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Fax: 202-408-8745

August 18, 2004

VIA ELECTRONIC SUBMISSION

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW – Lobby Level
Washington, D.C. 20554

Re: ***Section 251 Unbundling Obligations for Incumbent Local Exchange Carrier, CC 01-338; Implementation of Local Competition of the Telecommunications Act of 1996, CC Docket No. 96-98; Deployment of Wireline Services Offering Advanced Telecommunications Capability, CC Docket No. 98-147 – Ex parte***

Dear Ms. Dortch:

Based on recent press reports,[1] it appears that the Commission is under increasing pressure from CLECs to adopt tentative conclusions regarding impairment for high-capacity loop and interoffice transport facilities (including DS-1 facilities) in its up-coming notice of proposed rulemaking (NPRM) regarding permanent unbundling rules. As the attached maps and following analysis demonstrate, CLECs have widely deployed alternative fiber facilities (including fiber directly connecting to end-user premises), which they are using in combination with alternative facilities provided by other CLECs and ILEC special access services to successfully provide high capacity services to end users. In light of this evidence, and evidence submitted by Verizon,[2] any conclusion, tentative or otherwise, that CLECs are impaired on a nationwide basis without access to high-capacity transmission facilities (including DS1s) on an unbundled basis not only is at odds with the facts, but also with the D.C. Circuit's decision in *USTA II*.[3] SBC currently is

[1] *See*, "CLECs CALL ON ADMINISTRATION TO PUSH FCC TO RELEASE UNE RULES," TR Daily, August 17, 2004.

[2] Verizon Ex Parte, "Competing Providers are Successfully Providing High-Capacity Services to Customers without Using Unbundled Elements, CC Docket Nos. 01-338, 96-98, and 98-147 (filed June 2004).

[3] *USTA v. FCC*, 359 F.3d 554, 574 (D.C. Cir. 2004) (*USTA II*) (requiring the Commission to consider the deployment of alternative facilities and draw reasonable inferences concerning the feasibility of deploying facilities along similar routes); *id.* at 575 (requiring the Commission to consider whether CLECs are capable of competing without access to UNEs, not simply whether they already are doing so with alternative facilities); *id.* at 576, 577 (requiring the Commission to consider the availability of tariffed

in the process of gathering additional data concerning CLEC use of alternative high-capacity facilities to serve end-users, and identifying (based on that evidence) a reasonable test for determining whether and where CLECs are not impaired without unbundled access to ILEC high-capacity transmission facilities. SBC will submit that evidence and the results of its analysis in the course of the Commission's proceeding on remand. In the meantime, the Commission should reject calls for it to adopt any conclusion, tentative or otherwise, that CLECs are impaired without unbundled access to DS1 and other high-capacity loops and dedicated transport facilities until it can develop a complete record concerning the availability and use by CLECs of alternatives (including competitive fiber and ILEC special access services).

**High Capacity Dedicated Transport and Loops**

It is undisputed that CLECs have deployed myriad alternative fiber facilities in markets across SBC's territories, particularly in major metropolitan areas where demand for high capacity services is concentrated. Using these facilities, CLECs can and do provide high capacity services (including DS-1, DS-3 and other high capacity services) to end users in direct competition with SBC's access services. These CLEC-deployed facilities typically extend into CLEC collocation arrangements, and connect end user locations directly to competitive switches and competing carrier points-of-presence (POPs).

As described in greater detail below, SBC has engaged two independent telecommunications consultants to obtain information on the deployment of competitive fiber networks, and has translated that information onto maps that depict competitive fiber networks in 22 MSA's[4] in its operating territory, using widely-available GIS mapping software. On a population basis, these MSAs rank as low as 61st (*i.e.*, Bridgeport-Stamford-Norwalk-Danbury) among the top MSAs in the country. These 22 MSAs[5] were selected because they are responsible for 80% of SBC's special access revenue. Multiple maps were developed for each of the 22 MSAs, beginning at a high level and then "zooming-in" to present additional detail concerning the deployment and use of competitive transport and loop facilities.

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special access services in determining whether would-be entrants are impaired without unbundled access to ILEC facilities).

[4] The term "MSA" is used for consistency and simplicity. Strictly speaking, all of these are Metropolitan Areas (MAs). If an MA stands alone (i.e., its territory does not touch another MA's), it is an MSA (Metropolitan Statistical Area). If two (or more) MAs are contiguous, they are designated individually as PMSAs (Primary MSAs). The grouping of multiple contiguous PMSAs is designated as a CSMA (Consolidated MSA).

[5] The 22 MSAs are Chicago, Los Angeles – Long Beach, Detroit, Dallas, Houston, Orange County, San Jose, San Diego, Oakland, San Francisco, St. Louis, Kansas City, Cleveland-Lorain-Elyria, Indianapolis, Columbus, Milwaukee, Sacramento, Ft. Worth, Bridgeport-Stamford-Norwalk-Danbury, San Antonio, Austin-San Marcos, and Oklahoma City. *See* Attachment A.

**GeoTel**

GeoTel, a telecommunications research and geographic information systems mapping firm, was engaged to identify the location of competitive fiber.[6] The company provides a variety of reports on telecommunications infrastructure to assist service providers in penetrating new markets and expanding in existing markets, and to help fiber vendors sell or lease fiber to those service providers. It gathers information about business opportunities, product offerings, potential customers, and telecommunications markets throughout the country, and provides that information to its clients, which include major telecommunications services providers, consultants, government agencies and universities.

GeoTel uses several sources to compile and verify fiber deployment data. First, GeoTel acquires information from fiber owners themselves. Some fiber owners provide the information to GeoTel on their own so that GeoTel can help them locate buyers; others provide the information at GeoTel's request. Second, GeoTel traces fiber routes in large metropolitan areas by identifying fiber access manholes and using Global Positioning Systems to map the location of fiber facilities. Third, GeoTel searches public records, such as construction permits and information from companies that lay trenches for fiber to identify where fiber has been deployed. GeoTel uses each of these multiple sources not only to gather data, but also to serve as a cross-check on the other sources. GeoTel repeats the foregoing methodology approximately every six months to ensure that its information is accurate and up-to-date.

**GeoResults**

GeoResults is a database marketing and consulting firm that has developed a national database that identifies over 80,000 fiber "lit" buildings across the United States.[7] The database contains the identity of each service provider serving these buildings. GeoResults's clients include American Fiber Systems, Cox Enterprises, Global Crossing, Lucent, RCN, Time Warner Telecom, SBC and other incumbent local exchange carriers, who can use the information contained in GeoResults's database to develop transport and fiber route deployment strategies, avoid stranded investment, and focus sales and marketing efforts.

GeoResults has access to two equipment databases maintained by Telcordia that are used by carriers throughout the country to track network assets, manage their networks, and facilitate interoperability with other carriers' networks. The first is a library of Common Language Location Identifier ("CLLI") codes, which are used to identify physical locations and network equipment. The second database is an inventory of equipment codes in the Central On-line Entry System ("CLONES"), which is the repository for CLLI codes. When a carrier deploys equipment (such as a multiplexer) that is to be connected to the public telecommunications

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[6] http://www.geo-tel.com/

[7] http://www.georesults.com/index.htm

network, it must obtain a CLLI code that denotes the type of equipment and its location, and enter that code into the CLONES database. These databases thus contain information entered by the carriers themselves regarding their network sites, transmission facilities, network equipment, circuits and vendors.

All carriers use multiplexers to provision high-capacity services, such as DS-1 and DS3 services. As a consequence, one can identify buildings that are being served by competitive carriers, and thus which are "lit" by alternatives to ILEC facilities, by searching the CLONES database to identify where CLECs have deployed such equipment at specific customer locations and connected that equipment to non-ILEC fiber or other means of transport, such as fixed wireless networks. GeoResults has painstakingly reviewed and analyzed the Telcordia databases to compile its listing of competitively lit buildings.

**Map Descriptions**

The fiber maps attached hereto identify, for each MSA, where CLECs have deployed or are using alternatives to UNEs to provide competitive high-capacity services to end-users. In particular, the first map for each MSA shows the MSA and SBC's wire center boundaries, as well as the location of competitive fiber based on data gathered by GeoTel. The wire centers shaded by horizontal lines are those wire centers that account for 80 percent of the SBC's special access revenues for DS-1 and DS-3 services.

The second map shows central offices served by known CLEC fiber based on SBC records regarding the presence of fiber-based collocation. CLECs can make connections between these collocations either directly or indirectly – by using either their own fiber network or another carrier's network – and are capable of providing transport between any two central offices that connect to these networks. Therefore, the gray lines on these maps indicate available competitive transport routes between wire centers in the MSA.

The subsequent maps are effectively magnified versions of the initial map, showing ever greater detail. They reflect the known fiber routes in the metropolitan and downtown areas and also show the CLEC lit buildings (*i.e.*, the purple squares).

These maps provide a conservative representation of the availability of alternatives to ILEC high-capacity UNEs. No third party can be expected to identify all competitively deployed fiber. Moreover, high capacity transport and loop services and facilities provided by alternative technologies, such as fixed wireless and cable, are not depicted. Discovery responses from competitive providers in the now-terminated state Triennial Review proceedings confirmed that other competitive fiber and lit buildings exist, but such information was not used in the preparation of these materials. Before drawing any conclusions about the need for DS1 loop unbundling, the Commission should require CLECs to provide information within their possession about, *inter alia*, exactly where they have deployed facilities, their policies for

extending facilities to new locations, and where they serve customers using incumbent LEC special access services.

For selected MSAs, SBC also has identified end-user customer locations that are served by CLECs using special access services purchased from SBC. Internal billing records were examined to identify CLEC purchases of high capacity services. These records contain the address of the customer that is being served by the non-ILEC service provider using SBC-provided special access services. The records were manually reviewed to remove entrance facilities and special access purchased by wireless providers. The remaining end-user locations were mapped as triangles. These maps demonstrate that CLECs are using special access purchased from SBC to extend the reach of their network. Analysis of additional MSAs within SBC's territory is currently underway, and will be provided in the course of the Commission's proceeding on remand from the D.C. Circuit.

If you have any questions concerning the foregoing, or the attached maps, please contact the undersigned.

Sincerely,

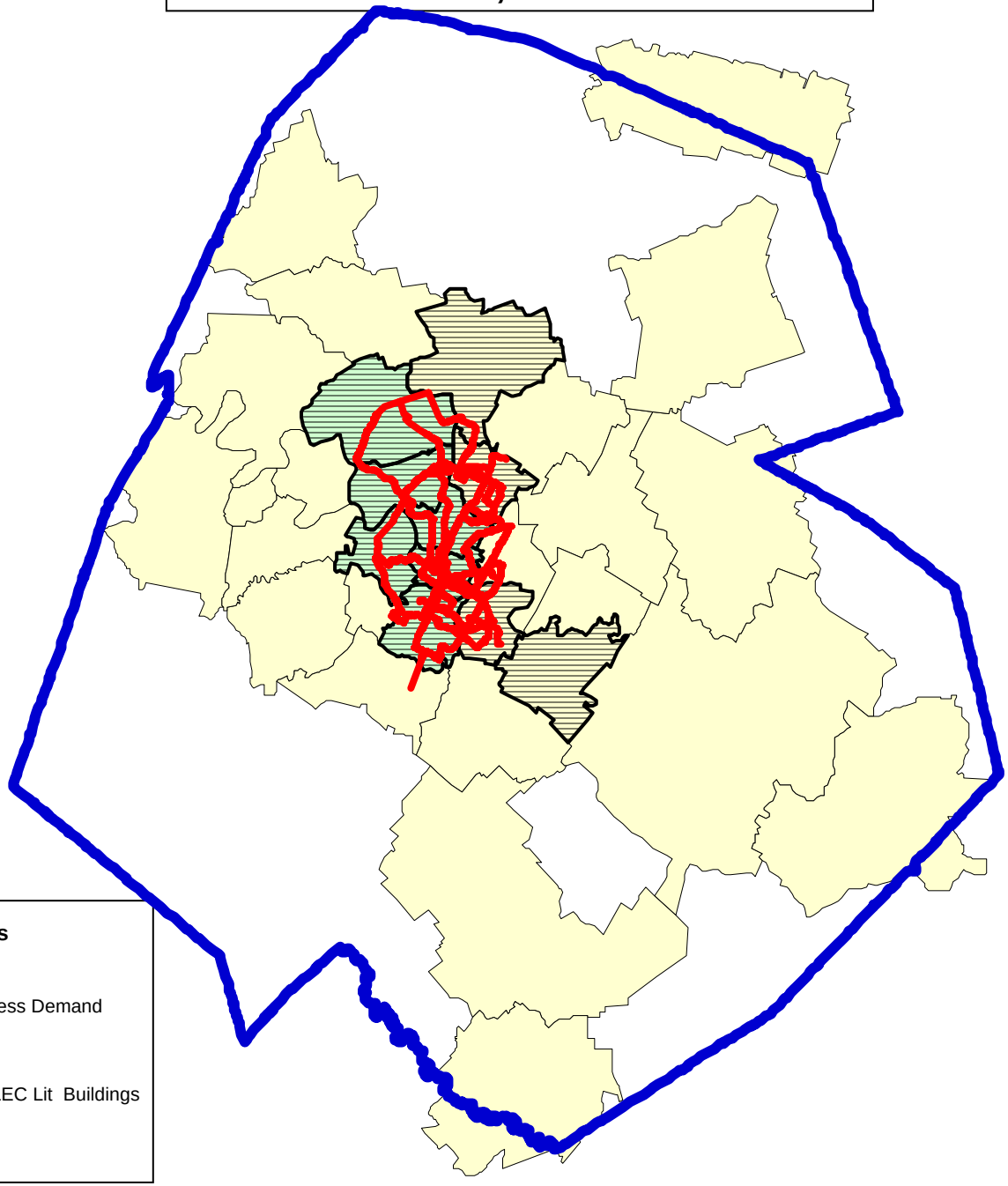
**/s/ Christopher M. Heimann**

Attachments

cc: Chairman Michael K. Powell
Commissioner Kathleen Abernathy
Commissioner Jonathan Adelstein
Commissioner Michael Copps
Commissioner Kevin Martin
Scott Bergmann
Matthew Brill
Christopher Libertelli
Jessica Rosenworcel
Bryan Tramont
Jeffrey Carlisle
Michelle Carey
Thomas Navin
John Rogovin

# Attachment A

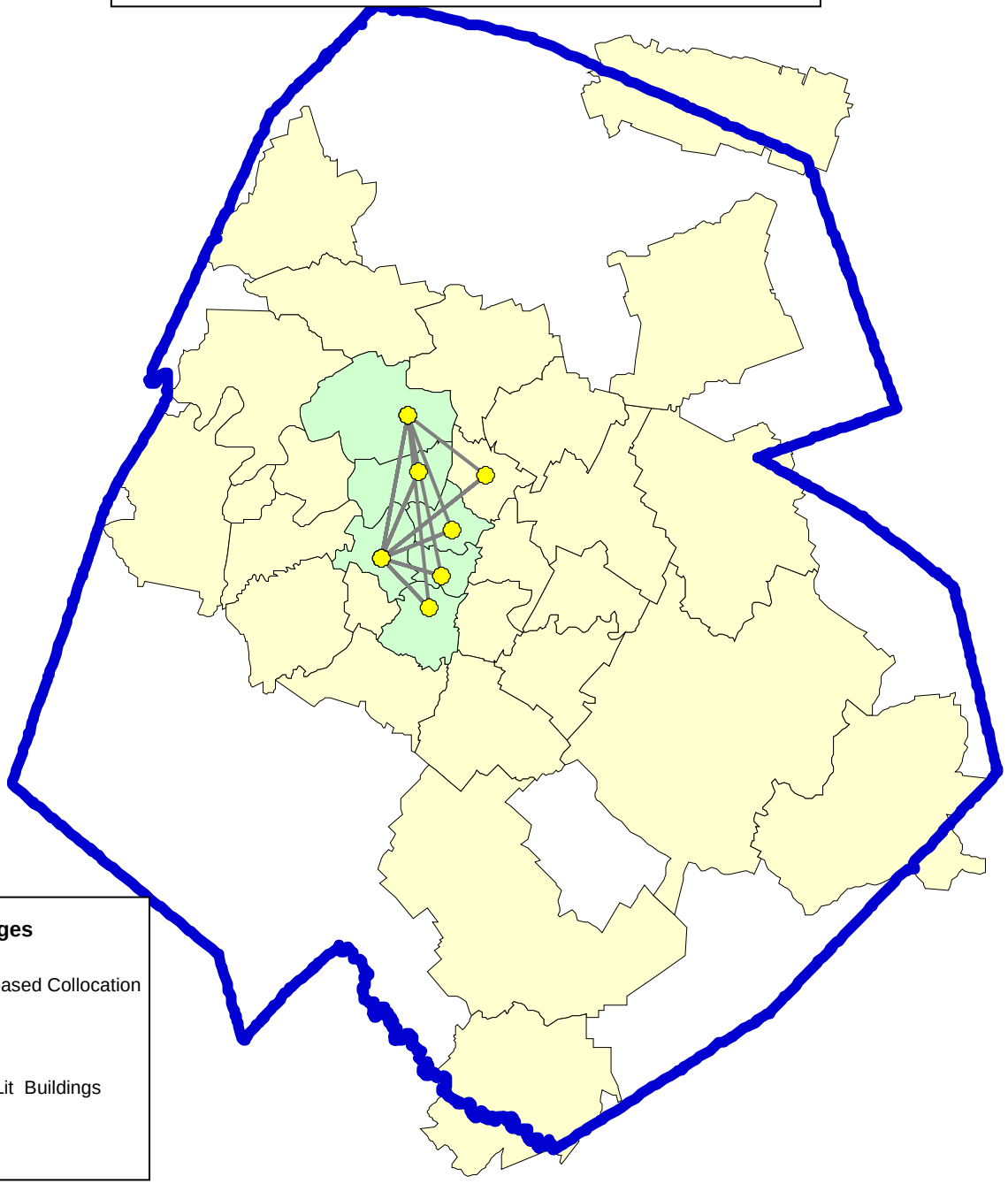
# Austin, TX-MSA



**Alternate Fiber Routes**

- Known Alternate Fiber
- 80 Percent of Special Access Demand For DS1 & DS3 Services
- SBC Territory
- Wire Centers w/Known CLEC Lit Buildings
- Non-SBC Territory
- MSA Boundary

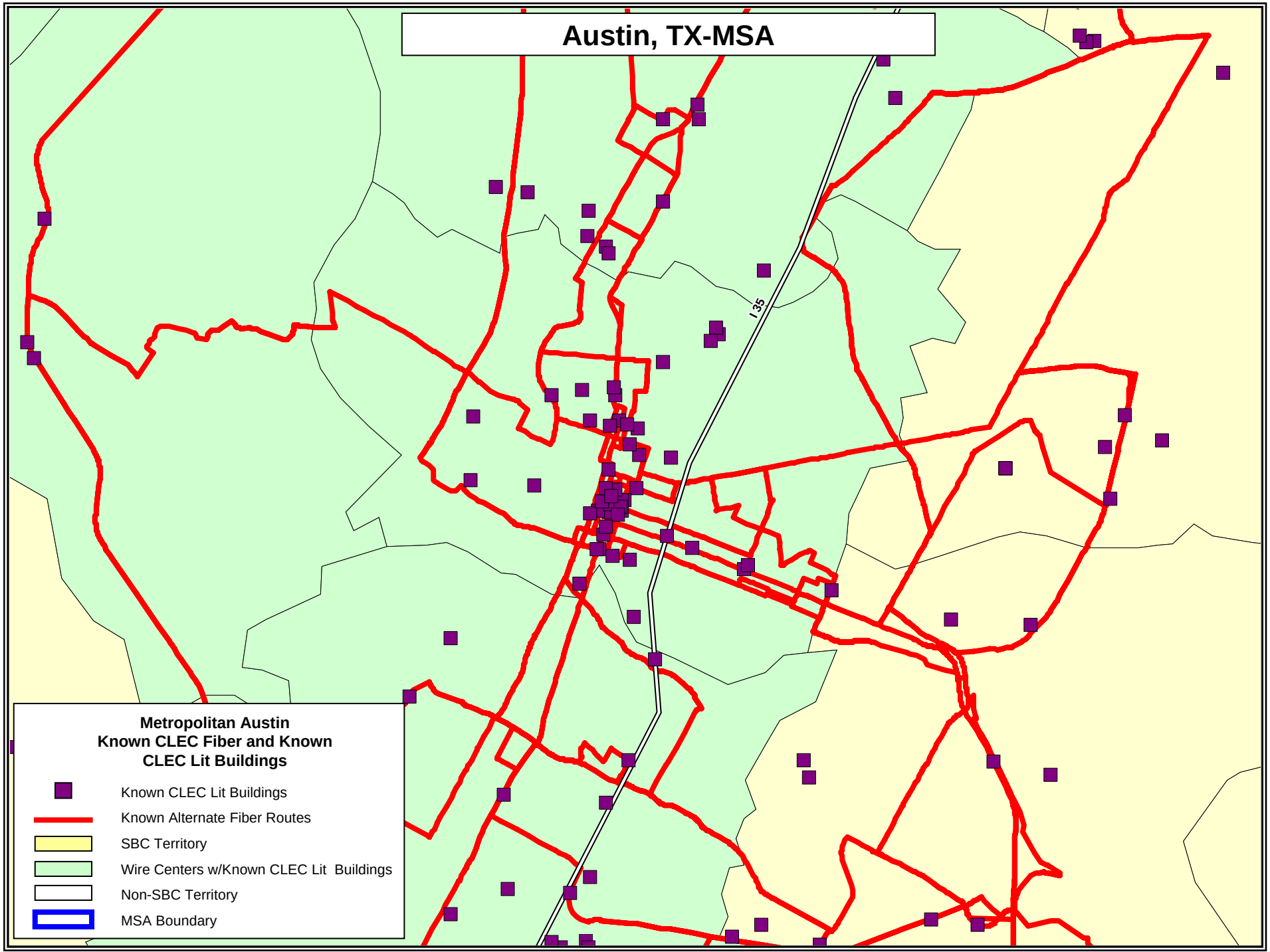
# Austin, TX-MSA

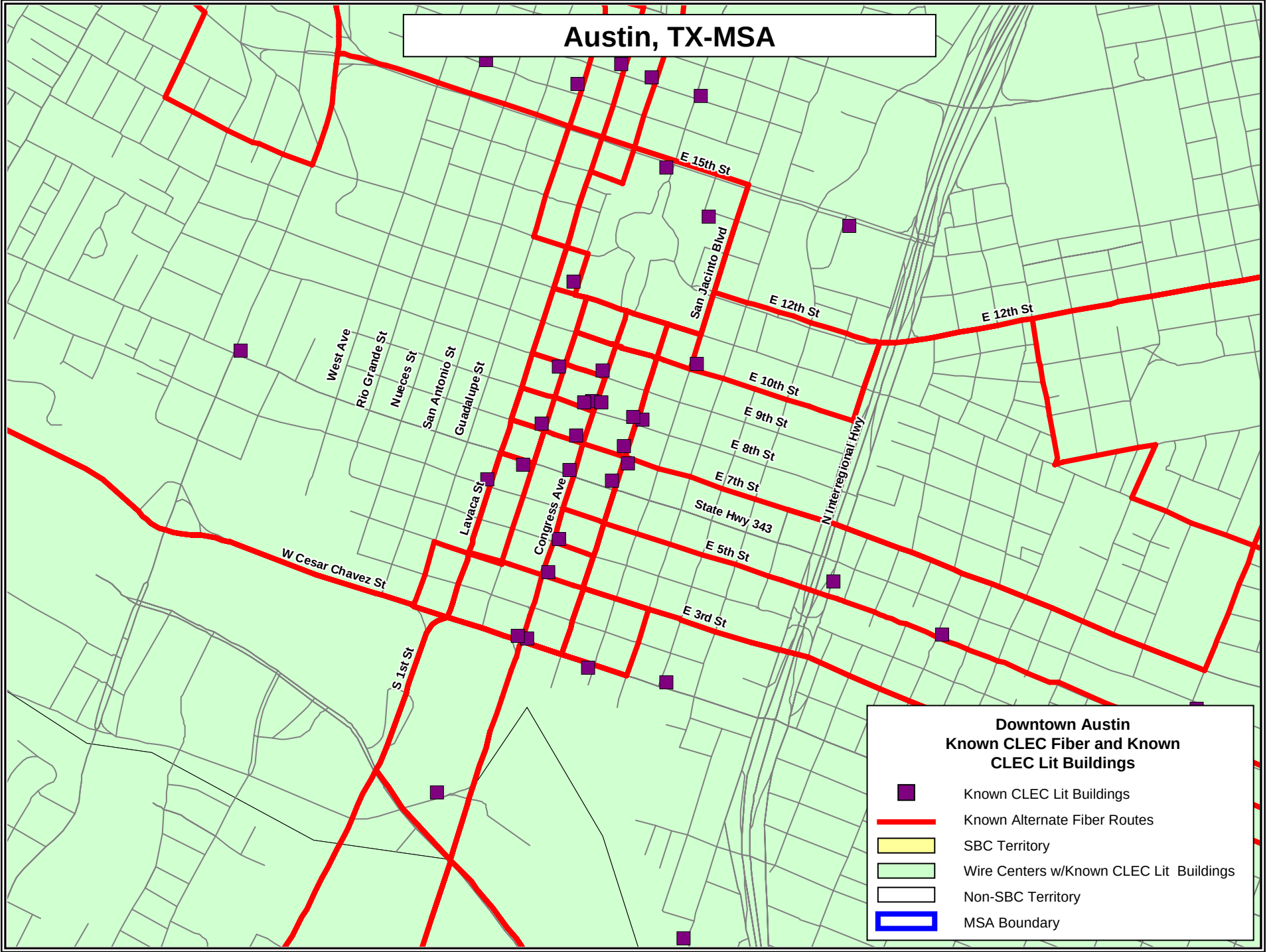


**Available CLEC Transport Linkages**

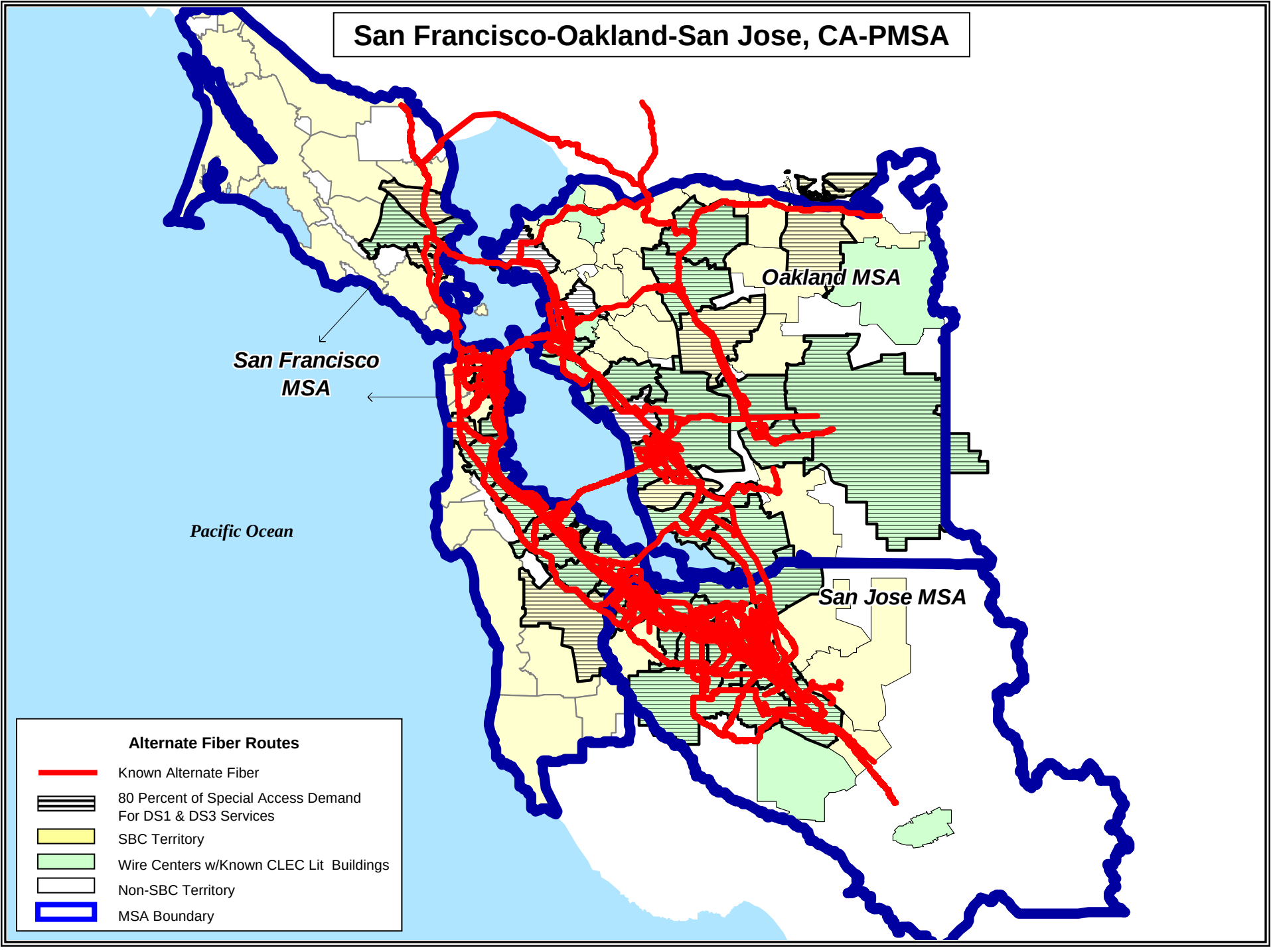
- COs with Known CLEC Fiber-based Collocation
- Available Transport Link
- SBC Territory
- Wire Centers w/Known CLEC Lit Buildings
- Non-SBC Territory
- MSA Boundary

# Austin, TX-MSA

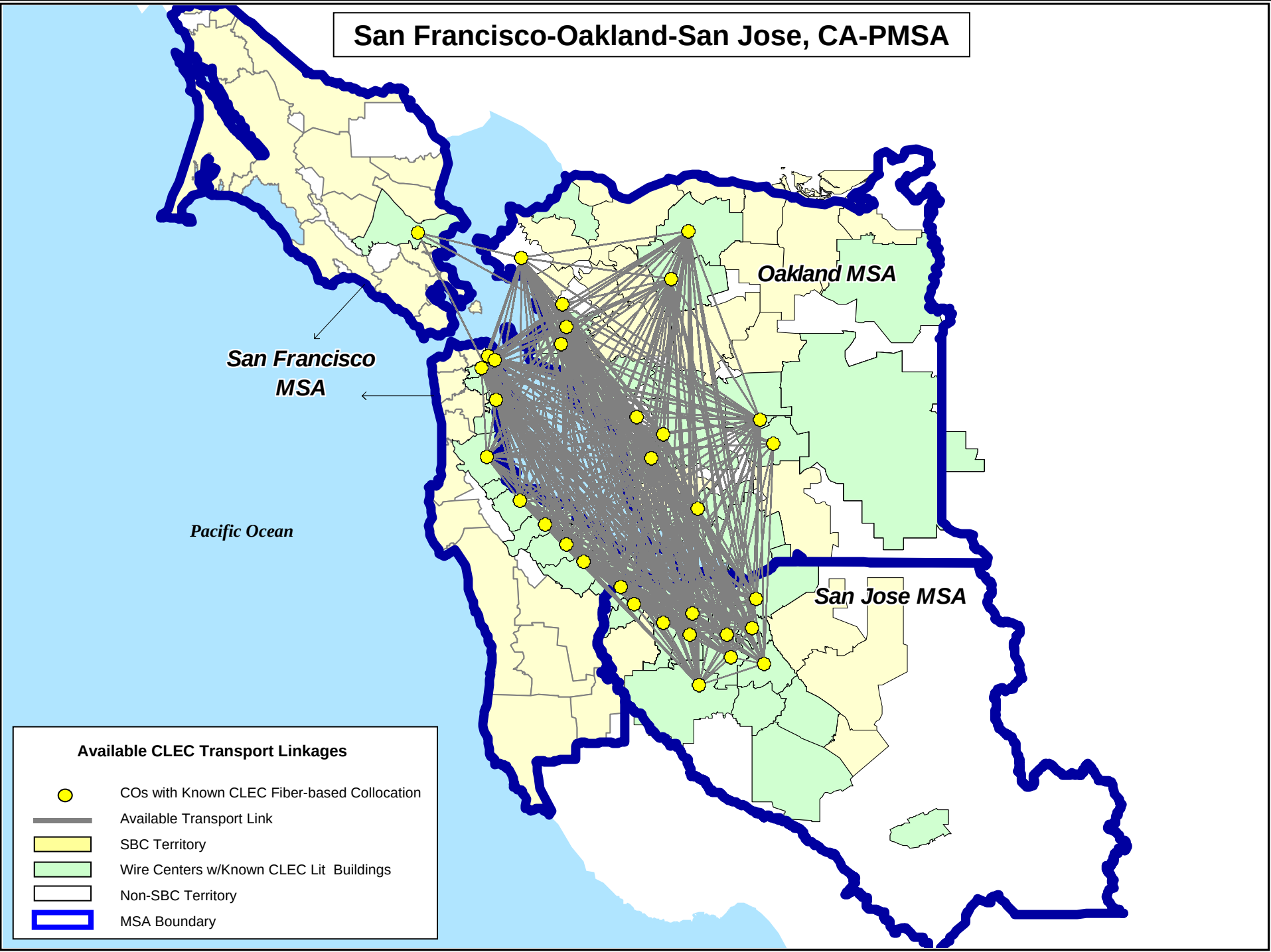


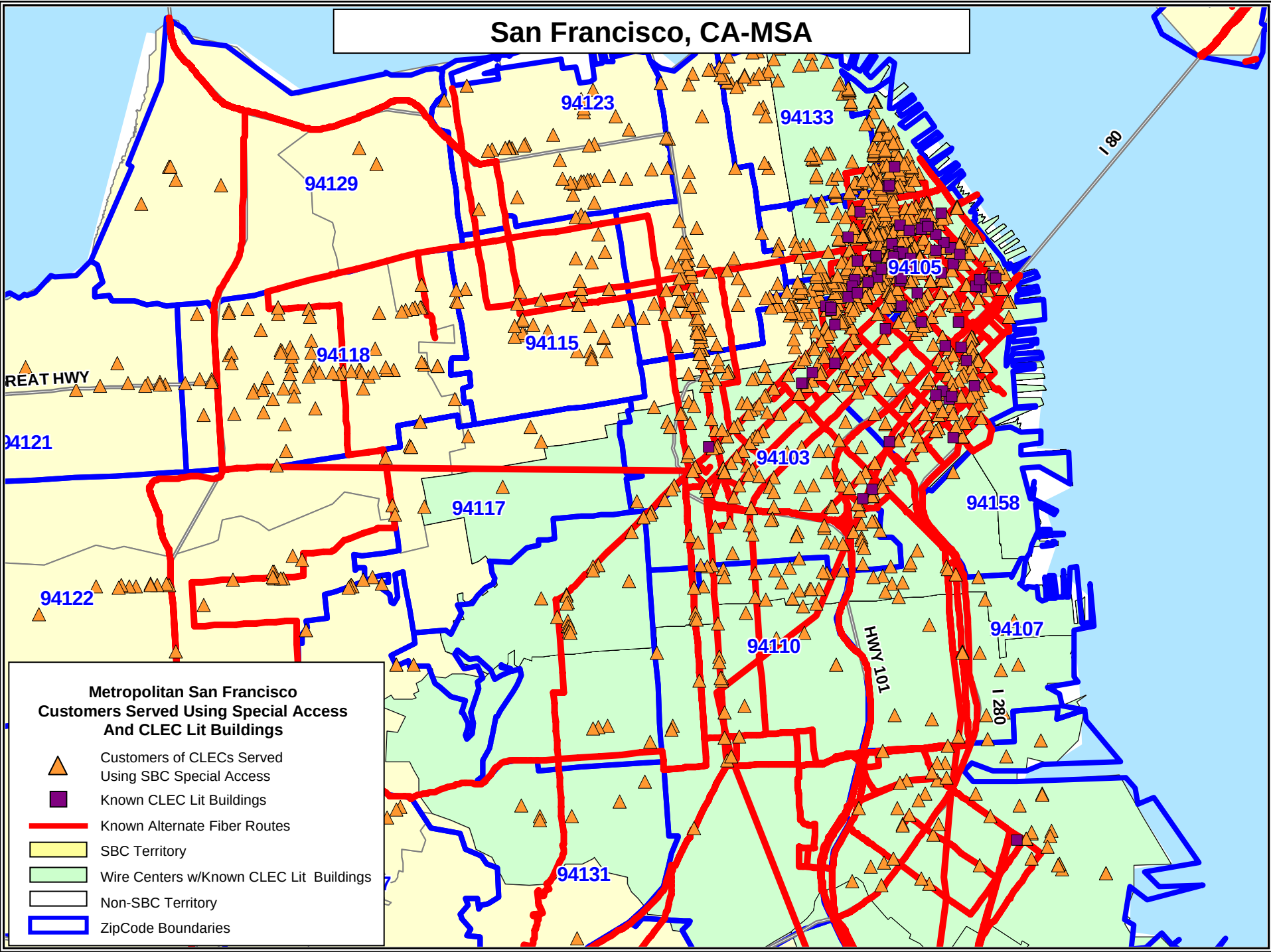

Austin, TX-MSA
E 15th St
E 12th St
E 12th St
E 10th St
E 9th St
E 8th St
E 7th St
State Hwy 343
E 5th St
E 3rd St
W Cesar Chavez St
S 1st St
West Ave
Rio Grande St
Nueces St
San Antonio St
Guadalupe St
Lavaca St
Congress Ave
San Jacinto Blvd
N Interregional Hwy
Downtown Austin
Known CLEC Fiber and Known
CLEC Lit Buildings
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
MSA Boundary

