Attachment A

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

In the Matter of	)	
	)	
Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers	)	CC Docket No. 01-338
	)	
Implementation of the Local Competition Provisions in the Telecommunications Act of 1996	)	CC Docket No. 96-98
	)	
Deployment of Wireline Services Offering Advanced Telecommunications Capability	)	CC Docket No. 98-147

UNE-P AND INVESTMENT

Prepared for and Submitted by

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UNE-P AND INVESTMENT

The facts on the ground show that facilities-based investment by CLECs is *lower* in states with high volumes of UNE-P than in states with low volumes of UNE-P. The facts also show that AT&T's claim that there is a correlation between high volumes of UNE-P and ILEC investment is wrong. AT&T supports its contrary arguments with data from just a few hand-picked states, and in some cases with data regarding only AT&T's own investments, rather than those of CLECs as a whole.

A. Real-World Experience Confirms That UNE-P Impedes CLEC Facilities-Based Investment.

AT&T claims that CLECs need the UNE-P in order to "develop[] a sufficiently large customer base" to make it economical "to transfer . . . customers off the ILECs' switches entirely onto" the CLECs' own switches.[1] AT&T asserts that, as a result, "facilities-investment is highest where UNEs are most available."[2] The facts show otherwise.

1. Data from all states with significant CLEC entry demonstrate that the availability of the UNE-P decreases the level of facilities-based competition.

To support its theory that UNE-P leads to facilities-based competition, AT&T points to its own business plan in just two states, California and New York. But the data from all states with significant CLEC entry refute this theory. As demonstrated in Figure 1, a simple regression analysis shows that facilities-based competition within a state decreases as UNE-P penetration within that state increases. In statistical terms, there is a strong *negative* correlation between facilities-based competition and UNE-P usage.[3]

Figure 1 is based on data from the 26 states where, as of year-end 2001, total CLEC facilities-based and UNE-P lines represented at least 10 percent or more of the BOC access lines within those states.[4] These 26 states represent 87 percent of all facilities-based CLEC lines and 91 percent of all UNE-P lines.[5] These states account for 76 percent of all CLEC switches. They

[1] AT&T Brief at 61.

[2] AT&T Brief at vi.

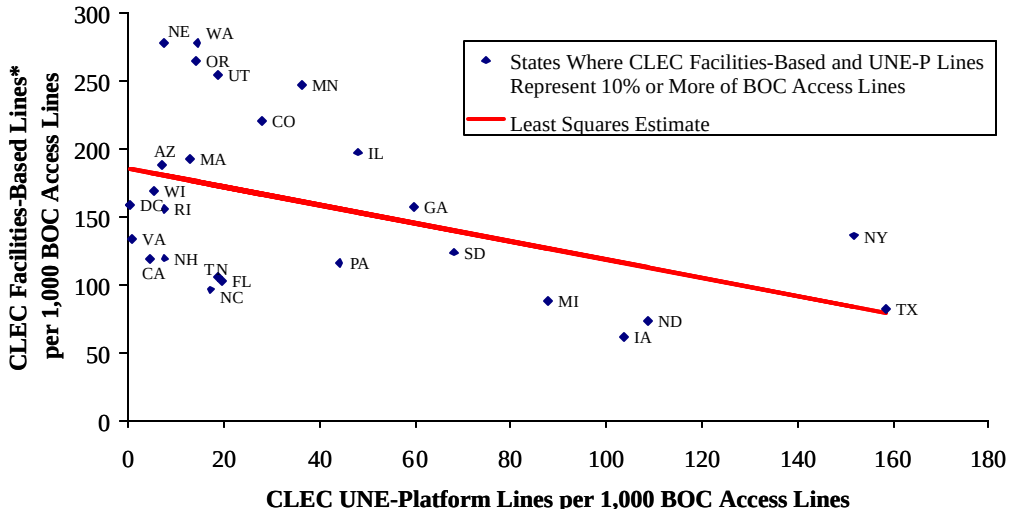
[3] Appendix A contains the results of the statistical analysis. It demonstrates that, to a 95-percent level of confidence, there is a statistically significant *negative* correlation between these two variables.

[4] We have normalized CLEC lines against the BOC access lines within a state, rather than all ILEC lines within that state, because data are not available for CLEC lines in non-BOC territory (including in the former GTE territory). This permits an apples-to-apples comparison of the CLEC lines within a BOC's territory in a given state to the BOC's own lines within that state.

[5] States where total CLEC lines represent less than 10 percent of BOC access lines were properly excluded from this analysis. These states typically have relatively low volumes of both facilities-based lines and UNE-P, which produces a close to 1:1 correlation between these two variables that, given the relatively small volumes involved, is not meaningful as a statistical matter. The 10-percent threshold applied in Figure 1 removes those states that merely add statistical noise to the analysis. In any event, including these states does not produce a statistically significant positive correlation, but rather a statistically insignificant correlation. Thus, this analysis of all states also does not support AT&T's claims.

also contain nearly three-quarters of all BOC access lines. They include all of the states in which, as of year-end 2001, AT&T was providing UNE-P to residential consumers.[6]

Figure 1. Facilities-Based Competition Decreases as UNE-P Penetration Increases



*Facilities -based lines are based on CLEC E911 listings as of year-end 2001.

The inverse relationship between facilities-based competition and UNE-P usage is particularly striking in the business market.[7] As of year-end 2001, CLECs served at least 13 million, and more likely closer to 20 million business lines using their own switches, compared to only 1.6 million business lines through UNE-P.[8] Nearly all of these lines were originally acquired and continue to be served by CLECs using their own switches; only a negligible amount of facilities-based lines have been migrated from UNE-P. Thus, the pattern is just the opposite of what AT&T claims: relatively low UNE-P volumes are associated with relatively high facilities-based volumes.

This relationship also is evident in residential markets. UNE-P usage is heavily concentrated in residential markets: approximately 70 percent of all UNE-P lines serve residential customers. But the states in which facilities-based residential competition is most

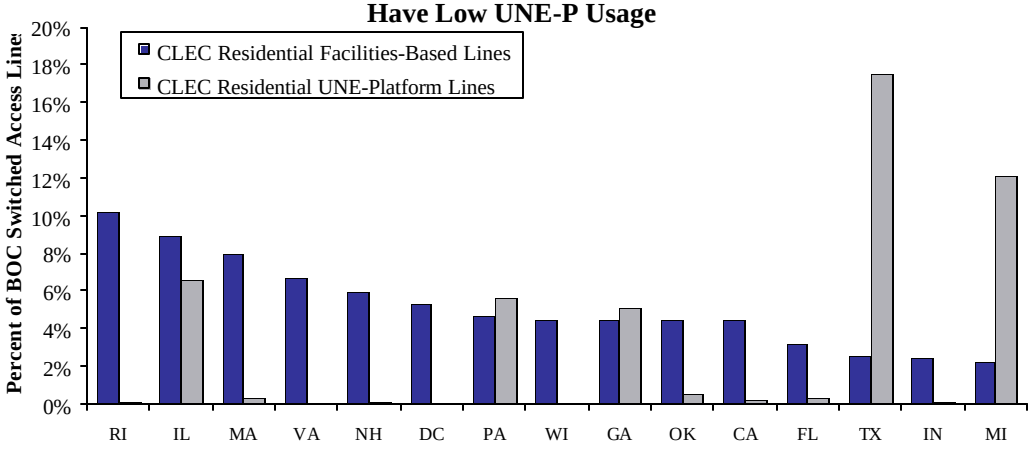
[6] AT&T is providing local residential service using UNEs in New York, Texas, Michigan, Georgia, Illinois, and Ohio, and has announced plans to begin providing service in New Jersey and California later this year. *See* AT&T Press Release, *AT&T Says It's Eager to Compete in PA. Local Phone Market, Hopeful That Regulatory Judge's Opinion Today Will Pave the Way* (May 7, 2002); AT&T Press Release, *AT&T Enters Illinois Residential Local Phone Market* (June 5, 2002); AT&T Press Release, *AT&T Enters Ohio Residential Local Phone Market* (June 11, 2002); AT&T Press Release, *AT&T To Offer Residential Local Service in New Jersey Later This Summer* (July 15, 2002).

