that these conditions impose fewer or less

1 stringent obligations on SBC/Ameritech, then the
2 requirements of any past or future Commission decision
3 or any provision of the 1996 Act or the Commission or
4 state decisions implementing the 1996 Act, or any
5 other pro-competitive statutes or policies, nothing in
6 these conditions shall relieve SBC/Ameritech from the
7 requirements of that Act or those decisions."

8 Q. Okay. Does this mean in common language
9 that whatever comes out of the merger conditions can't
10 trump or supercede an applicable statutory or FCC
11 requirement?

12 MR. ASHBY: Objection, calls for a legal
13 conclusion.

14 MR. BOWEN: I am asking for a lay opinion,
15 Your Honor.

16 EXAMINER WOODS: Sustained. That objection
17 is going to be suspended for the remainder of this
18 witness's testimony, although I understand that she is
19 testifying as a lay person. You may answer.

20 THE WITNESS: A. In my opinion I read that
21 to say that the Plans of Record would not override a
22 state or a federal decision.

1 MR. BOWEN:

2 Q. Okay. So this Commission in this case
3 could reach a decision on OSS that was inconsistent
4 with the Plan of Record and still be okay, right?

5 A. Yes.

6 Q. Now, let's turn to the Advanced Services
7 Plan of Record. That was the first POR under the
8 merger conditions, right?

9 A. Yes.

10 Q. Now, am I right that at least that Plan
11 of Record was supposed to have three phases?

12 A. Yes.

13 Q. Phase 1, 2 and 3?

14 A. Uh-huh.

15 Q. And am I right that Phase 1 is kind of a
16 disclosure phase where SBC says here is what I plan to
17 do or here is my current OSS and here is what I plan
18 to do in the future?

19 A. Phase 1 is SBC writing a Plan of Record
20 for advanced services and submitting it to the FCC,
21 and in Phase 1 then the FCC tells them to go ahead
22 with it or, if they have any objections, to go on to

1 Phase 2. The FCC gives the SBC permission to go on to
2 Phase 2.

3 Q. And CLECs also got access to the Plan of
4 Record via accessible letters, right?

5 A. That's right.

6 Q. Now -- and I think you already answered
7 this, but let me make sure. If anybody comments back
8 to you with anything besides I'm fine with what you
9 did, then you move into Phase 2. In other words, if
10 you think that he I say has an objection or asks for
11 enhancement beyond what you propose, then you are into
12 Phase 2, right?

13 A. My understanding of Phase 2 was that we
14 were supposed to go forward and have collaboratives
15 with the CLECs.

16 Q. And the collaboratives were designed, I
17 take it you would agree, to resolve questions or
18 problems the CLECs had with what you propose; that's
19 what you were collaborating about in other words?

20 A. I wouldn't say they were necessarily all
21 problems. They were enhancements. The CLEC may have
22 wanted more than what we put into our plan.

1 Q. And isn't it a fact that a number of
2 CLECs wanted more in your Advanced Services Plan of
3 Record than you had proposed?

4 A. That's true.

5 Q. And they told you so in written comments,
6 didn't they?

7 A. I did not participate in the very
8 beginning, but I do know that there was quite a bit of
9 discussion around what they wanted during the
10 collaboratives.

11 Q. Well, do you know enough to be able to
12 agree with me that CLECs asked for more information or
13 more enhancements than SBC had offered for advanced
14 services?

15 A. That's true.

16 Q. That Plan of Record was issued on, I
17 think, December 6 of last year; does that sound right
18 to you?

19 A. Yes.

20 Q. Am I correct that the Plan of Record as
21 issued had no discussion whatsoever of line-sharing
22 OSS?

1 A. Initially.

2 Q. Do you recall how many collaborative
3 meetings were held pursuant to the Advanced Services
4 Plan of Record, Phase 2?

5 A. No, because I didn't attend all of them.

6 Q. Let me ask you if these dates sound
7 roughly right. January 19, February 1 and 2, a
8 meeting in early March and a conference call on March
9 31, all of this year?