# San Francisco-Oakland-San Jose, CA-PMSA



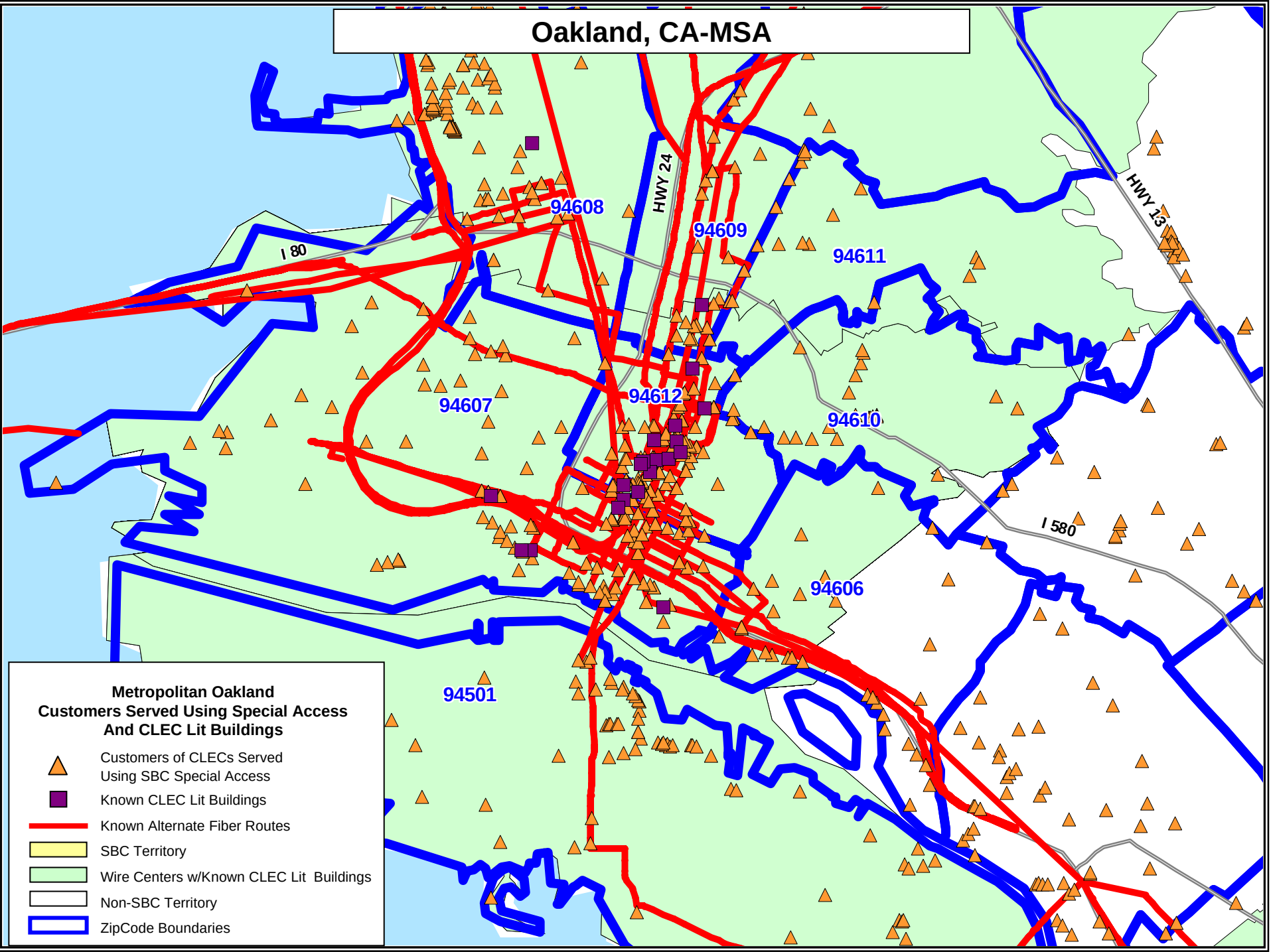
# San Francisco-Oakland-San Jose, CA-PMSA



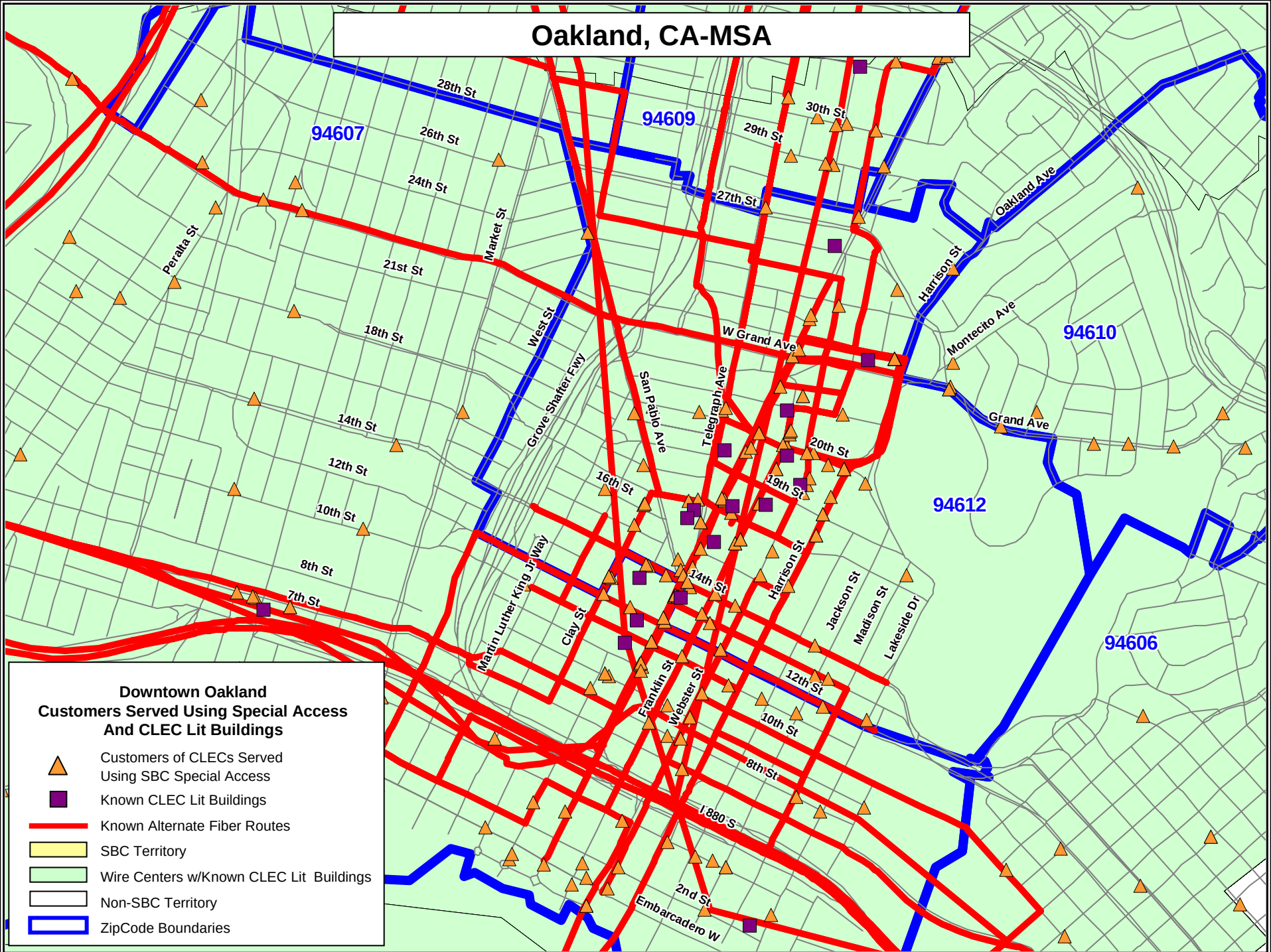

San Francisco, CA-MSA
94123
94133
94129
94105
94118
94115
REAT HWY
94121
94103
94117
94158
94122
94107
94110
HWY 101
I 280
I 80
94131
Metropolitan San Francisco
Customers Served Using Special Access
And CLEC Lit Buildings
Customers of CLECs Served
Using SBC Special Access
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
ZipCode Boundaries

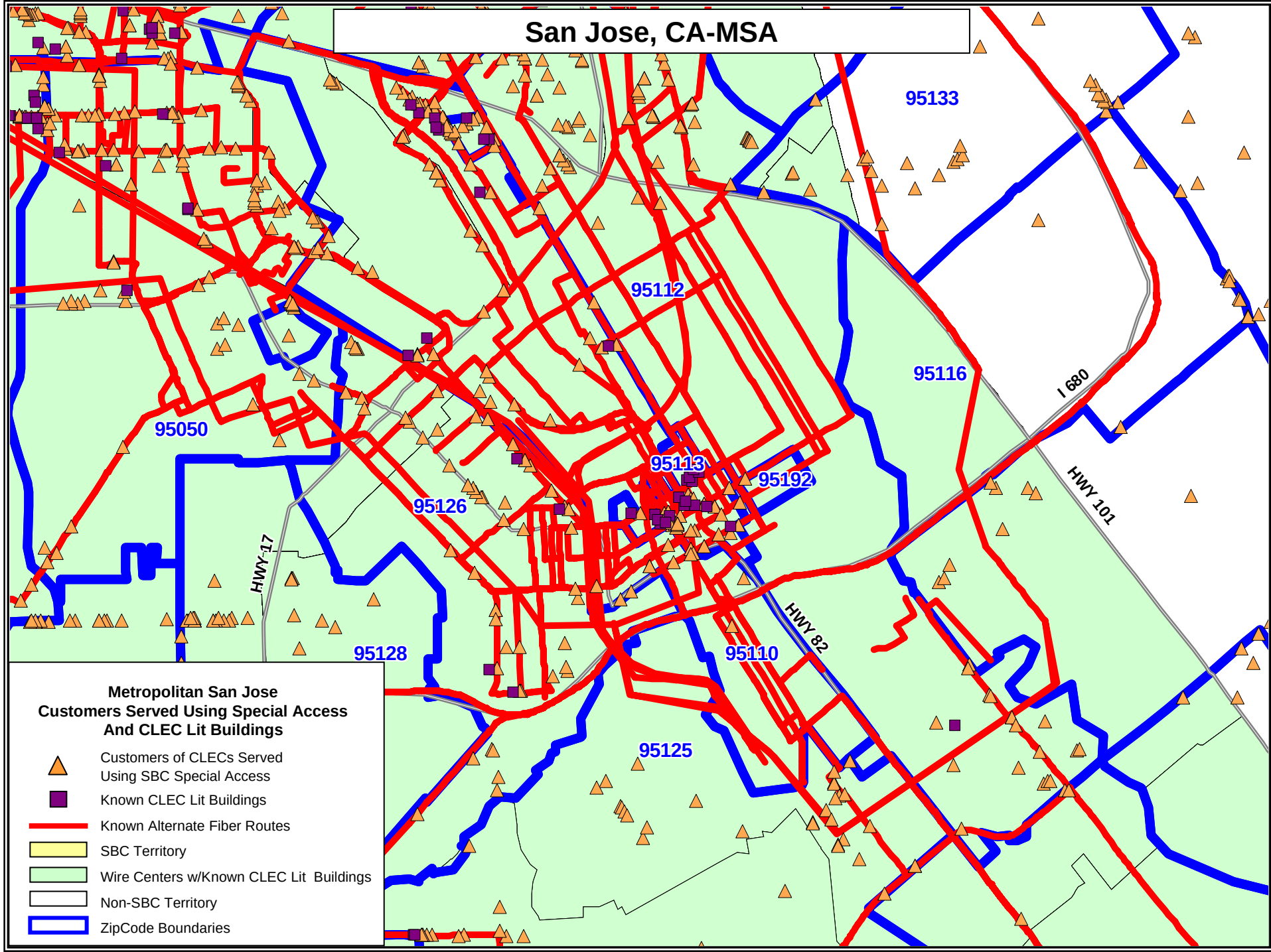
San Francisco, CA-MSA
94133
94108
94109
94111
94102
94105
94103
94107
Broadway
Jackson St
Washington St
Battery St
Drumm St
Montgomery St
Pine St
Spear St
Stockton St
1st St
Beale St
Market St
Mission St
Howard St
2nd St
Folsom St
3rd St
4th St
I 80 W
Brannan St
5th St
I 80
Downtown San Francisco
Customers Served Using Special Access
And CLEC Lit Buildings
Customers of CLECs Served
Using SBC Special Access
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
ZipCode Boundaries

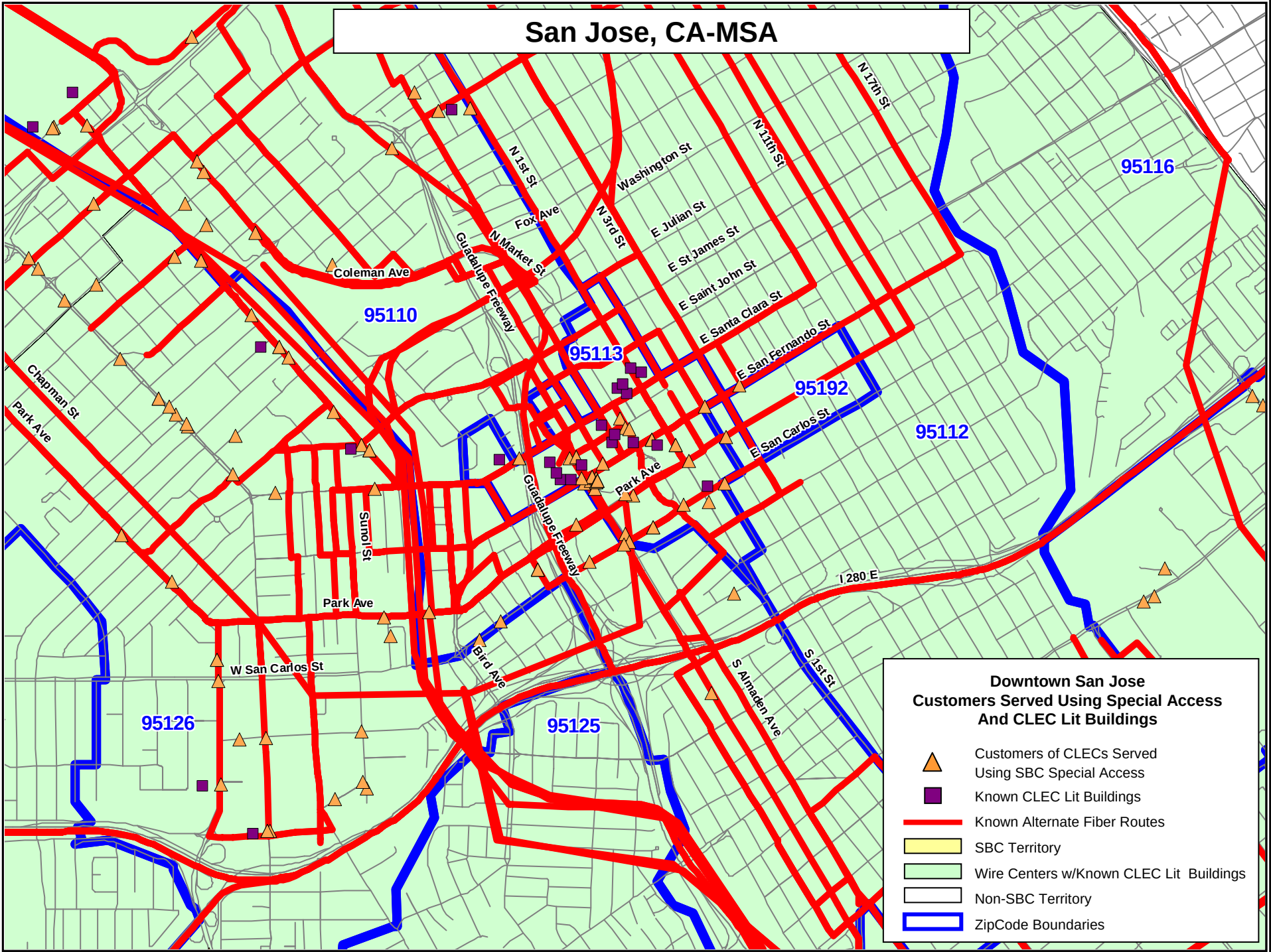
# Oakland, CA-MSA



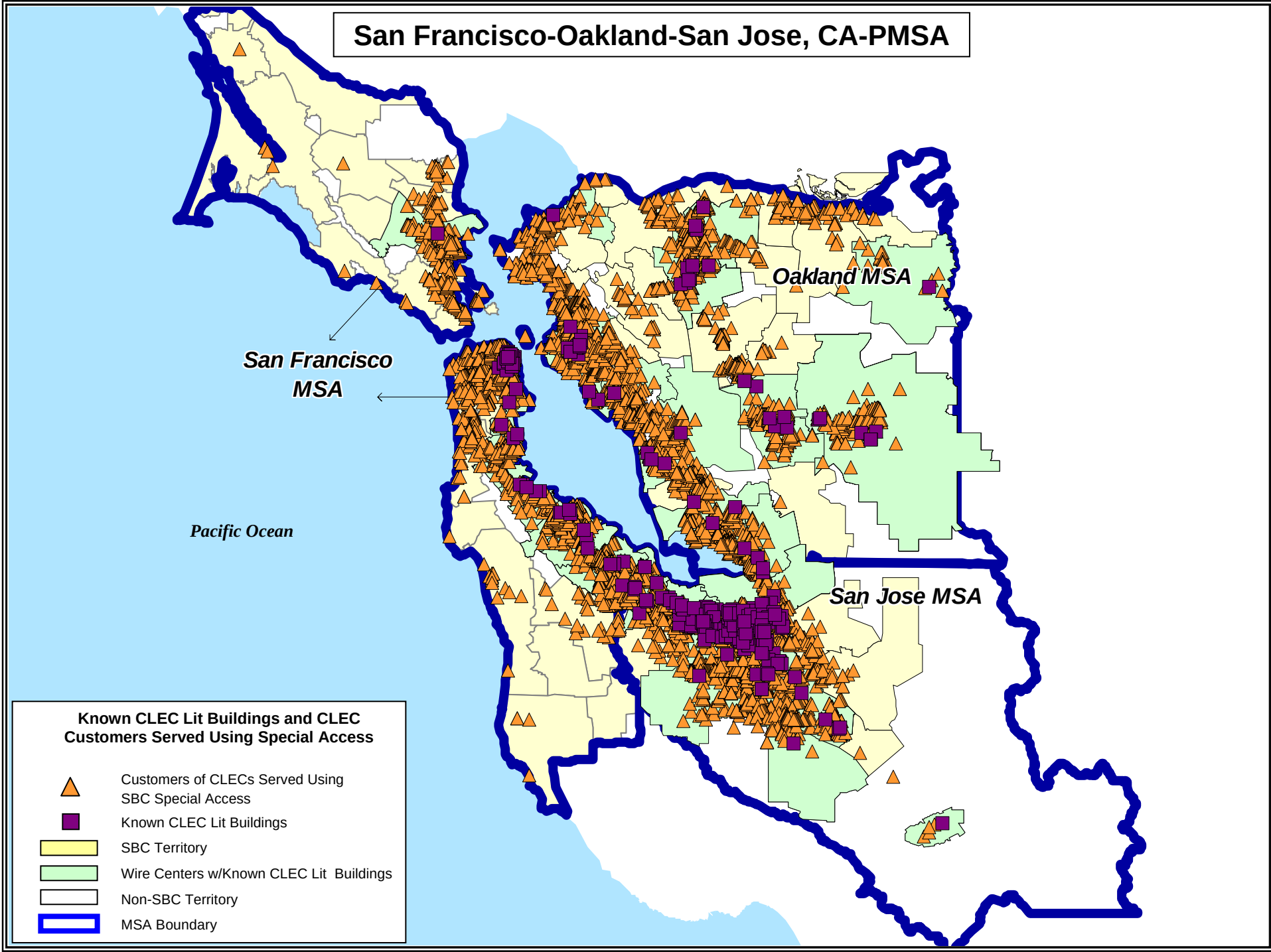
# Oakland, CA-MSA



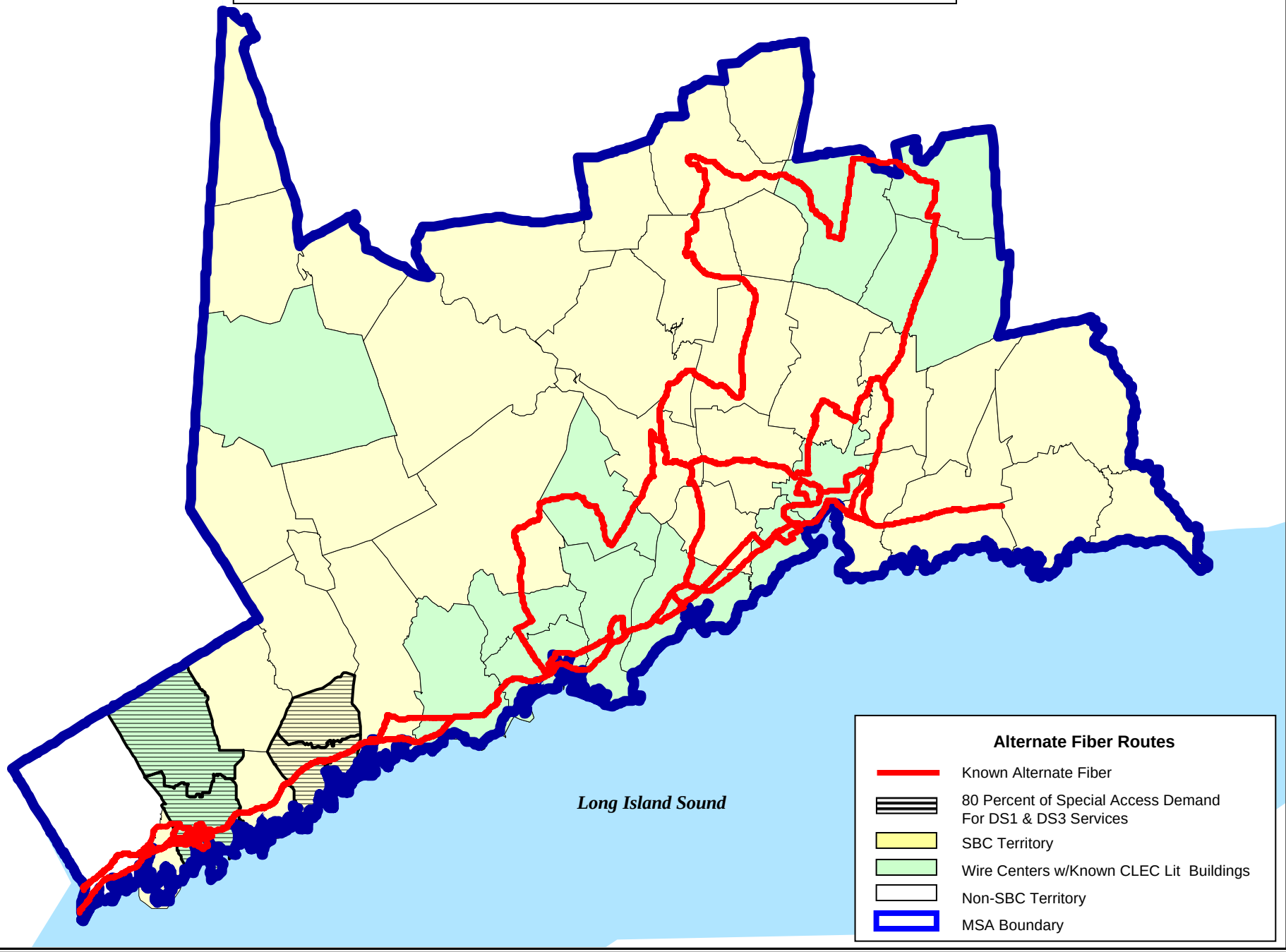

San Jose, CA-MSA
95133
95112
95116
95050
95113
95192
95126
95128
95110
95125
HWY 17
HWY 82
I 680
HWY 101
Metropolitan San Jose
Customers Served Using Special Access
And CLEC Lit Buildings
Customers of CLECs Served
Using SBC Special Access
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
ZipCode Boundaries


San Jose, CA-MSA
Downtown San Jose
Customers Served Using Special Access
And CLEC Lit Buildings
Customers of CLECs Served
Using SBC Special Access
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
ZipCode Boundaries
95110
95113
95192
95112
95116
95126
95125
N 1st St
Fox Ave
N Market St
Guadalupe Freeway
Washington St
N 3rd St
N 11th St
N 17th St
E Julian St
E St James St
E Saint John St
E Santa Clara St
E San Fernando St
E San Carlos St
Coleman Ave
Chapman St
Park Ave
Sunol St
W San Carlos St
Bird Ave
I 280 E
S Almaden Ave
S 1st St

# San Francisco-Oakland-San Jose, CA-PMSA



# Bridgeport-Stamford-Norwalk-Danbury, CT-MSA



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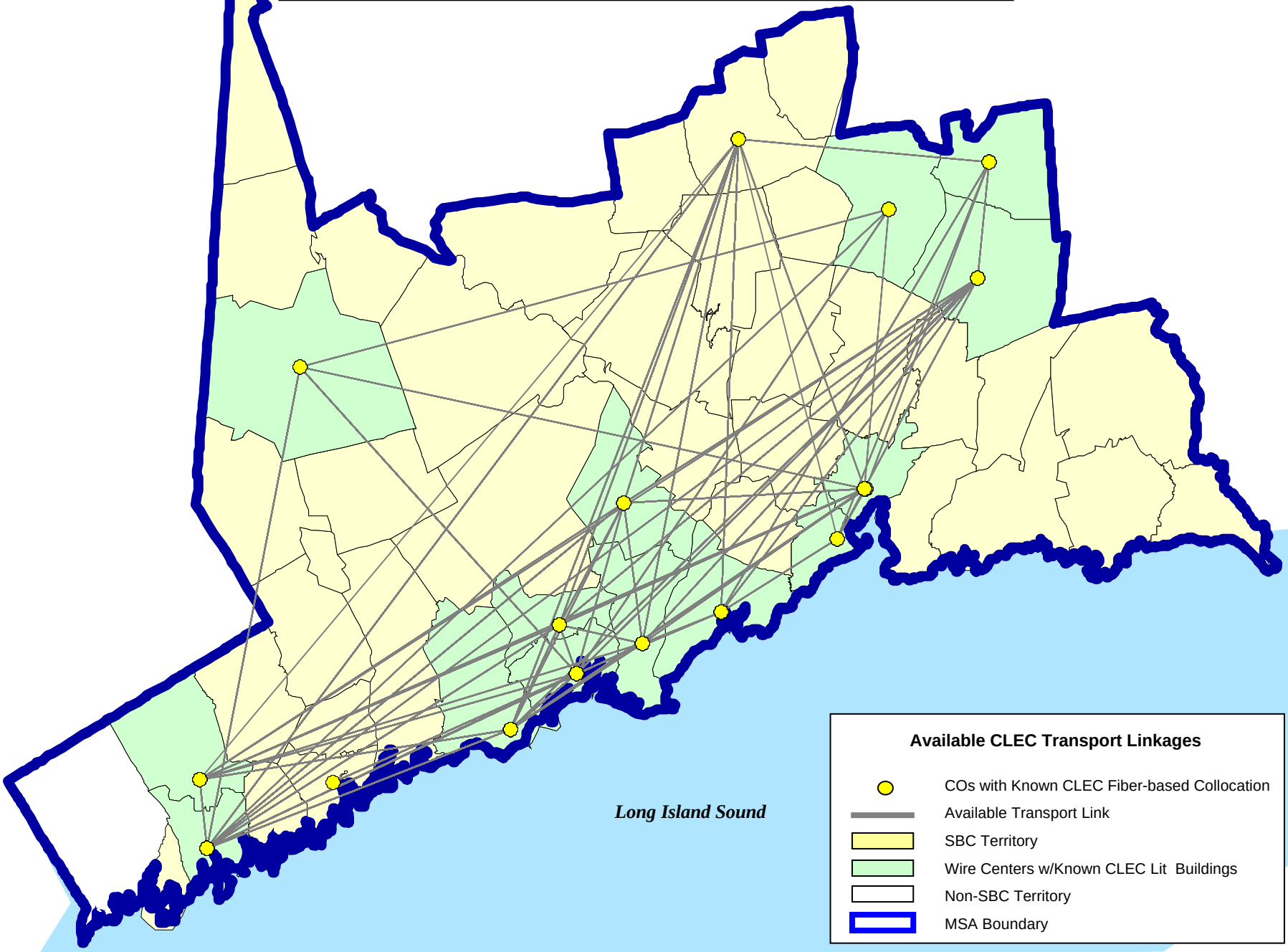
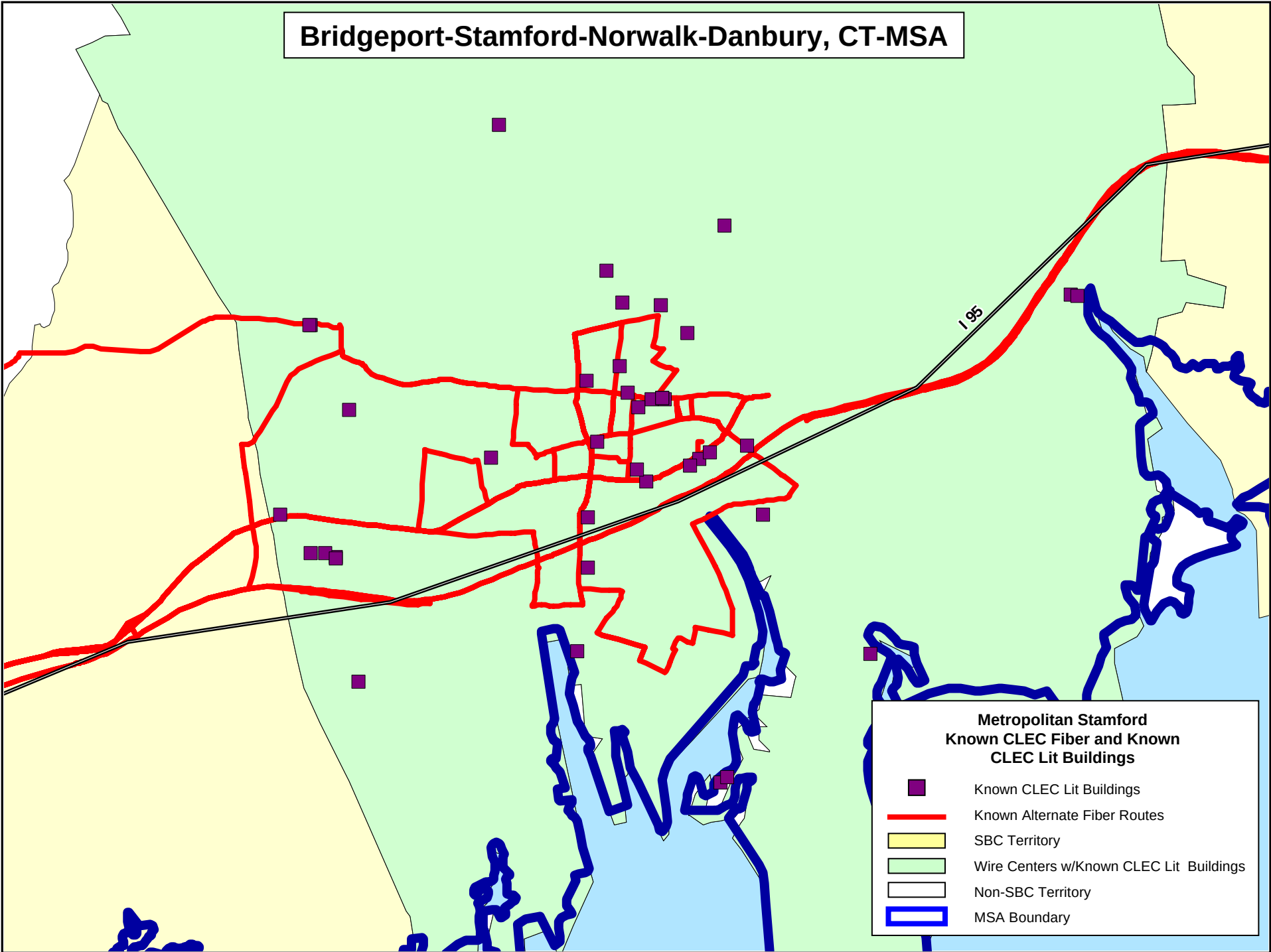
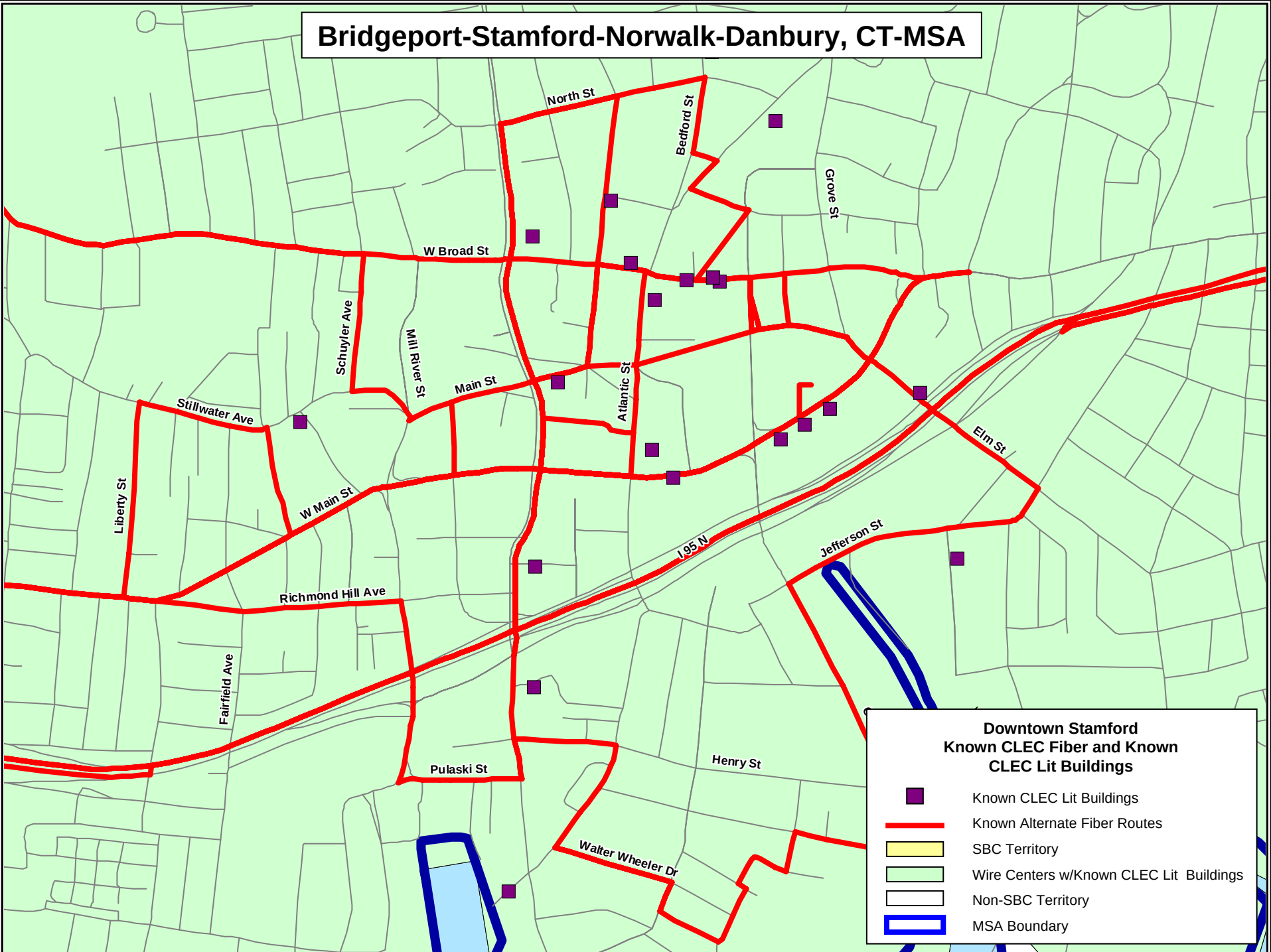
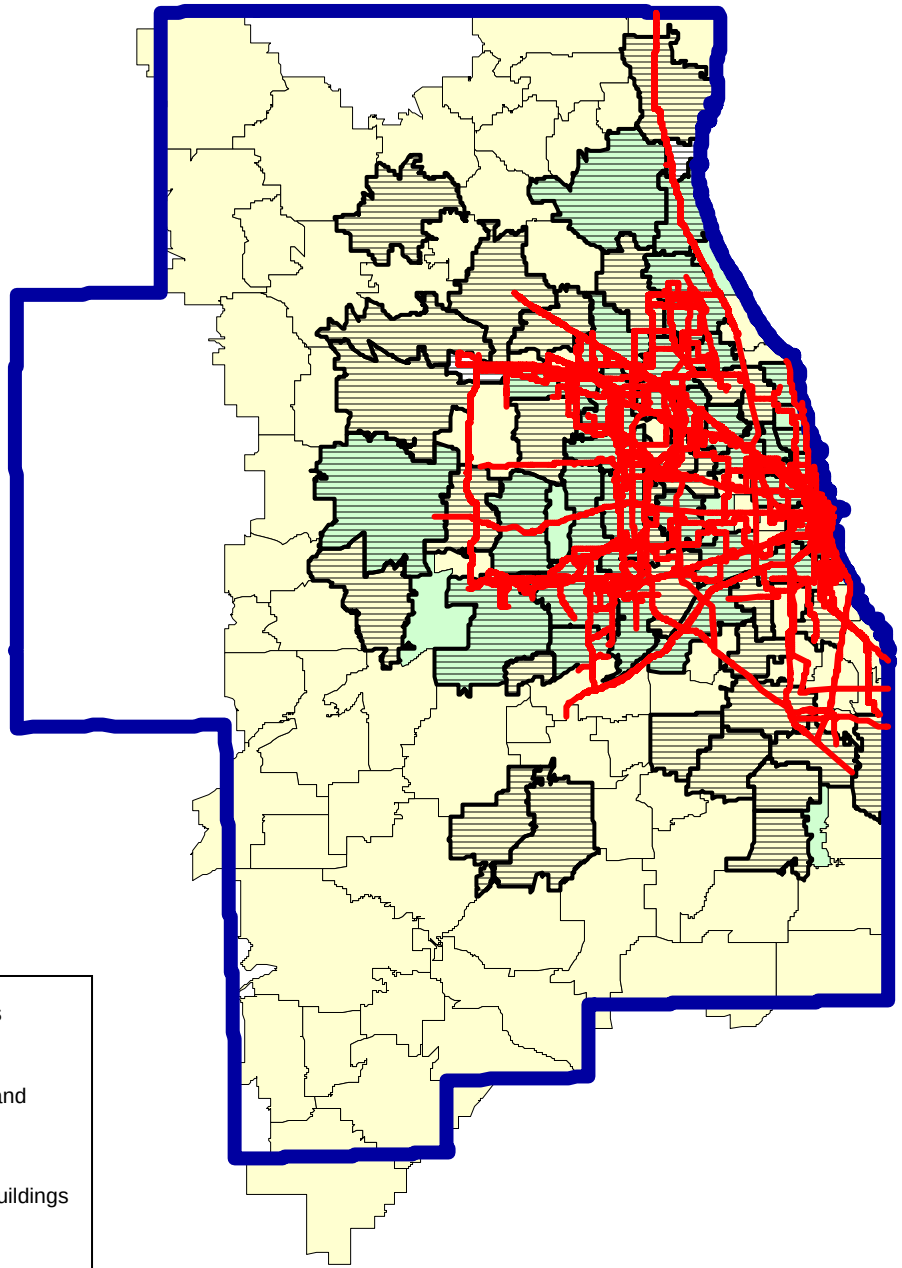