[7] The fact that UNE-P volumes have recently begun to increase significantly in certain states with substantial facilities-based competition, such as Michigan and California, in no way suggests a positive correlation between facilities-based competition and UNE-P usage in those states. The recent increase in UNE-P usage in those and other states is a result of recent decreases in UNE-P rates and is occurring *despite*, not because of, the substantial facilities that were previously deployed.

[8] *See UNE Fact Report 2002* at II-4.

advanced tend to have very low levels of residential UNE-P. For example, the five states with the most facilities-based residential lines in proportion to the BOC access lines in each state are Rhode Island, Illinois, Massachusetts, Virginia, and New Hampshire.[9] In each of these states except Illinois, residential UNE-P represents less than 1 percent of the BOC access lines in the state. *See* Figure 2. This same is true with respect to all but five of the 15 states with the highest level of facilities-based residential competition. *See id.*

Figure 2. Most States with High Levels of Facilities-Based Residential Competition Have Low UNE-P Usage



Conversely, the level of residential UNE-P is highest in those residential markets where levels of facilities-based residential competition are relatively low. The three states with the highest residential UNE-P penetration (by far) are New York, Texas, and Michigan, where residential UNE-P lines represent 26 percent, 18 percent, and 12 percent of the BOC residential lines in those states, respectively. By comparison, facilities-based residential lines represent only 2.5 percent or less of the BOC access lines in each of those states. Indeed, New York – the state championed as the gold-standard in AT&T's analysis – has proportionately more residential UNE-P than any other state, but its level of facilities-based residential competition does not even place it among the top-15 states. And there is no evidence to suggest that AT&T or any other CLEC has actually migrated residential lines from UNE-P to their own switches. As these facts demonstrate, UNE-P does not stimulate facilities-based competition in residential markets, but impedes it.

Most facilities-based residential competition is provided through cable telephony (and to an increasing degree through wireless).[10] Quite obviously, UNE-P does nothing to facilitate the deployment of cable telephony, because cable telephony is provided over an entirely separate network. But UNE-P can discourage the investment in cable telephony from ever occurring, and the facts indicate that is exactly what is occurring. As noted above, the states with the highest levels of residential UNE-P all have low levels of facilities-based residential competition through cable telephony. This is why one of the nation's two largest cable telephony providers – Cox –

[9] The analysis of competition in residential markets excludes the states served by Qwest in the analysis because residential E911 listings for Qwest were not available.

[10] *See UNE Fact Report 2002* at II-11 & IV-10.

has stated that "instead of promoting local competition, the current broad availability of UNEs and the Commission's pricing methodology actually jeopardize the development of facilities-based competition."[11] Likewise, analyst Legg Mason has recently stated with respect to WorldCom's plan to expand its UNE-P offerings, "the more successful the plan is, the more it will reduce the attractiveness of the telephony opportunity for cable."[12] And "[g]iven how the . . . plan affects the attractiveness of telephony to new facilities-based providers," state regulators may be forced to modify state rates "if they want to encourage new facilities-based competitors, such as cable."[13]

2. Even the more limited comparison of New York to California proves the negative influence of UNE-P on facilities-based competition.

The evidence AT&T submits to support its claims fails to prove its theory that access to the UNE-P leads to greater facilities-based investment. In the first place, rather than analyze the full range of relevant data, or even some reasonable subset, AT&T supplies an essentially anecdotal discussion of its own business plan in just two states – New York and California. AT&T reports that it has deployed more circuit switches in New York, where UNE-P is widespread, than in California, where it isn't – and claims that this proves its thesis that more UNE-P leads to more facilities-based investment.[14]

This is just brazen data dredging. And it fails even on its own terms. More importantly, the proliferation of UNE-P customers in New York, and not in California, has *not* in fact resulted in proportionately more competitive facilities-based investment or proportionately more facilities-based competition in New York.

In the analysis of "cause" and "effect," timing matters – the cause has to come first, the effect has to follow. AT&T and other CLECs deployed most of their circuit switches in New York *before* the rise of UNE-P.[15] AT&T did not begin providing UNE-P service in New York until August 1999, and did not do so in large volumes until late 1999 at the earliest.[16] Yet AT&T deployed far *more* circuit switches in New York *before* year-end 1999 (15 switches) than it has deployed since (2 switches).[17] CLECs as a whole in New York likewise deployed most of their switches (55 of 73) before the rise of UNE-P in that state.

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[11] Comments of Cox Communications, Inc. at 12, *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98 (FCC filed May 26, 1999).

[12] Legg Mason, *WorldCom/MCI Bundled Phone Offer Challenges Rivals, Regulators* at 2 (Apr. 23, 2002).

[13] *Id*. at 4.

[14] *See* AT&T Brief at 49-50; AT&T Willig Decl. ¶ 107.

[15] Appendix B provides the dates on which CLEC switches in New York and California were deployed.

[16] By December 1999, when AT&T began offering residential service through UNE-P statewide, the company had signed up 50,000 customers in New York. *See* AT&T Press Release, *AT&T Offers New Yorkers a New Choice for Local Residential Phone Service* (Dec. 1, 1999).

[17] The same is true for WorldCom, the CLEC that is most comparable to AT&T. WorldCom began providing UNE-P service in New York a few months before AT&T, and also had acquired a large volume of platforms by late 1999. But like AT&T, WorldCom deployed most of its switches (8 of 9) prior to that time. *See* Figure 3.

Nor is it even appropriate to attribute the few switches that AT&T and other CLECs have deployed since year-end 1999 in New York to the rise of UNE-P. As noted above, CLECs that have obtained UNE-P are not migrating those UNE-P customers to their own switches in any significant numbers. In New York, for example, AT&T and WorldCom together provide UNE-P service to well over one million residential customers[18] – enough customers, in other words, to fill five to ten large switches (or an even larger number of smaller ones). Even though AT&T and WorldCom also operate 26 local circuit switches in New York state,[19] neither appears to have converted any residential customers in New York to their own switches.[20]

Moreover, since the end of 1999 – which is to say, since the time that UNE-P competition supposedly began to spur facilities-based competition in *New York* – AT&T, WorldCom, and all CLECs collectively, have actually been deploying more of their new switches in *California*, where AT&T claims that UNE-P has been less viable than in New York. *See* Figure 3. In fact, since 1999, CLECs have deployed more than twice as many switches in California as in New York, despite the fact that New York's demographics make it a more likely target for facilities-based competition than California.[21] *See id.* Today, despite far higher volumes of UNE-P in New York than in California, CLEC circuit-switch deployment in California is roughly equal to CLEC switch deployment in New York – hardly the result one would expect if AT&T's theory were correct. *See* Figure 4.

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[18] S. Alexander, *Judge Recommends Qwest Be Fined for Impeding Local Service by AT&T; But AT&T Says It Won't Enter Market*, Star Trib. (Feb. 26, 2002) (AT&T vice president Tom Pelto said that AT&T uses the UNE-Platform to provide local residential phone service to about 1 million people in New York.); M. McDonald, *Local Phone Fight Gets Put on Hold*, Crain's N.Y. Bus. at 1 (Mar. 5, 2001) (WorldCom accumulated 400,000 customers in New York).

[19] *See* Appendix B; *see also UNE Fact Report 2002* at Appendix B.

[20] *See* Declaration of Vijetha Huffman ¶ 5, *attached to* Comments of WorldCom, Inc., *Application of Verizon New Jersey, Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions), Verizon Global Networks Inc. and Verizon Select Services Inc. for Authorization To Provide In-Region, InterLATA Services in New Jersey*, CC Docket No. 01-347 (FCC filed Jan. 14, 2002) ("UNE-P . . . is the only service-entry vehicle that WorldCom uses to offer local residential service, and it is the only service-delivery option that WorldCom currently views as even potentially viable."); Supplemental Declaration of Michael Lieberman on Behalf of AT&T Corp. ¶ 20, *attached to* Ex Parte Letter of Peter Keisler, Sidley Austin Brown & Wood (representing AT&T), to William F. Caton, FCC, CC Docket No. 01-324 (Feb. 8, 2002) (AT&T has recently stated that it has not pursued a strategy of converting platform customers to its own facilities "to provide basic local residential service to customers anywhere in the country.").

