

Attachment B



CLECs' Share of Switched Access Lines in SBC Territory

SBC calculated the number of CLEC switched access lines by adding the number of CLEC resold and UNE-P switched access lines to the number of CLEC-switched, stand-alone UNE and self-provided loops.¹ SBC used two methodologies to estimate the number of CLEC-switched lines: (1) it calculated the number of lines based on the number of CLEC interconnection trunks (using a conservative estimate of 2.75 lines per interconnection trunk); and (2) it totaled the number of CLEC E911 listings, which understates the number of CLEC-switched lines because multi-line end-users often have only one E911 listing for the reasons stated in Exhibit 5.

12 State Total

CLEC and SBC Switched Access Line Data – Based on CLEC Interconnection Trunks *EOY 2001*

	Residence	Business	Total
Estimated CLEC Switched Access Lines	3,945,825	8,324,832	12,270,657
SBC Retail Switched Access Lines	32,948,682	20,659,275	53,604,960
CLEC Market Share	10.7%	28.7%	18.6%

SWB Region – Based on CLEC Interconnection Trunks *EOY 2001*

	Residence	Business	Total
Estimated CLEC Switched Access Lines	1,680,047	2,500,748	4,180,795
SWB Retail Switched Access Lines	9,572,145	5,368,138	14,937,285
CLEC Market Share	14.9%	31.8%	21.9%

Ameritech (AIT) Region – Based on CLEC Interconnection Trunks *EOY 2001*

	Residence	Business	Total
Estimated CLEC Switched Access Lines	1,347,566	3,133,349	4,480,915
AIT Retail Switched Access Lines	12,262,897	7,896,643	20,159,540
CLEC Market Share	9.9%	28.4%	18.2%

Pacific Region – Based on CLEC Interconnection Trunks *EOY 2001*

	Residence	Business	Total
Estimated CLEC Switched Access Lines	918,212	2,690,735	3,608,947
Pacific Retail Switched Access Lines	11,113,640	7,394,494	18,508,135
CLEC Market Share	7.6%	26.7%	16.3%

¹ Source Document Attached



CLECs' Share of Switched Access Lines in SBC Territory – Cont'd

12 State Total

CLEC and SBC Switched Access Line Data – Based on E911 Listings EOY 2001

	Residence	Business	Total
Estimated CLEC Switched Access Lines	3,409,945	5,926,670	9,336,615
SBC Retail Switched Access Lines	32,948,682	20,659,275	53,604,960
CLEC Market Share	9.4%	22.3%	14.8%

SWB Region – Based on E911 Listings EOY 2001

	Residence	Business	Total
Estimated CLEC Switched Access Lines	1,457,150	1,559,809	3,016,959
SWB Retail Switched Access Lines	9,572,145	5,368,138	14,937,285
CLEC Market Share	13.2%	22.5%	16.8%

Ameritech (AIT) Region – Based on E911 Listings EOY 2001

	Residence	Business	Total
Estimated CLEC Switched Access Lines	1,292,320	2,542,647	3,834,967
AIT Retail Switched Access Lines	12,262,897	7,896,643	20,159,540
CLEC Market Share	9.5%	24.4%	16.0%

Pacific Region – Based on E911 Listings EOY 2001

	Residence	Business	Total
Estimated CLEC Switched Access Lines	660,475	1,824,214	2,484,689
Pacific Retail Switched Access Lines	11,113,640	7,394,494	18,508,135
CLEC Market Share	5.6%	19.8%	11.8%

