

The information contained in this affidavit is true and correct to the best of my knowledge and belief:

Debrah A. Baker-Oliver
Debrah A. Baker-Oliver

Subscriber and sworn before me this 8th day of April, 1997

Kathy B. Hummert NOTARY PUBLIC

**KATHY B HUMMERT
NOTARY PUBLIC STATE OF MISSOURI
ST. LOUIS COUNTY
MY COMMISSION EXP. MAY 23, 1997**

My commission expires:

May 23, 1997

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the matter of)
)
Application of SBC Communications Inc.,)
Southwestern Bell Telephone Company,)
and Southwestern Bell Communications) CC Docket No.
Services, Inc., d/b/a Southwestern Bell Long)
Distance, Pursuant to Section 271 of the)
Telecommunications Act of 1996 to Provide)
In-Region Originating, InterLATA Services)
in Oklahoma)
_____)

AFFIDAVIT OF BETSY BERNARD
ON BEHALF OF PACIFIC BELL COMMUNICATIONS INC.

STATE OF)
) ss.
COUNTY OF)

Betsy J. Bernard, being sworn on oath, deposes and states as follows:

A. AFFIANT'S BACKGROUND AND DUTIES

1. My name is Betsy J. Bernard. I am President of Pacific Bell Communications ("PBCOM"), a subsidiary of Pacific Telesis Group ("PTG"), which is a wholly-owned subsidiary of SBC Communications Inc. ("SBC"). PBCOM was formed in December 1995 and will provide intraLATA and interLATA service focused on serving customers in California and Nevada.
2. I have worked in the telecommunications industry for more than 20 years. Before joining Pacific Bell, I spent 18 years at AT&T in positions including sales and marketing, strategic planning, and product management for voice and data products directed at both

the business and consumer markets. Following is a list of titles I held at AT&T:

Management - Long Lines, District Marketing Manager, National Accounts Branch Manager, Marketing Director, Human Resources Director, Product Management Vice President, Sales Vice President, and Customer Service Vice President. My expertise in the highly competitive long distance market is advantageous as I build PBCOM from the ground up to compete with the three industry leaders: AT&T, MCI and Sprint.

3. I joined Pacific Bell in 1995 and as Vice President of Business Markets, managed a portfolio of accounts and services representing \$3 billion of annual revenue. While in this position, I supported the restructuring of Pacific's Business Communications Services group into a market-based organization and championed the launch of Pacific Bell Network Integration, a Pacific Bell subsidiary.
4. I hold a Masters of Science degree in management from Stanford University. Prior to earning the MS degree, I received an MBA degree from Fairleigh Dickinson University and a BA degree in political science from St. Lawrence University.

B. PURPOSE OF AFFIDAVIT

The purpose of my affidavit is to demonstrate that PBCOM is in full compliance with the separate affiliate requirements of the Act. This affidavit demonstrates how Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance ("SBLD") and PBCOM, together with Southwestern Bell Telephone Company ("SWBT"), Pacific Bell ("PB"), and Nevada Bell ("NB"), comply and will comply with Section 272 of the 1996 Act and with the FCC's rules implementing that Section in their relationships or

with any other SBC Section 271 affiliate that carries out the authorization requested in this Application.¹ SBC's "Bell operating companies (" SBC BOCs"), as defined in Section 3(4) of the 1996 Act, are SWBT, PB and NB.² PB is subject to Section 251(c) within its operating areas in California. NB is subject to Section 251(c) within its operating area in Nevada. SWBT is subject to Section 251(c) within its operating areas in Oklahoma, Texas, Missouri, Kansas and Arkansas. The Affidavits of Elizabeth Ham, Kathleen Larkin, Karol Sweitzer, James Riley and John Gueldner discuss the SBC BOCs' compliance with the 1996 Act, as well as with certain other relevant sections of the 1996 Act. PBCOM has no plans to offer services in Oklahoma.

C. SBLD COMPLIES WITH THE "SEPARATE AFFILIATE" REQUIREMENT (SECTION 272(a))

1. SBC will provide interLATA services originating in Oklahoma or which are treated as originating in Oklahoma under Section 271(j), through SBLD, an SBC subsidiary that is separate from the SBC BOCs, or through a wholly-owned subsidiary of SBLD hereinafter created or acquired, or another Section 272 compliant affiliate.