[21] For example, population density is nearly twice as high in New York as it is in California. *See* Netstate.com, *Census 2000 State Population Information*, http://www.netstate.com/states/tables/st_population.htm (population per square mile: California – 207, New York – 348). New York also has a much higher percentage of its population living in large cities than California. For example, 50 percent of the New York population lives in the state's 15 largest cities, compared to 30 percent in California. *See* United States Census Bureau, *Census 2000 Redistricting Data*, http://www.census.gov/clo/www/redistricting.html.

Figure 3. Despite the Rise of UNE-P in New York, CLECs Have Deployed More Switches in California

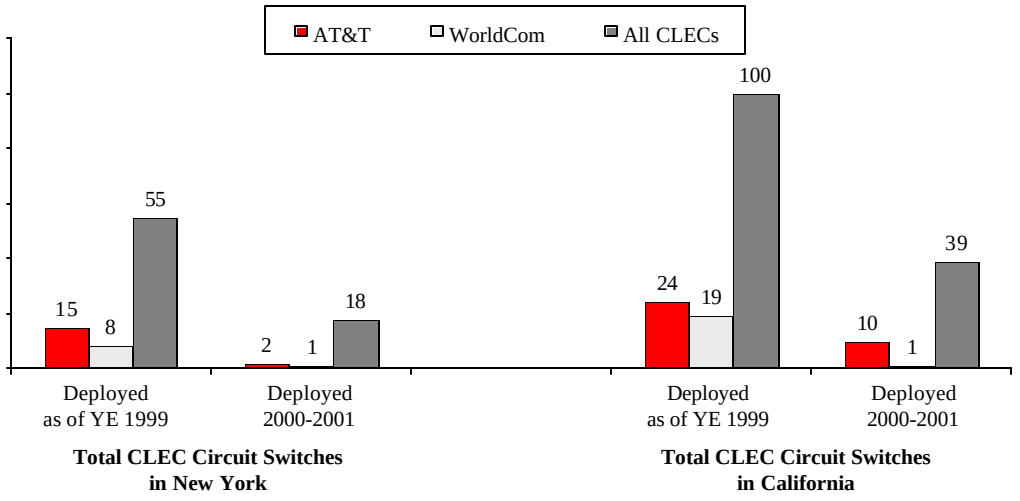
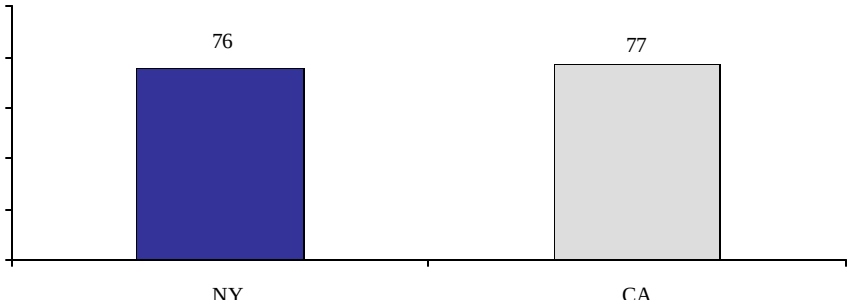
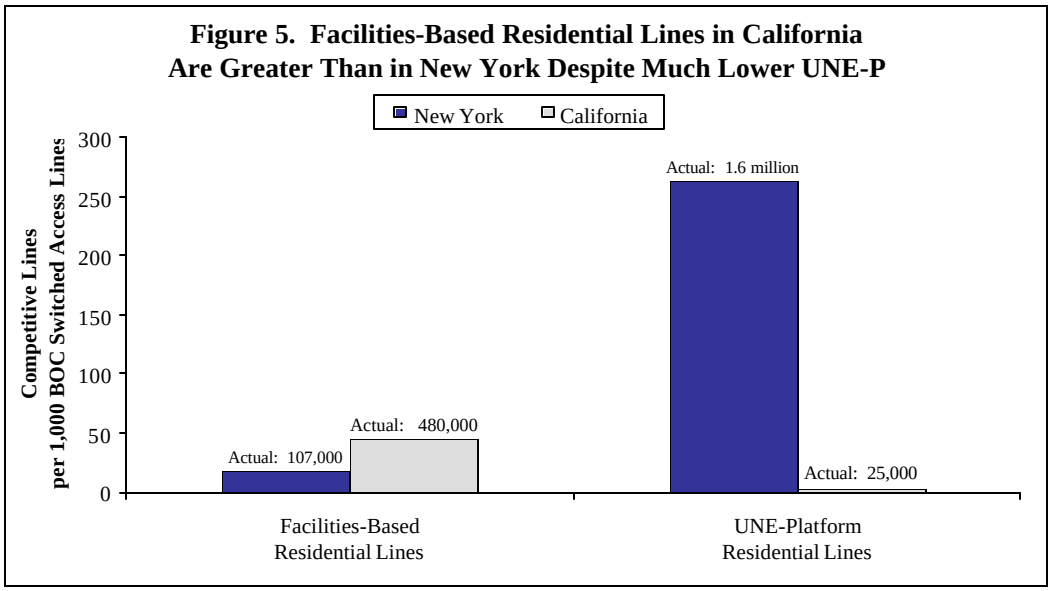


Figure 4. CLEC Switch Deployment in California Is Comparable to New York Despite Much Lower UNE-P



California also has much higher levels of facilities-based residential competition than New York, despite far lower levels of UNE-P in California. As of year-end 2001, CLECs were serving approximately 1.6 million residential lines through UNE-P in New York – roughly 26 percent of the number of BOC access lines in the state. As of that same date, CLECs were serving only 25,000 residential lines through UNE-P in California – less than 1 percent of the number of BOC access lines in the state. Despite this enormous disparity, the number of facilities-based residential lines is proportionately *higher* in California – more than double – than the number in New York. *See* Figure 5.[22]

[22] There is likely an even greater number of facilities-based residential lines in California than this analysis indicates because it does not include competitive lines located in Verizon's service area, which includes approximately 4 million switched access lines in Los Angeles and surrounding MSAs. There are numerous competitors providing facilities-based service in Verizon's territory, however. For example, as discussed below, Cox provides cable telephony in Orange County.



Facilities-based residential competition also is much more widely *available* in California than in New York. In New York, only one cable operator – Cablevision – has deployed cable telephony on an extremely limited basis (to fewer than 15,000 homes).[23] Despite original plans to deploy its service more broadly,[24] Cablevision stopped marketing its service in late 2000,[25] when residential UNE-P volumes in NY had already exceeded 1 million lines. In California, by contrast, cable telephony is now available to several million homes and growing. AT&T's cable network in the Bay Area passes 2.7 million homes,[26] at least one-third of which already "can get cable telephony today."[27] AT&T claims that among such homes there already is "19% telephony penetration" and "many communities in high 20s."[28] Moreover, the "backbone and headend segments of rebuilds [are] nearly complete,"[29] which will enable AT&T to provide cable telephony to those homes served by its San Francisco network that can not already receive it. In addition to AT&T, Cox offers cable telephony to nearly 700,000 homes in Orange County and

[23] *See* Cablevision Systems Corp., Form 10-K (SEC filed Apr. 1, 2002) (As of YE 2001, Cablevision provided residential telephone service to approximately 13,400 subscribers in Long Island and parts of southern Connecticut).

[24] *See, e.g.*, P. Joshi, *All This and Cable, Too*, Newsday at C08 (Sept. 14, 1998) ("Right now, [Cablevision] has offered telephone service to about 6,000 homes in nine Nassau County communities. The company plans to aggressively roll out throughout metropolitan New York over the next several years.").

[25] *See, e.g.*, J. Reif-Cohen, *et al.*, Merrill Lynch Capital Markets, Investext Rpt. No. 8305280, Cablevision Systems Corp. – Company Report at *5 (Dec. 17, 2001) ("For the past year, Cablevision has stopped marketing its telephone service and will not add anymore telephone homes to its universe.").

[26] Dan Somers, President and CEO, AT&T Broadband, *Operational Overview*, AT&T Broadband, Investor Presentation at 18 (July 2001).

[27] *Comcast Purchase of AT&T Means More Services*, Silicon Valley/San Jose Bus. J. at 11 (Jan. 4, 2002).