Bridgeport-Stamford-Norwalk-Danbury, CT-MSA
I 95
Metropolitan Stamford
Known CLEC Fiber and Known
CLEC Lit Buildings
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
MSA Boundary

# Bridgeport-Stamford-Norwalk-Danbury, CT-MSA



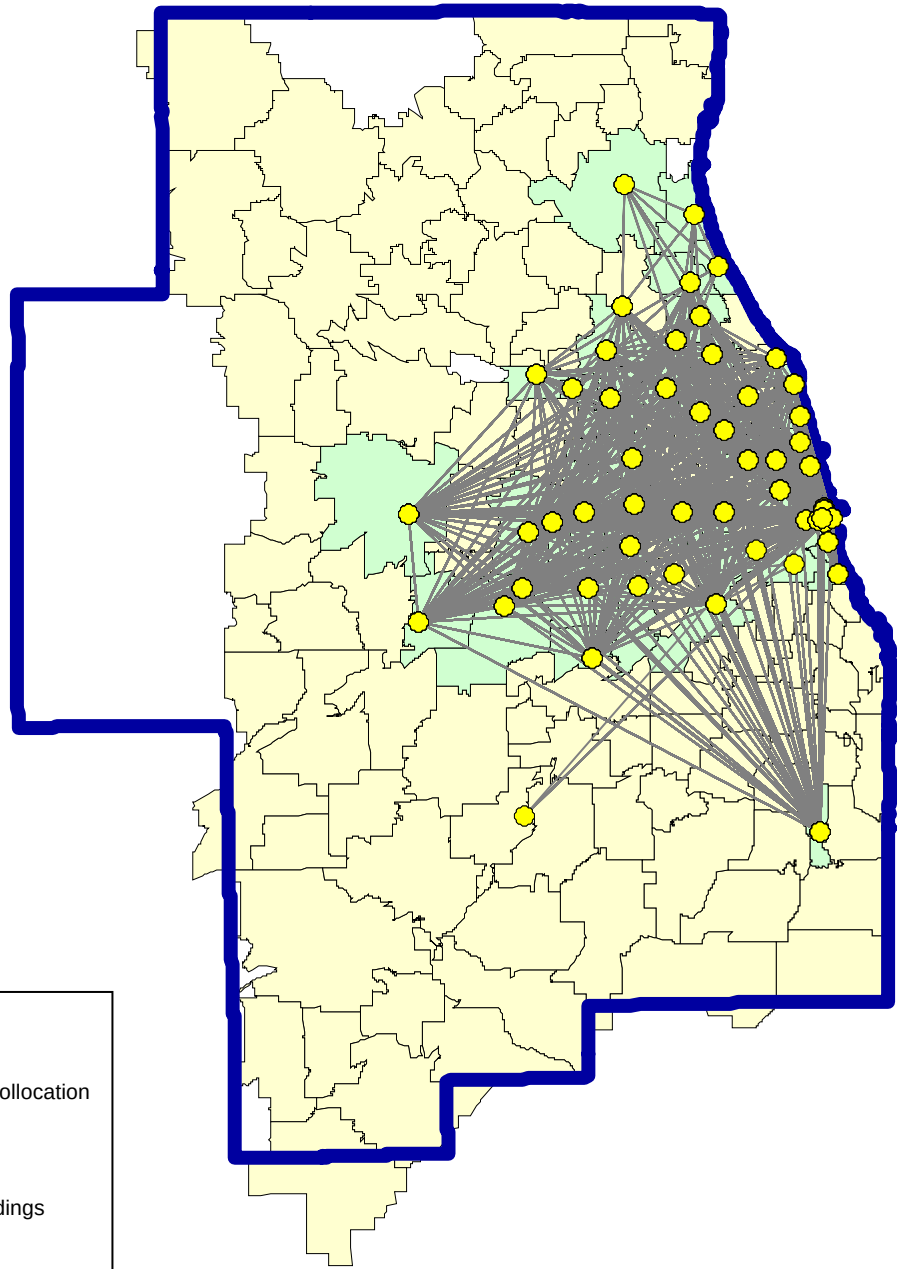
# Chicago, IL-MSA



**Available CLEC Transport Linkages**

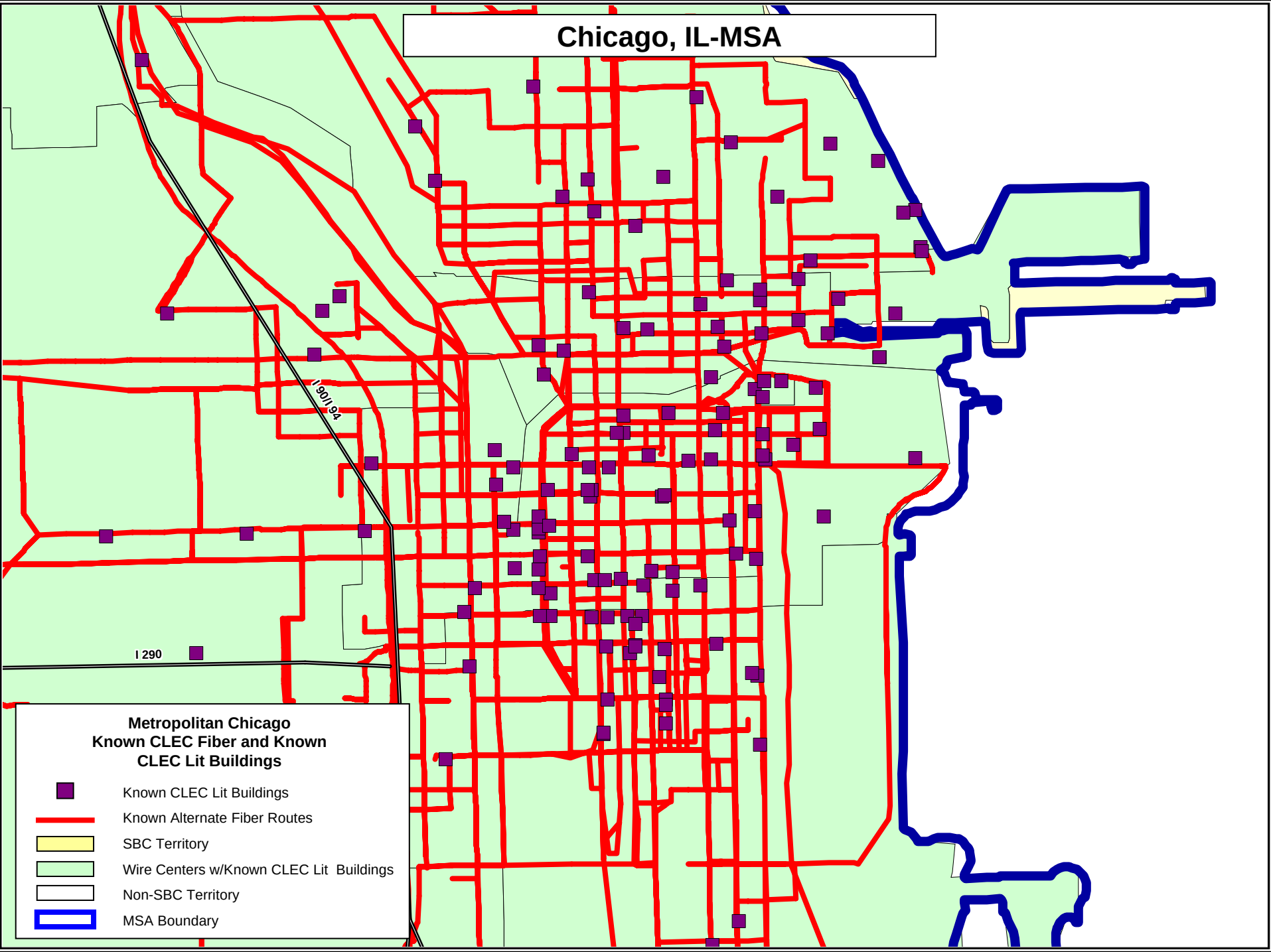
- Known Alternate Fiber
- 80 Percent of Special Access Demand For DS1 & DS3 Services
- SBC Territory
- Wire Centers w/Known CLEC Lit Buildings
- Non-SBC Territory
- MSA Boundary

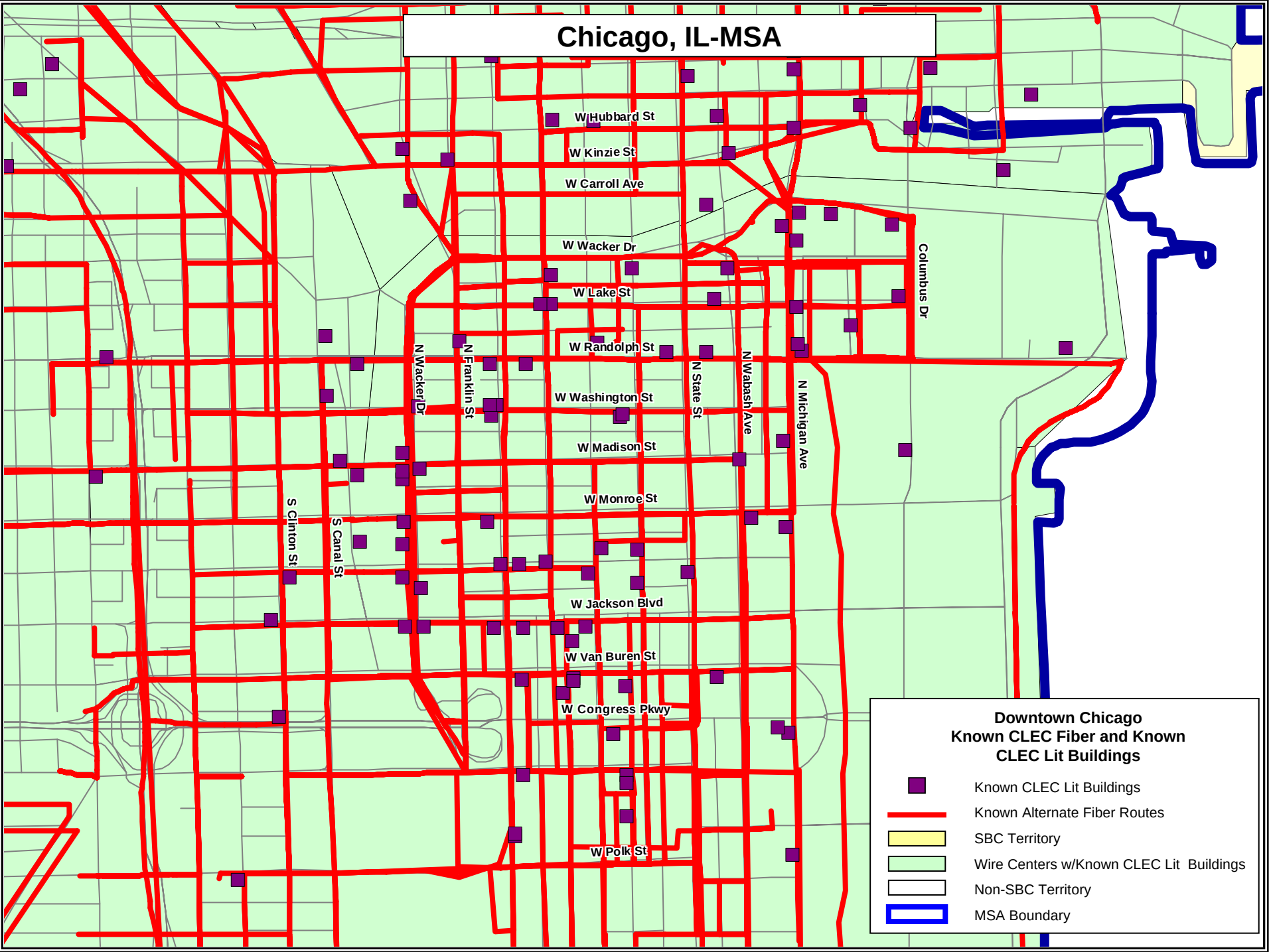
# Chicago, IL-MSA



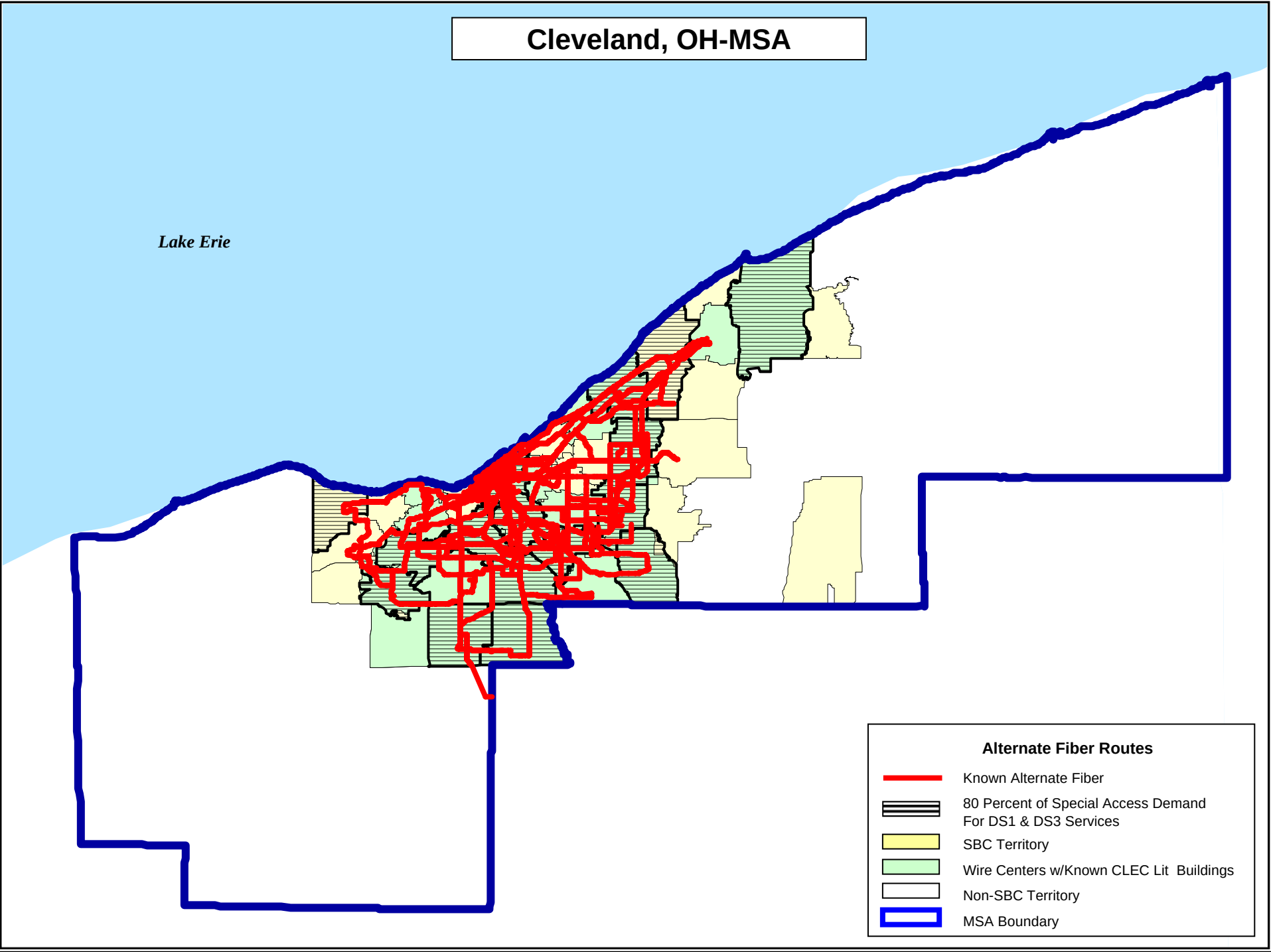
**Available CLEC Transport Linkages**

- COs with Known CLEC Fiber-based Collocation
- Available Transport Link
- SBC Territory
- Wire Centers w/Known CLEC Lit  Buildings
- Non-SBC Territory
- MSA Boundary

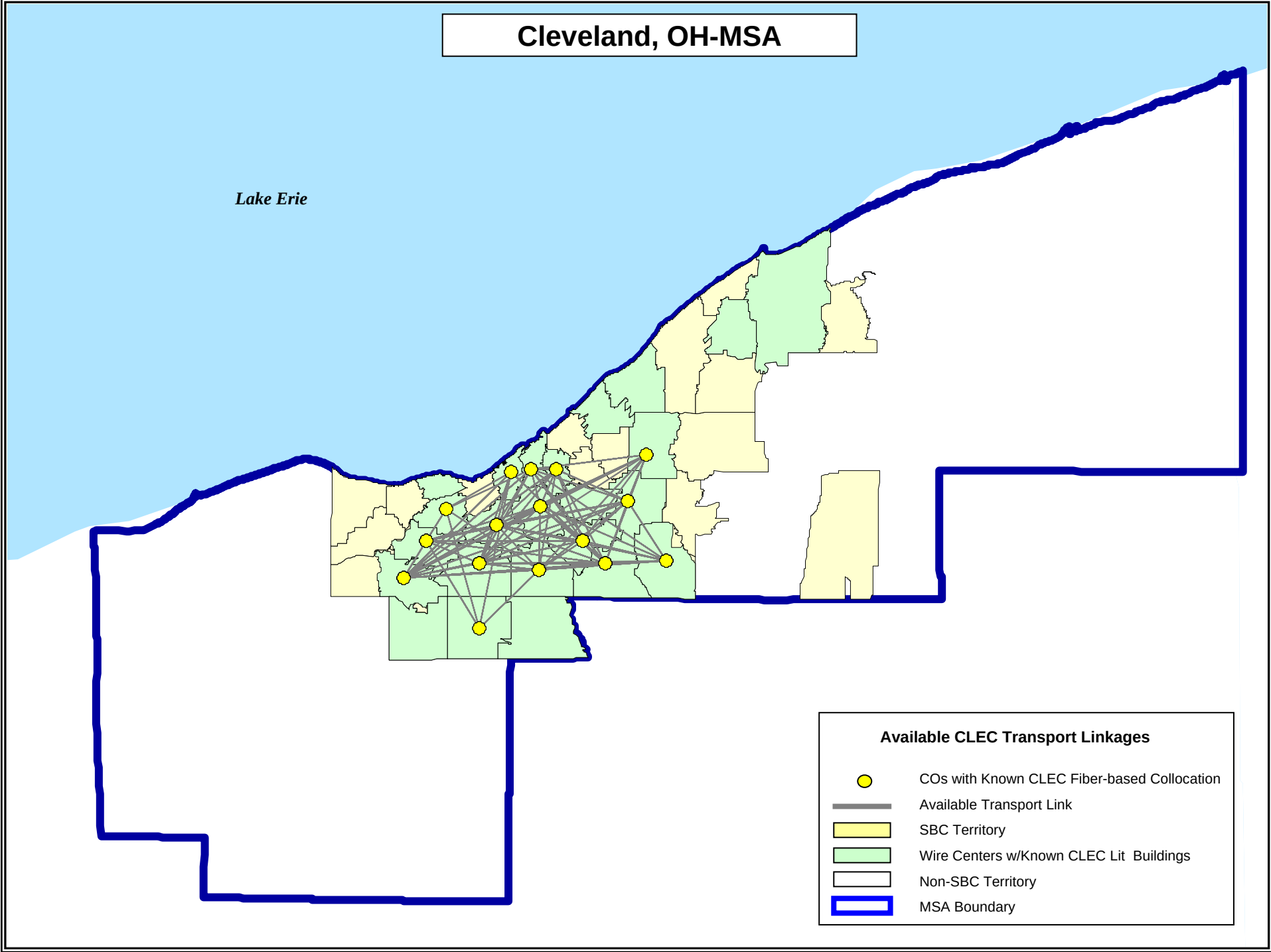

Chicago, IL-MSA
I 90/I 94
I 290
Metropolitan Chicago
Known CLEC Fiber and Known
CLEC Lit Buildings
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
MSA Boundary

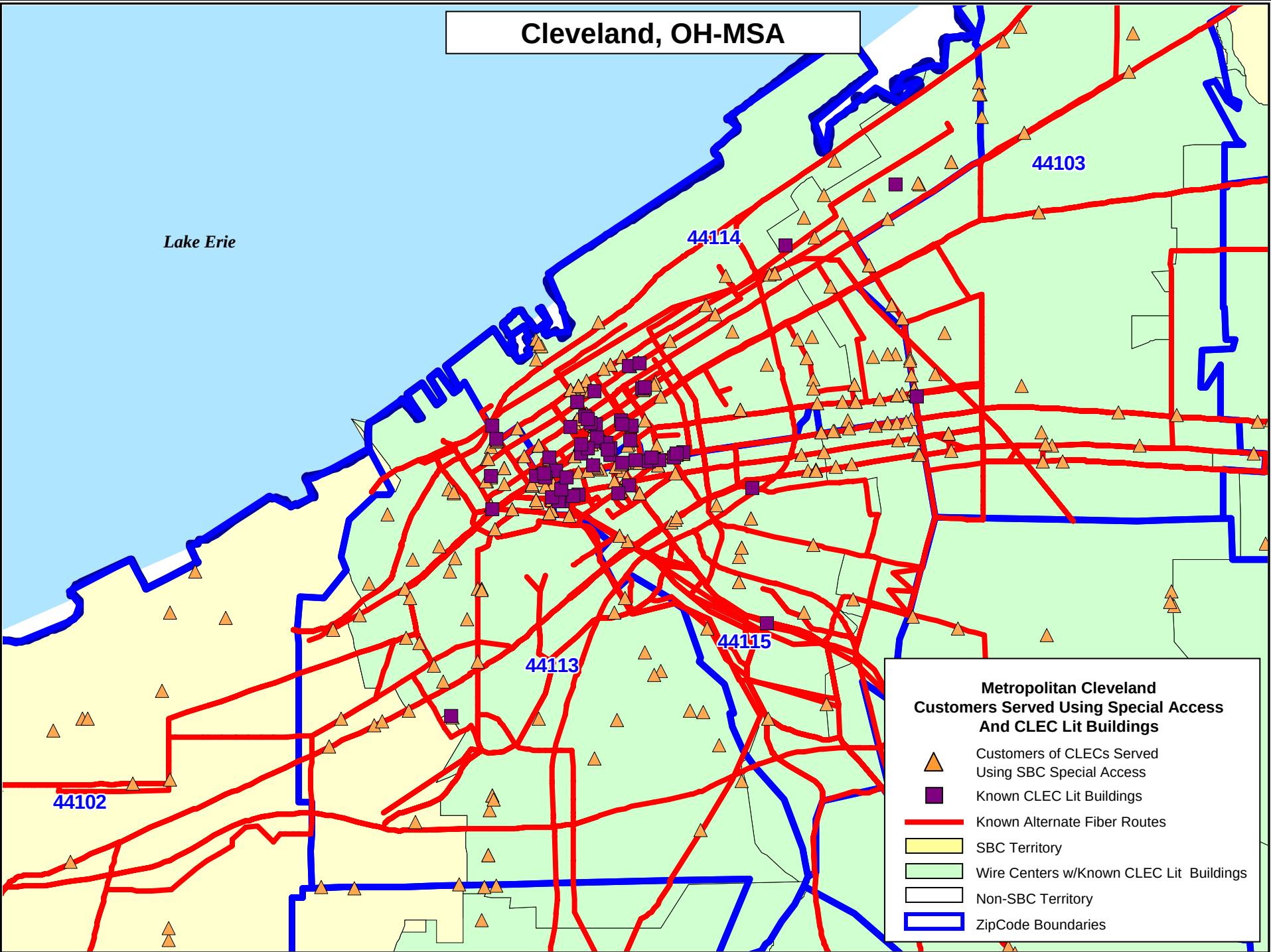

Chicago, IL-MSA
W Hubbard St
W Kinzie St
W Carroll Ave
W Wacker Dr
W Lake St
W Randolph St
W Washington St
W Madison St
W Monroe St
W Jackson Blvd
W Van Buren St
W Congress Pkwy
W Polk St
N Wacker Dr
N Franklin St
N State St
N Wabash Ave
N Michigan Ave
Columbus Dr
S Clinton St
S Canal St
Downtown Chicago
Known CLEC Fiber and Known
CLEC Lit Buildings
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
MSA Boundary

# Cleveland, OH-MSA



# Cleveland, OH-MSA




Cleveland, OH-MSA
Lake Erie
44103
44114
44115
44113
44102
Metropolitan Cleveland
Customers Served Using Special Access
And CLEC Lit Buildings
Customers of CLECs Served
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Known CLEC Lit Buildings
Known Alternate Fiber Routes
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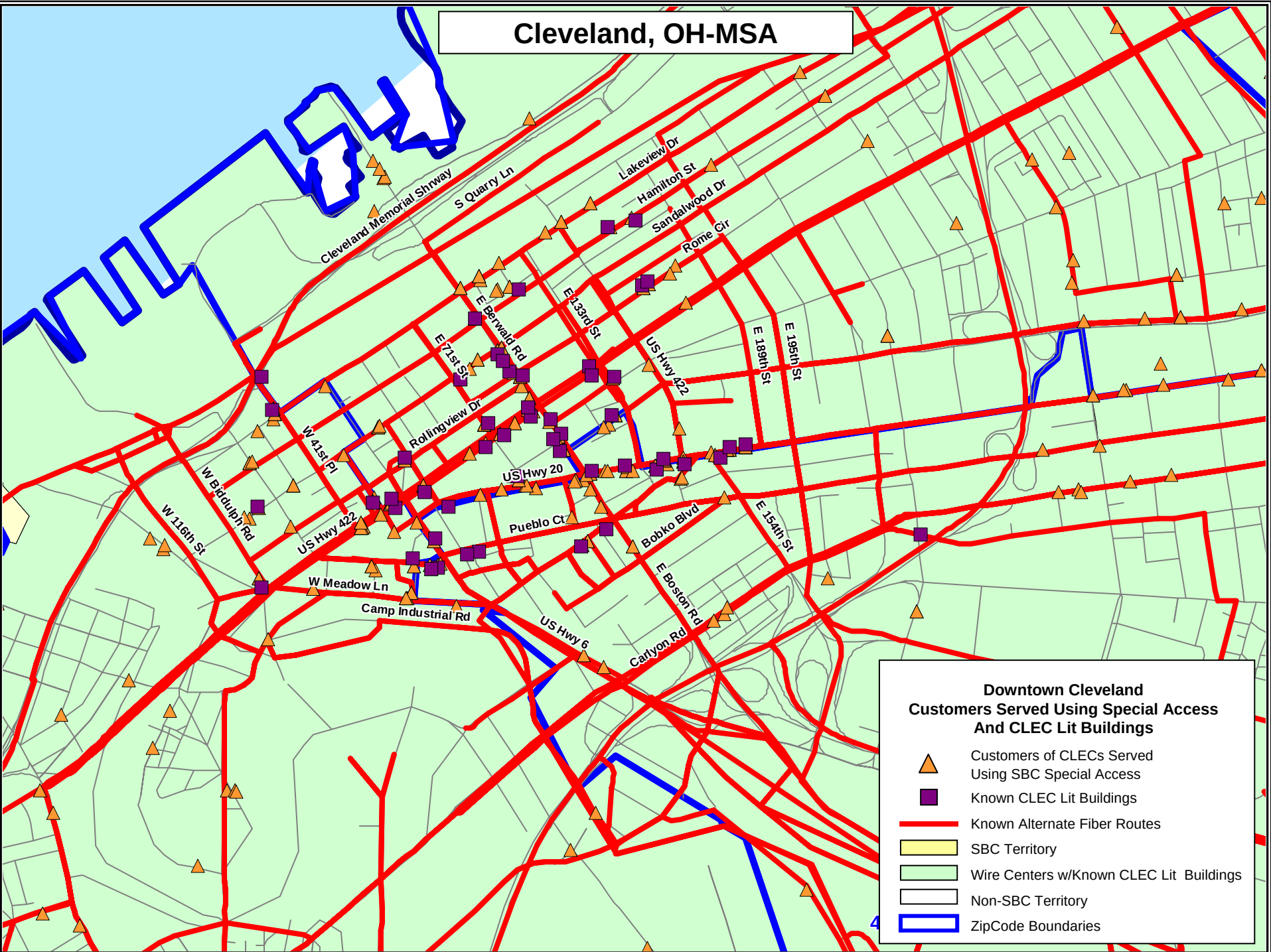
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
ZipCode Boundaries