¹ See In the Matter of Implementation of the Non-Accounting Safeguards of Sections 271 and 272 of the Communications Act of 1934, as amended, First Report and Order, Cc Docket No. 96-149, FCC 96-489 (rel. Dec. 24, 1996) ("Non-Accounting Safeguards First Report and Order"); In the Matter of Implementation of the Telecommunications Act of 1996; Accounting Safeguards Under the Telecommunications Act of 1996, Report and Order (rel. Dec. 24, 1996) ("Accounting Safeguards Report and Order"). Applicants reserve their rights with regard to the filing of a petition for review with a court of competent jurisdiction.

² As used herein, SBC BOCs refers to SWBT, PB and NB, both collectively and individually.

2. PBCOM is a "separate affiliate" within the meaning of Section 272:
 - a. PBCOM is a duly formed and existing corporation organized under the laws of the State of California and is a wholly-owned subsidiary of PTG. PB is a duly formed and existing corporation organized under the laws of the State of California and is a wholly owned subsidiary of PTG, a Nevada corporation, which, in turn, is a wholly owned subsidiary of SBC. NB is a duly formed and existing corporation organized under the laws of the State of Nevada and is a wholly owned subsidiary of PTG. Neither PB, NB or SWBT own stock of PBCOM; and correspondingly, PBCOM owns no stock of PB, NB or SWBT, and is in all respects a separate corporate entity from PB, NB, or SWBT.
 - b. PBCOM operates separate and apart from the SBC BOCs, which are affiliated incumbent local exchange carriers providing local telephone exchange service and subject to the requirements of Section 251(c).
 - c. PBCOM provides no "in-region" telecommunications services of any kind as of the date of this affidavit, as defined in Section 271(i).
 - d. SBC may from time to time reorganize, merge, or otherwise change the form of SBLD or PBCOM or create or acquire additional interLATA service-providing subsidiaries. Any such subsidiaries will meet the requirements of Section 272 of the 1996 Act, as well as applicable state and federal regulations.

D. PBCOM WILL "OPERATE INDEPENDENTLY" FROM THE SBC BOCS

1. Section 272(b)(1) provides that the required separate affiliate "shall operate independently from the Bell operating company." In the Non-Accounting Safeguards First Report and Order, the Commission concluded that Section 272(b)(1) "imposes requirements beyond those listed in sections 272(b)(2)-(5)." The Commission further concluded that operational independence required that:
 - a. the BOC and its Section 272 affiliate be precluded from jointly owning switching or transmission facilities or the land or buildings where those facilities are located;
 - b. a Section 272 affiliate be precluded from performing operating, installation, and maintenance functions associated with the BOC's facilities; and
 - c. a BOC or any BOC affiliate, other than the Section 272 affiliate itself, be precluded from performing operating, installation, or maintenance functions associated with the interLATA switching and transmission facilities that the section 272 affiliate owns or leases from the provider other than the BOC with which it is affiliated.
2. PBCOM and the SBC BOCs will operate independently under this standard. In particular:

- a. PBCOM does not and, as long as the requirements of Section 272 or any lawful regulations remain applicable, will not, jointly own telecommunications transmission and switching facilities or the land and buildings on which such facilities are located with the SBC BOCs, and
- i. PBCOM will use only those shared services from the SBC BOCs allowed in the Non-Accounting Safeguards First Report and Order or other applicable regulations.. PBCOM will pay the SBC BOCs for all affiliate transactions services that the SBC BOCs provide in compliance with federal and state accounting requirements. All such transactions between PBCOM and the SBC BOCs will be conducted on an arm's length basis, reduced to writing and made available for public inspection as required in the Accounting Safeguards Report and Order ¶ 122.
- ii. As a structurally separate affiliate, PBCOM will comply with all of the requirements of Section 272(b) of the 1996 Act. Transactions related to the joint marketing of PBCOM services by the SBC BOCs will be provided pursuant to arms-length agreements that will be available for public inspection and accounted for in accordance with the FCC's requirements adopted in Docket No. 96-150.

- iii. PBCOM will utilize the joint marketing flexibility that the 1996 Act grants to enable one-stop shopping and to provide bundled offers that should be very attractive to customers.

- b. PBCOM is not currently providing, and will not provide, as long as the requirements of Section 272 or any lawful regulations remain applicable, operating, installation, or maintenance services in connection with the SBC BOCs' switching and transmission facilities, although PBCOM may perform such services for the SBC BOCs in the event the SBC BOCs purchase sophisticated equipment from PBCOM or within the meaning of paragraph 164 of the Non-Accounting Safeguards First Report and Order. PBCOM has no existing plans to sell such equipment to the SBC BOCs or to install or maintain such equipment for the SBC BOCs.