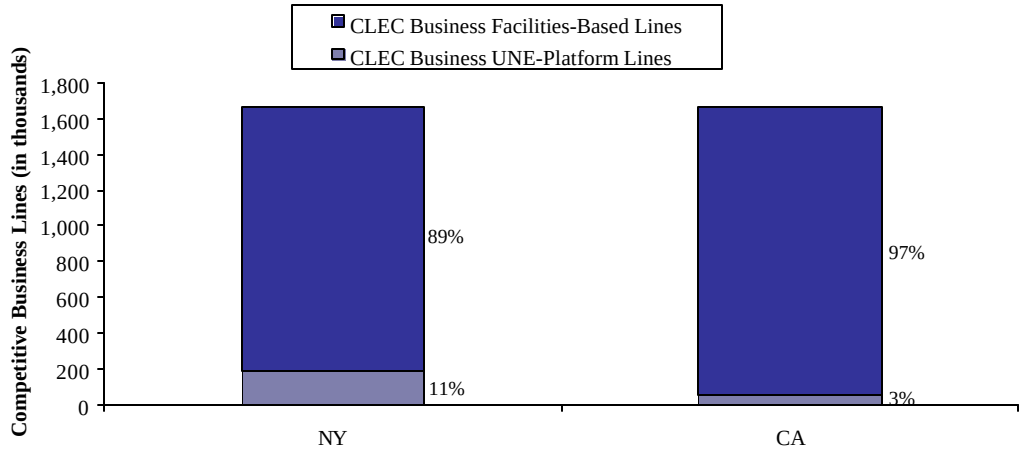
[28] Dan Somers, President and CEO, AT&T Broadband, *Operational Overview*, AT&T Broadband, Investor Presentation at 18 (July 2001).

[29] *Id.*

San Diego.[30] Cox makes this service available to 97 percent of the homes it passes in Orange County, and 77 percent of the homes it passes in San Diego.[31]

Finally, the inverse relationship between facilities-based competition and UNE-P penetration is particularly evident in comparing business markets in New York and California. Both AT&T and WorldCom use UNE-P to serve some business customers in New York, but these numbers are dwarfed by the number of business lines that AT&T and WorldCom serve over their own facilities. This also is true generally for all CLECs, not just AT&T and WorldCom. New York CLECs collectively serve at least 1.5 million business lines using their own switches, compared to only 186,000 lines through UNE-P. *See* Figure 6. California CLECs collectively serve at least 1.6 million business lines using their own switches, compared to only 54,000 lines through UNE-P. Again, virtually all of these lines have always been served using CLEC switches; the number of lines migrated from UNE-P to CLEC switches is minuscule. Thus, contrary to AT&T's claims, facilities-based business competition in both states has evolved prior to the availability of the UNE-P, or despite its availability, not because of it. *See id.*

Figure 6. Facilities-Based Business Competition in New York and California Is Not Attributable to UNE-P



[30] *Top 100 Systems*, Cablevision Magazine (Oct. 22, 2001); Cox Communications, *Presentation before the Lehman Brothers Telecom Trends and Technology Conference* (Dec. 7, 2001), http://www.corporate-ir.net/ireye/ir_site.zhtml?ticker=cox&script=1200 (Cox offers cable telephony to approximately 257,000 customers in Orange County, and approximately 406,000 customers in San Diego).

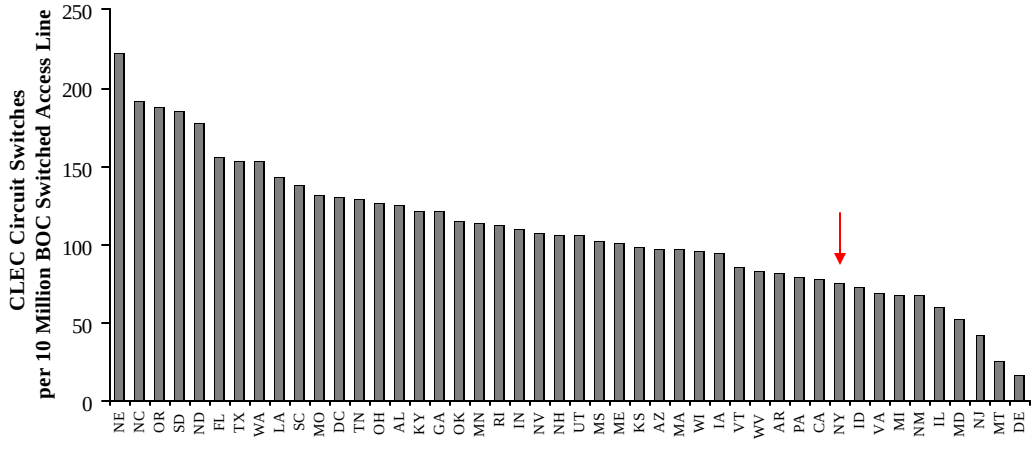
[31] Cox Communications, *Presentation before the Lehman Brothers Telecom Trends and Technology Conference* (Dec. 7, 2001), http://www.corporate-ir.net/ireye/ir_site.zhtml?ticker=cox&script=1200 (Cox offers cable telephony to approximately 257,000 customers in Orange County, and approximately 406,000 customers in San Diego).

3. AT&T's theory fares no better when New York is compared to other states.

UNE-P penetration is far greater in New York than in any other state. CLECs in New York also serve a large number of lines with their own switches. But when the numbers are normalized against the number of BOC access lines in each state, the number of facilities-based CLEC lines is found to be proportionately higher in many other states. And this is all the more striking given that New York's demographic characteristics – particularly its high overall population density and the massive concentration of telecommunications revenues in New York City – make it a far more attractive candidate for facilities-based competition than most other states.

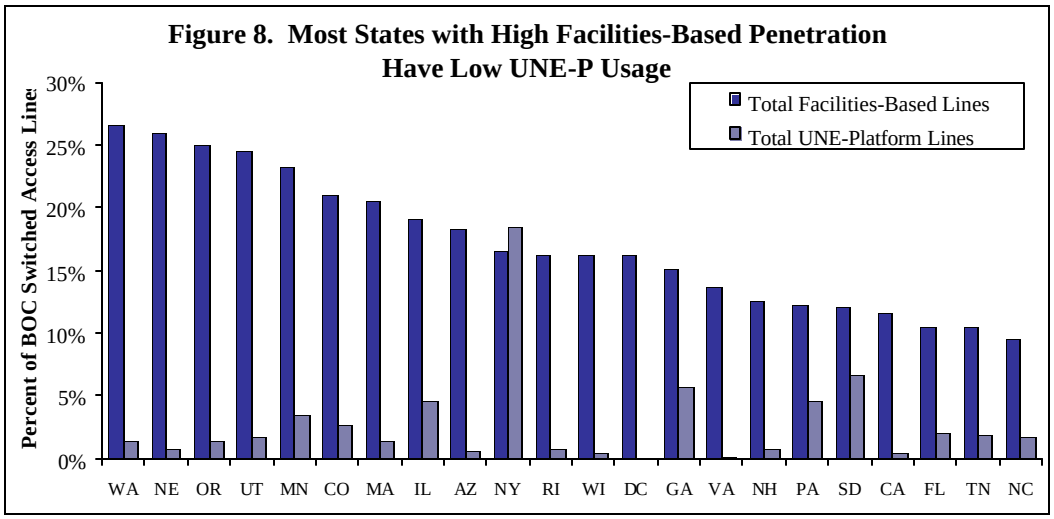
For example, among the 48 contiguous states,[32] New York ranks only 37th in terms of the number of CLEC *switches* deployed per BOC access lines in the state. *See* Figure 7.

Figure 7. High UNE-P in New York Has Not Led to High CLEC Switch Deployment



Moreover, New York ranks only tenth in terms of the number of facilities-based CLEC *lines*. *See* Figure 8. Significantly, *all* of the nine states that have proportionately more facilities-based lines than New York also have much lower volumes of UNE-P. *See id.*

[32] Data for the 48 contiguous states exclude Connecticut but include the District of Columbia.



Even within the former Bell Atlantic region, New York does not stand out in terms of facilities-based competition. Six states within the former Bell Atlantic region have more facilities-based residential competition than New York.[33]

Finally, data from three of the largest states in Verizon's region – New York, Massachusetts, and Pennsylvania – suggest a direct relationship between high levels of residential UNE-P and low levels of facilities-based residential competition.[34] New York has the most residential UNE-P (26 percent of BOC lines), but the least facilities-based residential competition (2 percent of BOC lines); Massachusetts has the least residential UNE-P (less than 1 percent of BOC lines), and the most facilities-based residential competition (8 percent of BOC lines); and Pennsylvania falls in the middle in terms of both residential UNE-P (6 percent of BOC lines) and facilities-based residential lines (5 percent of BOC lines). Significantly, while WorldCom has decided to provide residential UNE-P in both Massachusetts and Pennsylvania, AT&T has declined to do so. AT&T has instead made cable telephony its exclusive means of serving residential customers in both states.