Cleveland, OH-MSA
Cleveland Memorial Shrway
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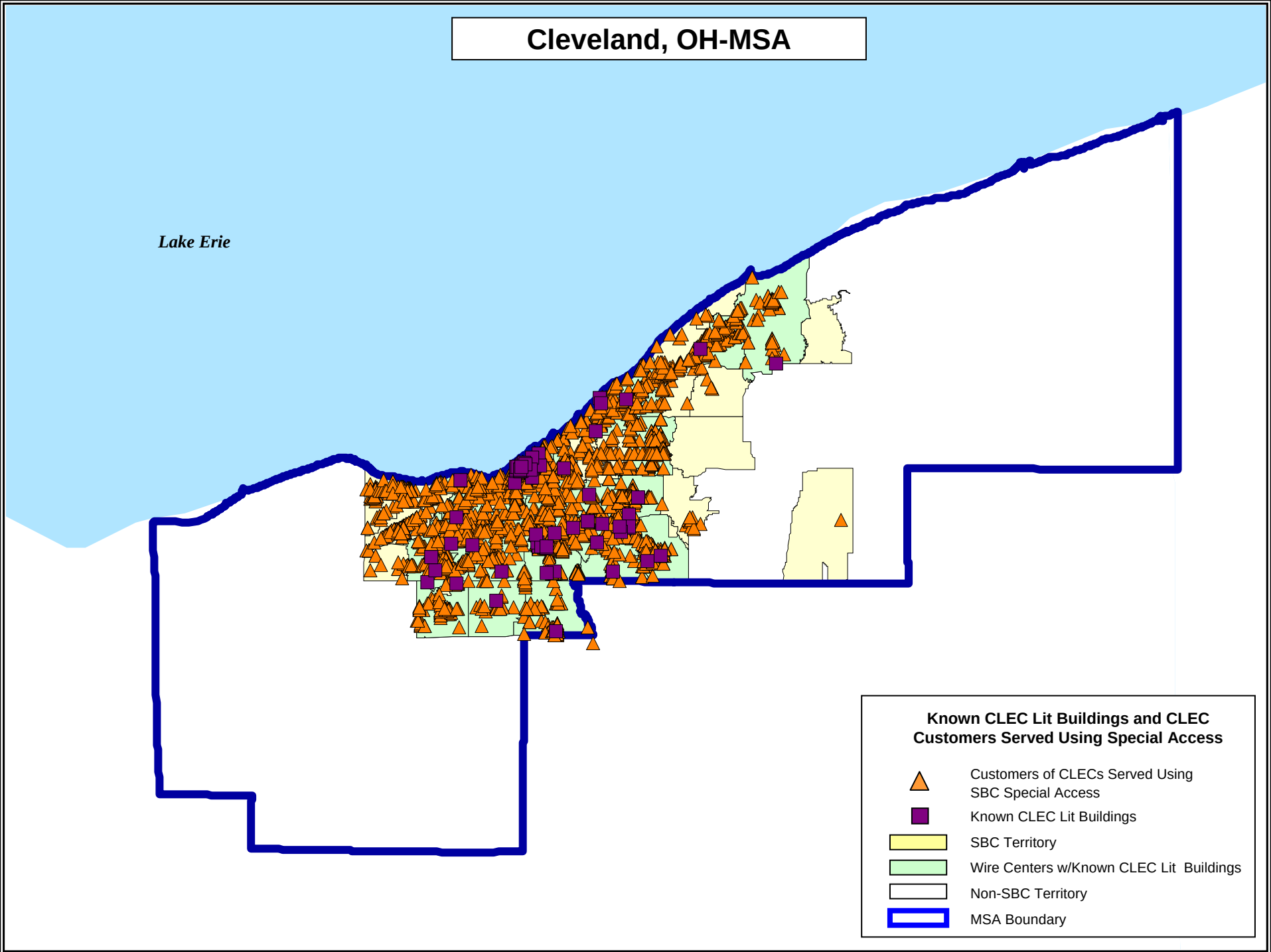
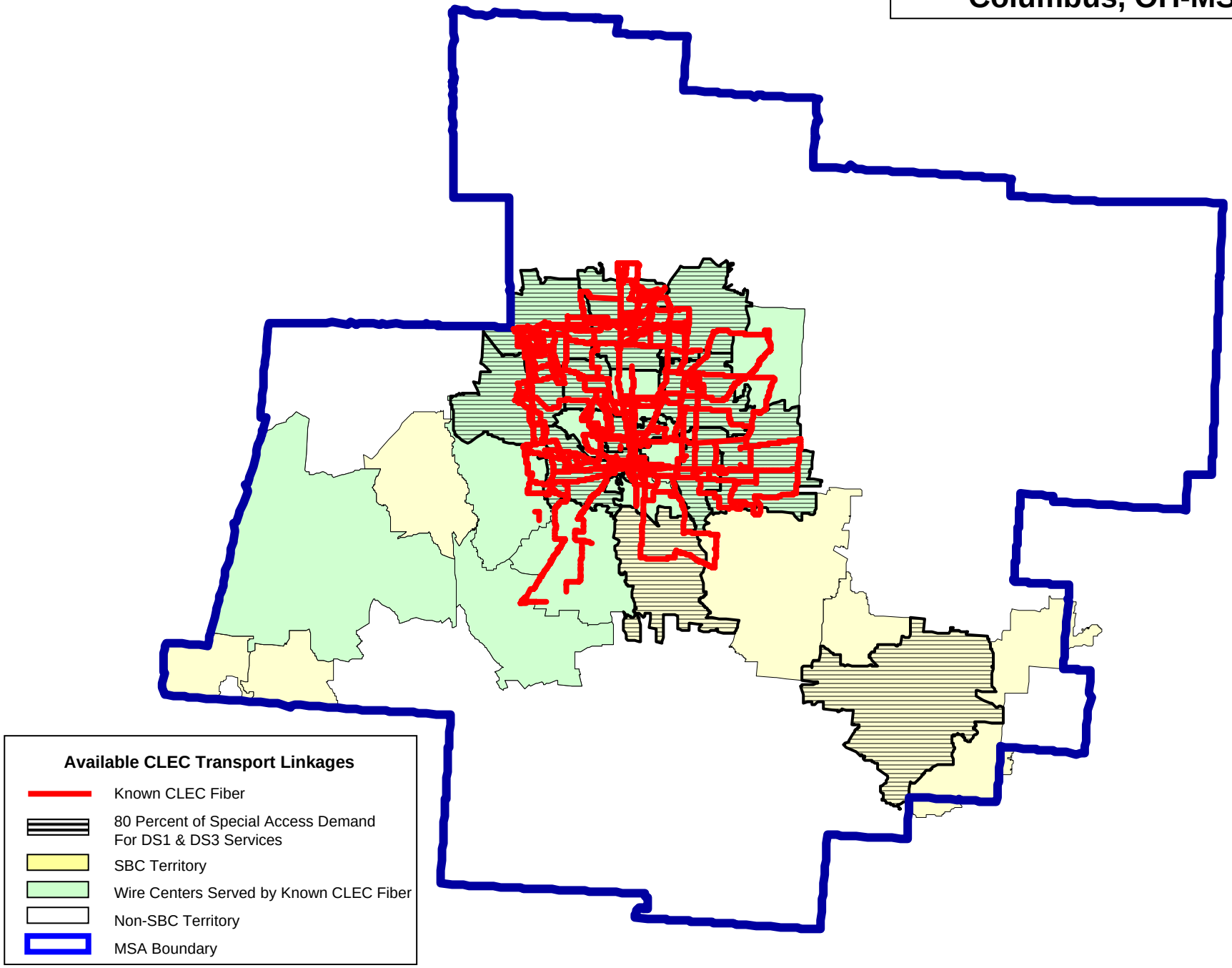
Lakeview Dr
Hamilton St
Sandalwood Dr
Rome Cir
E 133rd St
E Berwald Rd
E 71st St
US Hwy 422
E 189th St
E 195th St
Rollingview Dr
W 41st Pl
W Biddulph Rd
W 116th St
US Hwy 20
US Hwy 422
Pueblo Ct
Bobko Blvd
E 154th St
W Meadow Ln
Camp Industrial Rd
US Hwy 6
E Boston Rd
Carlyon Rd
Downtown Cleveland
Customers Served Using Special Access
And CLEC Lit Buildings
Customers of CLECs Served
Using SBC Special Access
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
ZipCode Boundaries

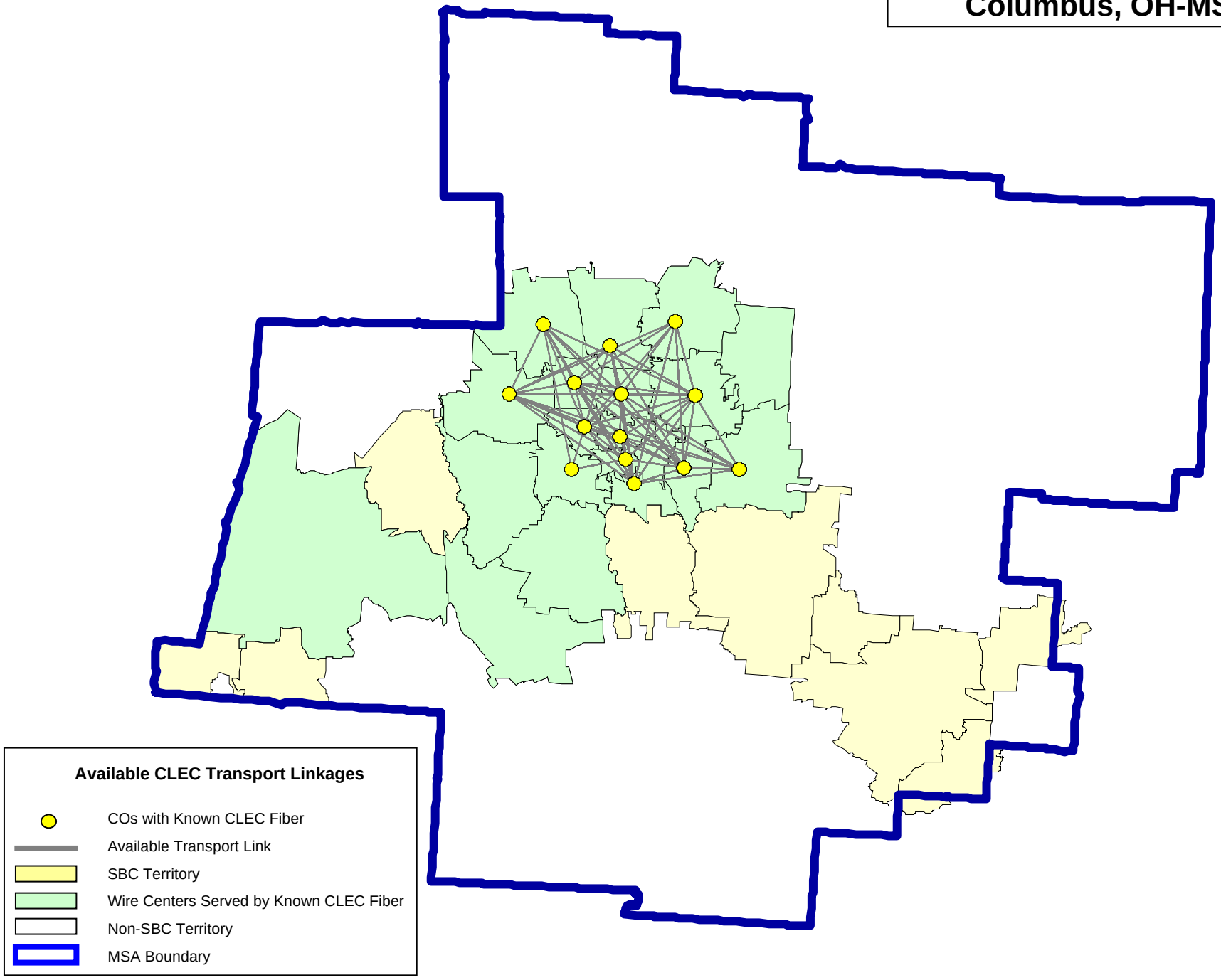
# Cleveland, OH-MSA

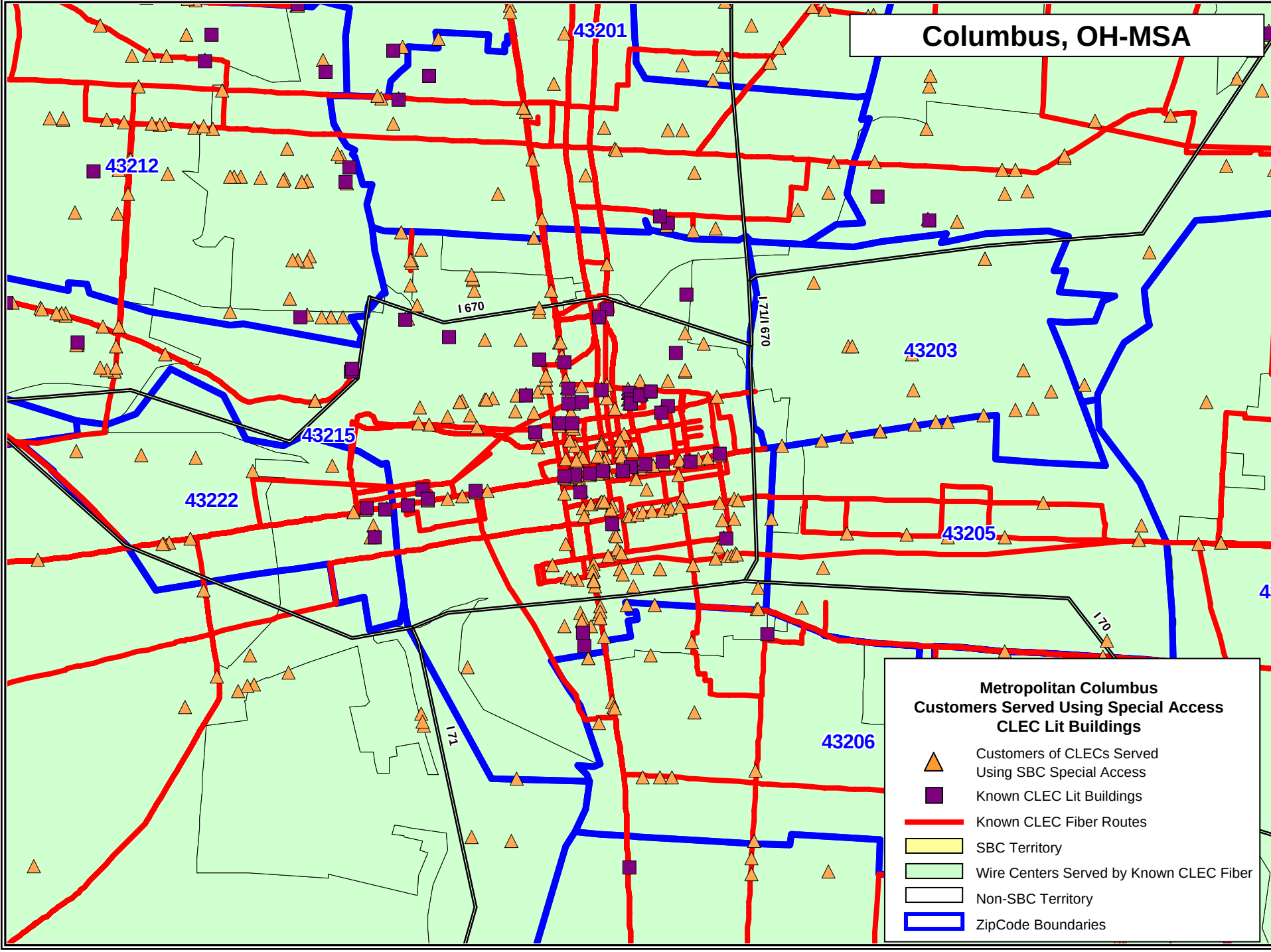


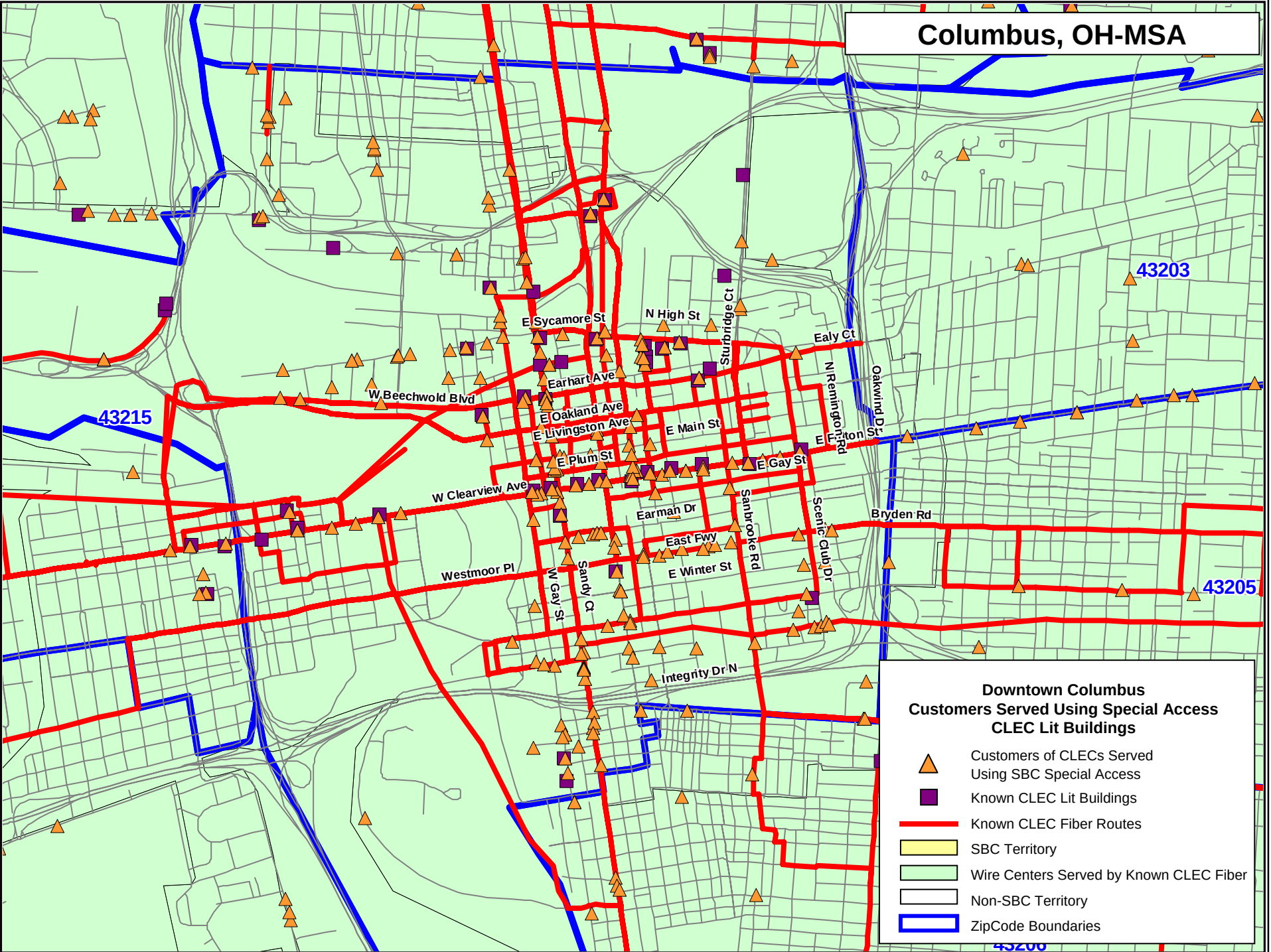
# Columbus, OH-MSA



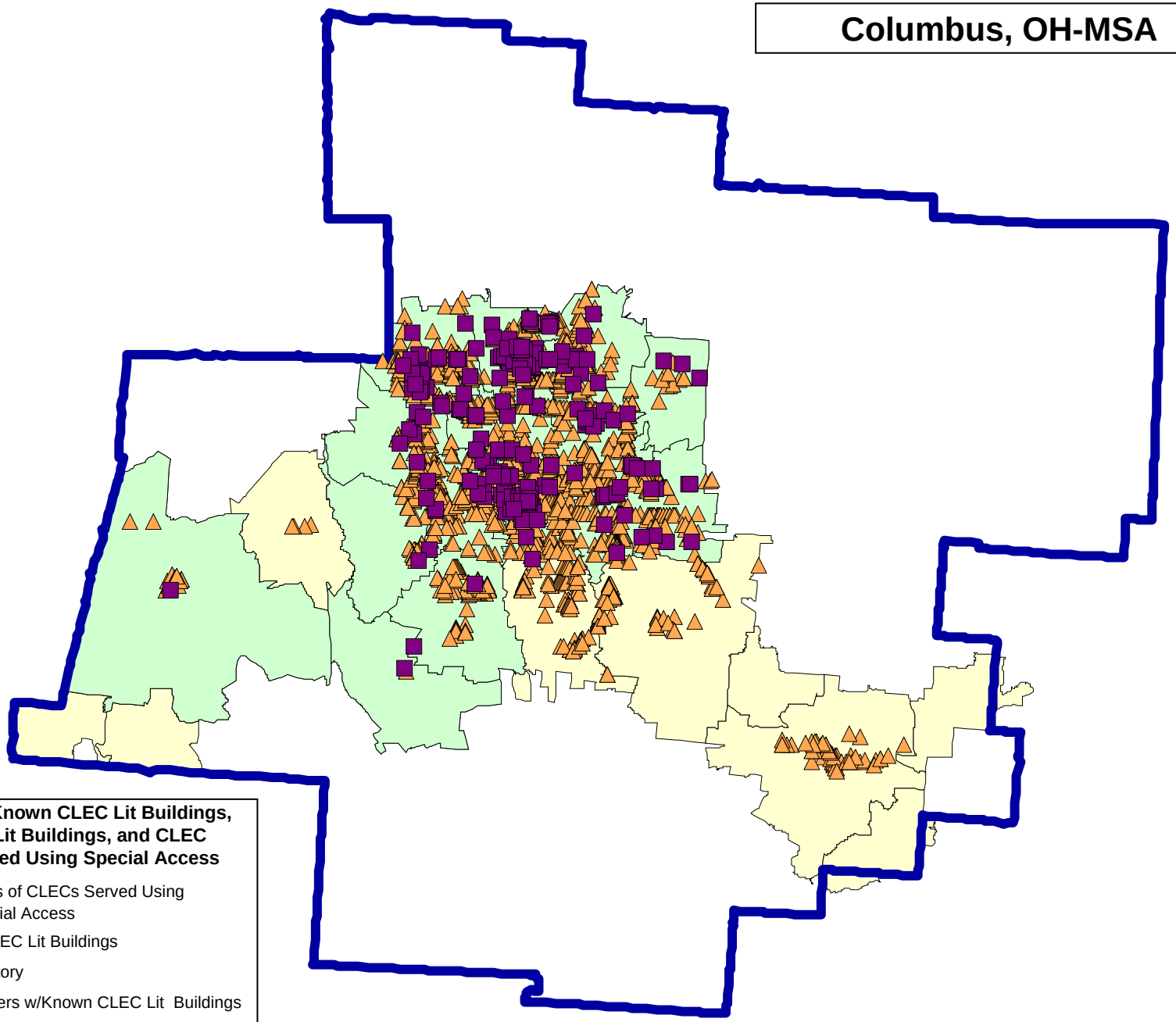
# Columbus, OH-MSA




Columbus, OH-MSA
43201
43212
43203
43215
43222
43205
43206
I 670
I 71/I 670
I 70
I 71
Metropolitan Columbus
Customers Served Using Special Access
CLEC Lit Buildings
Customers of CLECs Served Using SBC Special Access
Known CLEC Lit Buildings
Known CLEC Fiber Routes
SBC Territory
Wire Centers Served by Known CLEC Fiber
Non-SBC Territory
ZipCode Boundaries


Columbus, OH-MSA
43203
43215
43205
E Sycamore St
N High St
Sturbridge Ct
Ealy Ct
Earhart Ave
W Beechwold Blvd
E Oakland Ave
E Livingston Ave
E Main St
N Remington Rd
Oakwind Dr
E Fulton St
E Plum St
E Gay St
W Clearview Ave
Earman Dr
Sanbrooke Rd
Scenic Club Dr
Bryden Rd
East Fwy
E Winter St
Westmoor Pl
W Gay St
Sandy Ct
Integrity Dr N
Downtown Columbus
Customers Served Using Special Access
CLEC Lit Buildings
Customers of CLECs Served Using SBC Special Access
Known CLEC Lit Buildings
Known CLEC Fiber Routes
SBC Territory
Wire Centers Served by Known CLEC Fiber
Non-SBC Territory
ZipCode Boundaries

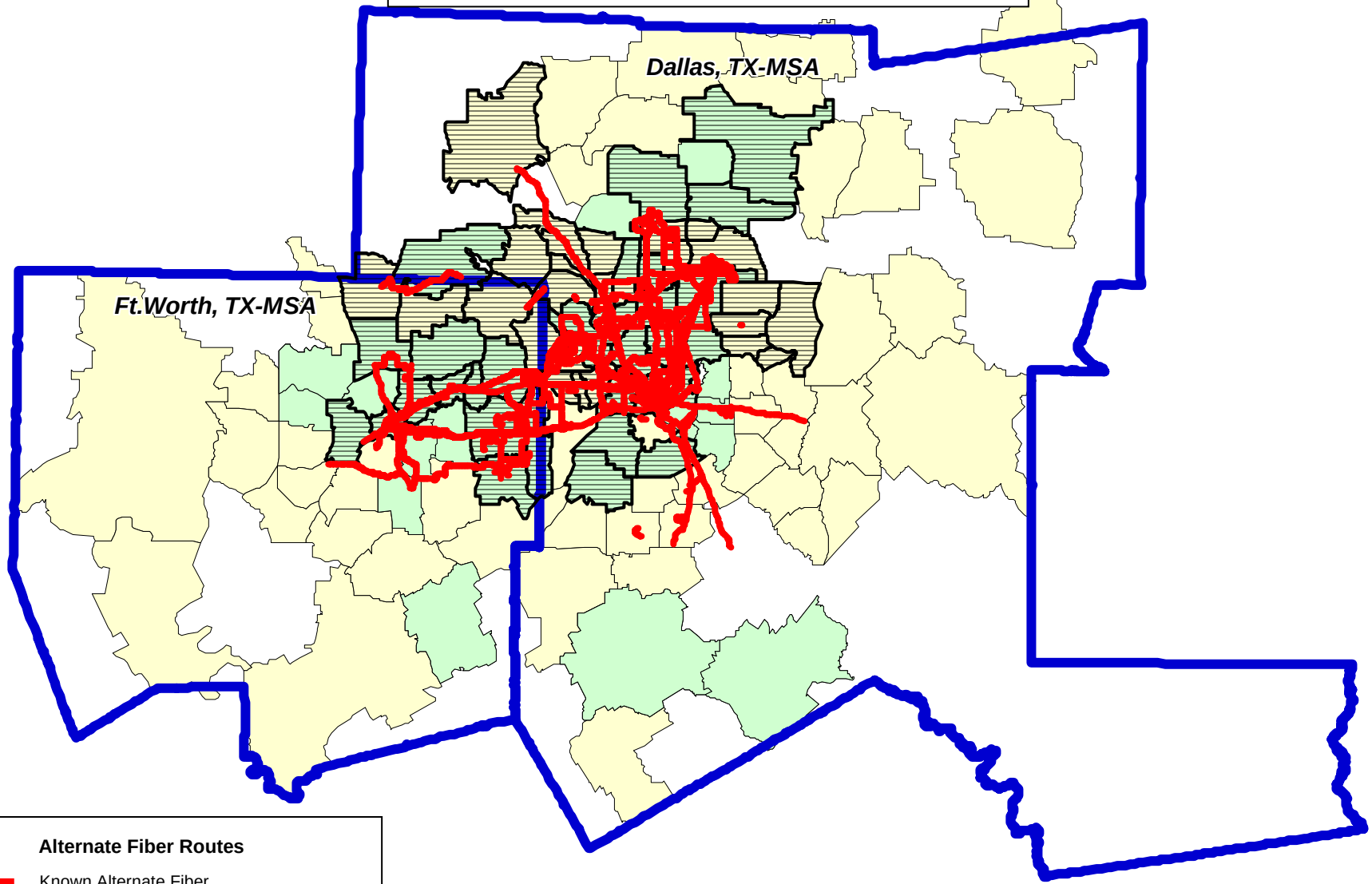
# Columbus, OH-MSA



**Wire Centers w/ Known CLEC Lit Buildings, Known CLEC Lit Buildings, and CLEC Customers Served Using Special Access**

- Customers of CLECs Served Using SBC Special Access
- Known CLEC Lit Buildings
- SBC Territory
- Wire Centers w/Known CLEC Lit Buildings
- Non-SBC Territory
- MSA Boundary

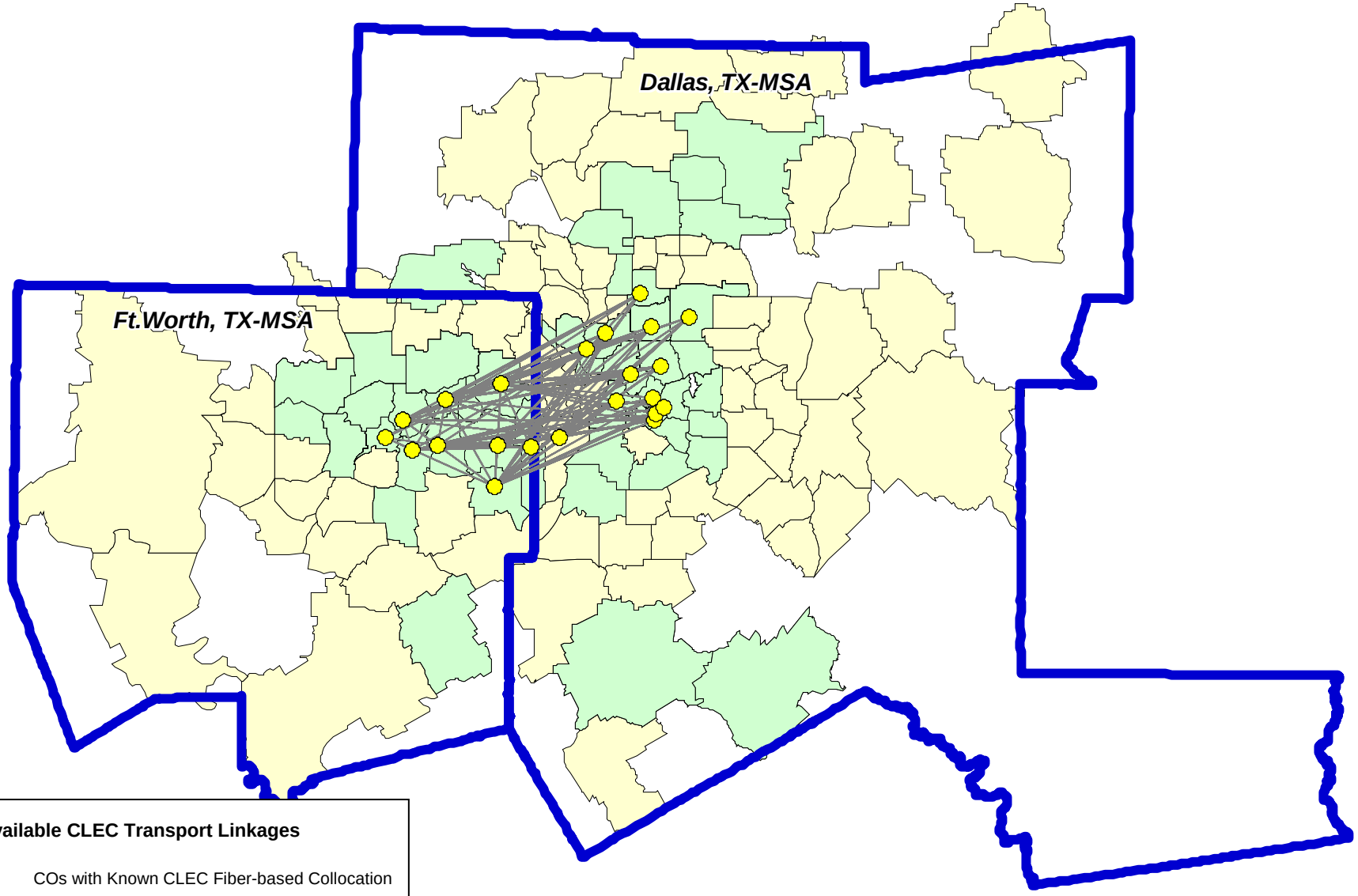
# Dallas-Ft.Worth, TX-PMSA




**Alternate Fiber Routes**

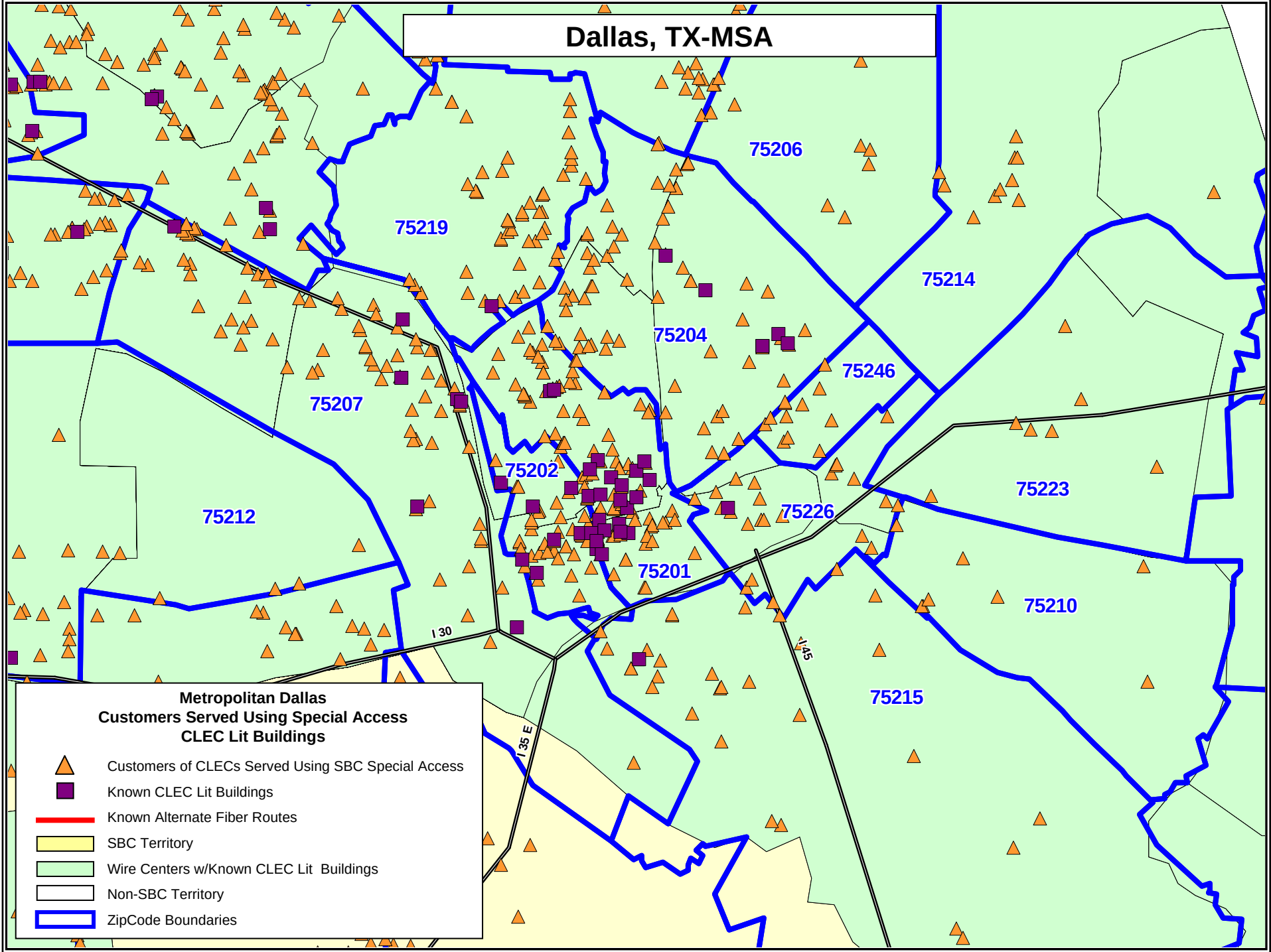
- Known Alternate Fiber
- 80 Percent of Special Access Demand For DS1 & DS3 Services
- SBC Territory
- Wire Centers w/Known CLEC Lit Buildings
- Non-SBC Territory
- MSA Boundary