E. PBCOM COMPLIES WITH THE ACCOUNTING REQUIREMENTS

As required by Section 272 (b)(2), PBCOM books, records, and accounts are also separate from the SBC BOCs. Our books follow Generally Accepted Accounting Principles in compliance with CC Docket No. 96-150. All the services that PBCOM obtains from the SBC BOCs will be accounted for in compliance with the rules set forth in the Accounting Safeguards Report and Order. PBCOM's capital and expense accounting are separate from those of the SBC BOCs.

F. PBCOM COMPLIES WITH THE SEPARATE OFFICERS, DIRECTORS AND EMPLOYEES REQUIREMENTS

PBCOM and the SBC BOCs have separate officers, directors and employees.

1. No officer of PBCOM is or will be an officer of the SBC BOCs, and as long as the applicable requirements of Section 272 remain, no officer of PBCOM will simultaneously serve as an officer of an SBC BOC.
2. No director PBCOM is or will be a director of an SBC BOC, and as long as the applicable requirements of Section 272 remain, no director of PBCOM will also simultaneously serve as a director of an SBC BOC.
3. No PBCOM employee is or will simultaneously be an employee of an SBC BOC, and as long as the applicable requirements of Section 272 remain, no employee of PBCOM will simultaneously be employed by an SBC BOC.

G. PBCOM HAS NOT OBTAINED CREDIT WITH RECOURSE TO THE SBC BOCS' ASSETS IN THE EVENT OF DEFAULT

In compliance with Section 272 (b)(4), PBCOM has not obtained, and will not obtain, credit under any arrangement that would permit a creditor, upon default, to have recourse to the assets of the SBC BOCs. PBCOM has not requested and will not request the SBC BOCs, or any other affiliate to co-sign a contract or any other arrangement with PBCOM that would permit a creditor to obtain recourse to the SBC BOCs' assets in the event of a default by PBCOM.

H. PBCOM WILL CONDUCT ALL TRANSACTIONS ON AN ARMS-LENGTH BASIS, IN WRITING, AND AVAILABLE FOR PUBLIC INSPECTION

1. PBCOM, PB, and NB have conducted their transactions to date under existing FCC affiliate transaction rules. PBCOM will conduct future transactions with the SBC BOCs on an arms-length basis. In particular, the services the SBC BOCs have provided or will provide to PBCOM have been and will be accounted for in accordance with Parts 32 and 64 of the FCC's rules.
2. In addition, in accordance with the Accounting Safeguards Report and Order, upon commencement of the requested authorization, services or goods that the SBC BOCs provide to PBCOM will be provided and accounted for in conformity with the FCC's then-effective rules. Transactions between PBCOM and the SBC BOCs will be conducted on an arms-length basis, reduced to writing, and made available for public inspection. As with all other transactions, transactions involving joint marketing services PBCOM provides to the SBC BOCs or vice versa will be provided pursuant to arms-length agreements, reduced to writing, available for public inspection, and accounted for in accordance with the FCC's requirements.

I. PBCOM COMPLIES WITH THE REQUIREMENTS OF SECTION 272(g)

1. PBCOM has not marketed or sold and will not market or sell telephone exchange services provided by the SBC BOCs unless the SBC BOCs permit other entities offering the same or similar service as PBCOM to market and sell the SBC BOCs' telephone exchange services.

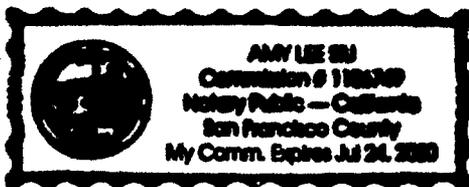
2. In addition, PBCOM will not permit the SBC BOCs to market or sell its interLATA services to customers until PBCOM has received authority to offer interLATA services in that state pursuant to an application under Section 271 or other lawful authorization.

I. PBCOM WILL CONDUCT A BIENNIAL AUDIT IN CONFORMITY WITH SECTION 272(d)

Section 272(d) requires that a company required to operate a separate subsidiary under Section 272, "shall obtain and pay for a joint federal/State audit every two (2) years conducted by an independent auditor to determine whether such company has complied with this section of the regulations propagated under this section, and particularly whether such company has complied with a separate accounting requirements under [Section 272(b)]." PBCOM, together with the SBC BOCs, will conduct the required audits in accordance with the requirements of Section 272 and the FCC's rules.