B. The Data Do Not Support AT&T's Claims that UNE-P Encourages ILEC Investment.

Limiting its analysis to the 13 states that have already been granted section 271 approval, or for which an application is pending, AT&T asserts that the "availability of UNE-P increases *ILEC* incentives to build because UNE-P is a precursor to facilities entry by CLECs."[35] AT&T claims that, among these states, the three with the highest ILEC investment rates in 1999 and

[33] Rhode Island, Massachusetts, New Hampshire, District of Columbia, Pennsylvania, and Virginia. This is based on internal company data collected for the *UNE Fact Report 2002*.

[34] The data in this paragraph is based on internal company data collected for the *UNE Fact Report 2002*.

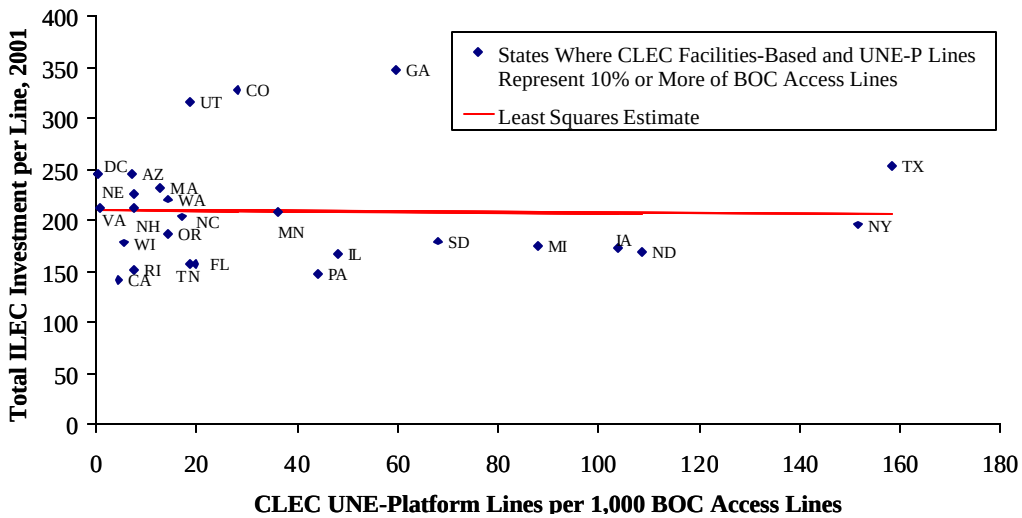
[35] AT&T Brief at 66.

2000 were Georgia, Texas, and New York, which it claims also are the states with the highest levels of UNE-P entry.[36]

As an initial matter, fails to explain why it should limit its analysis to these 13 states, and there is no logical basis for doing so. Many states that have not yet received section 271 approval have significant levels of local competition, provided both through CLECs' own facilities and through UNE-P. Conversely, some of the states that have received 271 approval still have relatively low levels of competition, even though those markets have been fully opened, as the FCC has found.

As explained above, however, there are 26 states in which CLECs have captured 10 percent or more of the BOC access lines in those states. To the extent that UNE-P usage is, as AT&T claims, increasing ILEC investment, it should be evident in a comparison of the data from these states. But, as demonstrated in Figure 9, there is no statistically significant correlation between UNE-P levels and ILEC investment in these 26 states.[37] Figure 9 is a simple regression analysis that compares the levels of ILEC investment within a state with the level of UNE-P penetration in that state. It demonstrates that there is no relationship between these two variables. Thus, the evidence fails to support AT&T's assertion of a relationship between UNE-P and ILEC investment

Figure 9. ILEC Investment Does *Not* Increase as UNE-P Increases



AT&T's analysis is further flawed because it is limited to just two years, 1999 and 2000. But some states have historically received proportionately more ILEC investment than others, with the record stretching back into the years preceding the advent of UNE-P usage. For example, AT&T claims that, in both 1999 and 2000, there was much larger ILEC investment in

[36] *See* AT&T Brief at 66; AT&T Willig Decl. ¶ 108.

[37] Appendix C contains the results of the statistical analysis. It demonstrates that, to a 95-percent level of confidence, there is no statistically significant correlation between these two variables.

Georgia (where there is relatively high UNE-P) than in Massachusetts (where there is relatively low UNE-P).[38] But that was also so in 1996, 1997, and 1998.[39] AT&T likewise claims that ILEC investment in California in 2000 was far lower than in New York, Texas, and all other 271 states. Here, too, however, that simply continues a longstanding historical pattern.[40] Here again, the data fail to support AT&T's theory that the UNE-P promotes ILEC investment.

The only relevant measure of what impact, if any, UNE-P has had in a particular state is the relative *change* in ILEC investment that has occurred since the advent of UNE-P. The data show that, even among the 13 states chosen by AT&T, there is no correlation between the volume of UNE-P in the state and the average increase in ILEC investment in that state.

For example, focusing on the two states – Georgia and Massachusetts – on which AT&T anchors its analysis, the average annual increase in ILEC investment per line over the last two years was in fact higher in Massachusetts than in Georgia, despite the fact that UNE-P penetration in Georgia is six times higher than in Massachusetts.[41] In fact, during this period the average increase in ILEC investment was higher in Massachusetts than in *any* other 271-approved state.[42] And among the Verizon states, the second highest increase in ILEC investment during this period was Rhode Island, where, as in Massachusetts, there is extensive facilities-based competition but only modest UNE-P usage. AT&T's other two main examples – New York and Texas – ranked only 5th and 10th, respectively, among the fourteen 271-approved states in terms of *growth* of ILEC investment over the past two years.

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[38] AT&T Willig Decl. ¶ 109.

[39] During 1996, 1997, and 1998, ILEC investment per line in Massachusetts was $144, $151, and $153, respectively, compared to $227, $171, and $183 in Georgia. *See* FCC, *ARMIS Data Retrieval System*, http://www.fcc.gov/wcb/armis/db ("*ARMIS Database*"). In calculating ILEC investment per line, the methodology used is the same as that used by AT&T. *See* AT&T Willig Decl. ¶ 108, fn.23.

AT&T's claim that the rise of UNE-P in Georgia correlates with higher BellSouth investment in 1999 and 2000 also fails for another reason: UNE-P was not commercially available in Georgia until February 2000, and was not ordered in significant volumes until later that year. Thus, the rise of UNE-P in Georgia could not possibly have had any correlation with BellSouth investment in 1999, and any correlation with BellSouth investment in 2000 is highly unlikely.

[40] During 1996, 1997, and 1998, ILEC investment per line in California was $112, $125, and $118, respectively. This produces an average per-line investment of $118 during those years. The average per-line investment of the 14 states with an approved or pending section 271 application during those same three years was as follows: Arkansas, $157; Georgia, $194; Kansas, $141; Louisiana, $114; Maine, $128; Massachusetts, $149; Missouri, $156; New Jersey, $141; New York, $139; Oklahoma, $122; Pennsylvania, $101; Rhode Island, $92; Texas, $186; Vermont, $140. *See ARMIS Database*.

[41] In 2000 and 2001, ILEC investment per line increased by 7 and 50 percent, respectively, in Massachusetts (an average of 28 percent), compared to 22 and 30 percent, respectively, in Georgia (an average of 26 percent). *See ARMIS Database*.

[42] The average growth in rates of ILEC investment over the past two years in the 271-approved states were as follows: Arkansas, 26%; Georgia, 26%; Kansas, 11%; Louisiana, 6%; Maine, 16%; Massachusetts, 28%; Missouri, 21%; New Jersey, 1%; New York, 13%; Oklahoma, 17%; Pennsylvania, 6%; Rhode Island, 17%; Texas, 20%; Vermont, 20%. *See ARMIS Database*.