10 A. I believe those to be probably the right
11 dates.

12 Q. Would you agree with me that the merger
13 conditions contemplate that the goal of this
14 collaborative process is to obtain written agreement
15 on all the issues that were being collaborated about?

16 A. That's true.

17 Q. And if you do get to agreement, written
18 agreement, on all issues, you move into face Phase 3
19 which is implementation, correct?

20 A. That's right.

21 Q. But isn't it fair to say that right now
22 for Advanced Services Plan of Record we are stuck in

1 Phase 2?

2 A. No, because we already implemented what
3 was in the plan. We went forward and implemented it
4 without total agreement because there wasn't any issue
5 left, I don't believe, on what elements of loop
6 qualification you needed.

7 MR. BOWEN: Your Honor, I passed to the
8 witness, to counsel, to the reporter, and to Your
9 Honor a document that I would ask that you mark as the
10 first cross exhibit on this witness.

11 EXAMINER WOODS: Covad Rhythms Jackson Cross
12 1 -- I'm sorry, Jacobson. It's getting late in the
13 day.

14 (Whereupon Covad/Rhythms
15 Jacobson Cross Exhibit 1 was
16 marked for purposes of
17 identification as of this
18 date.)

19 MR. BOWEN: And for the record, Jacobson
20 Cross 1 is a document dated April 3 entitled
21 "Notification of Final Status of Advanced Services OSS
22 Plan of Record" filed with the FCC in CC Docket Number

1 98-141 to the merger docket.

2 Q. Now, you have seen this before,
3 haven't you, Ms. Jacobson?

4 A. Yes.

5 Q. And we have chatted in Texas about this,
6 haven't we, briefly?

7 A. We had a comment about it but not this
8 particular version. This is the CLEC version, not the
9 SBC version.

10 Q. I think I have that, too. We will get to
11 that one. But you have seen this one, haven't you?

12 A. Yes.

13 Q. Isn't it correct that, looking at this
14 document, again, that you will see in here that a
15 number of issues from the CLEC's perspective have not
16 yet been resolved for the Advanced Services POR?

17 A. That's true.

18 Q. And, in fact, on page 19 carrying on to
19 20 there is a specific line-sharing subsection of
20 those comments, isn't there?

21 A. That's true.

22 Q. And could you turn to page 2 of those

1 comments and look about two-thirds of the way down the
2 page? Is it fair to say that the CLECs at least
3 believe that SBC has not fulfilled the requirements of
4 the Merger Conditions Order and, therefore, has not
5 successfully completed Phase 2?

6 A. I see where it says that, if that is what
7 you are asking me.

8 Q. I am asking you to agree that that is
9 factually the case. I know you won't agree with that,
10 but isn't that what the CLECs are saying?

11 A. I agree that the CLECs said we didn't
12 meet the merger conditions.

13 Q. Do you recall there being an Attachment A
14 to that set of comments?

15 A. Quite possibly. I don't recall.

16 Q. Well, I think it's already attached to
17 the document I passed out. Can you confirm that with
18 your copy? Do you have an Attachment A there?

19 A. I am looking. I don't see one.

20 Q. Okay, I may have --

21 A. Here it is.

22 Q. Now, am I correct that this attachment

1 indicates from a CLEC's perspective those sections
2 that CLECs do agree closure has been reached on?

3 A. That's right.

4 Q. Now, you mentioned that this was not the
5 SBC submission. We asked you in discovery for some
6 information, and I believe you responded with what was
7 the SBC's submission to the FCC on the Advanced
8 Services POR. Let me hand you Ameritech's response to
9 Rhythms Data Request Number 28. Am I right that
10 behind the cover page, behind the letter to Larry, I'm
11 sorry, Mr. Lawrence E. Strickling at the FCC, we find
12 SBC's submission of April 3, 2000, to the FCC on the
13 Advanced Services Plan of Record?