K. CONCLUSION

As demonstrated above, PBCOM will comply with the requirements set out by the 1996 Act and the Federal Communications Commission. Thus, the FCC should immediately grant SBLD's application.



Betsy J. Bernard
Betsy J. Bernard

Subscribed to and sworn before me this 9th day of April, 1997.

Amy Lee Shi
Notary Public

interconnection agreements with SWBT's local service provider customers (LSPs) in the Oklahoma Market Area.

3. The purpose of my affidavit is to describe the number and type of interconnection trunks that SWBT has installed for LSPs in Oklahoma; to provide information on the additional interconnection trunks that have been forecasted by LSPs; to provide information on the type of LSP switches being utilized; and to provide information on when SWBT and its LSP customers began exchanging live traffic in Oklahoma over the interconnection trunks. In addition, I will provide information on the assignment of telephone numbers to Oklahoma LSPs.

4. SWBT has installed a number of local/intraLATA trunks in Oklahoma City and Tulsa that are currently being used for LSP interconnection to and from SWBT's facilities in those serving areas. Beginning on or about January 6, 1997, SWBT began passing live traffic over a number of those trunk groups to the ordering LSP.

5. Local/intraLATA trunks are one-way trunks used for the transmission of local and intraLATA traffic and, as used in this affidavit, also include trunks used for E911, Operator and Directory Assistance, and choke trunks (i.e., trunks to protect the network from overflow in special situations such as concert promotions, ticket sales and the like). They do not include interLATA trunks used for the provision of exchange access to interexchange carriers (IXCs). A large number of the LSP local/intraLATA trunks that have been ordered to date are one-way trunks from SWBT to the LSP, which means the traffic carried over those trunks is terminated on the LSP's facilities and not on SWBT's network.

6. Butler Proprietary Schedule 1 shows the number of local/intraLATA trunks (incoming and outgoing) that have been installed by SWBT in Oklahoma City and Tulsa for the provision of interconnection to LSPs. It also shows the number of additional local/intraLATA trunks that

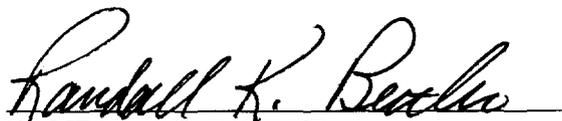
have been forecasted for Oklahoma City and Tulsa by LSPs. Because the information is considered or could be considered proprietary LSP customer information, Butler Schedule 1 is being filed under seal with a request that it be given confidential treatment.

7. SWBT originated traffic in both Oklahoma City and Tulsa is being terminated on LSP owned/leased Lucent 5E switching equipment that is not owned or leased by SWBT. No LSP in Oklahoma is currently using any SWBT unbundled local switching equipment.

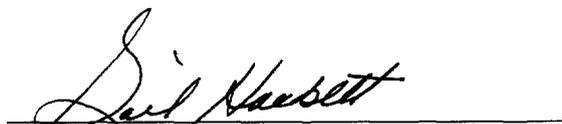
8. All of the local/intraLATA trunk groups installed to date are currently operational. Traffic is being exchanged over a large number of these trunk groups. Exceptions appear in the case of E911 trunks and choke trunks, which do not appear to be in use at this time, but have been tested and can be used at any time.

9. Additional data showing LSP activity is the number of NXXs assigned for Oklahoma City and Tulsa. The LERG report currently shows approximately 20,000 telephone numbers (2 NXX codes) have been assigned for LSP use in Oklahoma City and approximately 30,000 telephone numbers (3 NXX codes) in Tulsa.

The information contained in this affidavit and in the attached Schedule is true and correct to the best of my knowledge and belief.


RANDALL K. BUTLER

Subscribed and sworn to before me this 8th day of April, 1997.