APPENDIX A. REGRESSION STATISTICS FOR FIGURE 1

Regression Statistics	
Multiple R	0.468664202
R Square	0.219646135
Adjusted R Square	0.18713139
Standard Error	59.50012169
Observations	26

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	23915.47043	23915.47043	6.755277908	0.015736696
Residual	24	84966.34754	3540.264481		
Total	25	108881.818			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	185.4032671	15.68746366	11.81856233	1.71219E-11	153.0259401	217.7805941	153.0259401	217.7805941
X Variable 1	-0.673618956	0.259174751	-2.599091747	0.015736696	-1.208529241	-0.138708671	-1.208529241	-0.138708671

RESIDUAL OUTPUT

Observation	*Predicted Y*	*Residuals*
1	180.6044122	6.905939381
2	182.337845	-63.21654081
3	166.5051474	54.00558292
4	185.1371276	-26.16290469
5	172.1167124	-69.88739742
6	145.1336051	11.87031769
7	153.047791	44.27183746
8	115.5301059	-54.37010294
9	176.7735875	15.56286116
10	126.1968694	-37.93628646
11	161.0429272	85.9474555
12	180.2891146	97.02851692
13	180.2643091	-60.84169231
14	83.17953903	52.47516256
15	173.7671997	-77.73334964
16	112.1112315	-39.07491477
17	175.8588531	88.36664056
18	155.6945439	-40.48412761
19	180.2587223	-25.36378541
20	139.5179939	-15.69243439
21	172.8737062	-67.83797457
22	78.66648786	2.914796534
23	172.7077562	81.75518014
24	184.8972561	-51.14385667
25	175.7211714	102.1846702
26	181.7213168	-13.54359336

APPENDIX B. DEPLOYMENT OF CLEC CIRCUIT SWITCHES IN CALIFORNIA AND NEW YORK

The list of switches in this appendix is based on information contained in Telcordia's *Local Exchange Routing Guide*. The deployment date for these switches is based on information contained in Telcordia's Business Integrated Rating/Routing Database System.

CLEC Circuit Switches Serving BOC Rate Centers in California and New York

State	Type	CLEC	City	Street	Year Deployed
CA	DS	ADVANCED TELCOM GROUP	CONCORD	2041 EAST ST	2001
CA	5E	ADVANCED TELCOM GROUP	SAN RAFAEL	1009 E ST	2000
CA	5E	ALLEGIANCE TELECOM	LOS ANGELES	818 W 7TH ST. SUITE 320	1998
CA	5E	ALLEGIANCE TELECOM	RANCHO CORDOVA	10995 GOLD CENTER DR	2000
CA	5E	ALLEGIANCE TELECOM	SAN DIEGO	5761 COPLEY DR	1999
CA	5E	ALLEGIANCE TELECOM	SAN FRANCISCO	651 BRANNAN STREET, 3RD FLOOR	1998
CA	5E	ALLEGIANCE TELECOM	SANTA ANA	1251 E DYER RD	1999
CA	5E2	ALLEGIANCE TELECOM	SUNNYVALE	677 PALOMAR AVE	2000
CA	DS	ARRIVAL COMMUNICATIONS	BAKERSFIELD	1800 19TH ST	2001
CA	5E	AT&T	ANAHEIM	217 N LEMON ST	1999
CA	4E	AT&T	ANAHEIM	217 N LEMON ST	1997
CA	4E	AT&T	DUNNIGAN	INTER YOLO CNTY	1998
CA	5E	AT&T	DUNNIGAN	INTER YOLO COUNTY & ROADS 6 AND 86	2000
CA	4E	AT&T	GARDENA	17200 S VERMONT AVE	1997
CA	5E	AT&T	LOS ANGELES	700 S FLOWER ST	1997
CA	4E	AT&T	LOS ANGELES	420 S GRAND AVE	1998
CA	NT5	AT&T	LOS ANGELES	420 S GRAND AVE	1999
CA	5E	AT&T	MOJAVE	N-O HWY 58 & 9 MI E-O MOJAVE INDEX D	2000
CA	5E	AT&T	OAKLAND	1587 FRANKLIN ST	2000
CA	4E	AT&T	OAKLAND	1601 FRANKLIN ST	1998
CA	NT5	AT&T	OAKLAND	1601 FRANKLIN ST	2000
CA	5E	AT&T	OAKLAND	344 20TH ST	1997
CA	4E	AT&T	OXNARD	1050 S C ST	1997
CA	5E	AT&T	SACRAMENTO	603 S ST	1998
CA	4E	AT&T	SACRAMENTO	DONOT USE SEE SCRMCA01	1998
CA	4E	AT&T	SAN BERNARDINO	455 2ND ST	1998
CA	5E	AT&T	SAN BERNARDINO	455 W 2ND ST	2000
CA	5E	AT&T	SAN DIEGO	5464 MOREHOUSE DR	1997
CA	NT5	AT&T	SAN DIEGO	650 ROBINSON AVE	2000
CA	4E	AT&T	SAN DIEGO	650 ROBINSON AVE	1998
CA	5E	AT&T	SAN FRANCISCO	1 BUSH ST	1997
CA	NT5	AT&T	SAN FRANCISCO	360 SPEAR ST	2000
CA	5E	AT&T	SAN FRANCISCO	555 PINE ST	1999
CA	4E	AT&T	SAN FRANCISCO	611 FOLSOM ST	1997
CA	5E	AT&T	SAN FRANCISCO	360 SPEAR ST	2001
CA	NT5	AT&T	SAN JOSE	95 ALMADEN AVE	1999
CA	4E	AT&T	SAN JOSE	95 ALMADEN AV	1997
CA	5E	AT&T	SAN JOSE	95 ALMADEN AV	1999
CA	5E	AT&T	SHERMAN OAKS	14800 VENTURA BLVD	2000
CA	4E	AT&T	SHERMAN OAKS	14800 VENTURA BLVD	1997
CA	5E	AT&T	SHERMAN OAKS	14800 VENTURA BLVD	2000
CA	5E	AT&T	STOCKTON	345 N SAN JOAQUIN AV	1992
CA	4E	AT&T	STOCKTON	344 N HUNTER ST	1998
CA	D12	CITIZENS	ELK GROVE	820 ELK GROVE FLORIN RD	1991