14 A. I don't believe it's all here.

15 Q. Well, the part that is here you recognize
16 as being part of the submission?

17 A. Part of it.

18 Q. All right. Could you turn back to page
19 17, please, of the SBC's submission?

20 A. All right.

21 Q. First of all, you are familiar with this
22 document, are you not, before today?

1 A. Yes, I am.

2 Q. Am I correct that on that page there is a
3 reference to an audit process?

4 A. Yes, there is.

5 Q. And is that audit process supposed to
6 give CLECs the right to go look at your systems and
7 see what they are capable of doing?

8 A. The audit, as I understand it, needs to
9 be negotiated between the CLECs and SBC.

10 Q. Fair enough. But once that negotiation
11 is finished, aren't we supposed to be able to go look
12 at your systems?

13 A. I think that depends on the negotiations.
14 I mean, it depends on how you are going to do that.

15 Q. Isn't that what we are asking for?

16 A. Yes.

17 Q. And it's not done yet, right, the
18 negotiations are not?

19 A. I believe it's under negotiation, though.

20 Q. Are you saying the SBC is not going to
21 agree to let us go see your systems?

22 A. No, not at all.

1 Q. That's one way in which we can find out
2 just what's in your systems, right, just take a look
3 at them via an audit?

4 A. That would be one way.

5 Q. All right. Am I also correct that in
6 SBC's submission, SBC says it's committed to ordering
7 flow-through, that is the flowing through of orders
8 without manual intervention? You might want to check
9 page 20. You might want to check the sentence that
10 says SBC is committed to creating ordering
11 flow-through as matter of routine at the top of the
12 page.

13 A. Right, as a matter of routine, wherever
14 feasible.

15 Q. Okay, but that's still the commitment
16 that's being offered in Illinois; is that right?

17 A. Yes.

18 Q. Does that apply to line-sharers?

19 A. Yes, it does.

20 Q. Turn back, please, to page 22 of that
21 document. There is a little table here with ordering
22 at the bottom and then some references to particular

1 operating areas. I see the entry for EDI (Ameritech -
2 xDSL Ordering Flow-through) at the bottom of the page
3 there?

4 A. Yes.

5 Q. That's scheduled for, on this document,
6 December 2 of this year, is that right?

7 A. That's right.

8 Q. Is that still on target as far as you
9 know?

10 A. Yes.

11 Q. But that's only going to be for loops
12 below 12,000 feet, right?

13 A. Well, if they are over 12,000 feet, we
14 have to do a loop qualification.

15 Q. So the answer to my question is yes with
16 your explanation, it is only available below 12,000
17 feet?

18 A. I cannot be sure of that.

19 Q. Let's look back at Attachment B then,
20 another table.

21 A. Is that further back?

22 Q. Yes, a few more pages, one or two more

1 pages. It's a sideways page.

2 A. All right.

3 Q. Do you see that little chart there that
4 at the top says, "DSL Flow-Through Availability by DSL
5 Type and Location"?

6 A. Yes.

7 Q. Do you see the little "X"s in the AIT
8 column for xDSL below 12,000 feet?

9 A. That's right.

10 Q. That means that it will be available for
11 that at some point on the schedule that you have
12 talked about, right?

13 A. That's right.

14 Q. And for xDSL loops up to 17,500 I see
15 nothing in there which means it won't be available for
16 those loops, right?

17 A. It meant that at the time of this
18 document, it was not yet scheduled.

19 MR. BOWEN: Okay. I think I did not mark
20 that as an exhibit; is that right?

21 EXAMINER WOODS: My understanding is it is
22 not marked, no.

1 MR. BOWEN: I am going to ask that the
2 document we have been referring to, which is the
3 response to data request, Rhythms Data Request 28, be
4 marked as Jacobson Cross Exhibit 2.

5 (Whereupon Covad/Rhythms
6 Jacobson Cross Exhibit 2 was
7 marked for purposes of
8 identification as of this
9 date.)

10 MR. BOWEN:

11 Q. Now, back on page 5 of your testimony,
12 your direct testimony, at lines 6 and 7 you say the
13 loop -- the question you are asked is what loop
14 make-up information should you give us for
15 line-sharing. I am paraphrasing. And your answer is
16 the loop make-up information should be that which is
17 required for DSL-capable loops under the parties'
18 interconnection agreements. Do you mean that whatever
19 is in there now is what should control or am I
20 misreading your intentions in that answer?