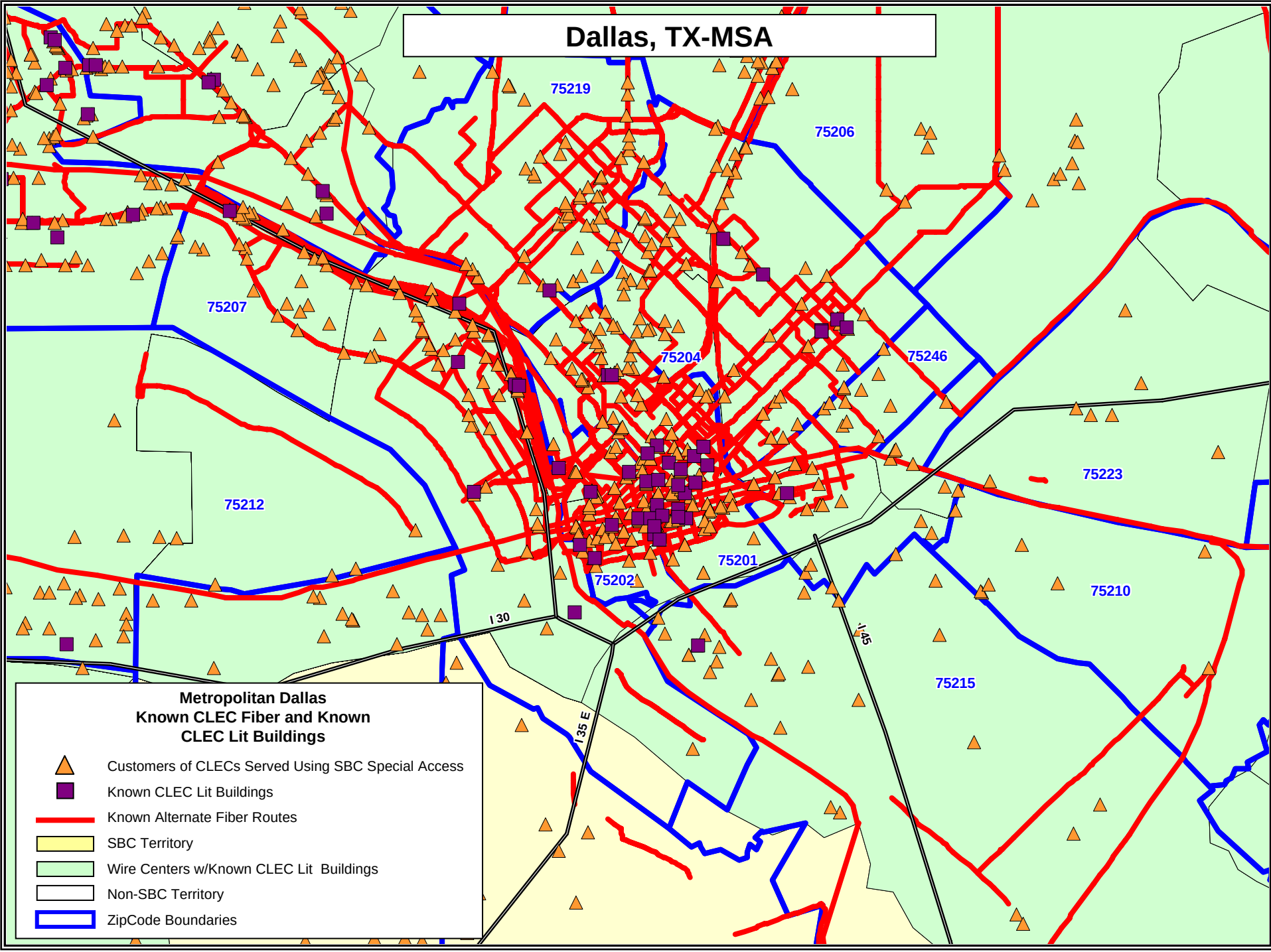
# Dallas-Ft.Worth, TX-PMSA



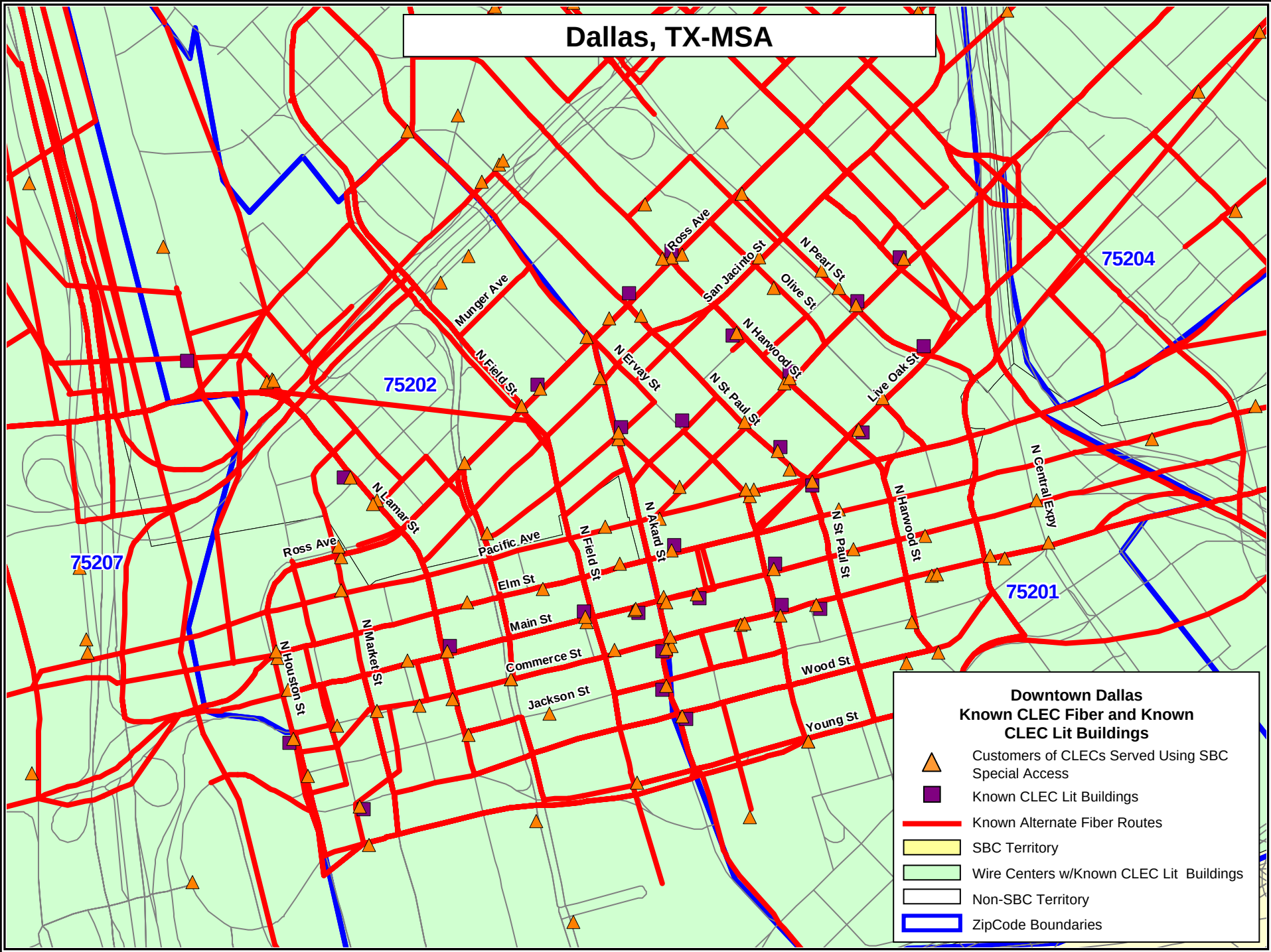

**Available CLEC Transport Linkages**

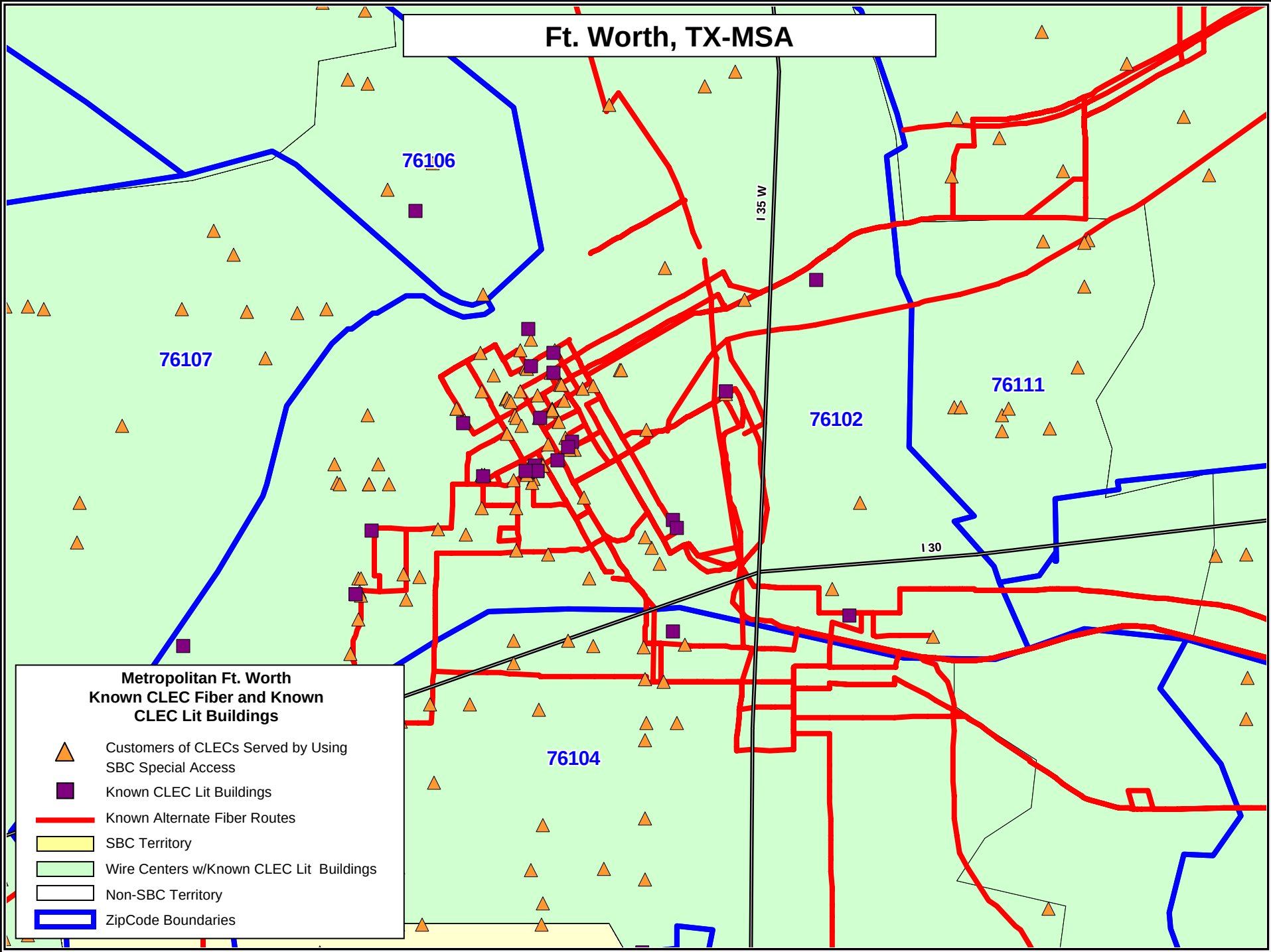
- COs with Known CLEC Fiber-based Collocation
- Available Transport Link
- SBC Territory
- Wire Centers w/Known CLEC Lit Buildings
- Non-SBC Territory
- MSA Boundary

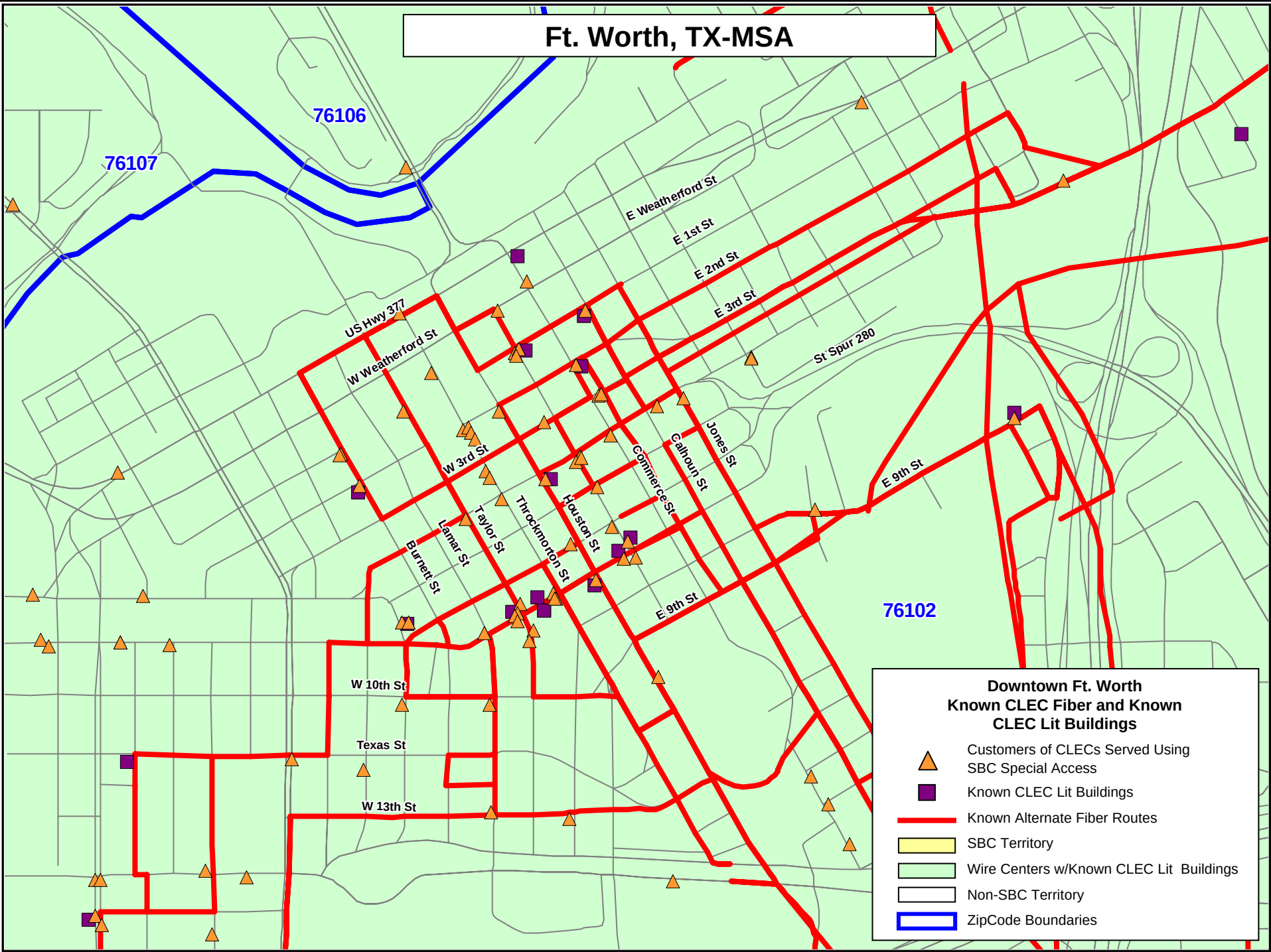

Dallas, TX-MSA
75206
75219
75214
75204
75246
75207
75202
75223
75212
75226
75201
75210
I 30
I 45
75215
I 35 E
Metropolitan Dallas
Customers Served Using Special Access
CLEC Lit Buildings
Customers of CLECs Served Using SBC Special Access
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
ZipCode Boundaries


Dallas, TX-MSA
75219
75206
75207
75204
75246
75223
75212
75201
75202
75210
75215
I 30
I 45
I 35 E
Metropolitan Dallas
Known CLEC Fiber and Known
CLEC Lit Buildings
Customers of CLECs Served Using SBC Special Access
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
ZipCode Boundaries

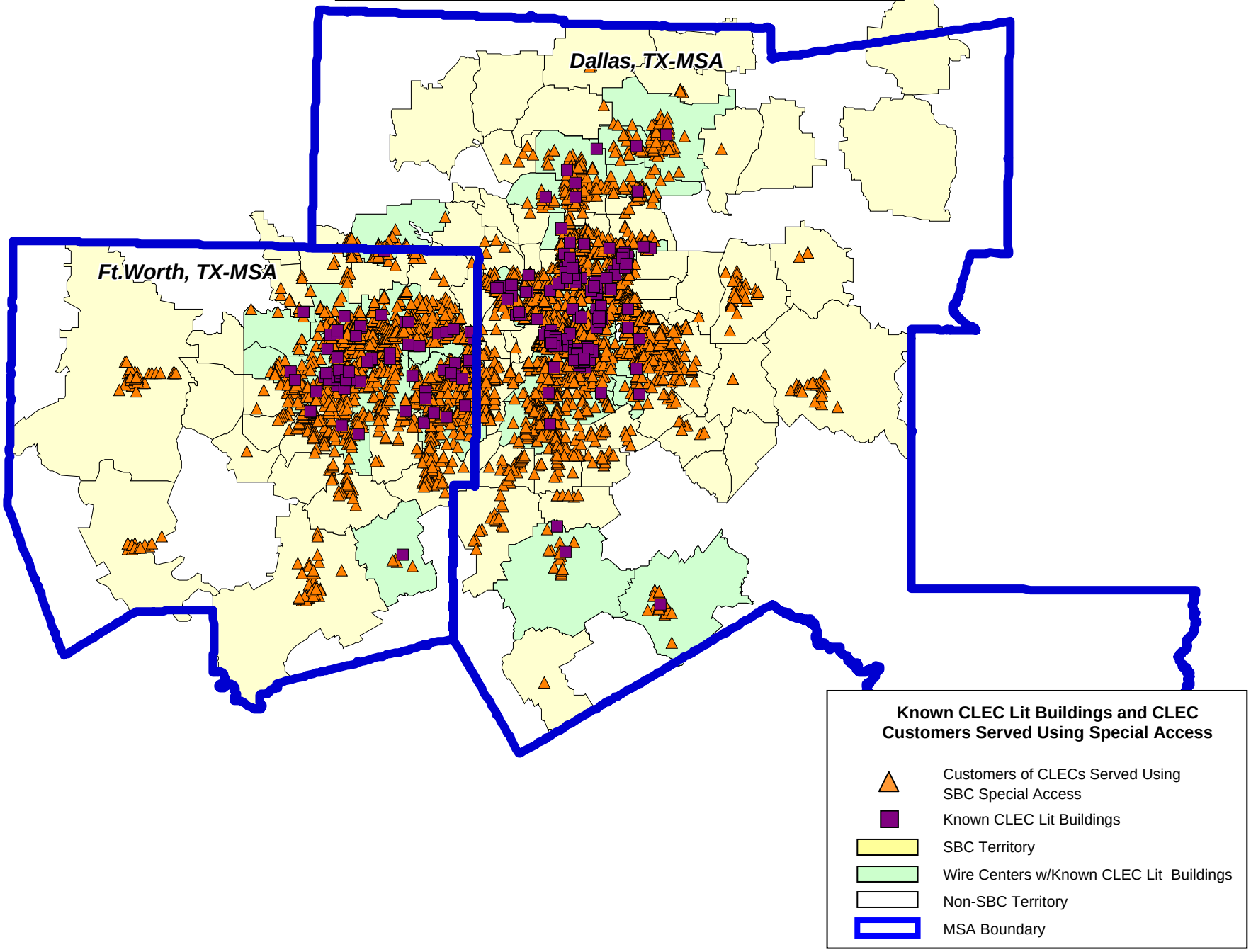
# Dallas, TX-MSA



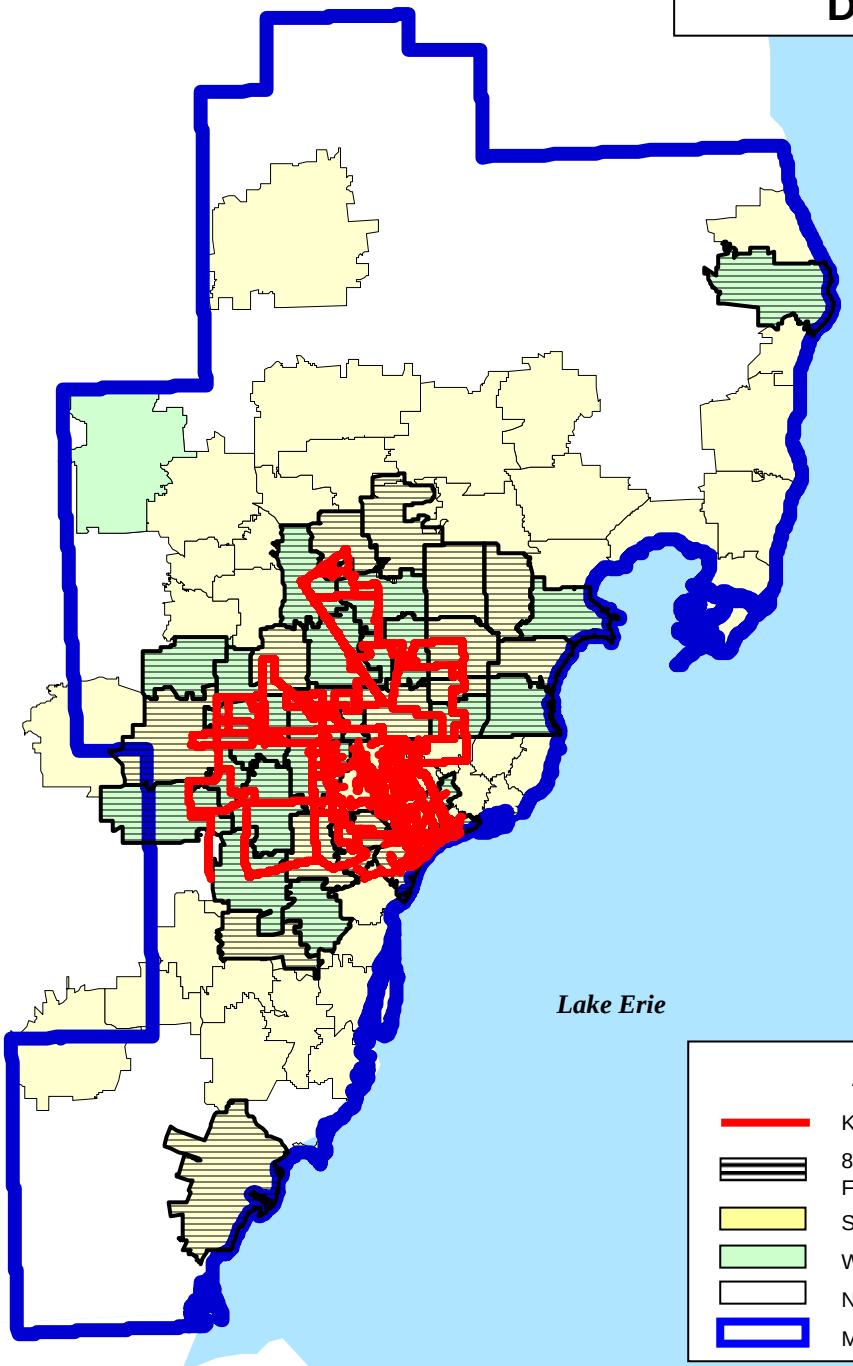

Ft. Worth, TX-MSA
76106
76107
76102
76111
76104
I 35 W
I 30
Metropolitan Ft. Worth
Known CLEC Fiber and Known
CLEC Lit Buildings
Customers of CLECs Served by Using
SBC Special Access
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
ZipCode Boundaries


Ft. Worth, TX-MSA
76106
76107
76102
E Weatherford St
E 1st St
E 2nd St
E 3rd St
St Spur 280
US Hwy 377
W Weatherford St
W 3rd St
Jones St
Calhoun St
Commerce St
Houston St
Throckmorton St
Taylor St
Lamar St
Burnett St
E 9th St
W 10th St
Texas St
W 13th St
Downtown Ft. Worth
Known CLEC Fiber and Known
CLEC Lit Buildings
Customers of CLECs Served Using
SBC Special Access
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
ZipCode Boundaries

# Dallas-Ft.Worth, TX-PMSA



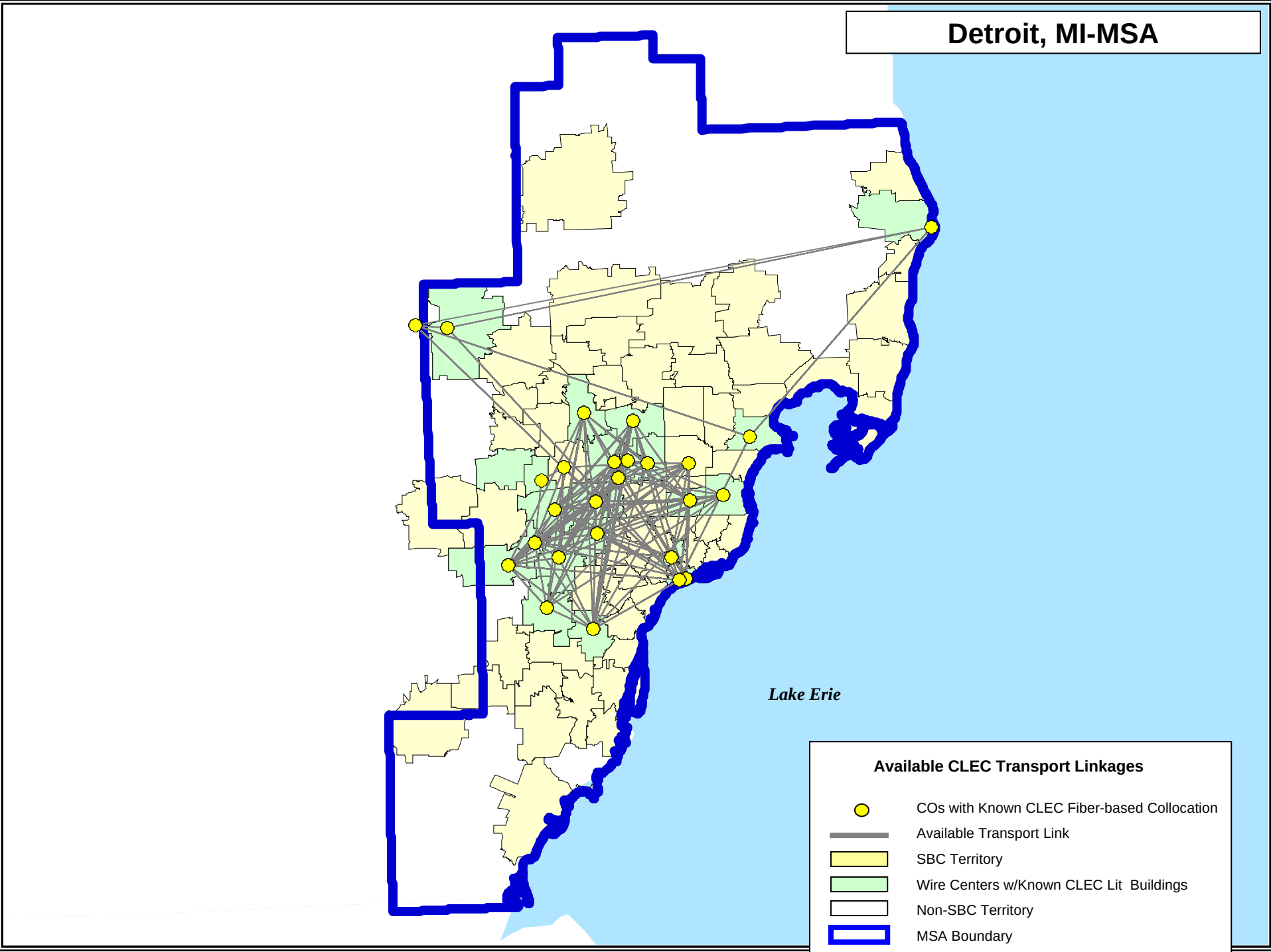
# Detroit, MI-MSA

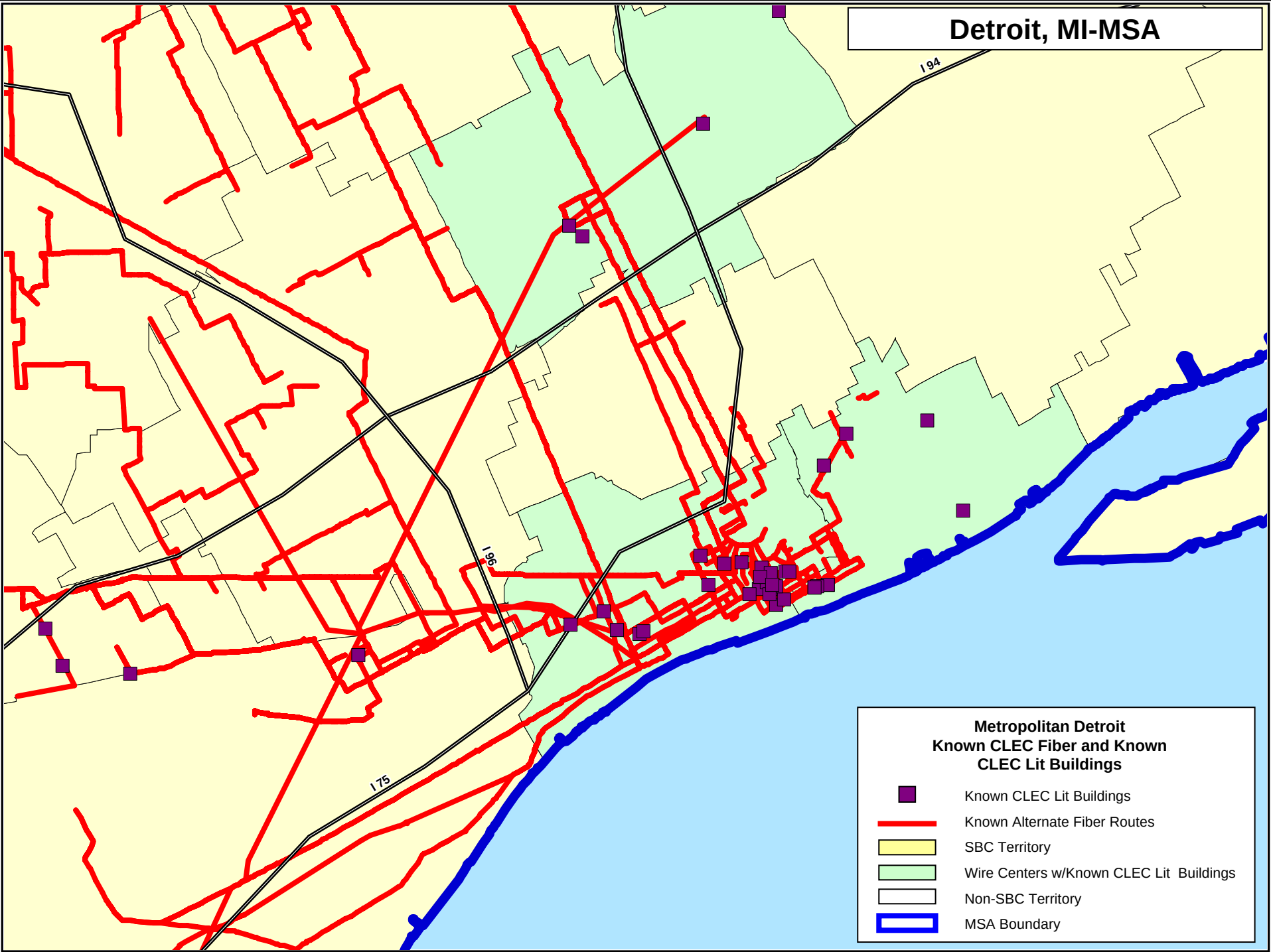


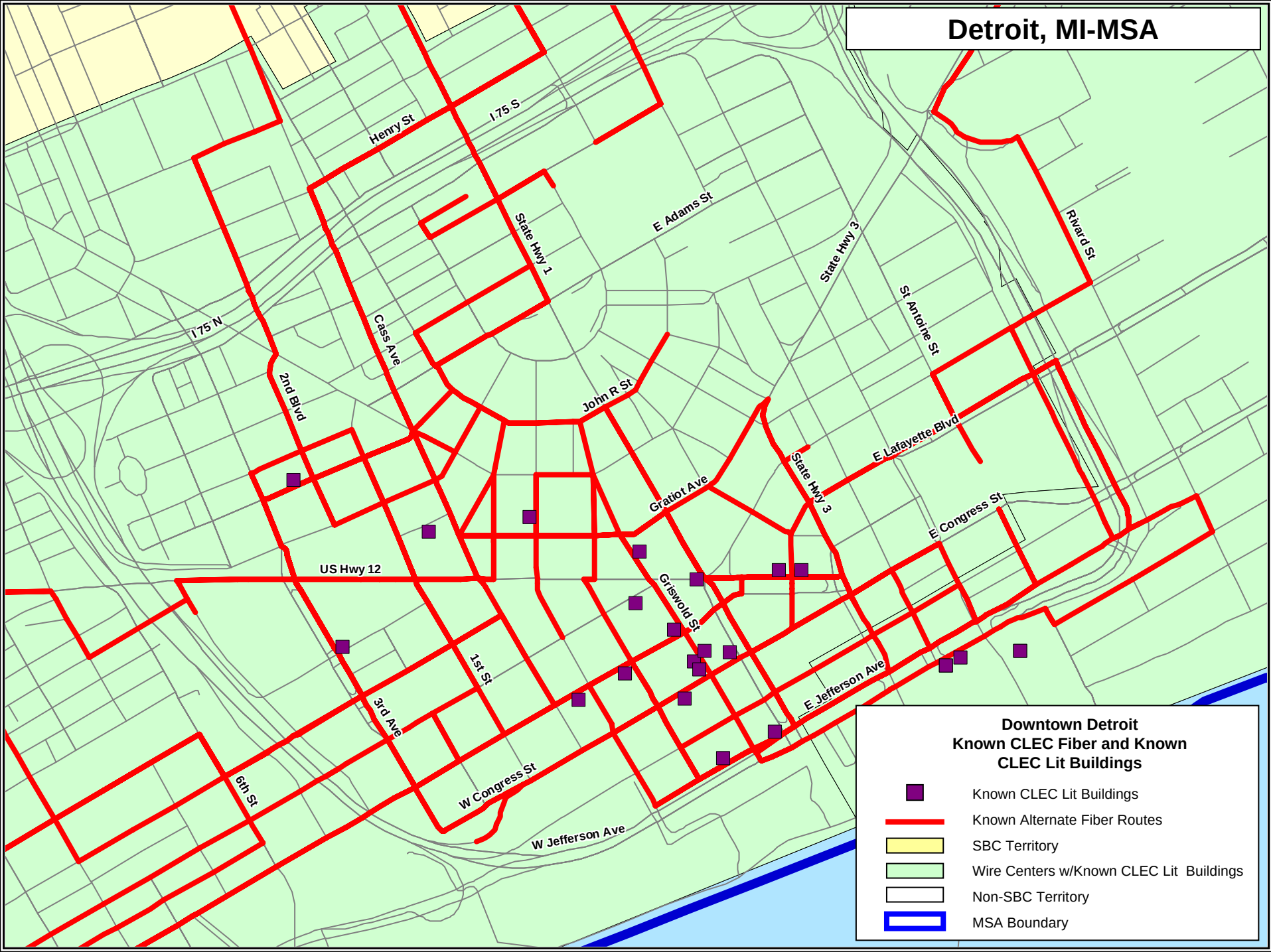

**Alternate Fiber Routes**

- Known Alternate Fiber
- 80 Percent of Special Access Demand For DS1 & DS3 Services
- SBC Territory
- Wire Centers w/Known CLEC Lit Buildings
- Non-SBC Territory
- MSA Boundary

