

EXHIBIT A

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Ensuring Customer Premises Equipment Backup Power for Continuity of Communications)	PS Docket No. 014-174
)	
Technology Transitions)	GN Docket No. 13-5
)	
Policies and Rules Governing Retirement of Copper Loops by Incumbent Local Exchange Carriers)	RM-11358
)	
Special Access for Price Cap Local Exchange Carriers)	WC Docket No. 05-25
)	
AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services)	RM-10593
)	

DECLARATION OF RICHARD HATCH

1. My name is Richard (Rex) Hatch. My title is Area Manager – Regulatory Relations in the Technology Operations unit of AT&T Inc. (“AT&T”). My current business address is 131 Huntsville Road, Eureka Springs, Arkansas. I have served in my current position with AT&T for 15 years. I began working for AT&T in 1977 as a central office frame attendant with the Southwestern Bell Telephone Company. Since then I have served in numerous non-management and management positions in many different capacities supporting AT&T’s network, including positions in construction and engineering as well as installation and repair. I received my Business Administration Degree in Business Management from Tarkio College at Tarkio, Missouri.

2. My responsibilities in my current position include the preparation and publication of notices of network modifications that AT&T provides to interconnected competitive providers to comply with its responsibilities under the network change rules promulgated by the Federal Communications Commission (“FCC”). In connection with those responsibilities, I have read the Notice of Proposed Rulemaking and Declaratory Ruling (“NPRM”) that the FCC released in the above-captioned dockets on November 25, 2014. The purpose of this declaration is to address certain statements contained in that NPRM concerning the current state of the rules regarding the notices that AT&T and other incumbent local exchange carriers (“ILECs”) must provide when they undertake certain changes to their wireline network.
3. In particular, I note that the NPRM, at Paragraph 51, states that the FCC’s current rules defining the types of facilities for which the ILECs must provide notice of any network changes “do not encompass the feeder portion of loops.” I am advised by counsel that this statement is inconsistent with statements the Commission has made in at least one prior order concerning the scope of the existing FCC rules regarding network changes. Based on my experience in my current position, it also is inconsistent with AT&T’s understanding of those rules and its practice in providing notice of network changes involving the copper feeder portion of loops.
4. I have conducted a review of AT&T’s records of network change notices dating back to 2007. In that period I found at least 250 notices that AT&T provided to the industry pursuant to the FCC’s rules concerning a planned network change involving the feeder portion of loops in AT&T’s network. Those notices involved facilities in all regions in AT&T’s ILEC footprint and generally involved the retirement of the copper feeder

portion of the loop and its replacement by either digital loop carrier or next generation digital loop carrier.

5. Most of those cases in which AT&T has provided notice of the retirement of copper feeder cable involved facilities on which competitive carriers did not have any Asynchronous Transfer Mode (ATM) Digital Subscriber Line (DSL) circuits. Even in those cases in which competitive providers did have facilities, I am unaware of any objections that any interconnecting provider may have filed in response to AT&T's network change notice. In fact, during the 14-plus years that I have been responsible for the network change notification process, I am unaware of any objection to a network change notice AT&T has provided, whether it involved copper feeder retirement or some other network modification.
6. Attached to this declaration is one of the more recent examples of the types of public notice that AT&T has provided regarding the retirement of copper feeder. This notice involved the retirement of copper feeder facilities in the Oviedo, Florida wire center. The notice was issued on April 1, 2014. Consistent with the requirements of the FCC's rules, the notice provided the implementation date of the planned change (in this case, the 4th quarter of 2014), the location where the changes would occur, a description of the types of changes planned, and a description of the reasonably foreseeable impact of the planned changes. As indicated on its face, this public notice, as with every notice of planned network changes published by AT&T, is made available on a publicly accessible website.
7. The attached notice indicates that there was one ATM DSL circuit serving a competitive carrier on the copper feeder that was being retired. Consistent with my experience, no

objection was filed by any carrier to that network change or the displacement of the CLECs ATM DSL circuit.

VERIFICATION PAGE

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that, based on the information available to me, the foregoing is true and correct to the best of my knowledge.



Richard (Rex) Hatch

Executed on January 28, 2015

Attachment 1

PUBLIC NOTICE of NETWORK CHANGE UNDER RULE 51.329(a)

Network Disclosure Number: ATT20140401L.1

Issue Date: 04/01/2014

Modification Date:

4th Qtr 2014

Carrier's Name: BellSouth
Telecommunications, LLC.

Carrier's Address: 135 Huntsville Rd, Eureka Springs, AR 72632

Contact: Your Account Manager or Service Representative
Technical Issues
Richard Hatch
135 Huntsville Rd
Eureka Springs, AR 72632
479 253-7675
rh4979@att.com

Public Notice: **can be obtained on the Internet at:**
<https://ebiznet.att.com/networkreg/>

Network Change:

In the Oviedo wire center (**OVIDFLCA**) – Route 3, there will be a cutover of 114 working circuits to a nearby DLC. The copper cable will be retired in place and a total of 12,800 feet of 314/400/1200-pair copper cable (800' of underground PIC cable & 12,000' of buried PIC copper) from CO MDF to MH S1 & from MH S1 to MH E8 on SR419 will be retired. This is due to copper facility conflicts associated with FDOT road move plans for SR426/SR419 from Pine Street to Lockwood Blvd. There is a fiber fed DLC site in the route with existing hardwire capacity to provide the necessary cutover from copper facilities to pair gain. There are three SAls affected by the cutover of cable 3 to existing PG and FPG counts from a fiber-fed DLC serving the affected Xboxes. The affected copper cable count is 3, 1-1200.

Description of Type of Changes Planned:

It is proposed to cut the existing all-buried copper feeder facilities to existing fiber-fed DLC facilities at the following locations in the Oviedo, FL wire center.

The Xboxes and the respective spare pairs after the cut-over are shown below:

Xbox	No. of DLC Spares After Cut-Over
655 E. Broadway St.	40 spr
F 141 Academy Ave.	30 spr
F 101 Reed Ave.	39 spr

Description of Reasonably Foreseeable Impact of the Planned Changes:

After this Plan is implemented and work is completed, metallic feeder facilities from the Central Office to the affected area will no longer be available. Unbundled loops that are defined as compatible with Digital Loop Carrier (DLC), e.g., those defined to transport POTS-grade service, will be transferred to the new DLC system without consequence. Competitive carriers employing unbundled loops that are defined to require metallic facilities, e.g., Digital Subscriber Line (DSL) or line sharing circuits will be notified individually. This notification is intended to allow the affected carrier to convert the circuit to one compatible with DLC. **Currently, there is currently 1 Competitive Carrier circuit of this type on the affected copper facilities.**

It should be noted that if a competitive carrier obtains an unbundled loop that has been defined to transport POTS-grade service, but then utilizes this loop to provide DSL service, AT&T will have no knowledge of the presence of DSL. In such a case, AT&T has no basis to notify the carrier and the ability of the competitive carrier to provide DSL service may be affected.

Location of Change:

CLLI Code/Statewide	City	State	Implementation Date
OVIDFLCA	OVIDEO	FL	4th Quarter 2014