21 A. Well, as far as -- the reference I am
22 making to the interconnection agreements is not the

1 information because we don't detail the information in
2 the interconnection agreements. We are talking about
3 the technology for DSL.

4 Q. So you aren't trying to say that whatever
5 I find back over there is what controls what we are
6 talking about here today for line-sharing?

7 A. That you can find back over where?

8 Q. In the interconnection agreements you are
9 referring to here.

10 A. Whatever type of technology is outlined
11 in your interconnection agreement, we will provide the
12 information necessary for you to provision your loop.

13 Q. Oh, I see what you are saying, thank you.
14 Now, here is a chart on page 5 of your testimony and
15 there is a second chart on page 6 of your testimony.
16 These are what you are talking about, the 30 elements
17 of data that you are going to be offering to us; is
18 that right?

19 A. You talking about this list?

20 Q. Yes.

21 A. Okay, I wouldn't refer to it as a chart,
22 but a list.

1 Q. Sorry.

2 A. That's okay.

3 Q. This list, this is the list, right?

4 A. Uh-huh.

5 Q. This is the list of what Ameritech
6 Illinois is going to be providing to Rhythms and Covad
7 for loop qualification, right?

8 A. Well, we already have provided it, not
9 going to provide.

10 Q. Fine. This is the list?

11 A. This is the list.

12 Q. Now, part of this list says, I will give
13 you some of these things, I think, all the time and
14 some of these if it's present in our back-end systems.
15 You are breaking in two sub-lists, right?

16 A. No, I am saying that we will give it to
17 you electronically if it's available electronically.
18 If it's not, then we need to go into a manual search
19 and give it to you manually.

20 Q. I am just reading your testimony here on
21 page 5 where you say you have or will be provided the
22 following functionality for loop qual consisting of a

1 POR and there is a list of about eight or ten bullets
2 on that page and two more on the next page, and then
3 you say in addition the following information will be
4 returned when present in the back-end system of
5 Ameritech Illinois, another list, a longer list. What
6 I am trying to understand is, the first list of
7 bullets, is that what we will get all the time?

8 A. This is information, as I understand it,
9 that we have stored electronically in a data base.

10 Q. So the answer is yes?

11 A. Yes.

12 Q. And the second list is you will give it
13 to us if you have it?

14 A. We will give it to you if it's stored in
15 a back-office system. If we have it, we will give it
16 to you.

17 Q. But only if it's in a back-office system?

18 A. Only if it's stored in a back-office
19 system versus we don't have it at all.

20 Q. Do you mean an electronic system when you
21 say a back-office system?

22 A. Actually, in this case you could

1 interpret back-office system or back-end system to
2 mean our manual records as well, our paper records.

3 Q. Paper as well, not just computer data
4 bases, right?

5 A. Yes.

6 Q. Now, come down on page 6 with me please.
7 Do you see on line 22 the type of DLC entry there?

8 A. It's on my line 20 but yes.

9 Q. Okay.

10 A. Type of DLC? I have quantity of DLC on
11 line 22 but okay.

12 Q. There is a bullet that says "Type of
13 DLC"?

14 A. Yes.

15 Q. Is that information going to include
16 whether or not that DLC is DSL capable or not, say,
17 for line-sharing?

18 A. I do not know.

19 Q. You don't know. Do you think it should?

20 A. I don't know. I am not the expert on
21 this information. I wouldn't know what to do with
22 this information if you gave it to me. But I am

1 assuming, because the CLECs have asked for this
2 information in order to provision DSL, including
3 line-shared DSL, that they know what to do with this
4 information if they get it.

5 Q. If Rhythms tells you that they want this
6 bullet that says Type of DLC to include information
7 about whether or not that DLC is, in fact, DSL
8 capable, you would agree that would be appropriate,
9 right?