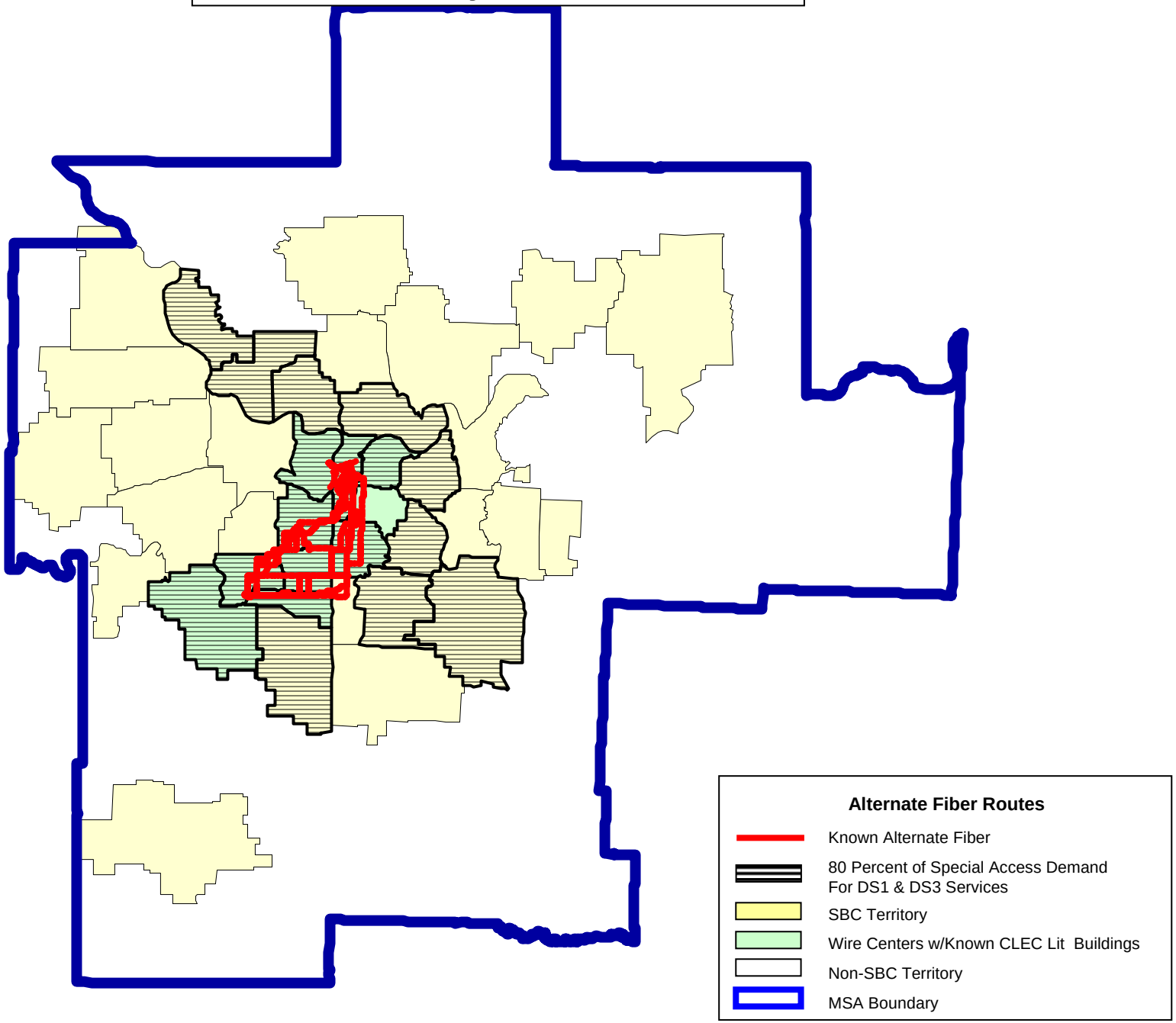
# Detroit, MI-MSA



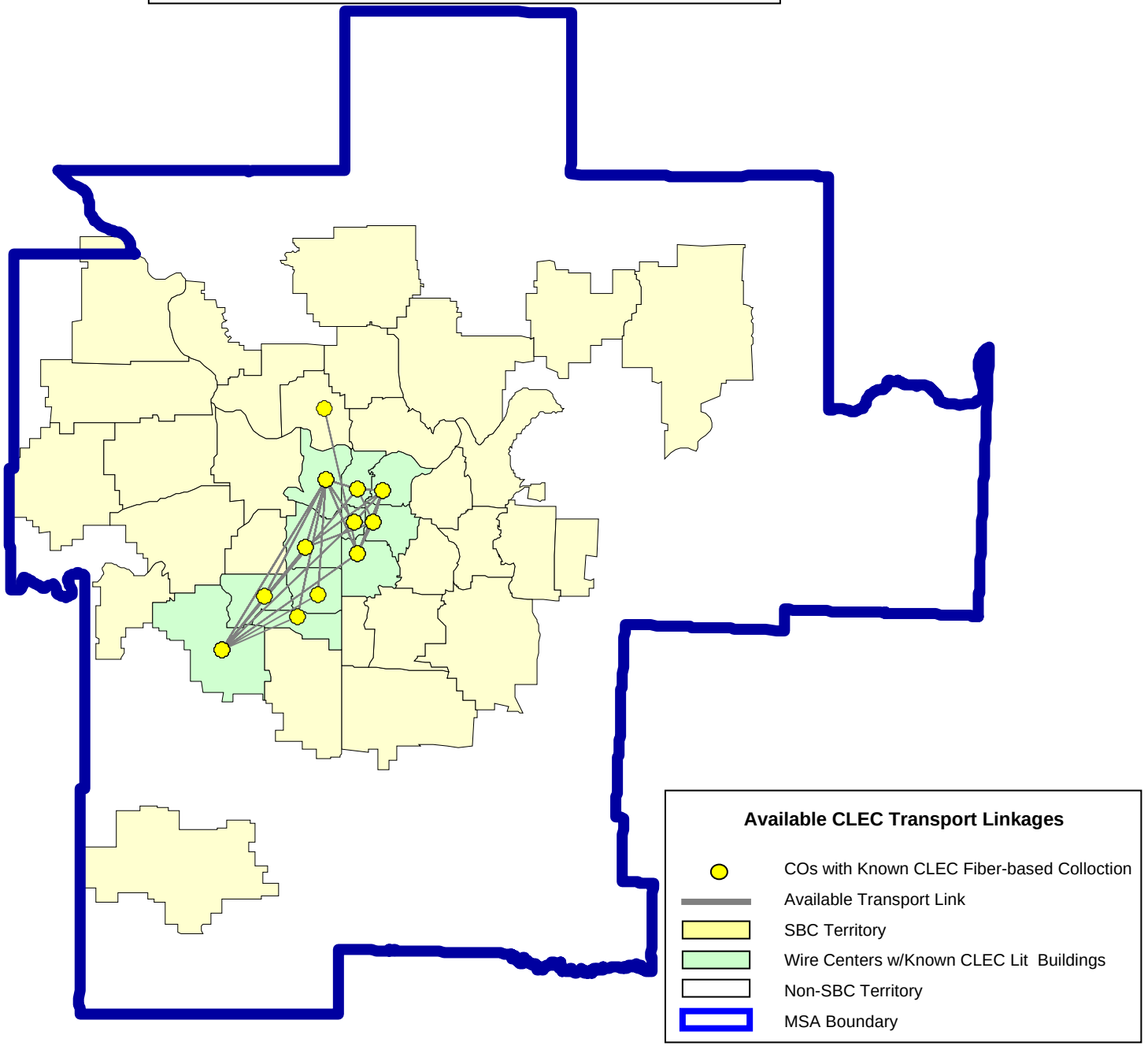

Detroit, MI-MSA
I 94
I 96
I 75
Metropolitan Detroit
Known CLEC Fiber and Known
CLEC Lit Buildings
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
MSA Boundary


Detroit, MI-MSA
Henry St
I 75 S
E Adams St
State Hwy 1
State Hwy 3
Rivard St
St Antoine St
I 75 N
Cass Ave
2nd Blvd
John R St
E Lafayette Blvd
Gratiot Ave
State Hwy 3
E Congress St
US Hwy 12
Griswold St
1st St
3rd Ave
E Jefferson Ave
6th St
W Congress St
W Jefferson Ave
Downtown Detroit
Known CLEC Fiber and Known
CLEC Lit Buildings
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
MSA Boundary

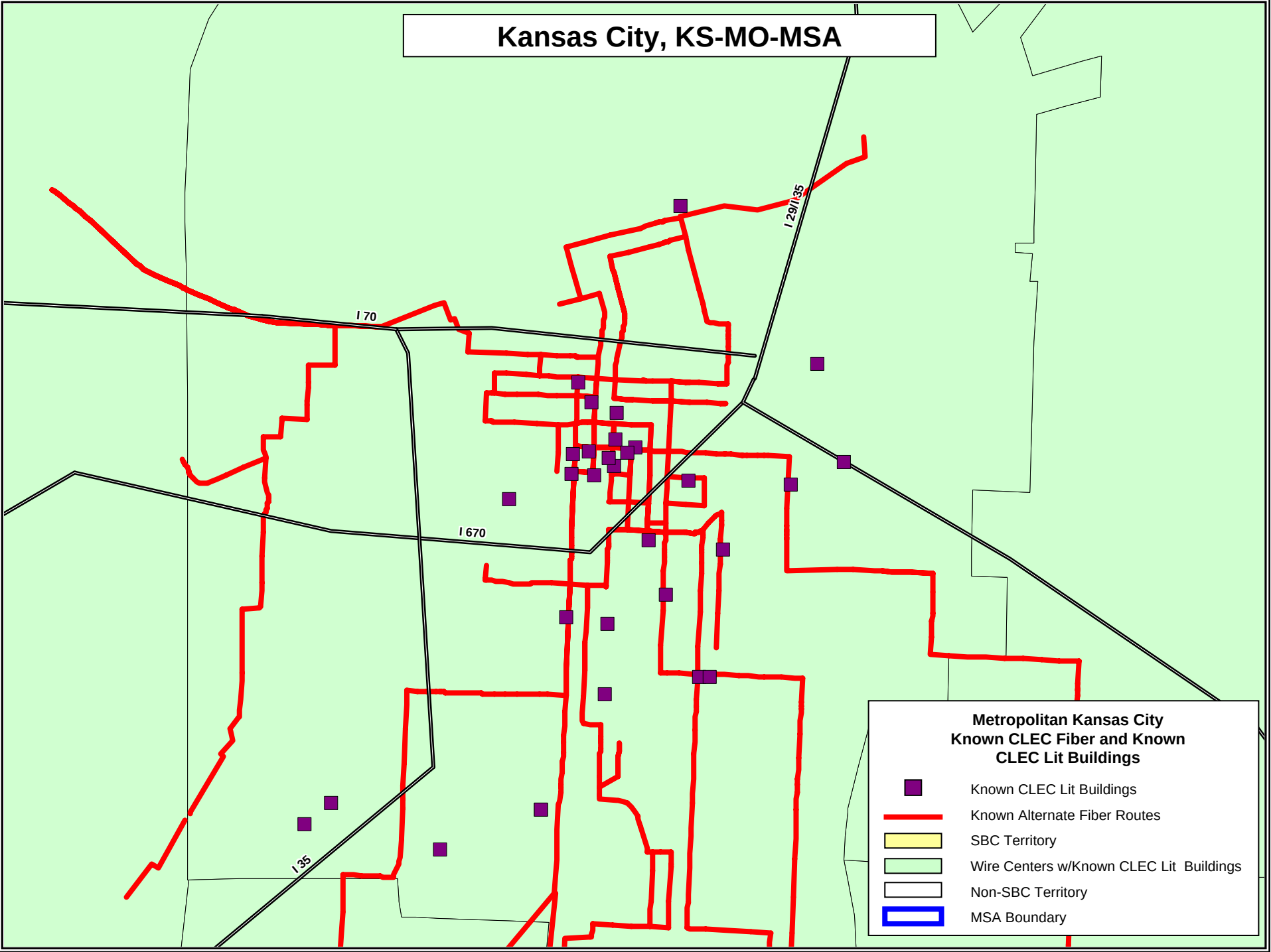
# Kansas City, KS-MO-MSA



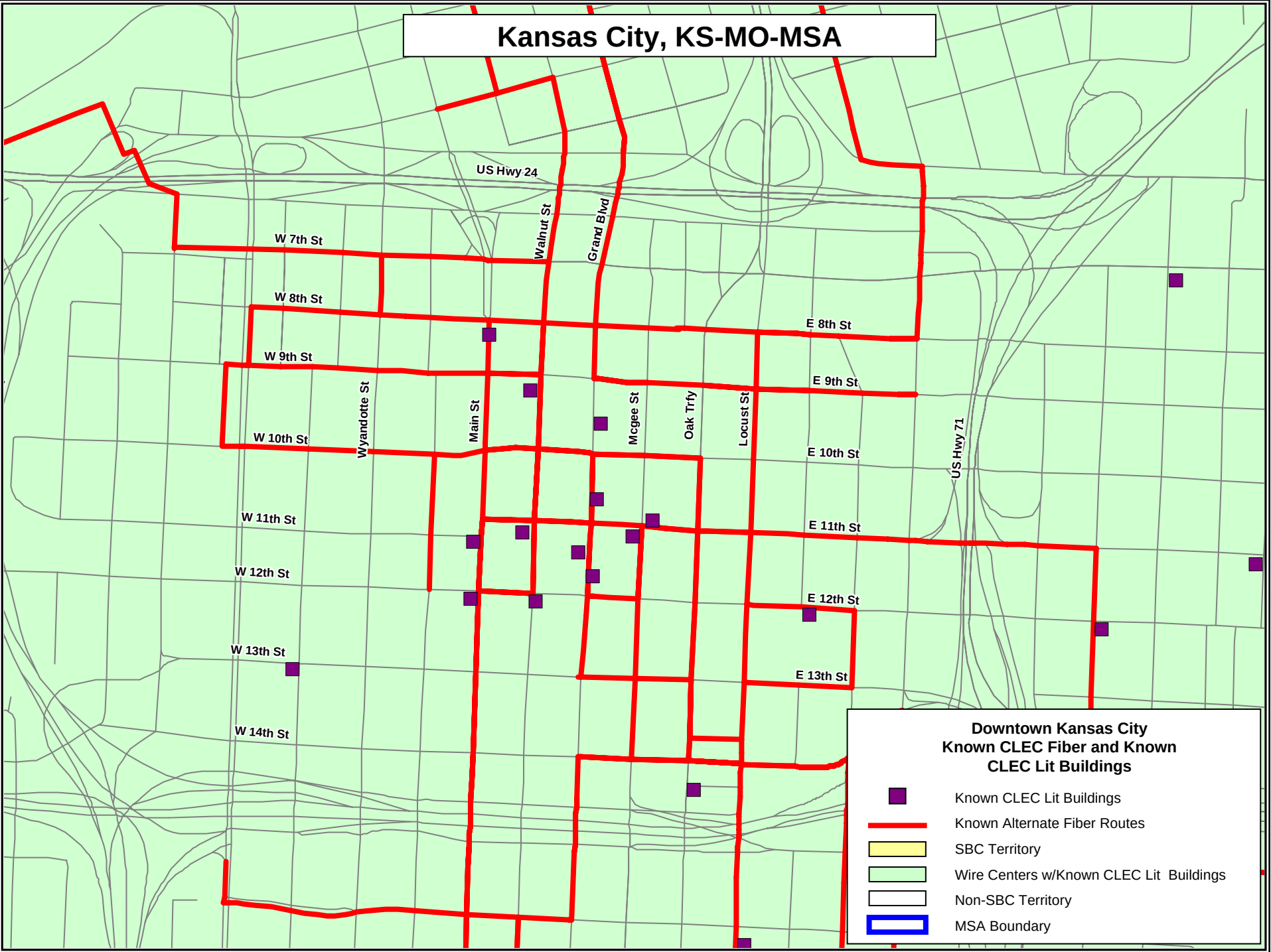
# Kansas City, KS-MO-MSA



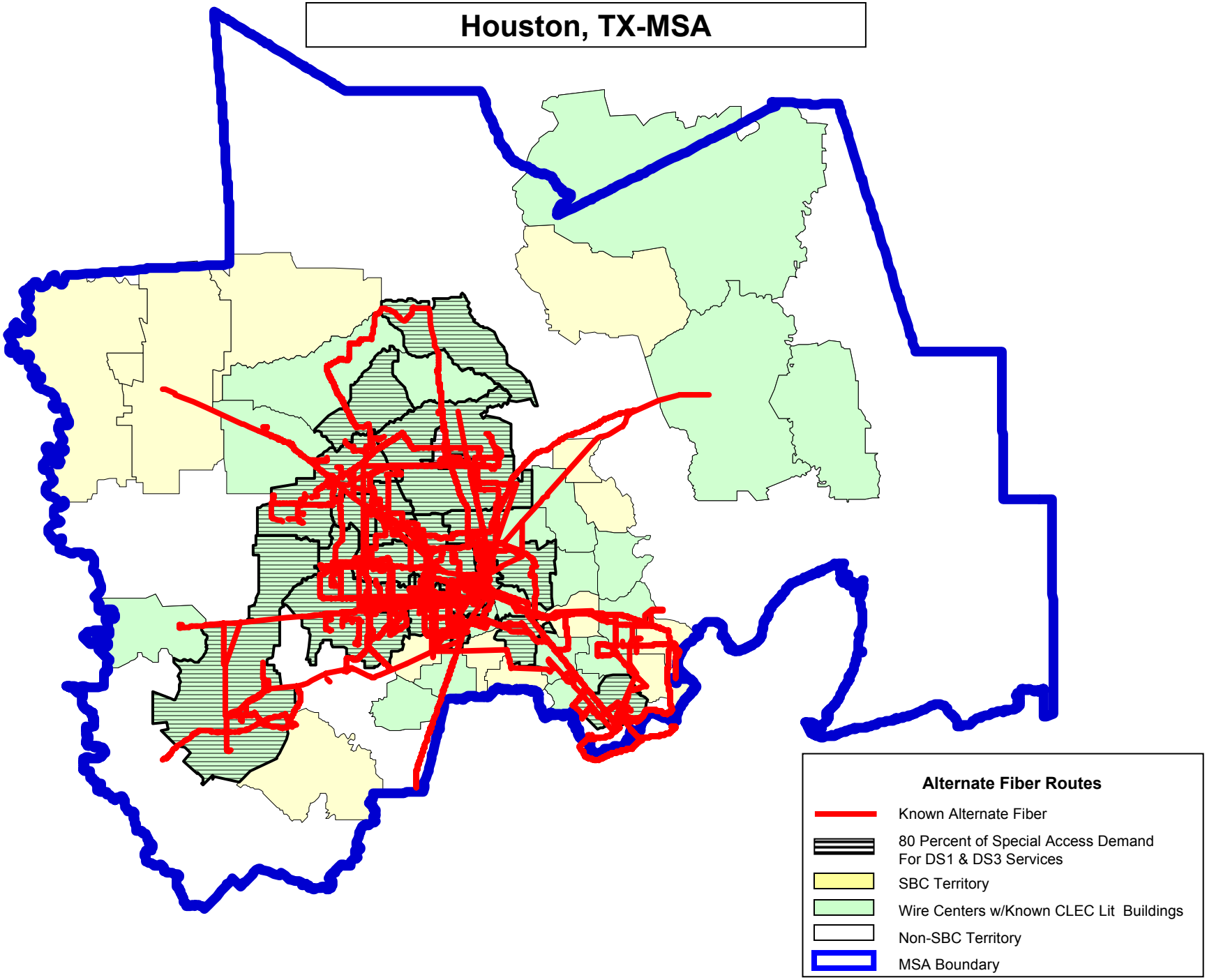
# Kansas City, KS-MO-MSA



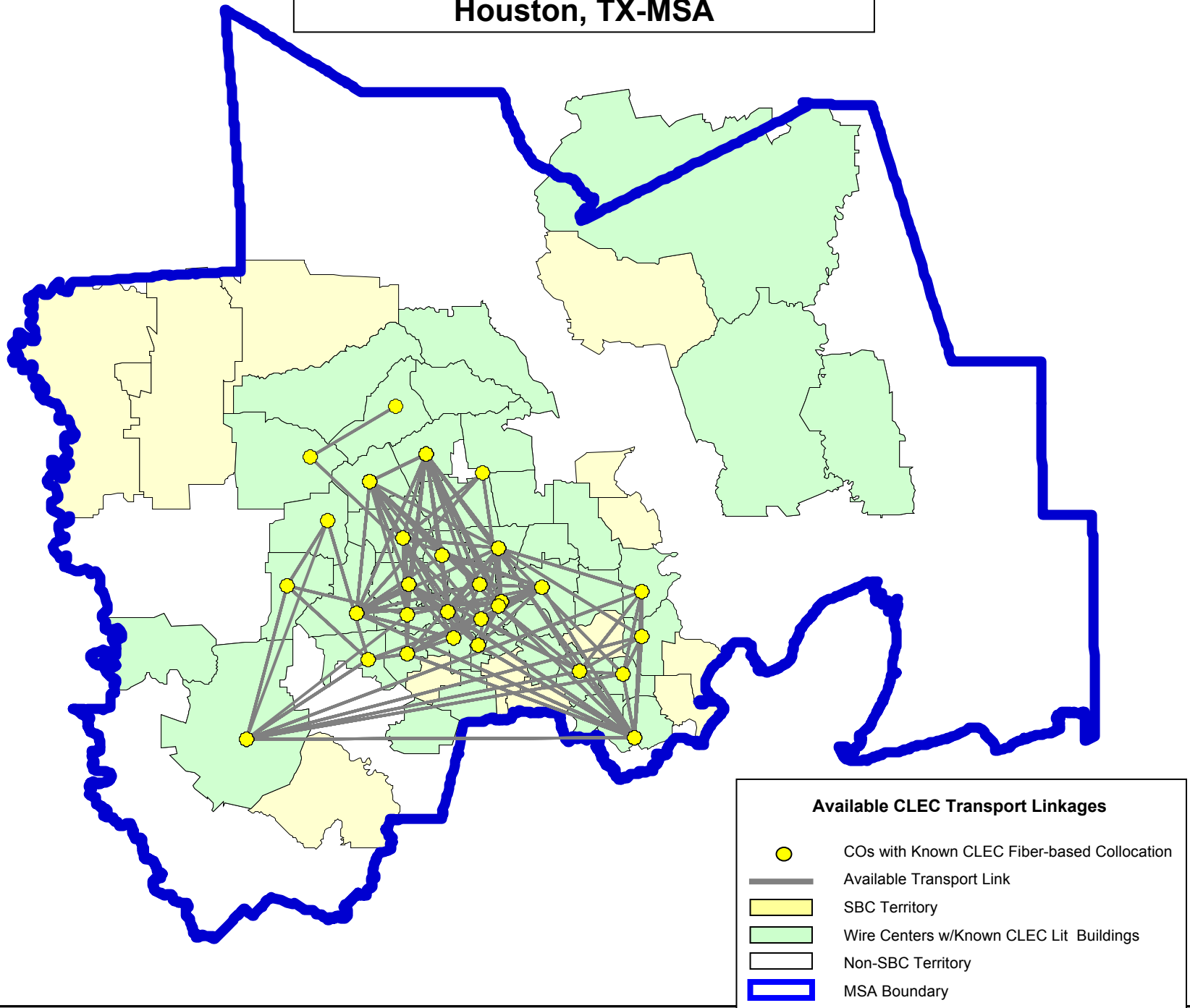
# Kansas City, KS-MO-MSA

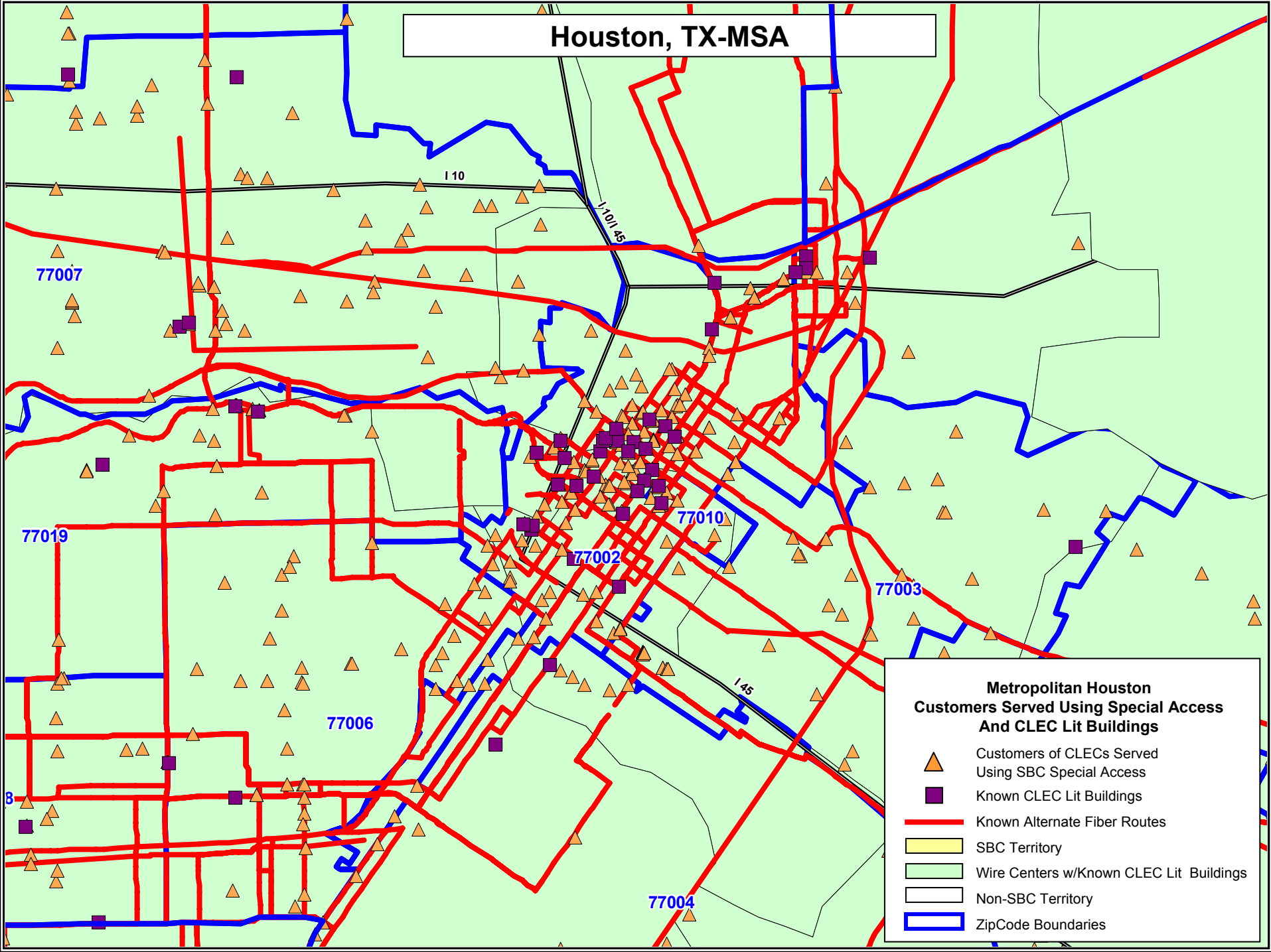


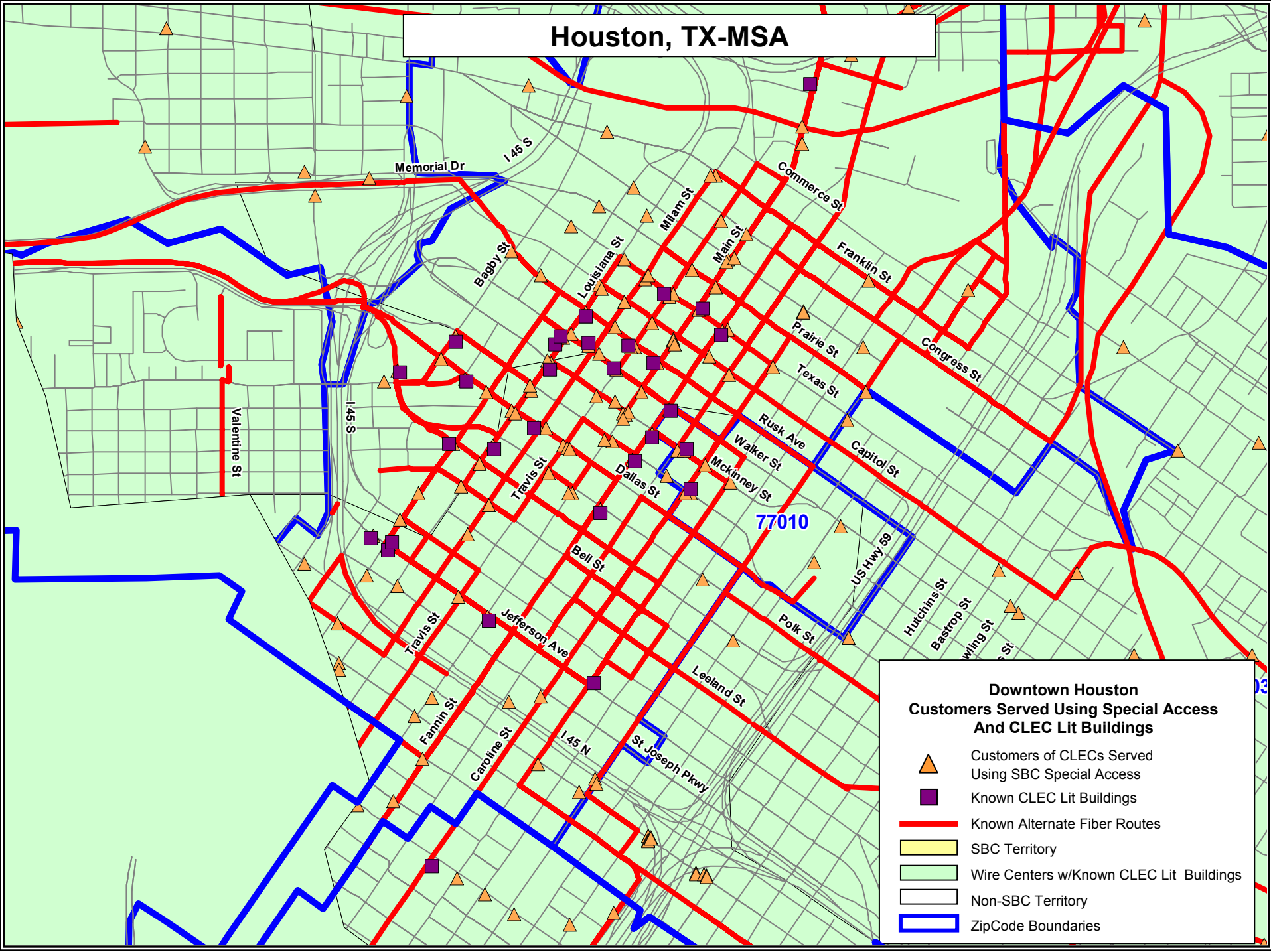
# Houston, TX-MSA



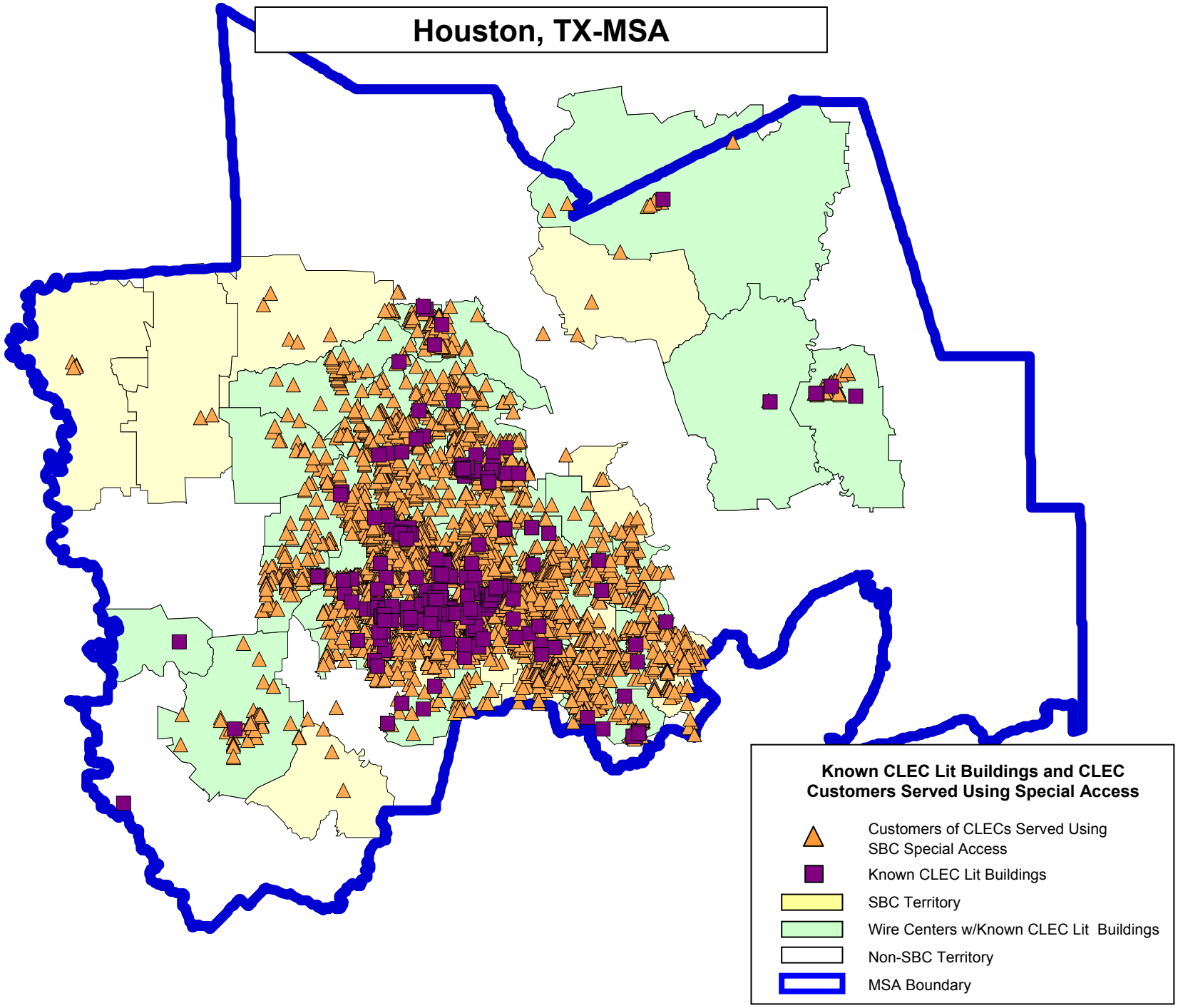
# Houston, TX-MSA



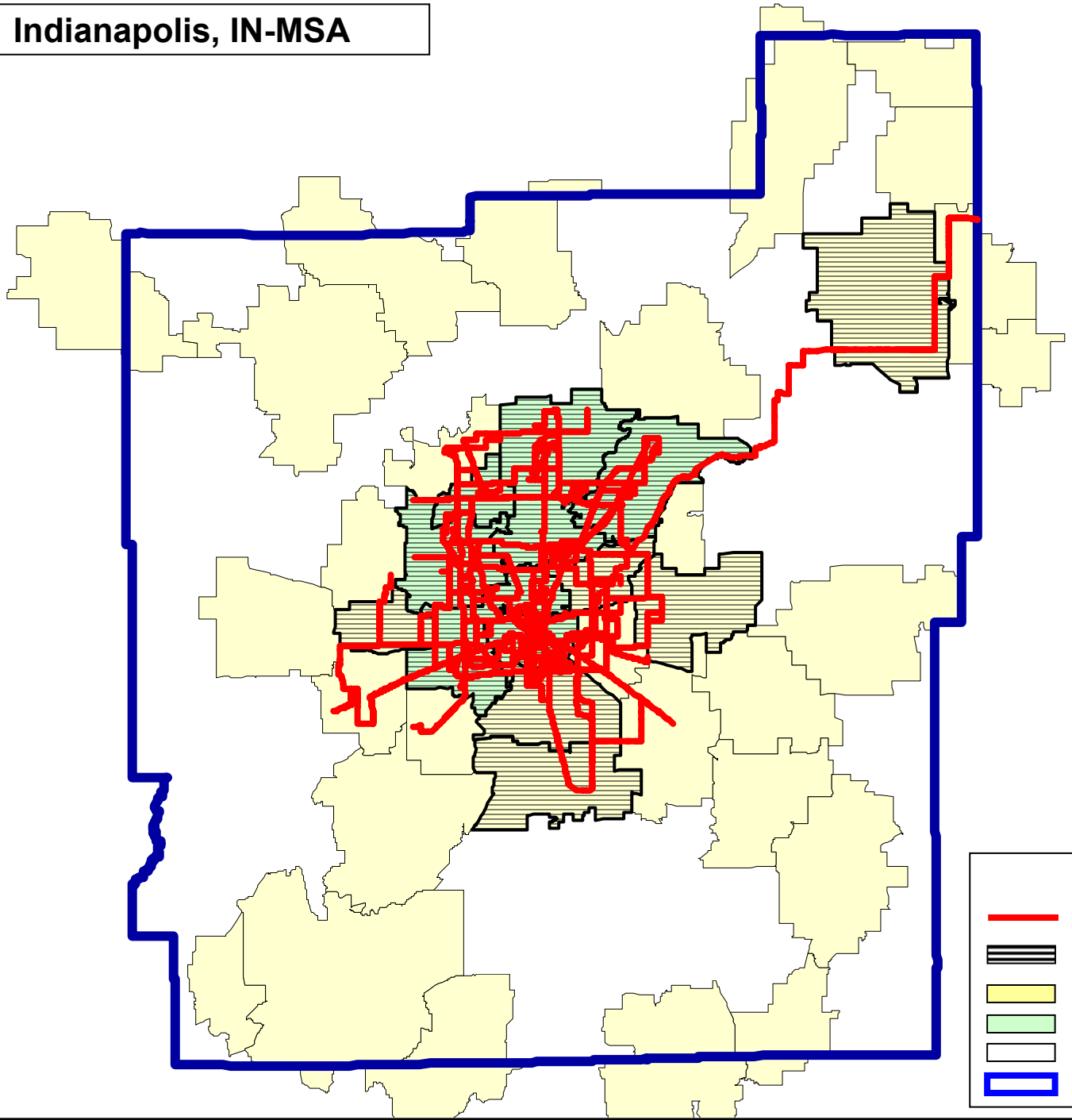

Houston, TX-MSA
I 10
I 10/I 45
I 45
77007
77019
77006
77002
77010
77003
77004
Metropolitan Houston
Customers Served Using Special Access
And CLEC Lit Buildings
Customers of CLECs Served
Using SBC Special Access
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
ZipCode Boundaries