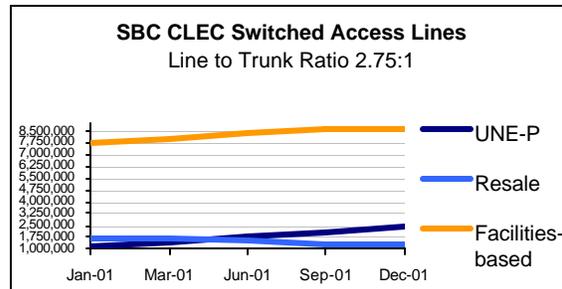
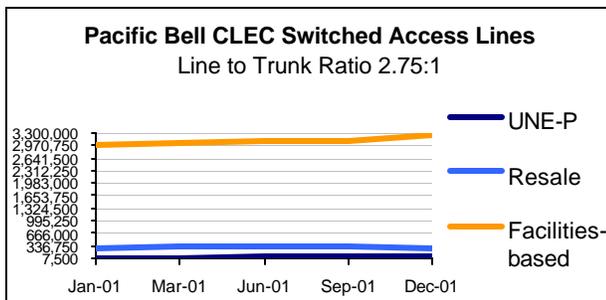
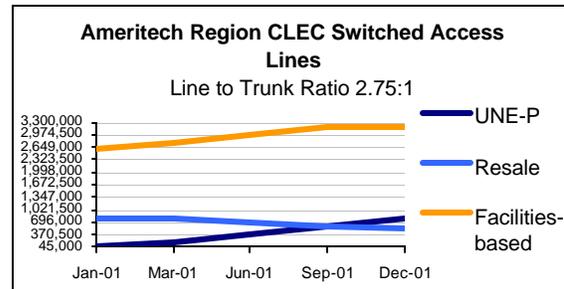
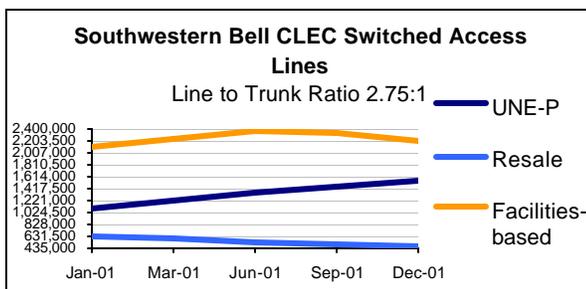


SBC Estimated CLEC Switched Access Lines – Based on CLEC Interconnection Trunks¹

-December 2001-

CLEC Switched Access Lines		SWB Region	Ameritech Region	Pacific Region	Total
CLEC Switched Facilities-Based Access Lines² (Interconnection Trunks x 2:75)	Residence	438,460	556,513	737,612	1,732,585
	Business	1,775,238	2,604,994	2,503,816	6,884,048
	TOTAL	2,213,698	3,161,507	3,241,428	8,616,633
UNE-P	Residence	1,004,303	635,273	25,514	1,665,090
	Business	522,710	155,830	54,538	733,078
	TOTAL	1,527,013	791,103	80,052	2,398,168
Resold Lines	Residence	237,284	155,780	155,086	548,150
	Business	202,800	372,525	132,381	707,706
	TOTAL	440,084	528,305	287,467	1,255,856
Total Estimated CLEC Switched Access Lines	Residence	1,680,047	1,347,566	918,212	3,945,825
	Business	2,500,748	3,133,349	2,690,735	8,324,832
	TOTAL	4,180,795	4,480,915	3,608,947	12,270,657

% CLEC Lines	SWB Region	Ameritech Region	Pacific Bell Region	Total
% CLEC Facilities-Based Switched Access Lines	53%	70%	90%	71%
% UNE-P	37%	18%	2%	19%
% Resold Lines	10%	12%	8%	10%



¹ Source Document Attached.

² The number of CLEC Facilities-Based Switched Access Lines includes stand-alone UNE loops used in conjunction with CLEC switching, and self-provided CLEC loops.

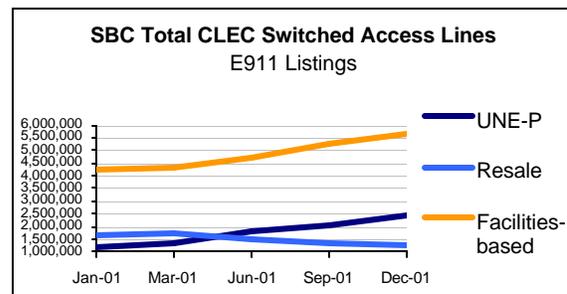
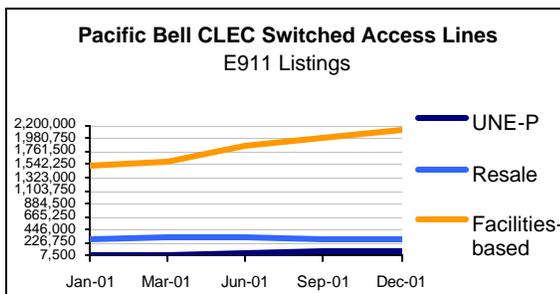
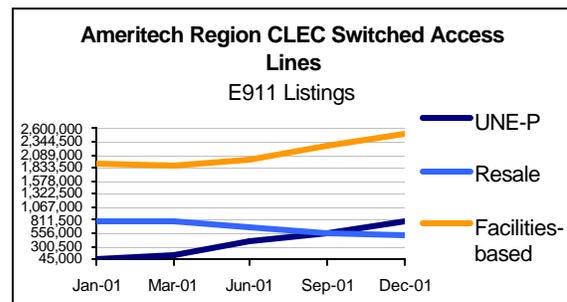
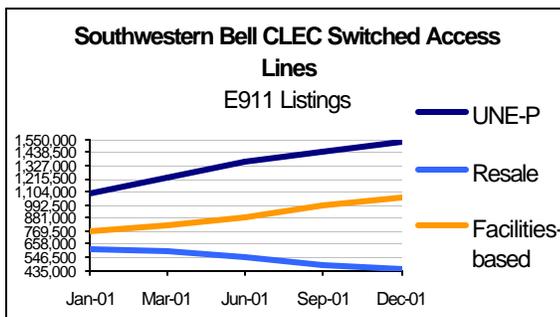