10 A. I thought we already had that in another
11 bullet. I could be wrong. Okay, then the last bullet
12 I have on page 5, and again I am not the technical
13 expert, so but I would read that "Qualification status
14 of the loop based on specified Power Spectral Density
15 mask, (PSD); if no PSD class is specified, the default
16 PSD is Class 5 which is ADSL." So I am assuming that
17 from that information you can at least tell that it's
18 ADSL.

19 Q. Let's assume that you have some digital
20 loop carrier systems that can support xDSL and some
21 that cannot. Can you assume that with me?

22 A. Yes.

1 Q. So if we want to decide whether a
2 particular DLC could or could not support DSL, we
3 would need to know which is which, right, just
4 logically?

5 A. Under that assumption?

6 Q. Correct?

7 A. Right.

8 Q. So under those assumptions, would you
9 agree, that it would be appropriate to tell us if we
10 asked you whether a particular DLC could or could not
11 support DSL?

12 A. I'm not sure the type of DSL doesn't tell
13 you that because I don't know what type of DSL tells
14 you. So I can't answer that.

15 Q. Would you agree with me that whatever
16 list you offer us should include enough information to
17 let us make the decision about whether or not it will
18 support our services or not?

19 A. Well, I can promise you, Mr. Bowen, that
20 we didn't offer you this list. This is the list that
21 the CLECs asked us for. When we originally started
22 out with loop qualification information, I believe we

1 had four components, and from there we built to this
2 list based on what the CLECs asked us to provide. So
3 these are the elements that were asked for by CLECs,
4 including Covad and Rhythms.

5 Q. Do you recall my question?

6 A. No.

7 Q. Will you agree with me that whatever list
8 is offered, based on whoever asked for whatever,
9 whatever information is offered to us should include
10 all the information that we need to make the decisions
11 about offering service?

12 A. I agree.

13 Q. And if something isn't on this list and
14 we ask you to provide it, then we should get it,
15 right?

16 A. If it's feasible, if it's available, I
17 mean, I can't say that you can get it because I don't
18 know if we have it.

19 Q. Well, if you have it, we should get it,
20 right?

21 A. I mean, you could ask me what color the
22 house is next to the terminal. We don't store that

1 information.

2 Q. Fair enough. If you have it, we should
3 get it, right?

4 A. If it's available. To my knowledge,
5 through this process we didn't deny anything that was
6 available to us to the CLECs.

7 Q. And when you say available, you mean in
8 your possession whether electronically or manual or
9 however it's held; that's what you mean by available,
10 right?

11 A. Yes.

12 Q. You don't just mean in data bases?

13 A. No, I don't mean in data bases.

14 Q. Now, you are also familiar, because you
15 reference in your testimony, with the Uniform and
16 Enhanced OSS Plan of Record?

17 A. Yes, I am.

18 Q. That's different from the Advanced
19 Services Plan of Record, right?

20 A. It is.

21 Q. And that started after the Advanced
22 Services Plan of Record?

1 Q. Can you flip back with me to -- you see
2 the current status column?

3 A. Yes.

4 Q. If I see DO in that column, that means
5 Disagreed and Open, that is the parties agree to
6 disagree, right?

7 A. That's right.

8 Q. If I see any DOs, that means this is not
9 done, right?

10 A. That's true. It was not done at the time
11 of this list. But there have been some meetings
12 afterwards so.

13 Q. Okay. Could you turn to page 38 and look
14 at Item Number 229?

15 A. All right.

16 Q. Do you see -- and there is a CLEC column
17 in Column 3, right?

18 A. I'm sorry, Column 3?

19 Q. Column 3 is which CLECs are maintaining
20 that they have a problem or this is the issue ID by
21 CLEC, right?

22 A. This is the CLEC that raised the issue

1 initially in the beginning.

2 Q. Issue 229 is access to SBC's records,
3 data bases and back-end systems; isn't that right?

4 A. That's right.

5 Q. And you see Rhythms as the CLEC and is
6 shown as DO which means Disputed Open, right?

7 A. Right.

8 Q. And do you see on 230, the next page, the
9 uniform population of loop qualification data, do you
10 see Rhythms as the CLEC and the status as DO?