Houston, TX-MSA
Memorial Dr
I 45 S
Bagby St
Louisiana St
Milam St
Main St
Commerce St
Franklin St
Prairie St
Texas St
Congress St
Rusk Ave
Walker St
Capitol St
Mckinney St
Dallas St
Travis St
Valentine St
I 45 S
77010
US Hwy 59
Bell St
Jefferson Ave
Polk St
Hutchins St
Bastrop St
Leeland St
Travis St
Fannin St
Caroline St
I 45 N
St Joseph Pkwy
Downtown Houston
Customers Served Using Special Access
And CLEC Lit Buildings
Customers of CLECs Served
Using SBC Special Access
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
ZipCode Boundaries

# Houston, TX-MSA



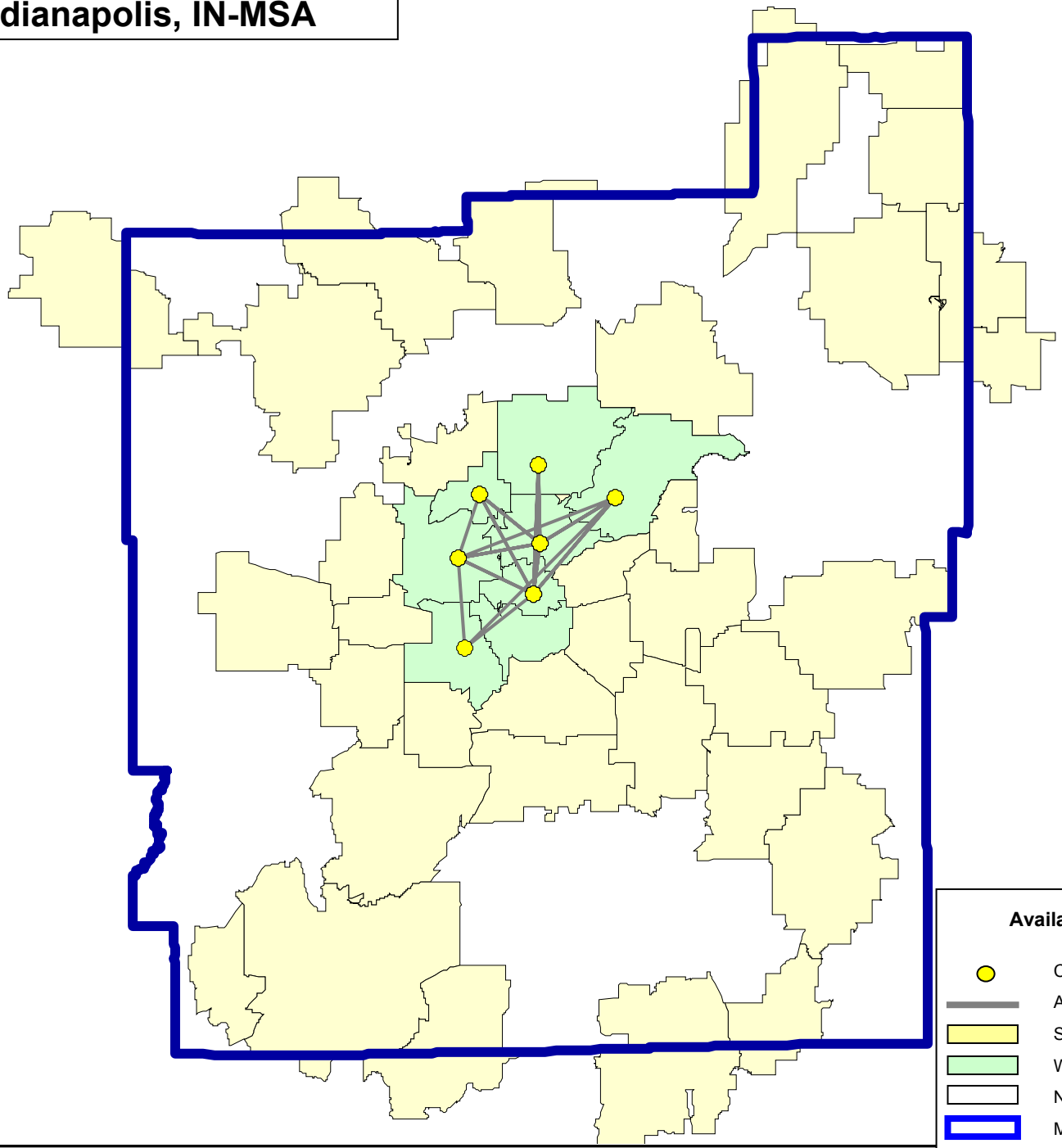
# Indianapolis, IN-MSA



**Alternate Fiber Routes**

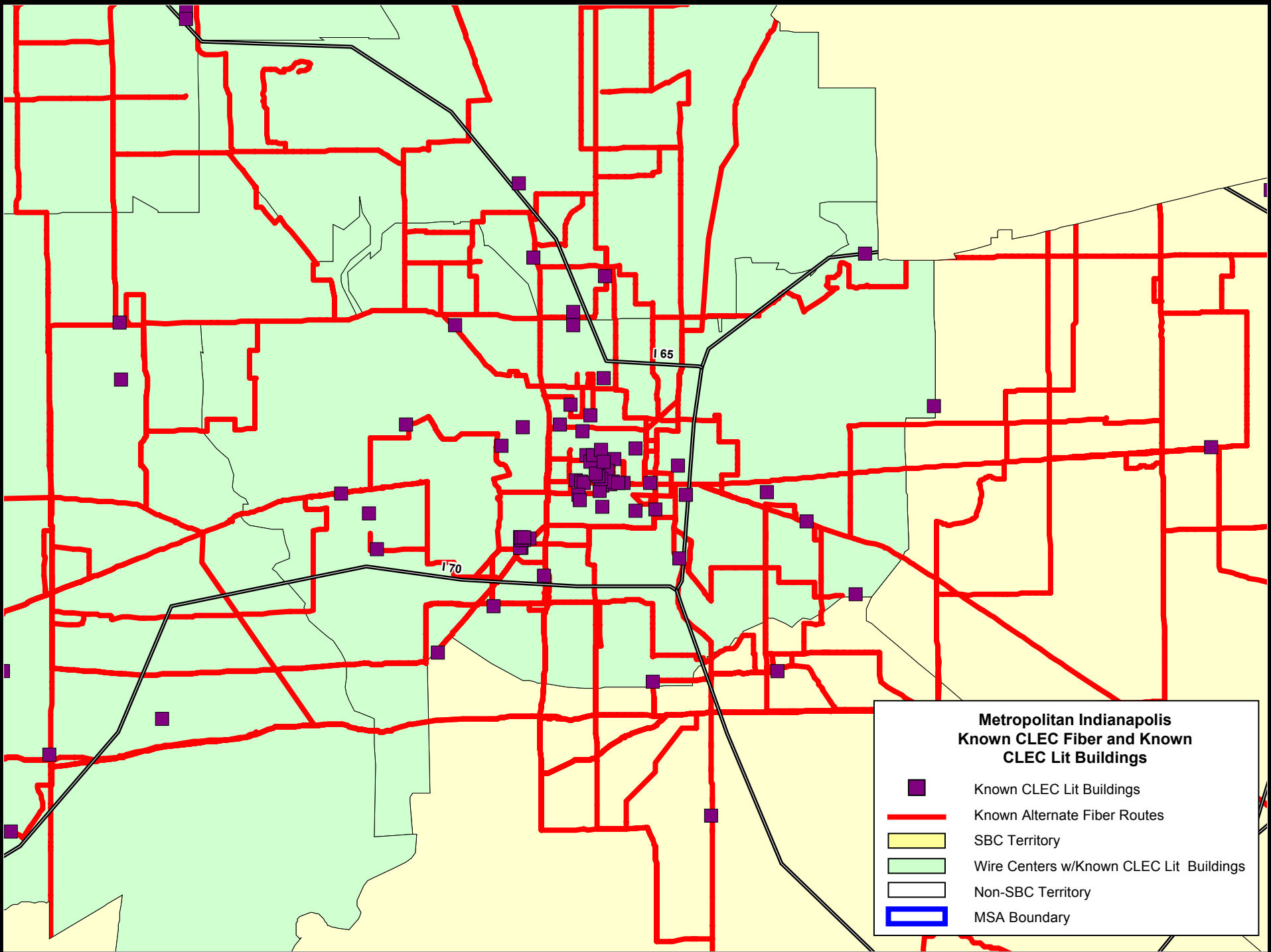
- Known Alternate Fiber
- 80 Percent of Special Access Demand For DS1 & DS3 Services
- SBC Territory
- Wire Centers w/Known CLEC Lit Buildings
- Non-SBC Territory
- MSA Boundary

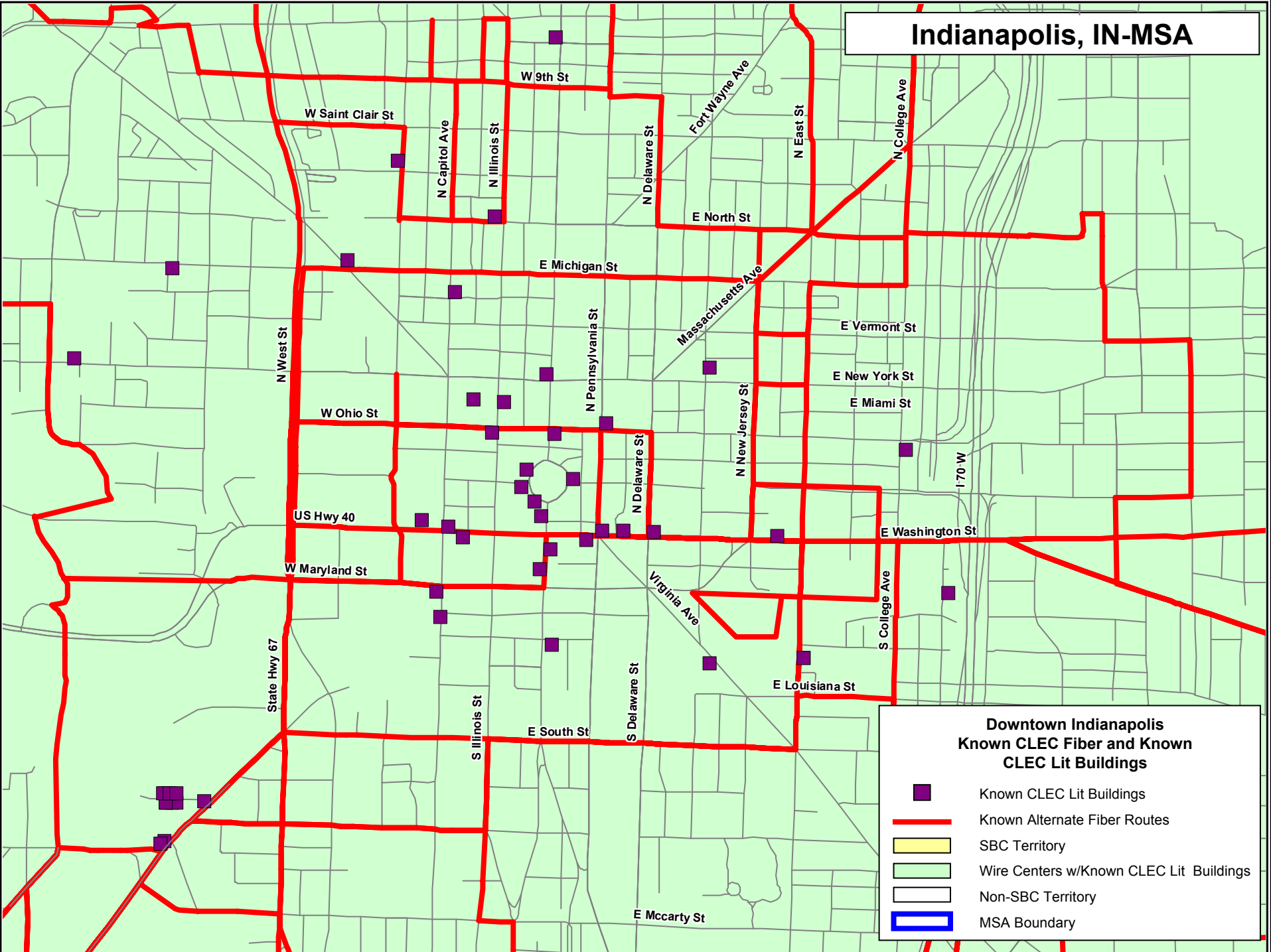
# Indianapolis, IN-MSA



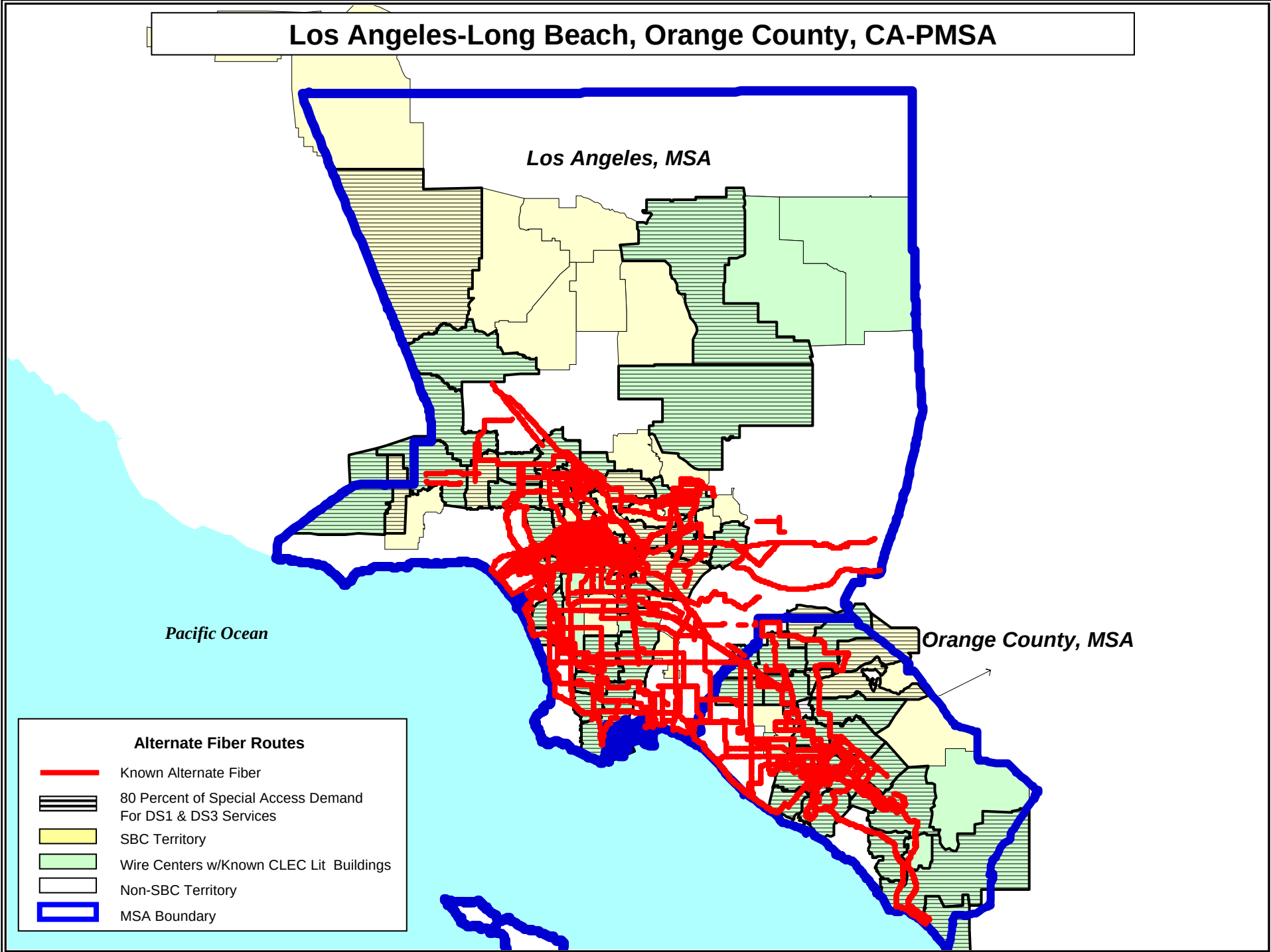
**Available CLEC Transport Linkages**

- COs with Known CLEC Fiber-based Collocation
- Available Transport Link
- SBC Territory
- Wire Centers w/Known CLEC Lit Buildings
- Non-SBC Territory
- MSA Boundary

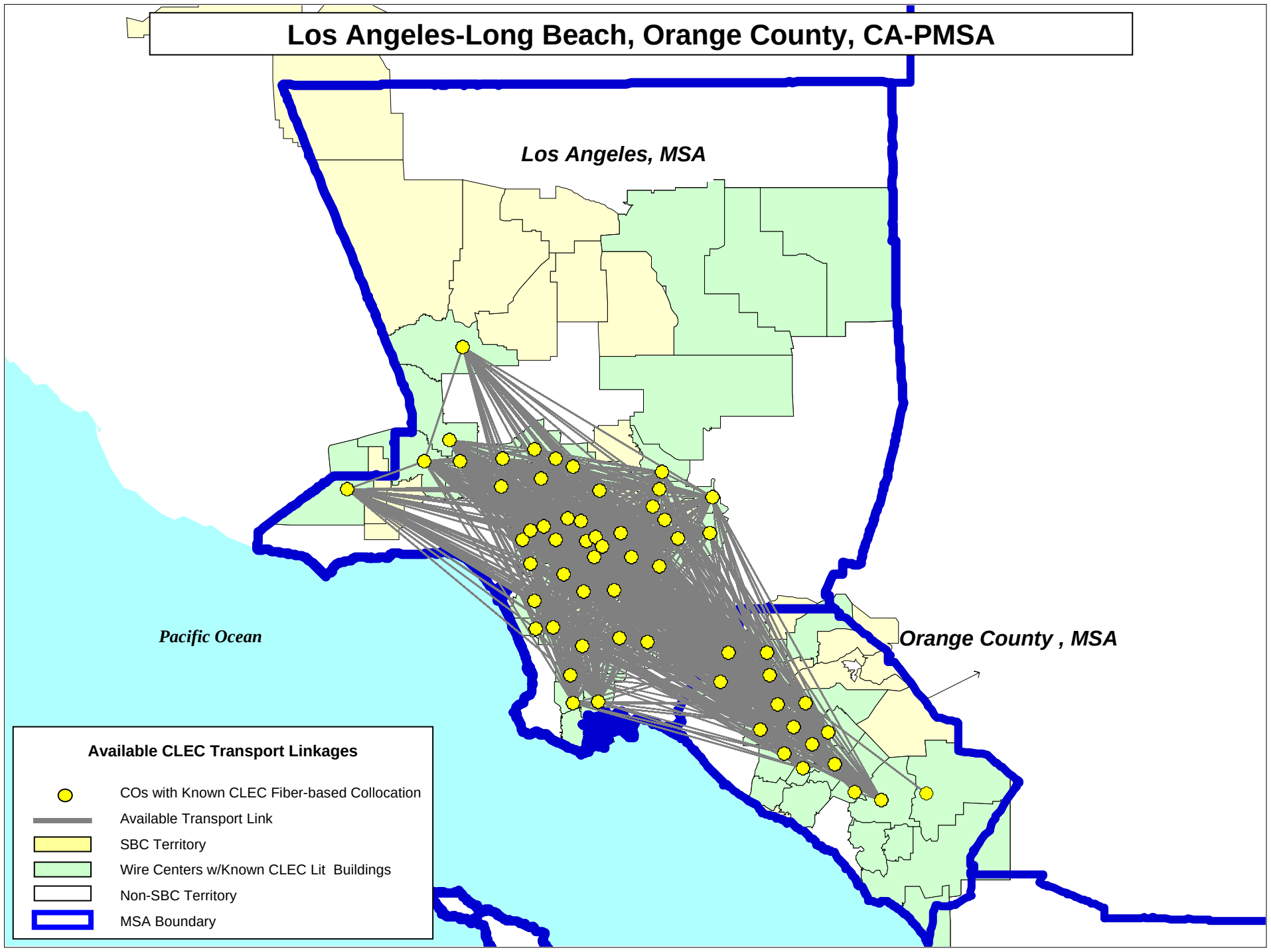

I 65
I 70
Metropolitan Indianapolis
Known CLEC Fiber and Known
CLEC Lit Buildings
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
MSA Boundary

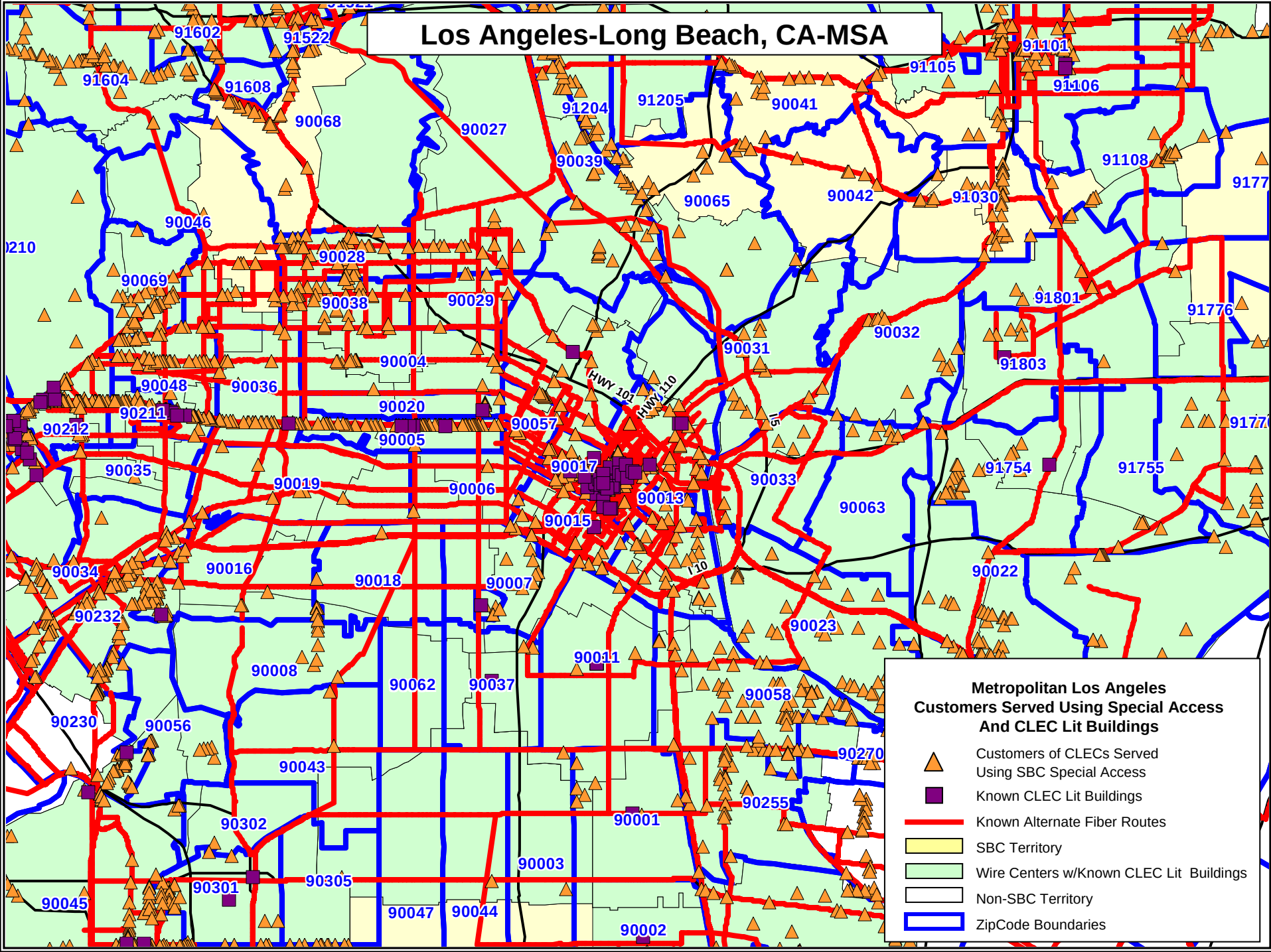

Indianapolis, IN-MSA
W 9th St
W Saint Clair St
N Capitol Ave
N Illinois St
N Delaware St
Fort Wayne Ave
N East St
N College Ave
E North St
E Michigan St
Massachusetts Ave
E Vermont St
E New York St
E Miami St
N West St
N Pennsylvania St
N New Jersey St
W Ohio St
N Delaware St
I 70 W
US Hwy 40
E Washington St
W Maryland St
Virginia Ave
S College Ave
State Hwy 67
E Louisiana St
S Illinois St
E South St
S Delaware St
E Mccarty St
Downtown Indianapolis
Known CLEC Fiber and Known
CLEC Lit Buildings
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
MSA Boundary

# Los Angeles-Long Beach, Orange County, CA-PMSA



# Los Angeles-Long Beach, Orange County, CA-PMSA




Los Angeles-Long Beach, CA-MSA
Metropolitan Los Angeles
Customers Served Using Special Access
And CLEC Lit Buildings
Customers of CLECs Served Using SBC Special Access
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
ZipCode Boundaries
HWY 101
HWY 110
I 5
I 10
91602
91522
91604
91608
90068
90027
91204
91205
90041
91105
91101
91106
90039
91108
90065
90042
91030
90046
90028
90069
90038
90029
91801
91776
90032
90031
91803
90004
90048
90036
90211
90020
90212
90057
90005
90017
90035
90019
90006
90013
91754
91755
90033
90063
90015
90034
90016
90018
90007
90022
90232
90023
90011
90008
90062
90037
90058
90230
90056
90270
90043
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90302
90001
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90301
90305
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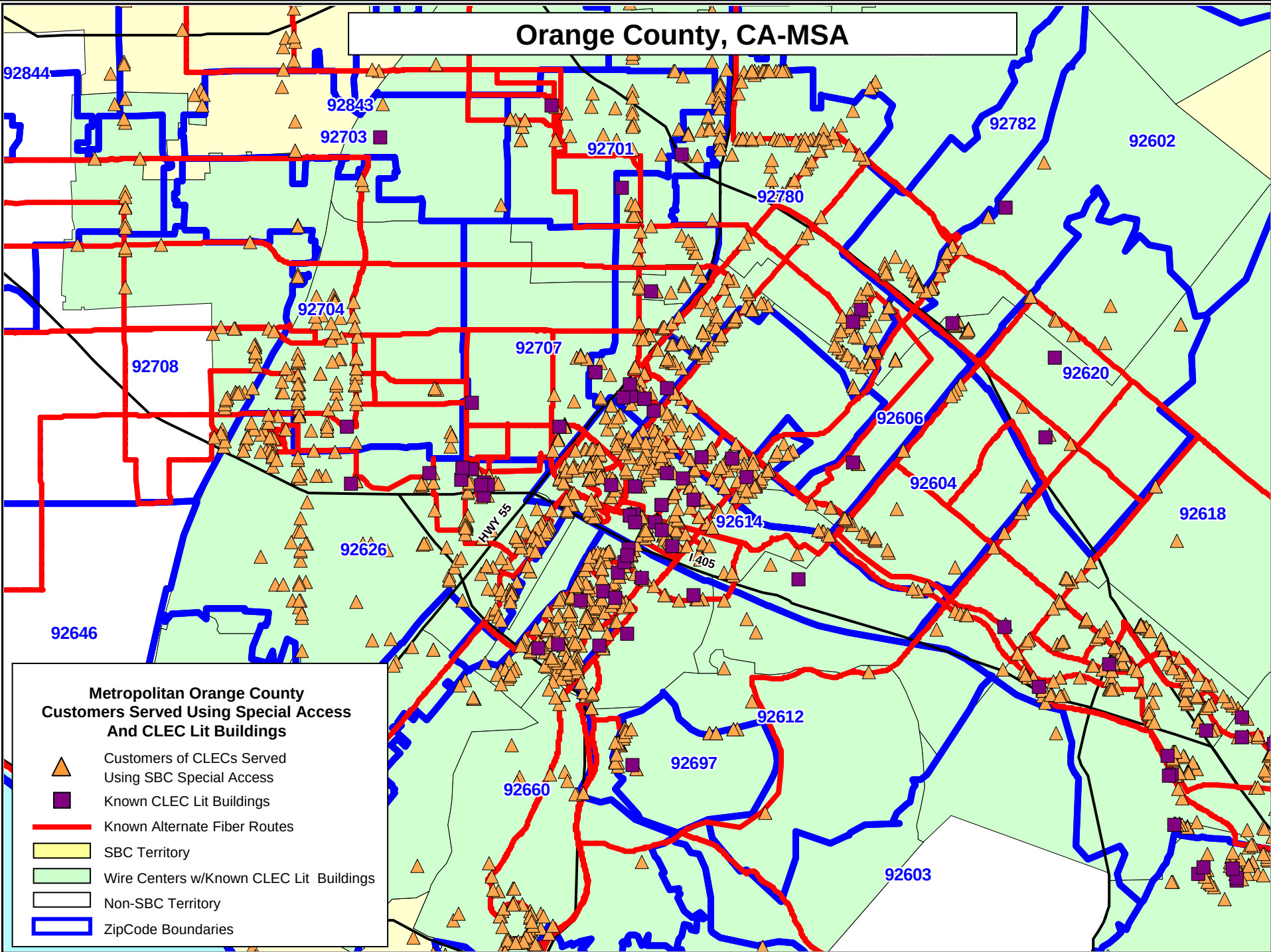
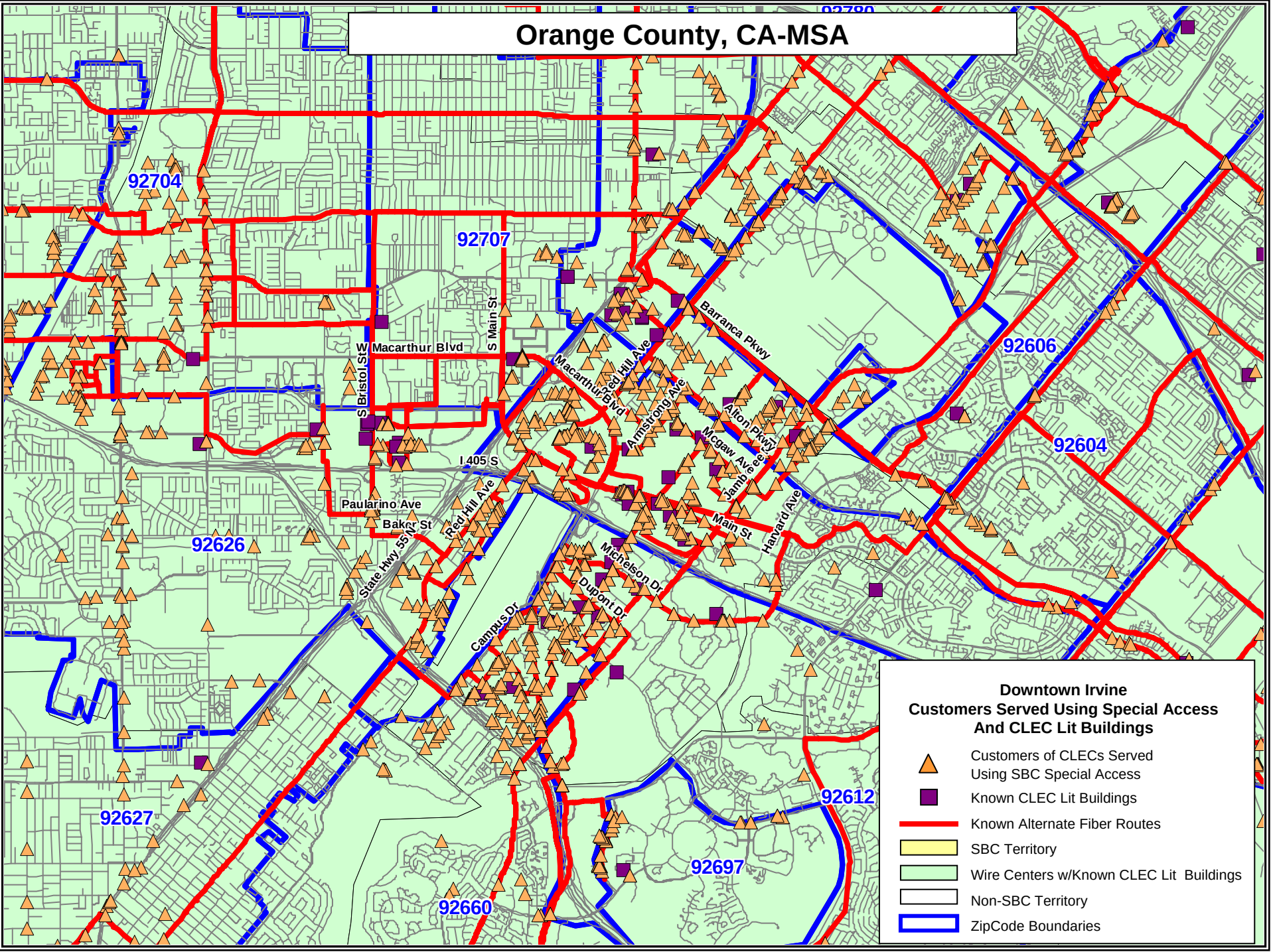
90047
90044
90002

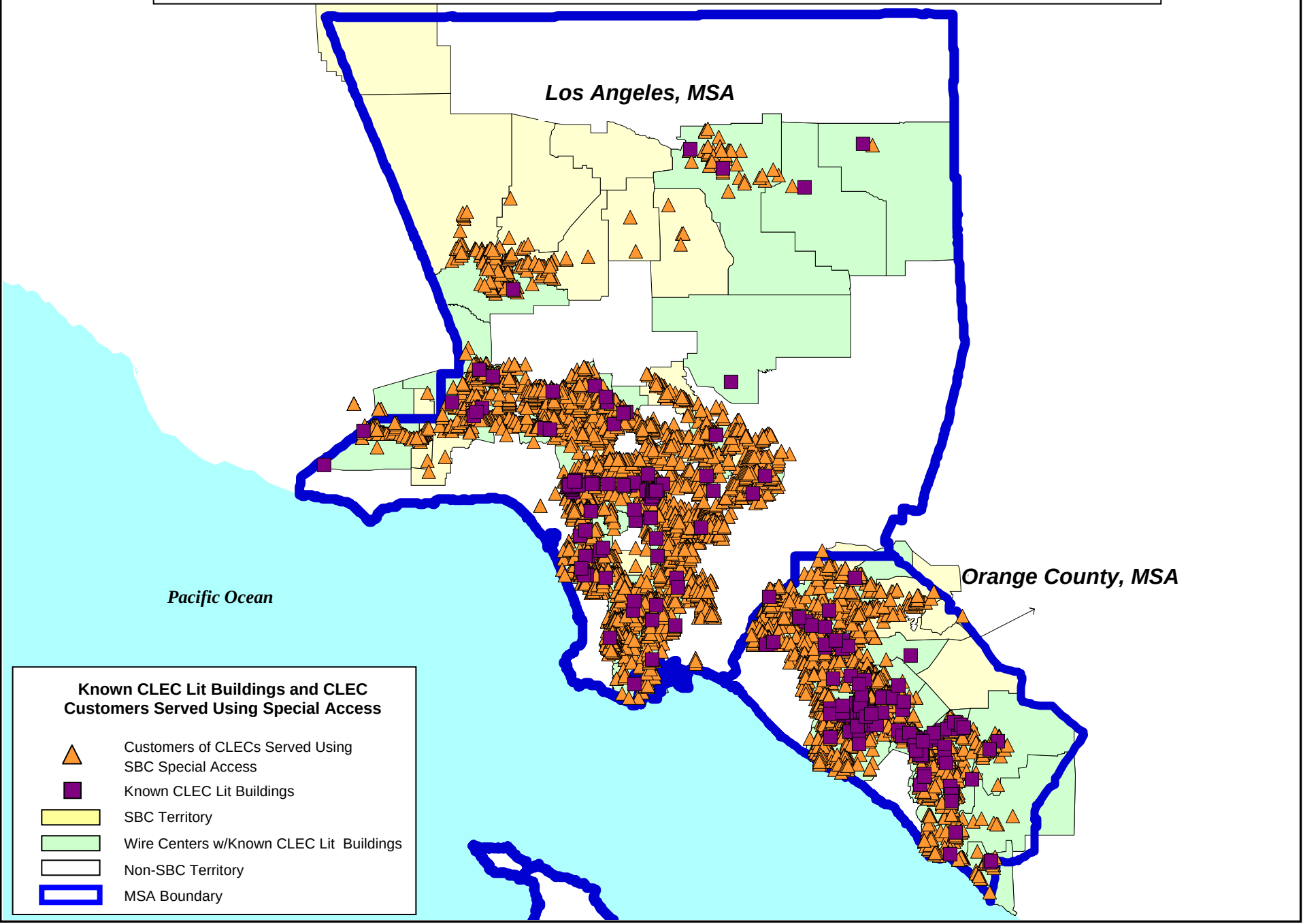
# Los Angeles-Long Beach, CA-MSA


Orange County, CA-MSA
92844
92843
92703
92701
92780
92782
92602
92704
92707
92708
92620
92606
92604
92618
92614
92626
HWY 55
I 405
92646
92612
92697
92660
92603
Metropolitan Orange County
Customers Served Using Special Access
And CLEC Lit Buildings
Customers of CLECs Served
Using SBC Special Access
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
ZipCode Boundaries