SBC Estimated CLEC Switched Access Lines – Based on CLEC E911 Listings³

-December 2001-

CLEC Switched Access Lines		SWB Region	Ameritech Region	Pacific Region	Total
CLEC Switched Facilities-Based Access Lines ⁴ (E911 Listings)	Residence	215,563	501,267	479,875	1,196,705
	Business	834,299	2,014,292	1,637,295	4,485,886
	TOTAL	1,049,862	2,515,559	2,117,170	5,682,591
UNE-P	Residence	1,004,303	635,273	25,514	1,665,090
	Business	522,710	155,830	54,538	733,078
	TOTAL	1,527,013	791,103	80,052	2,398,168
Resold Lines	Residence	237,284	155,780	155,086	548,150
	Business	202,800	372,525	132,381	707,706
	TOTAL	440,084	528,305	287,467	1,255,856
Total Estimated CLEC Switched Access Lines	Residence	1,457,150	1,292,320	660,475	3,409,945
	Business	1,559,809	2,542,647	1,824,214	5,926,670
	TOTAL	3,016,959	3,834,967	2,484,689	9,336,615

% CLEC Lines	SWB Region	Ameritech Region	Pacific Region	Total
% CLEC Facilities-Based Switched Access Lines	35%	65%	85%	61%
% UNE-P	51%	21%	3%	25%
% Resold Lines	14%	14%	12%	13%



³ Source Document Attached.

⁴ The number of CLEC Facilities-Based Switched Access Lines includes stand-alone UNE loops used in conjunction with CLEC switching, and self-provided CLEC loops.



Estimated CLEC Self-Provided Switched Access Lines

Many CLECs provide service in SBC's territory entirely over their own switching and loop facilities. As detailed in the charts below, SBC estimates the number of access lines served entirely over CLEC switching and loop facilities by first estimating total CLEC access lines, and then subtracting the lines served using resale, UNE-P combinations and stand alone unbundled loops purchased from SBC.

December 2001

Estimate 1 ¹ -- Based on CLEC Interconnection Trunks	SWB Region	Ameritech Region	Pacific Region	Total
Total Estimated CLEC Switched Access Lines	4,180,795	4,480,915	3,608,947	12,270,657
minus Resold Lines	440,084	528,305	287,467	1,255,856
minus UNE-P	1,527,013	791,103	80,052	2,398,168
minus Stand Alone UNE Loops	231,086	806,881	459,053	1,497,020
Estimated CLEC Self-Provided Switched Access Lines	1,982,612	2,354,626	2,782,375	7,119,613
% Estimated CLEC Self-Provided Switched Access Lines	47%	53%	77%	58%

December 2001

Estimate 2 ² -- Based on E-911 Listings	SWB Region	Ameritech Region	Pacific Region	Total
Total Estimated CLEC Switched Access Lines	3,016,959	3,834,967	2,484,689	9,336,615
minus Resold Lines	440,084	528,305	287,467	1,255,856
minus UNE-P	1,527,013	791,103	80,052	2,398,168
minus Stand Alone UNE Loops	231,086	806,881	459,053	1,497,020
Estimated CLEC Self-Provided Switched Access Lines	818,776	1,708,678	1,658,117	4,185,571
% Estimated CLEC Self-Provided Switched Access Lines	27%	45%	67%	45%