NOTARY PUBLIC

My commission expires:

August 5, 1997

BUTLER PROPRIETARY SCHEDULE 1

**HIGHLY SENSITIVE
CONFIDENTIAL: TO BE FILED UNDER SEAL
PURSUANT TO PROTECTIVE ORDER**

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In The Matter of
Application of SBC Communications Inc.,
Southwestern Bell Telephone Company, and
southwestern Bell Communications Services,
Inc., d/b/a Southwestern Bell Long Distance, for
Provision of In-Region, InterLATA Services in
Oklahoma

CC Docket No. _____

**AFFIDAVIT OF WILLIAM C. DEERE
ON BEHALF OF SOUTHWESTERN BELL TELEPHONE CO.**

**STATE OF TEXAS §
 §
COUNTY OF DALLAS §**

I, WILLIAM C. DEERE, being of lawful age and duly sworn upon my oath, do hereby depose and state:

1. My name is William C. Deere, My business address is Room 2312, One Bell Plaza, Dallas, Texas 75202. I am the Regional Manager- Planning and Engineering for Southwestern Bell Telephone Company ("SWBT"). In this position I participate in the development, planning, and engineering of SWBT's telephone network within its five state service area, and act as the regulatory and legislative technical liaison in those states. In this position I have testified before the Oklahoma Corporation Commission ("OCC") concerning the technical issues contained in this affidavit.
2. I have a Bachelor of Science - Electrical Engineering degree from Southern Methodist University in Dallas, Texas. I am also a Registered Professional Engineer in Texas. I have also completed training conducted by the Bell System, AT&T (Lucent), Northern Telcom

(Nortel), Ericsson, Bellcore and Southwestern Bell Telephone Company on switching systems, transmission systems, and local network distribution systems.

3. I was employed by Southwestern Bell in 1961 as a Student Engineer. I worked in the central office and the PBX engineering groups of the Engineering department until October, 1969. At that time I was transferred to the Traffic department where I worked as the Manager-Switching Design and then the Traffic Manager Network Design where I supervised the PBX design group for the north part of Texas until October, 1978. I worked in St. Louis for 18 months as the head of the Business Services staff, and then returned to Dallas as the Division Manager-Network Administration. In October 1984, I assumed the duties of Division Staff Manager-Network Planning Staff. My title was changed to Division Manager-Network Engineering (Customer Services) on October 1, 1986, as a result of a reorganization of the Texas Network department. I assumed my present title and responsibilities for the for the five states served by Southwestern Bell Telephone Company in October, 1993.

4. The purpose of my affidavit is to describe how SWBT has satisfied all of the network-related elements of the competitive checklist set forth in Section 271(c)(2)(B) of the Telecommunications Act of 1996 ("Act"). In doing so I will describe the network related elements that SWBT offers to requesting carriers through SWBT's Statement of Generally Available Terms and Conditions ("STC") and through SWBT's approved interconnection agreements with Brooks Fiber Communications of Oklahoma, Inc., Brooks Fiber Communications of Tulsa, Inc., ("Brooks"), and U. S. Long Distance, Inc., ("USLD"). I will also address the issue of whether it is technically practical for SWBT to discriminate against

LSPs or Interexchange Carriers (“IXCs”) in the provision of interconnection facilities, unbundled network elements or resale services.

5. Where applicable, I will explain how SWBT’s contracts satisfy its duties under §§ 251 and 252 of the Act, the FCC’s regulations implementing those sections (“Rules”), the FCC’s First Report and Order (FCC 96-325 (August 8, 1996) (“Order”)), the FCC’s Second Report and Order (FCC 96-333 (August 8, 1996) (“Second Report and Order”)), the FCC’s First Report and Order on Reconsideration (FCC 96-394 (September 27, 1996) (“First Reconsideration Order”)), and the FCC’s Second Order on Reconsideration (FCC 96-476 (Dec. 13, 1996) (“Second Reconsideration Order”)).
6. My affidavit will show that SWBT is currently offering all network related Checklist items in its Statement of Terms and Conditions for Oklahoma.
7. SWBT has agreed to accept the FCC’s First Report and Order, however, SWBT has reserved its rights to modify the STC and negotiated agreements in accordance with future court or administrative decisions that expand or limit its obligations

I. CHECKLIST ITEM (i): INTERCONNECTION

8. A Bell Operating Company (“BOC”), such as SWBT meets the requirements of the Checklist if it offers access and interconnection that includes :
 - (i) Interconnection in accordance with the requirements of sections 251(c)(2) and 252(d)(1). 47 U.S.C. § 271(c)(2)(B)(i)

As detailed below, SWBT’s interconnection Agreements fully satisfy this mandate.