11 A. Yes.

12 Q. On 233 on page 40, the realtime
13 flow-through of CLEC orders, do you see Rhythms as the
14 CLEC and DO as the status?

15 A. I do, but I would like to add a comment
16 in that --

17 Q. I am doing redirect, I'm sorry. We have
18 very limited time here. I am just asking you if you
19 agree with me with this document.

20 A. Yes, I do.

21 Q. On 234 would you agree that for the
22 parity issue that Rhythms is the CLEC and DO is the

1 status?

2 A. That's right.

3 Q. With respect to Issue 250, the
4 implementation phase work schedule time line in
5 Section III, sub I, of the POR, the CLECs are listed
6 as the parties and that issue is Disputed Open; do you
7 see that?

8 A. Yes.

9 Q. And do you see that Issue 255 on page 55
10 entitled Line-sharing; do you see that issue?

11 A. Yes.

12 Q. Now, what does TA mean? Tentatively
13 abated?

14 A. Yeah, tentatively abated.

15 Q. And do you see Rhythms as the CLEC for
16 both 235 and 237?

17 A. That's right.

18 Q. There has been a document created, has
19 there not, as a result of the Uniform and Enhanced
20 Plans of Record, OSS Plan of Record, resulting from
21 that May 19, 2000, collaborative process?

22 A. I believe it was actually later than that

1 that the document was formed.

2 Q. I'm sorry. I didn't mean to say that the
3 document was dated that date, but it came out of that
4 process, right?

5 A. Right, that five-week process, not
6 one-day process, a five-week process.

7 Q. You recall it with fondness, don't you?

8 A. Yes, I do. I spent those weeks in Dallas
9 and Chicago, so I do remember.

10 Q. Okay. Let me, I have handed you and the
11 rest of the folks in the room, including the reporter,
12 a document entitled "Uniform and Enhanced OSS Plan of
13 Record," 87 pages long. Do you recognize this
14 document?

15 A. Yes, I do.

16 MR. BOWEN: Your Honor, could we have this
17 marked as Jacobson Cross 4, please?

18 EXAMINER WOODS: So marked.

19 (Whereupon Covad/Rhythms
20 Jacobson Cross Exhibit 4 was
21 marked for purposes of
22 identification as of this

1 date.)

2 MR. BOWEN:

3 Q. Does this give the status from the SBC's
4 point of view or from the collaboratives point of
5 view, this second DOR; do you know?

6 A. This contains SBC's original language and
7 all language agreed to by the parties during the
8 collaboratives.

9 Q. You have heard of the term LSOG; have you
10 not?

11 A. Yes, I have.

12 Q. It's a Local Services Ordering Guide?

13 A. Yes.

14 Q. What do you use that for? Do you use
15 that for manual ordering or EDI-type ordering?

16 A. EDI.

17 Q. Am I correct that the group that controls
18 the LSAG is the ordering and billing forum of the OBF.

19 A. Yes. That's one group.

20 Q. One group, okay. Isn't the OBF currently
21 developing Version 5 of the LSOG?

22 A. They are.

1 Q. And you work for Pacific Bell, right?

2 A. Yes.

3 Q. You are on LSOG 4, right?

4 A. No.

5 Q. Which?

6 A. Three, three plus. And I'm sorry to put
7 it that way but that's what we call it, three plus,
8 four minus, it depends what you want to call it but
9 it's not a total four.

10 Q. If five isn't developed, you are either
11 an "A" or a "B" because you have got three 3. whatever
12 or four, right? Where is Ameritech? What version of
13 LSOG are they on? Is it one?

14 A. I believe so.

15 Q. So what's that? A "D" or an "F"?

16 A. One thing I would like to qualify is that
17 the LSOG Version 1 that Ameritech implemented, beyond
18 that they have implemented many, many products that do
19 not have industry standards at this time. They
20 actually make available ordering for more than LSOG 4
21 provides for.

22 Q. So you wouldn't give Ameritech a "D" or