¹ See Attached Source Document

² See Attached Source Document



Switched Access Line Market Share Change in SBC Territories Between 2000-2001

12 State Total CLEC and SBC Switched Access Line Interconnection Trunks * 2.75 – Estimate 1 Overall Market Share – 2000 to 2001			
	EOY 2000	EOY 2001	% Change 2000-2001
Estimated CLEC Switched Access Lines	10,192,855	12,162,257	19%
SBC 12-State Retail Switched Access Lines	56,225,223	53,604,958	-5%

12 State Total CLEC and SBC Switched Access Line E-911 Listings – Estimate 2 Overall Market Share – 2000 to 2001			
	EOY 2000	EOY 2001	% Change 2000-2001
Estimated CLEC Switched Access Lines	6,454,456	9,228,214	43%
SBC 12-State Retail Switched Access Lines	56,225,223	53,604,958	-5%

Sources

Because it does not have access to an exact accounting of access lines served by CLECs in its local service territories (only the CLECs themselves have such data), SBC estimates the number of CLEC access lines using two different methodologies, one based on interconnection trunks, and the other based on E911 database listings.¹ These are the same conservative methodologies used by SBC and reviewed by the FCC in connection with the Texas, Kansas/Oklahoma and Missouri/Arkansas 271 Applications.

Estimate 1: (Interconnection Trunks * 2.75) + UNE-Ps + Resold Lines

Interconnection Trunks are used by switch-based CLECs to connect their network to SBC's network for the purpose of passing traffic. Thus, CLEC end users are able to connect with SBC end users, and vice versa.² Interconnection trunks have the capacity to serve multiple CLEC access lines. SBC uses a conservative 2.75:1 access line-to-trunk ratio³ to estimate the number of access lines served by CLECs using interconnection trunk capacity purchased from SBC.

Because UNE-P arrangements and resold lines are served via SBC switching facilities, no interconnection trunks are required to transport CLEC UNE-P and resale traffic to the SBC network. Accordingly, SBC adds UNE-P and resold lines to the access line-to-trunk ratio to estimate the total access lines served by CLECs in SBC's local service territories.

The business/residence split for access lines served by CLECs using SBC interconnection trunks is estimated using the same ratio of business-to-residence lines as that appearing in the E911 database listings for switch-based CLECs.

Estimate 2: E-911 Listings + UNE-Ps + Resold Lines

CLECs using their own switching facilities to provide service to end users are responsible for establishing and maintaining the telephone number listings for those customers in SBC's E911 databases, and for designating whether the service provided to those telephone numbers is business or residential in nature.⁴ Switch-based CLEC E911 listings therefore provide another method of estimating CLEC access lines.

The E911 listings utilized in this estimate are only those listings served by switch-based CLECs, as input and updated by those CLECs themselves. As noted above, UNE-P and resold lines are not served using a CLEC switch. SBC therefore adds UNE-P and resold lines to the switch-based E911 listings to estimate the total access lines served by CLECs in SBC's local service territories. Because SBC's E911 databases do not reflect all access lines served by switch-based carriers, the E911 estimate of CLEC access lines is overly conservative.⁵

¹ All numbers quoted and data used in estimating competition are the most accurate numbers available as maintained in SBC's internal systems. Various factors involved in the data collection process - including manual processes and reliance on CLEC data - may result in fluctuation of the numbers.

² Interconnection trunks carry traffic from access lines served using the CLECs own loop facilities, as well as those served using unbundled loops purchased from SBC. Both types of service provided by switch-based CLECs therefore are included in this estimate.

³ See, e.g., UNE Fact Report at III-14, attached to Comments of the United States Telecom Association, Implementation of the Local Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98 (FCC filed May 26, 1999) (observing that "based on ILEC engineering experience, a single trunk can support up to approximately 10 facilities-based lines" and conservatively assuming that "CLEC trunks are serving between 2.5 and 5 facilities-based lines per trunk"); and US LEC Legal Information (May 3, 2000), utilizing an access line to trunk ratio of 5:1 to estimate the "equivalent access lines" served by its network.

⁴ The switch-based CLEC E911 listings used in this estimate include access lines served by such CLECs over their own loop facilities, as well as those served using unbundled stand-alone loops purchased from SBC.

⁵ For example, the E911 database generally does not include listings for "inbound only" access lines used by business entities such as call centers, reservation agencies and telemarketing centers, nor does it include access lines reported in competing E911 databases. CLECs presumably have won a significant number of those lines because they targeted such customers under the reciprocal compensation regime.