Methods of Interconnection

9. Consistent with § 251(c)(2)(A) of the Act and the FCC Rules, SWBT provides interconnection with its network for the transmission and routing of telephone exchange traffic and/or exchange access traffic. 47 C.F.R. § 51.305(a)(1); Order ¶ 184. (STC Section II, Appendix NIM and Appendix ITR.), (Brooks and USLD Section 2, Appendix NIM and Appendix ITR.) SWBT already provides for interconnection using four alternatives and will provide other technically feasible alternatives using the Bona Fide Request Procedure to be discussed later. In summary SWBT offers: (1) Mid-Span Fiber Interconnection (“MSFI”); (2) Physical Collocation Interconnection; (3) Virtual Collocation Interconnection; and (4) SONET Based Interconnection. (STC II. B. 1-4, Appendix NIM, p.1-5) and (Brooks and USLD Section II. B. and Appendix NIM.)
10. A MSFI interconnection arrangement may be negotiated at any mutually agreeable, economically and technically feasible point between a Local Service Provider’s (“LSP’s”) premises and a SWBT tandem or end office. (STC Appendix NIM, p.1), (Brooks and USLD Appendix NIM, p.1)
11. A MSFI may be used to provide interoffice trunking for the purpose of originating and terminating calls between an LSP’s switch and a SWBT switch, and for transit calls to or from a third party via SWBT’s tandem switch. 47 C.F.R. § 51.321(b). If MSFI is used to interconnect SWBT’s and the requesting LSP’s networks, the parties will jointly engineer and operate a single SONET transmission system. (STC Appendix NIM, p.1), (Brooks and USLD Appendix NIM, p.1)
12. There are two basic mid-span designs. In the first design, a LSP’s fiber cable and the SWBT fiber cable are connected at an economically and technically feasible point between

the LSP's location and the last entrance manhole at SWBT's central office or tandem switch location. For the second design, a LSP would provide fiber cable to the last entrance manhole at the SWBT central office or tandem switch location, and provide sufficient length of fiber optic cable for SWBT to pull the fiber optic cable to the SWBT cable vault for termination on the SWBT fiber distribution frame. SWBT will be responsible for designing, provisioning, ownership and maintenance of all equipment and facilities on its side of the network interconnection point ("NIP"). Similarly, the LSP will be responsible for the same functions on its side of the NIP. Each party is free to select the manufacturer of its Fiber Optic Terminal (FOT). (STC Appendix NIM p.2), (Brooks and USLD Appendix NIM, p.2)

13. The LSP location will include fiber optic terminals, multiplexing equipment, and fiber required to take the optical signal from SWBT for trunking or transport of unbundled loop traffic.

The fiber connection point may occur at several locations:

- A location with an existing SWBT fiber termination panel. In this situation, the NIP shall be outside the SWBT building which houses the fiber termination panel.
- A location with no existing SWBT fiber termination panel. In this situation, SWBT and the LSP shall negotiate provision, maintenance, and ownership of a fiber termination panel and an above ground outside cabinet as a NIP and for connection of the fiber cables.
- A manhole outside the SWBT central office or tandem switch location. In this situation the LSP would provide sufficient length of fiber optic cable for SWBT to pull the fiber

optic cable to the SWBT cable vault for termination on the SWBT fiber distribution frame (“FDF”). The NIP will be at the manhole and SWBT will assume ownership and maintenance responsibility for the fiber cabling from the manhole to the FDF.

- The SWBT central office or tandem switch location will include all SWBT fiber optic terminals, multiplexing, and fiber required to take the optical signal hand-off provided by the LSP for trunking. This location is SWBT’s responsibility to provision and maintain. (STC Appendix NIM, p.2), (Brooks and USLD Appendix NIM, p.2)

14. Any, or all of the above methods of interconnection will be available at the trunk side of the local switch, the trunk connection points of a tandem switch, central office cross connect points, out-of-band signaling transfer points, and points of access to unbundled network elements. SWBT provides requesting LSPs options for interconnection at all of these points. 47 C.F.R. § 51.305(a)(2). (STC II. B. 4), (Brooks and USLD II. A. 1. a., Appendix ITR)

15. The FCC Rules also requires the availability of interconnection at the line-side of a local switch. Paragraphs 210 and 211 of the FCC Order, provides that an example of this type of interconnection would be at the Main Distribution Frame (MDF) in the central office, and would be useful for LSPs that have their own distribution plant and seek to interconnect to an incumbents’ switch. SWBT has not yet received any requests for such a form of interconnection, but will make it available upon request. 47 C.F.R. § 51.305(a)(2)(i).

16. Where space permits, LSPs will be allowed to arrange for Physical Collocation of equipment in SWBT buildings and structures to terminate fiber cables on its own equipment located in secure areas separated from SWBT’s equipment area. A space preparation