CLEC Circuit Switches Serving BOC Rate Centers in California and New York					
State	**Type**	**CLEC**	**City**	**Street**	**Year Deployed**
CA	5E	COX	ALISO VEIJO	17 JOURNEY ST	1997
CA	D12	COX	EL CAJON	1175 N. CUYAMUCA ST.	2000
CA	DMS	COX	RANCHO SANTA MARGARITA	29947 AVENIDA DE LAS BANDERAS	2001
CA	D12	COX	SAN DIEGO	1441 EUCLID AVE	1997
CA	D12	ELECTRIC LIGHTWAVE	RANCHO CORDOVA	3224 LUYUNG DR.	1996
CA	NT5	FIRST WORLD COMMUNICATIONS	ANAHEIM	1520 S LEWIS ST	1997
CA	NT5	FOCAL COMMUNICATIONS	LOS ANGELES	1200 W 7TH ST	1998
CA	DM5	FOCAL COMMUNICATIONS	SAN FRANCISCO	650 TOWNSEND ST	1998
CA	NT5	FOCAL COMMUNICATIONS	SAN JOSE	1741 TECHNOLOGY DR	2000
CA	DS	GLOBAL CROSSING	ANAHEIM	2461 W LA PALMA AVE 2ND FLR	1997
CA	NT5	GLOBAL CROSSING	CALIFORNIA	SAN DIEGO	2001
CA	NT5	GLOBAL CROSSING	SACRAMENTO	1303 J ST	1999
CA	5E	ICG COMMUNICATIONS	ALHAMBRA	2300 W VALLEY BLVD	1999
CA	5E	ICG COMMUNICATIONS	IRVINE	2968 WHITE RD., SUITE 200	1996
CA	5E	ICG COMMUNICATIONS	LAKEWOOD	4007 PARAMOUNT BLVD	1997
CA	5E	ICG COMMUNICATIONS	LOS ANGELES	1905 ARMACOST AVE	1997
CA	5E2	ICG COMMUNICATIONS	LOS ANGELES	600 W 7TH ST	2000
CA	5E2	ICG COMMUNICATIONS	MILPITAS	1175 MONTAGUE EXPRESSWAY	2000
CA	5E	ICG COMMUNICATIONS	OAKLAND	180 GRAND AVE	1996
CA	5E	ICG COMMUNICATIONS	ONTARIO	1471 VALENCIA PL	1999
CA	5E	ICG COMMUNICATIONS	SACRAMENTO	1414 K ST	2000
CA	5E	ICG COMMUNICATIONS	SACRAMENTO	770 L ST	1996
CA	5E	ICG COMMUNICATIONS	SAN DIEGO	8951 COMPLEX DR	1996
CA	5E	ICG COMMUNICATIONS	SAN FRANCISCO	620 3RD ST	1998
CA	5E	ICG COMMUNICATIONS	SAN JOSE	190 PARK CENTER PLAZA	1997
CA	5E	KCINDUR COMM	SAN LUIS OBISPO	872 MORRO ST	1990
CA	DS	LEVEL 3	FRESNO	305 W NAPA AVE	2001
CA	DS	LEVEL 3	WEST SACRAMENTO	1075 TRIANGLE CT	2000
CA	DMS	MPOWER	BELLFLOWER	16730 BELLFLOWER BLVD	1998
CA	DS	MPOWER	EMERYVILLE	1400 65TH ST	2000
CA	NT5	MPOWER	LA MESA	4695 PALM AVE	1998
CA	DMS	MPOWER	POMONA	362 E 4TH ST	1997
CA	DS	MPOWER	SACRAMENTO	9332 TECH CENTER DR	2000
CA	NT5	MPOWER	SAN JOSE	560 CHARCOT AVE	2000
CA	DM5	NET-TEL CORP.	LOS ANGELES	530 W 6TH ST	1999
CA	NT5	NET-TEL CORP.	SAN FRANCISCO	200 PAUL AVE	2000
CA	DMH	NORTH COUNTY COMMUNICATIONS	LOS ANGELES	624 SOUTH GRAND	1999
CA	DMH	NORTH COUNTY COMMUNICATIONS	SACRAMENTO	926 J ST	1999
CA	DMH	NORTH COUNTY COMMUNICATIONS	SAN DIEGO	4008 TAYLOR ST	1999
CA	DMH	NORTH COUNTY COMMUNICATIONS	SAN FRANCISCO	98 BATTERY ST	1999
CA	VCD	PAETEC	LOS ANGELES	530 W 6TH ST	1999
CA	NT5	POINTE COMM INC	EL MONTE	11025 VALLEY BLVD	2000
CA	NT5	POINTE COMM INC	SAN DIEGO	3949 RUFFIN RD	2000
CA	5E	RCN	CARSON	1059 E BEDMAR ST	2000
CA	5E	RCN	SAN FRANCISCO	200 PAUL AVE	1999
CA	D12	SIERRA TELEPHONE CO.	OAKHURST	41950 ROAD 426	1989

CLEC Circuit Switches Serving BOC Rate Centers in California and New York					
State	**Type**	**CLEC**	**City**	**Street**	**Year Deployed**
CA	5E	SUREWEST COMMUNICATIONS	ROSEVILLE	224 LINCOLN ST	2001
CA	NT5	TELIGENT	LOS ANGELES	1200 W 7TH ST	1998
CA	NT5	TELIGENT	OAKLAND	1111 BROADWAY	1998
CA	DS	TIME WARNER TELECOM	BAKERSFIELD	1918 M ST	1998
CA	DM5	TIME WARNER TELECOM	FRESNO	7576 N DEL MAR AVE	1997
CA	5ESS	TIME WARNER TELECOM	IRVINE	7 MASON	2000
CA	DM5	TIME WARNER TELECOM	LOS ANGELES	3700 WILSHIRE BLVD	1997
CA	DM5	TIME WARNER TELECOM	RIVERSIDE	1110 P ALMYRITA AVE	1996
CA	DMS	TIME WARNER TELECOM	SAN DIEGO	1125 NINTH ST	1999
CA	5E	TIME WARNER TELECOM	SAN DIEGO	8925 WARE CT	1996
CA	DM5	TIME WARNER TELECOM	SAN FRANCISCO	501 2ND ST	1997
CA	DM5	TIME WARNER TELECOM	SAN LUIS OBISPO	3050 BROAD ST	1997
CA	DMS	TIME WARNER TELECOM	WALNUT CREEK	1340 TREAT BLVD	1996
CA	5E	U.S. TELEPACIFIC	LOS ANGELES	800 W 6TH ST SUITE 300 3RD FLOOR	1998
CA	5E	U.S. TELEPACIFIC	SAN DIEGO	6134 NANCY RIDGE DR	2000
CA	5E	U.S. TELEPACIFIC	SAN JOSE	55 NICHOLSON LN	2000
CA	DM5	URJET BACKBONE NETWORK	LOS ANGELES	624 S GRAND AVE 11TH FLOOR	2000
CA	5E	WESTERN INTEGRATED NETWORKS	NORTH HIGHLANDS	5411 LUCE AVE	2000
CA	DE4	WORLDCOM	ANAHEIM	905 EAST DISCOVERY LANE	1998
CA	5E	WORLDCOM	BAKERSFIELD	1415 18TH ST	1999
CA	5E	WORLDCOM	BAKERSFIELD	1415 18TH ST	1996
CA	5E	WORLDCOM	FRESNO	1315 VAN NESS	NA
CA	5E	WORLDCOM	FRESNO	1315 VAN NESS AVE	1996
CA	DMH	WORLDCOM	HAYWARD	21350 CABOT BLVD	2000
CA	NT5	WORLDCOM	IRVINE	17642 ARMSTRONG AVE	1997
CA	DE4	WORLDCOM	LOS ANGELES	609 W 7TH AVE	1996
CA	AXT	WORLDCOM	LOS ANGELES	1149 SOUTH BROADWAY	1996
CA	AXT	WORLDCOM	LOS ANGELES	1149 S BROADWAY ST	1996
CA	5E	WORLDCOM	REDWOOD CITY	2700 SPRING ST	1998
CA	DE4	WORLDCOM	SAN DIEGO	707 BROADWAY	1996
CA	DMH	WORLDCOM	SAN DIEGO	8806 COMPLEX DR	1998
CA	NT5	WORLDCOM	SAN DIEGO	8806 COMPLEX DR	1997
CA	DE4	WORLDCOM	SAN FRANCISCO	274 BRANNAN ST	1996
CA	AXT	WORLDCOM	SAN FRANCISCO	525 MARKET ST	1996
CA	AXT	WORLDCOM	SAN FRANCISCO	525 MARKET ST	1995
CA	NT5	WORLDCOM	SAN JOSE	611 RIVER OAKS PKY	1998
CA	5E	WORLDCOM	STOCKTON	400 E MAIN ST	1996
CA	5E	WORLDCOM	SUNNYVALE	464 OAKMEAD PKY	1996
CA	5E	WORLDCOM	WEST SACRAMENTO	2820 KOVR DR	1999
CA	NT5	XO	FREMONT	855 MISSION CT	1998
CA	DMS	XO	LONG BEACH	200 PINE AVE	1997
CA	DS	XO	LONG BEACH	200 PINE AVE	2000
CA	DMS	XO	LOS ANGELES	624 S GRAND	1997
CA	DMS	XO	LOS ANGELES	624 S GRAND	1997
CA	DM5	XO	ROSEVILLE	1390 LEAD HILL BLVD	1999
CA	DMS	XO	SAN DIEGO	5771 COPLEY DR	1998
CA	NT5	XO	SANTA ANA	1924 E DEERE AVE	1997
CA	DMS	XO	SANTA ANA	1924 E DEERE AVE	1997
CA	DMS	XO	SANTA ANA	1924 E DEERE AVE	1997
NY	5E	ADELPHIA	BUFFALO	101 LASALLE AVE	1994

CLEC Circuit Switches Serving BOC Rate Centers in California and New York					
State	**Type**	**CLEC**	**City**	**Street**	**Year Deployed**
NY	5E	ADELPHIA	SYRACUSE	6007 FAIRLAKES RD	1994
NY	5E	ALLEGIANCE TELECOM	NEW YORK	111 8TH AVENUE 14TH FLOOR	1999
NY	5E	ALLEGIANCE TELECOM	NEW YORK	60 HUDSON ST	1996
NY	5E	AT&T	ALBANY	158 STATE ST.	1999
NY	4E	AT&T	BUFFALO	65 FRANKLIN ST	1997
NY	5E	AT&T	BUFFALO	325 DELAWARE AVE	1999
NY	NT5	AT&T	HUNTINGTON	1444 E JERICHO TPKE	1999
NY	5E	AT&T	MANHATTAN	811 10TH AVE	1999
NY	4E	AT&T	MANHATTAN	811 10TH AVE	1997
NY	5E	AT&T	MANHATTAN	33 THOMAS ST	1996
NY	4E	AT&T	MANHATTAN	33 THOMAS ST	2001
NY	NT5	AT&T	MANHATTAN	33 THOMAS ST	1999
NY	5E	AT&T	MANHATTAN	67 BROAD ST	1998
NY	5E	AT&T	MANHATTAN	1 WORLD FINANCIAL (TOWER B) CTR	1997
NY	5E	AT&T	MANHATTAN	250 VESEY ST	1997
NY	5E	AT&T	MANHATTAN	216 E 45TH ST	1997
NY	5E	AT&T	QUEENS	9403 QUEENS BLVD	2000
NY	4E	AT&T	SYRACUSE	201 S STATE ST	1997
NY	NT5	AT&T	WHITE PLAINS	400 HAMILTON AVE.	1999
NY	4E	AT&T	WHITE PLAINS	360 HAMILTON AVE	1997
NY	NT5	BROADVIEW	QUEENS	3718 NORTHERN BLVD	1999
NY	NT5	BROADVIEW	SYRACUSE	224 HARRISON ST	1999
NY	5E	CABLEVISION LIGHTPATH	BETHPAGE	1111 STEWART AVE	1999
NY	5E	CABLEVISION LIGHTPATH	HICKSVILLE	111 NEW SOUTH RD	1994
NY	5E	CABLEVISION LIGHTPATH	WHITE PLAINS	151 FULTON AVE	2001
NY	5E	CHOICE ONE	ALBANY	80 STATE ST	1999
NY	5E	CHOICE ONE	BUFFALO	350 MAIN ST	1999
NY	5E	CHOICE ONE	SYRACUSE	110 W FAYETTE ST	1999
NY	EWSD	COMAV	BROOKLYN	25 CHAPEL ST	1998
NY	5E	CONVERSENT	MELVILLE	201 OLD COUNTRY RD	2000
NY	5E	CORE COMMUNICATIONS	MANHATTAN	67 BROAD ST	2000
NY	DMH	CTSI	SYRACUSE	201 S STATE ST	2000
NY	5E	E.SPIRE	NEW YORK	75 BROAD STREET 3RD FLOOR	1999
NY	5E	EAGLE COMMUNICATIONS	MANHATTAN	60 E 56TH ST	2000
NY	5E	EAGLE COMMUNICATIONS	MANHATTAN	601 W 26TH ST	1999
NY	D12	FAIRPOINT	CHATHAM	19 RAILROAD AV	1992
NY	NT5	FOCAL COMMUNICATIONS	MANHATTAN	325 HUDSON ST	2000
NY	NT5	GLOBAL CROSSING	ALBANY	11 N PAERL ST SUITE 2000	1999
NY	NT5	GLOBAL NAPS	MANHATTAN	1 FINANCIAL SQ	2000
NY	DS	ICG COMMUNICATIONS	MANHATTAN	67 BROAD ST	1999
NY	NT5	INTERMEDIA COMMUNICATIONS	MANHATTAN	160 W BROADWAY	1997
NY	DM5	INTERNATIONAL TELCOM	MANHATTAN	160 W BROADWAY	1999
NY	DS	LEVEL 3	ALBANY	314 N PEARL ST	2001
NY	DS	LEVEL 3	BUFFALO	240 SCOTT ST	2001
NY	DCO	METROPOLITAN TELECOMMUNICATIONS	MANHATTAN	67 BROAD ST	2000
NY	DE4	METTEL	HEMPSTEAD	875 MERRICK AVE	1998
NY	D12	MIDHUDSON_COMM	ALBANY	11 N PEARL ST	1999
NY	DMS10	NECLEC LLC	NEW YORK CITY	32 OLD SLIP 4TH FLOOR	2000
NY	NT5	NET2000	MANHATTAN	325 HUDSON ST	1999
NY	DM5	NET-TEL CORP.	MANHATTAN	67 BROAD ST	1999

CLEC Circuit Switches Serving BOC Rate Centers in California and New York					
State	**Type**	**CLEC**	**City**	**Street**	**Year Deployed**
NY	NT5	NORTHLAND NETWORKS	SYRACUSE	500 S SALINA ST	1998
NY	MFS	NORTHLAND NETWORKS	UTICA	258 GENESEE ST	2000
NY	VCD	PAETEC	ALBANY	1 COMMERCE PLZ	1999
NY	5E	PAETEC	MANHATTAN	111 8TH AVE.	1999
NY	5E	RCN	MANHATTAN	333 W. HOUSTON ST	1997
NY	5E	RCN	QUEENS	3316 WOODSIDE AVE	1999
NY	NT5	TELIGENT	MANHATTAN	111 8TH AVE	1998
NY	NT5	THOUSAND ISLANDS COMMUNICATIONS	WATERTOWN	130 PARK PL	2000
NY	5E	TIME WARNER TELECOM	COLONIE	10 AIRLINE DR	1999
NY	DMT	WARWICK VALLEY TELEPHONE COMPANY	MIDDLETOWN	24 JOHN ST	1999
NY	DS	WESTELCOM NETWORKS	PLATTSBURGH	24 MARGARET ST	2000
NY	AXT	WORLDCOM	BUFFALO	325 DELAWARE - 1ST F	1994
NY	5E	WORLDCOM	BUFFALO	325 DELAWARE AVE	2000
NY	DMH	WORLDCOM	GARDEN CITY	845 STEWART AVE	1998
NY	DMS	WORLDCOM	NEW YORK	111 8TH AVE	1996
NY	AXT	WORLDCOM	NEW YORK	111 8TH AVE	1996
NY	NT5	WORLDCOM	NEW YORK	60 HUDSON ST	1995
NY	NT5	WORLDCOM	NEW YORK	560 WASHINGTON ST	1997
NY	5E	WORLDCOM	WESTBURY (NASSAU)	48 SWALM ST	1997
NY	5E	WORLDCOM	WHITE PLAINS	20 CHURCH ST @ MAIN ST	1997
NY	NT5	XO	MANHATTAN	111 8TH AVE	1998
NY	DMS	XO	NEW YORK	75 BROAD ST	2000

APPENDIX C. REGRESSION STATISTICS FOR FIGURE 9

Regression Statistics	
Multiple R	0.018943218
R Square	0.000358846
Adjusted R Square	-0.041292869
Standard Error	56.14694118
Observations	26

ANOVA

	df	*SS*	*MS*	*F*	*Significance F*
Regression	1	27.15981654	27.15981654	0.008615384	0.926817767
Residual	24	75659.49611	3152.479004		
Total	25	75686.65592			

	Coefficients	*Standard Error*	*t Stat*	*P-value*	*Lower 95%*	*Upper 95%*	*Lower 95.0%*	*Upper 95.0%*
Intercept	209.8146645	14.80338316	14.17342659	3.70534E-13	179.2619895	240.3673394	179.2619895	240.3673394
X Variable 1	-0.022700648	0.244568735	-0.092819092	0.926817767	-0.527465604	0.482064309	-0.527465604	0.482064309

RESIDUAL OUTPUT

Observation	*Predicted Y*	*Residuals*
1	209.6529453	35.98208499
2	209.7113612	-68.37899611
3	209.1778066	118.5399595
4	209.8056957	35.46994284
5	209.3669137	-51.98752384
6	208.4575955	139.3033201
7	208.7242999	-40.85967442
8	207.4599712	-34.0627992
9	209.5238483	21.85584432
10	207.8194362	-31.89292248
11	208.9937323	-0.961809023
12	209.6423199	16.27995673
13	209.641484	2.405122565
14	206.369772	-10.67938401
15	209.4225344	-5.819058164
16	207.3447567	-38.21400877
17	209.4930221	-23.33881879
18	208.8134942	-61.76747334
19	209.6412957	-58.29928461
20	208.2683519	-28.35850641
21	209.3924241	-52.00711209
22	206.2176843	47.94713452
23	209.3868316	106.6086299
24	209.7976121	2.150691122
25	209.4883823	11.62491737
26	209.6905844	-31.54023269