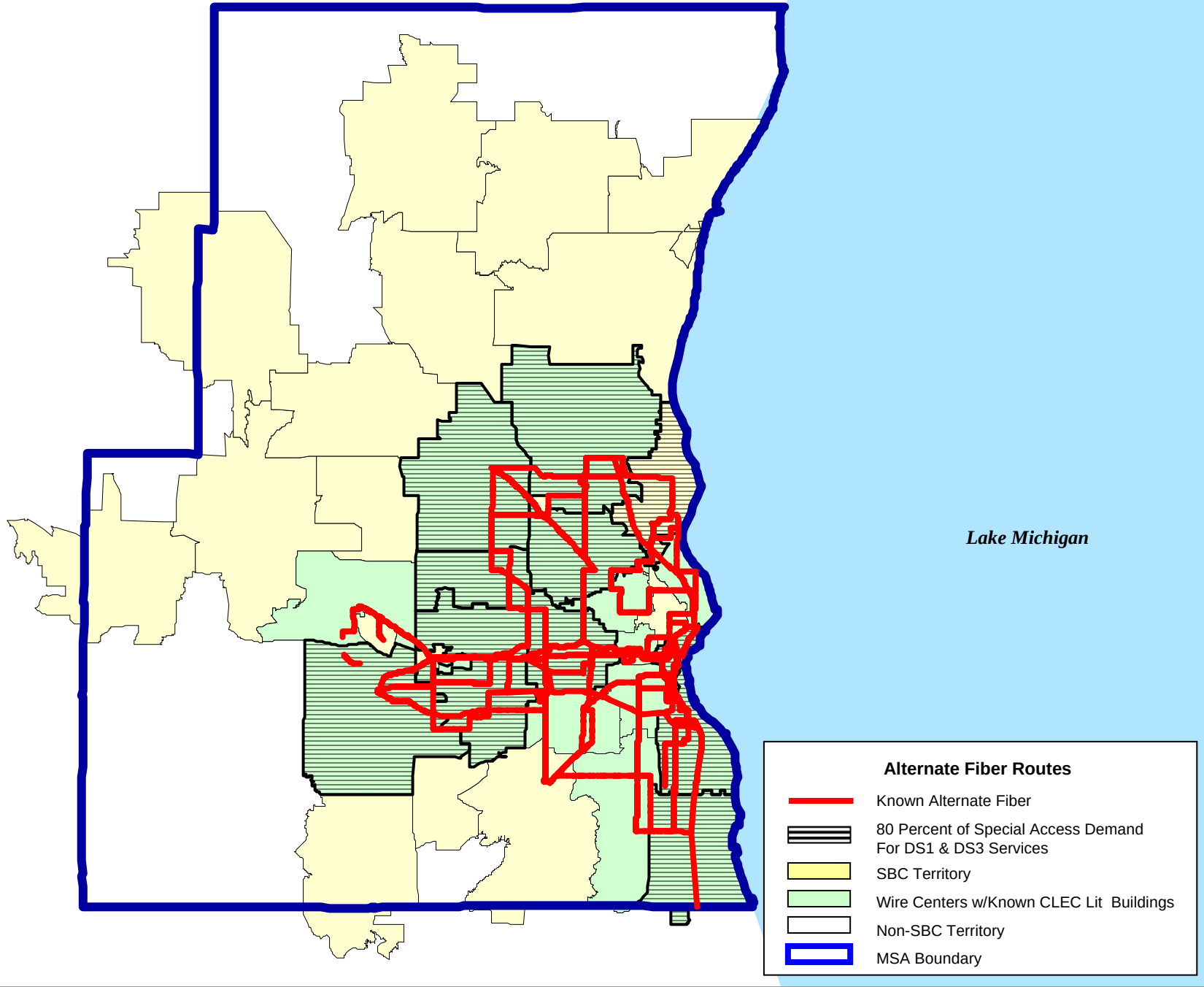
# Orange County, CA-MSA



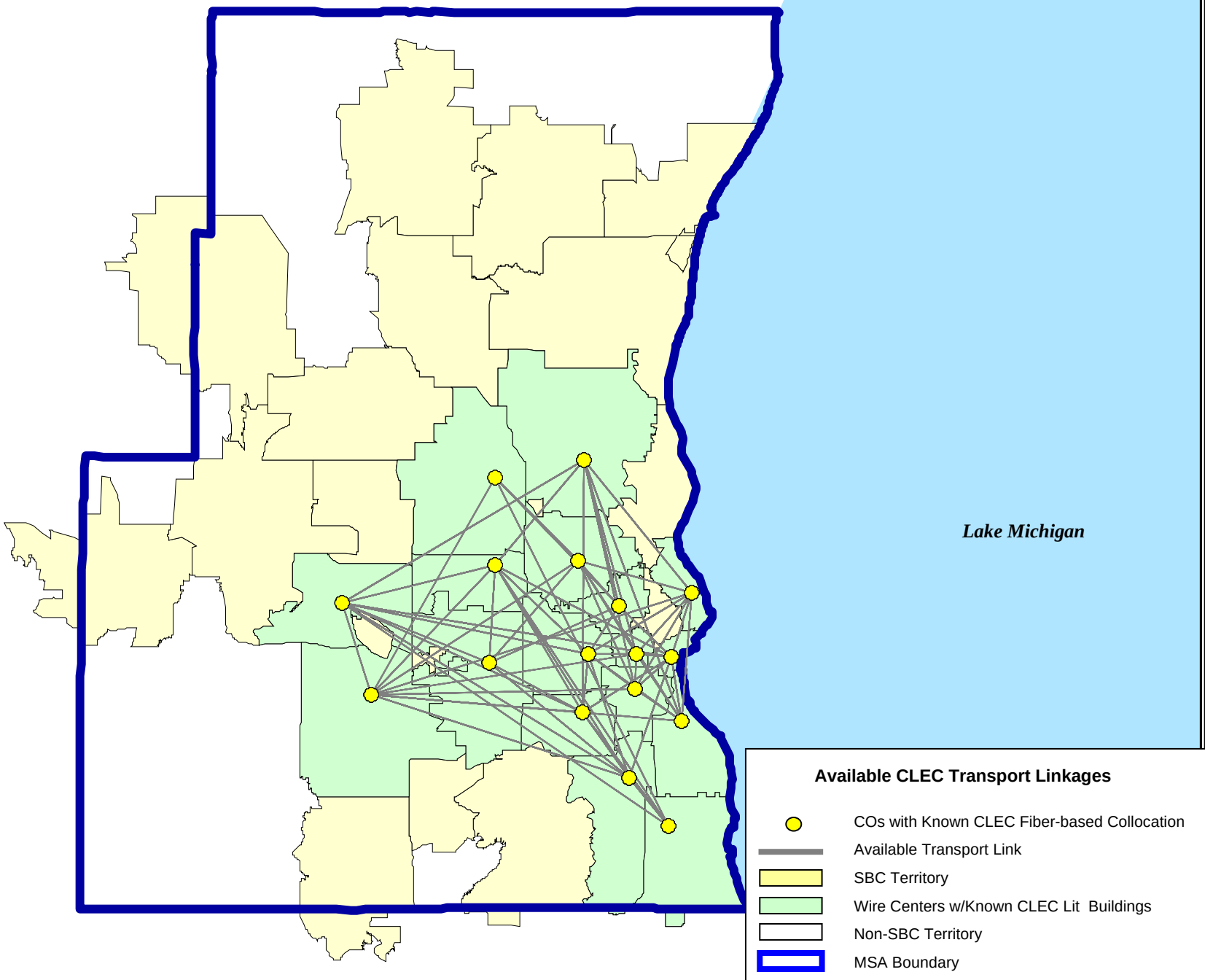
# Los Angeles-Long Beach, Orange County, CA-PMSA

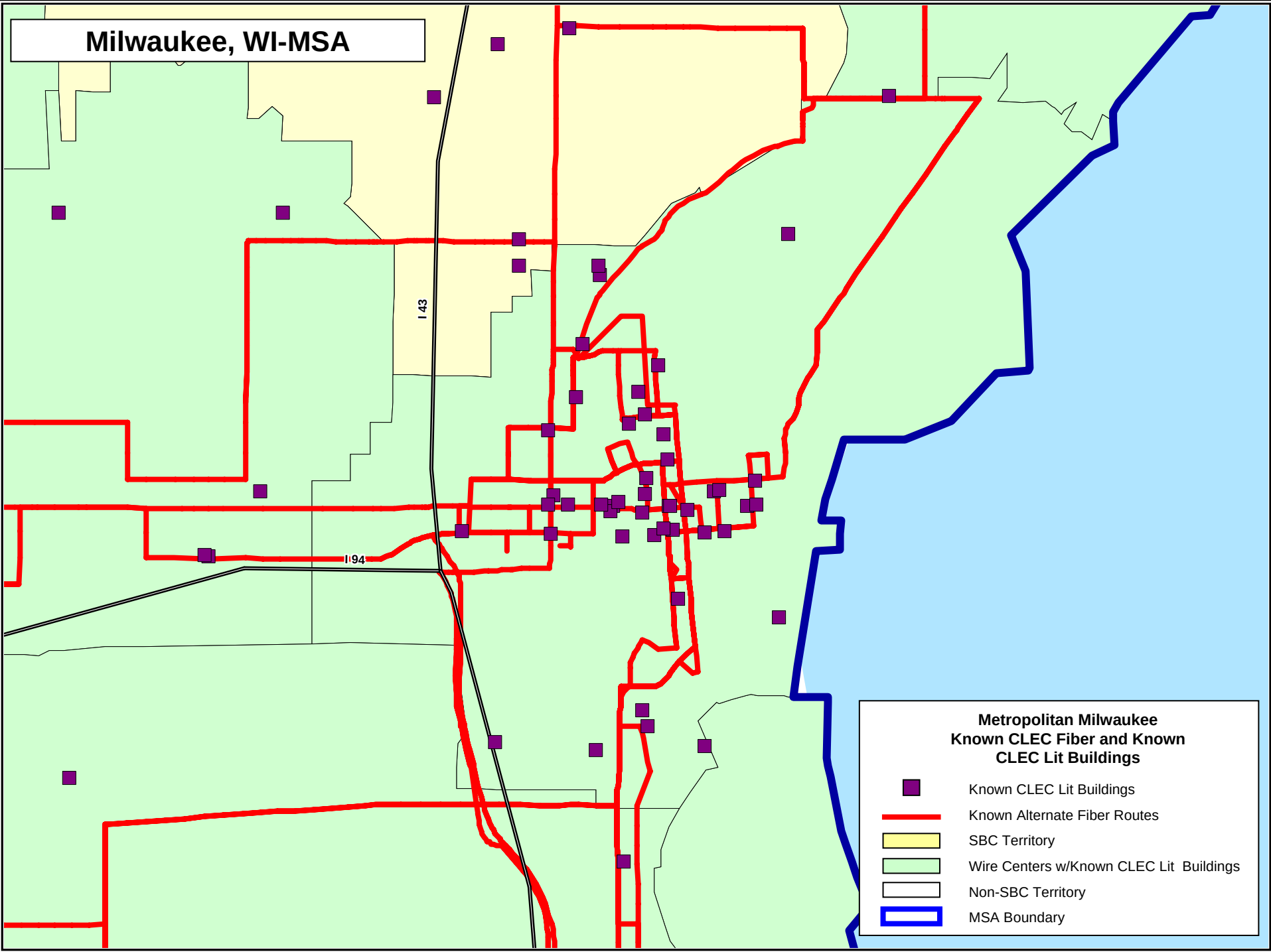


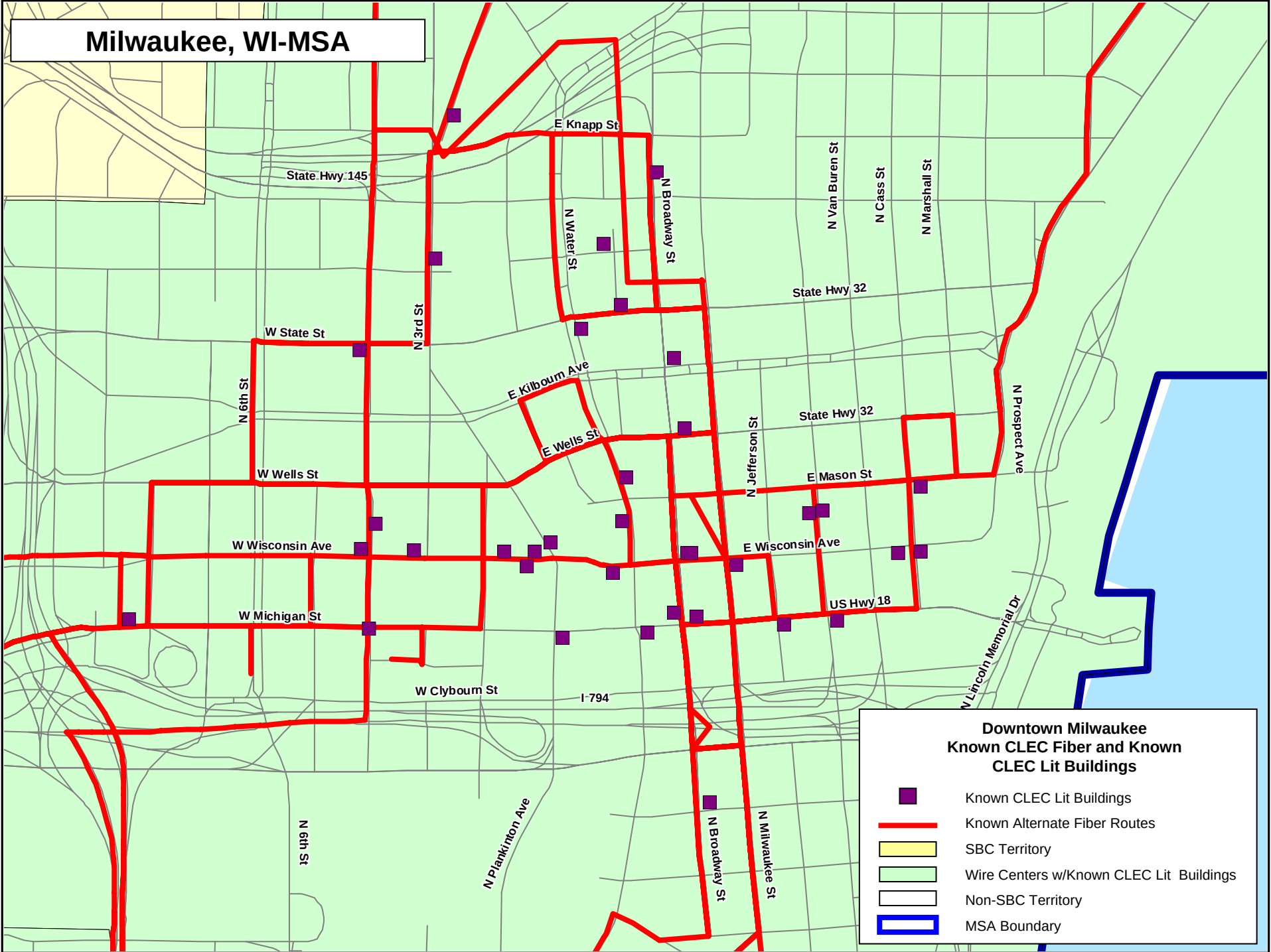
# Milwaukee, WI-MSA



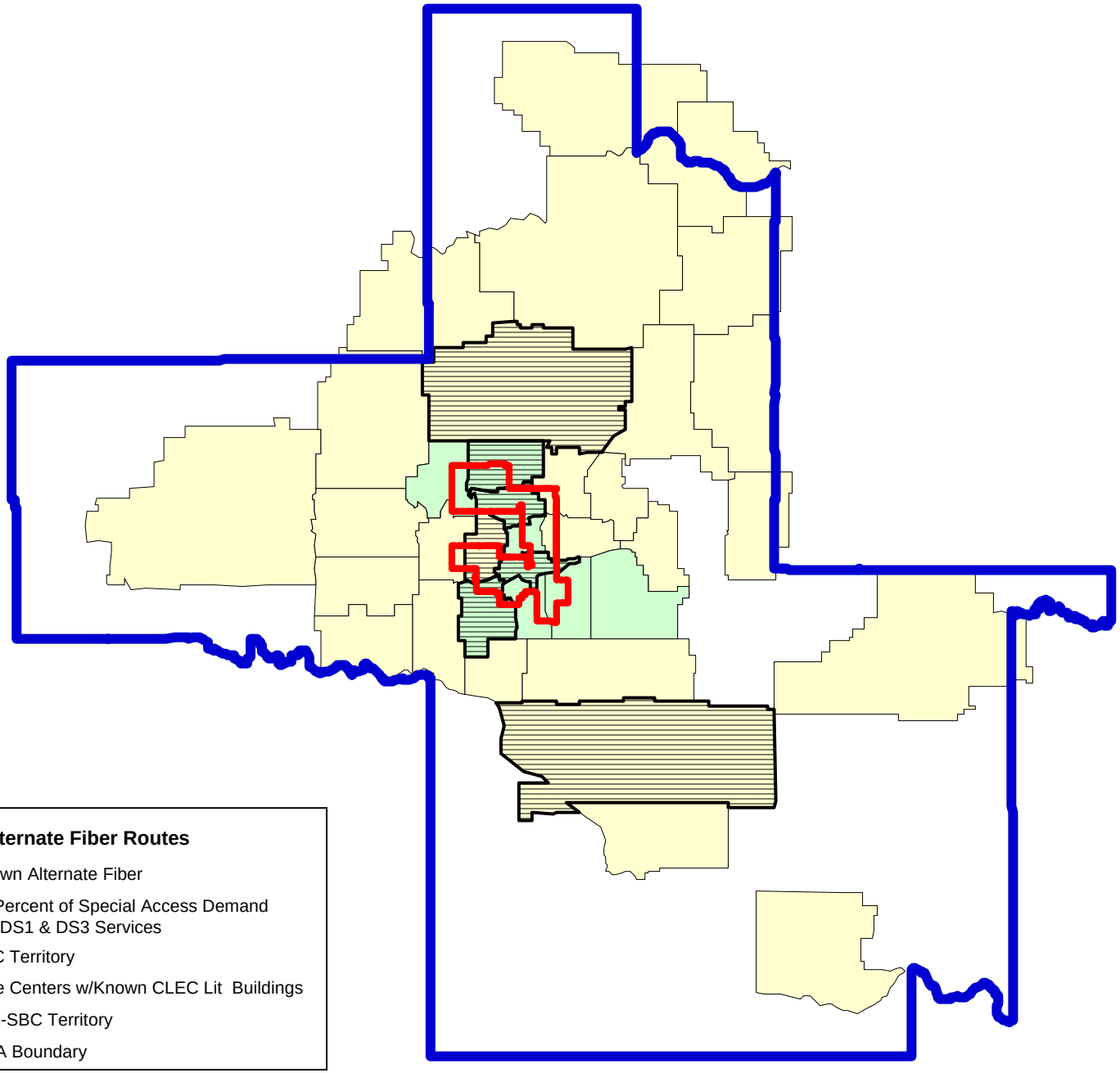
# Milwaukee, WI-MSA




Milwaukee, WI-MSA
I 43
I 94
Metropolitan Milwaukee
Known CLEC Fiber and Known
CLEC Lit Buildings
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
MSA Boundary


Milwaukee, WI-MSA
E Knapp St
State Hwy 145
N Broadway St
N Water St
N Van Buren St
N Cass St
N Marshall St
State Hwy 32
W State St
N 3rd St
E Kilbourn Ave
N 6th St
E Wells St
State Hwy 32
N Jefferson St
N Prospect Ave
W Wells St
E Mason St
W Wisconsin Ave
E Wisconsin Ave
US Hwy 18
W Michigan St
N Lincoln Memorial Dr
W Clybourn St
I-794
N 6th St
N Plankinton Ave
N Broadway St
N Milwaukee St
Downtown Milwaukee
Known CLEC Fiber and Known
CLEC Lit Buildings
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
MSA Boundary

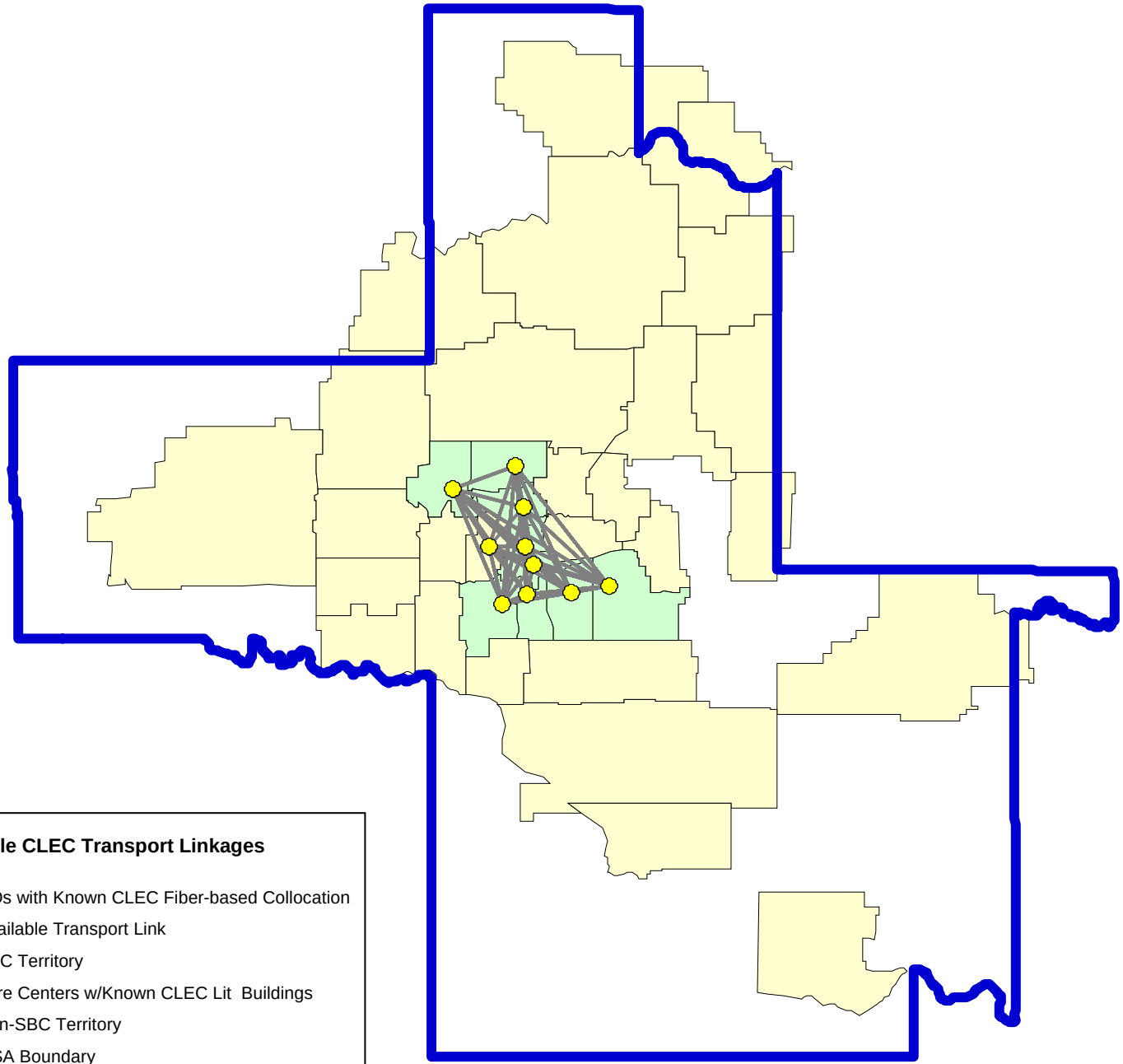
# Oklahoma City, OK-MSA



**Alternate Fiber Routes**

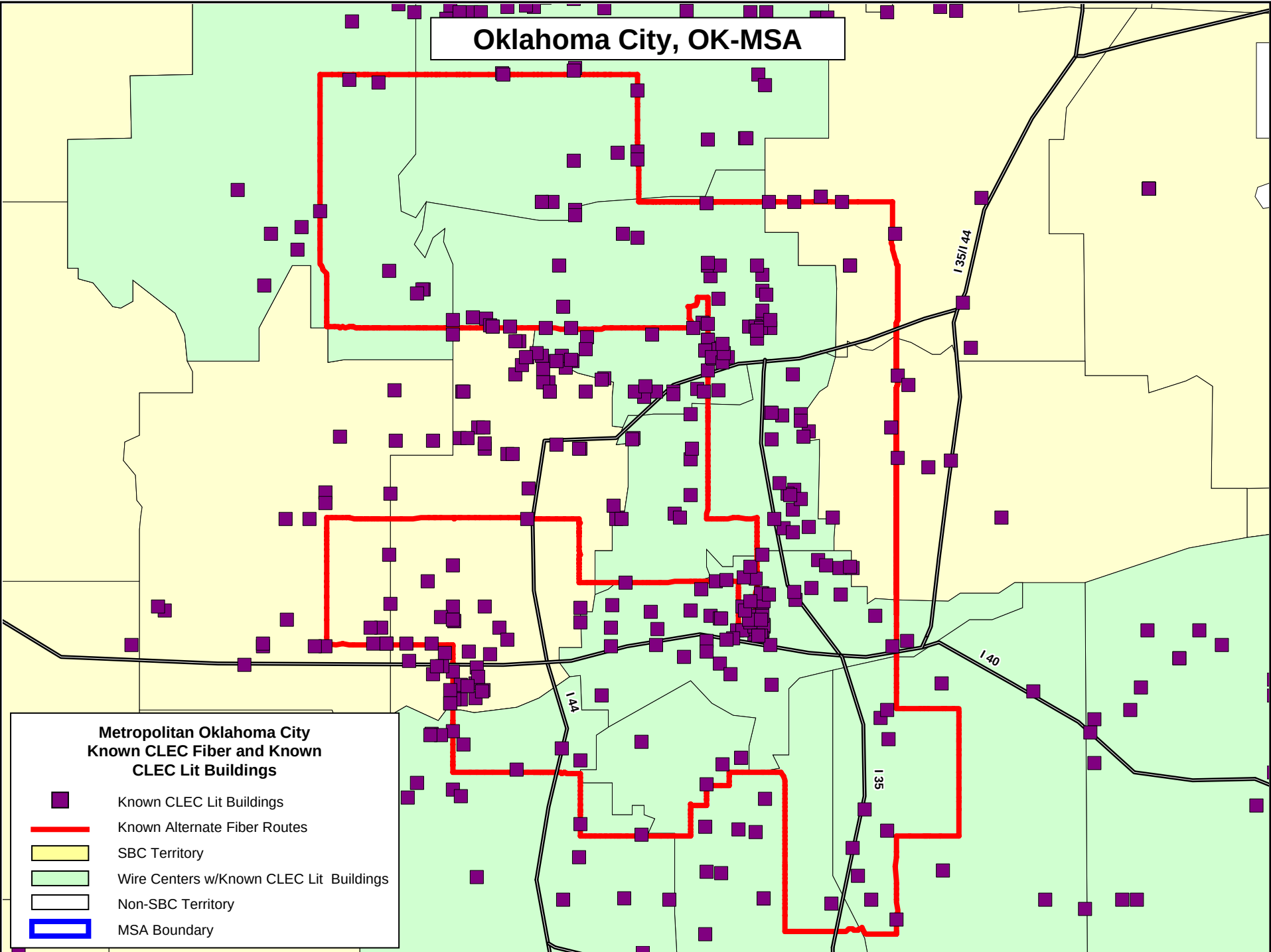
- Known Alternate Fiber
- 80 Percent of Special Access Demand For DS1 & DS3 Services
- SBC Territory
- Wire Centers w/Known CLEC Lit Buildings
- Non-SBC Territory
- MSA Boundary

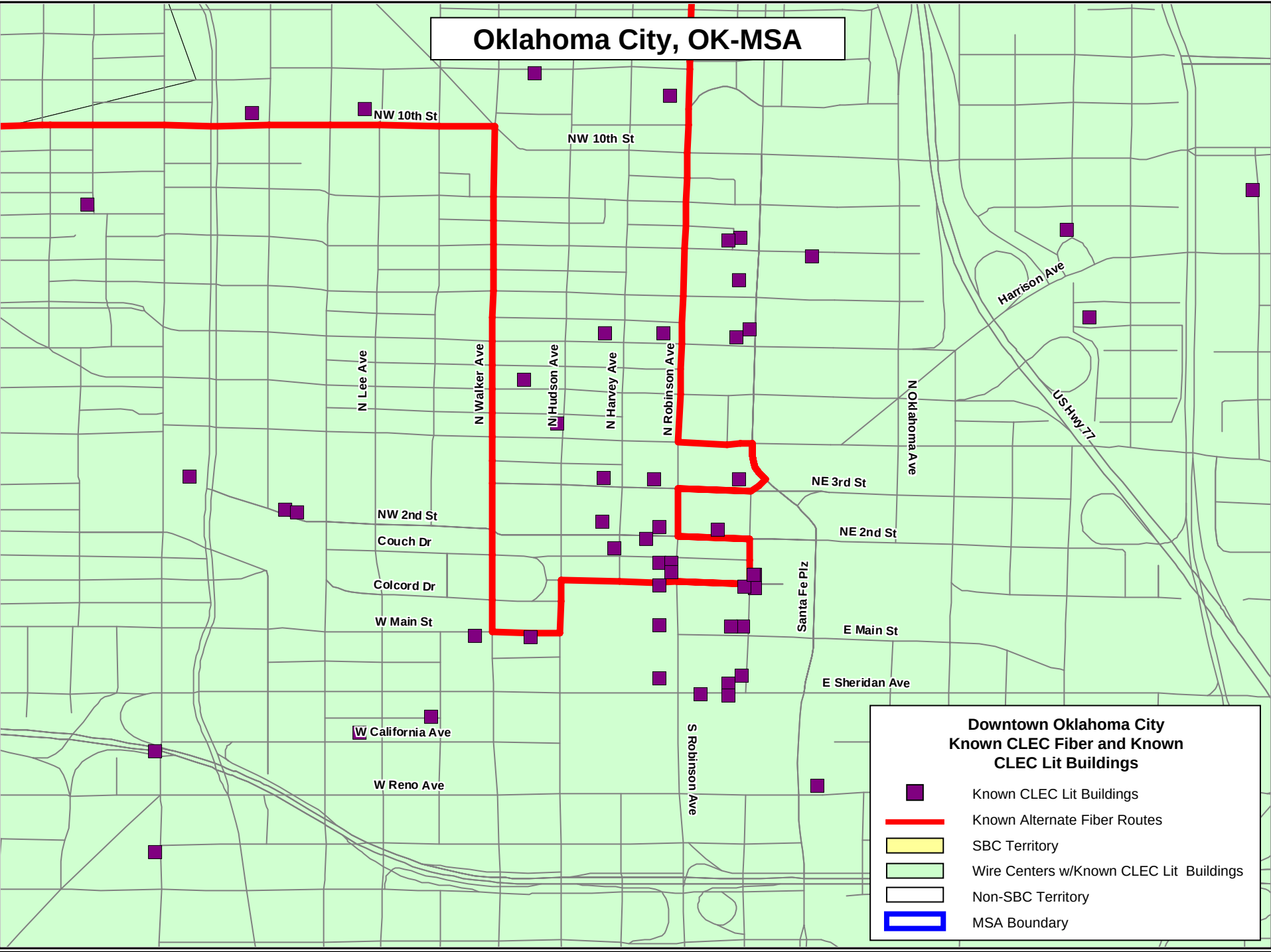
# Oklahoma City, OK-MSA



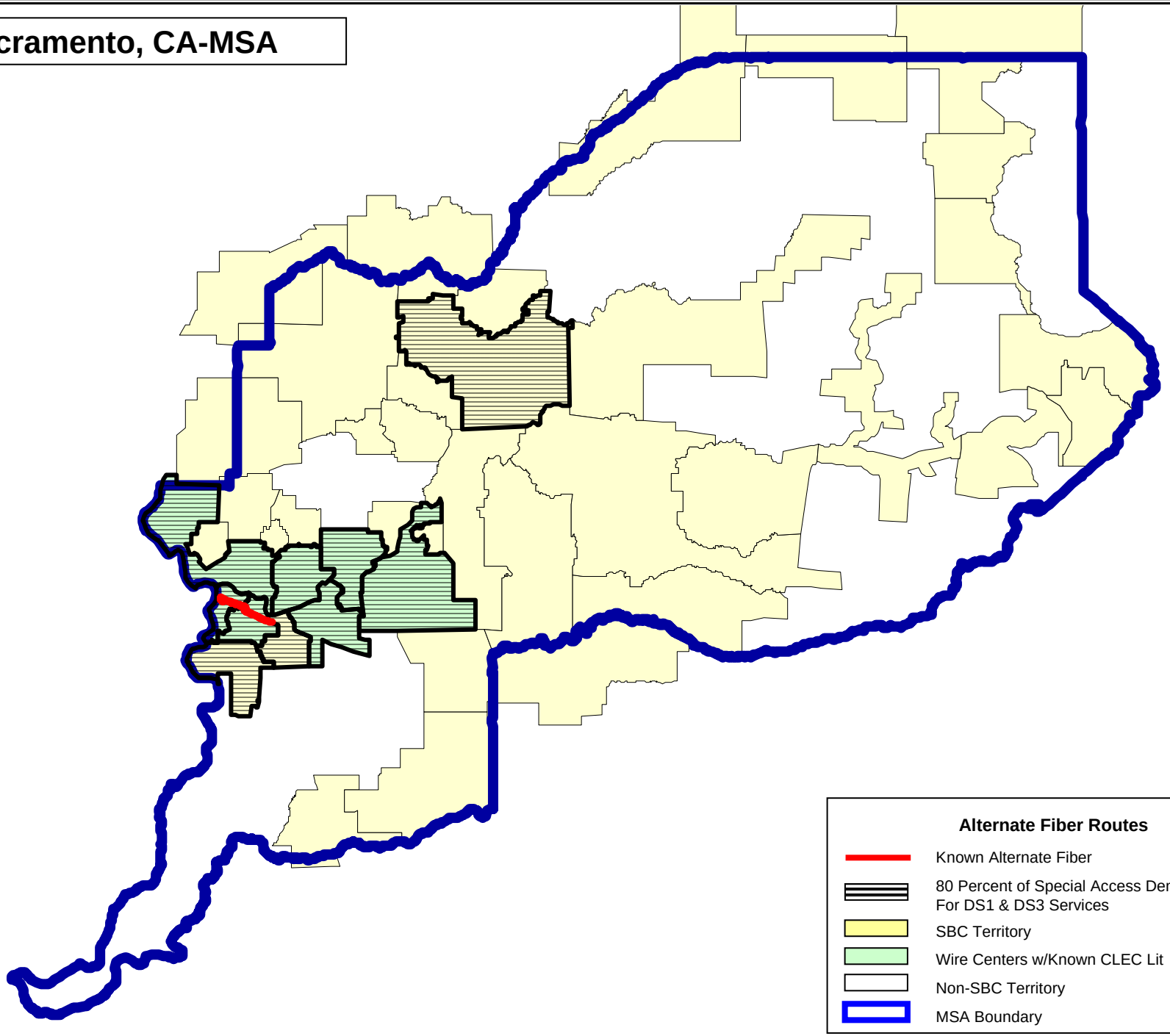
**Available CLEC Transport Linkages**

- COs with Known CLEC Fiber-based Collocation
- Available Transport Link
- SBC Territory
- Wire Centers w/Known CLEC Lit Buildings
- Non-SBC Territory
- MSA Boundary

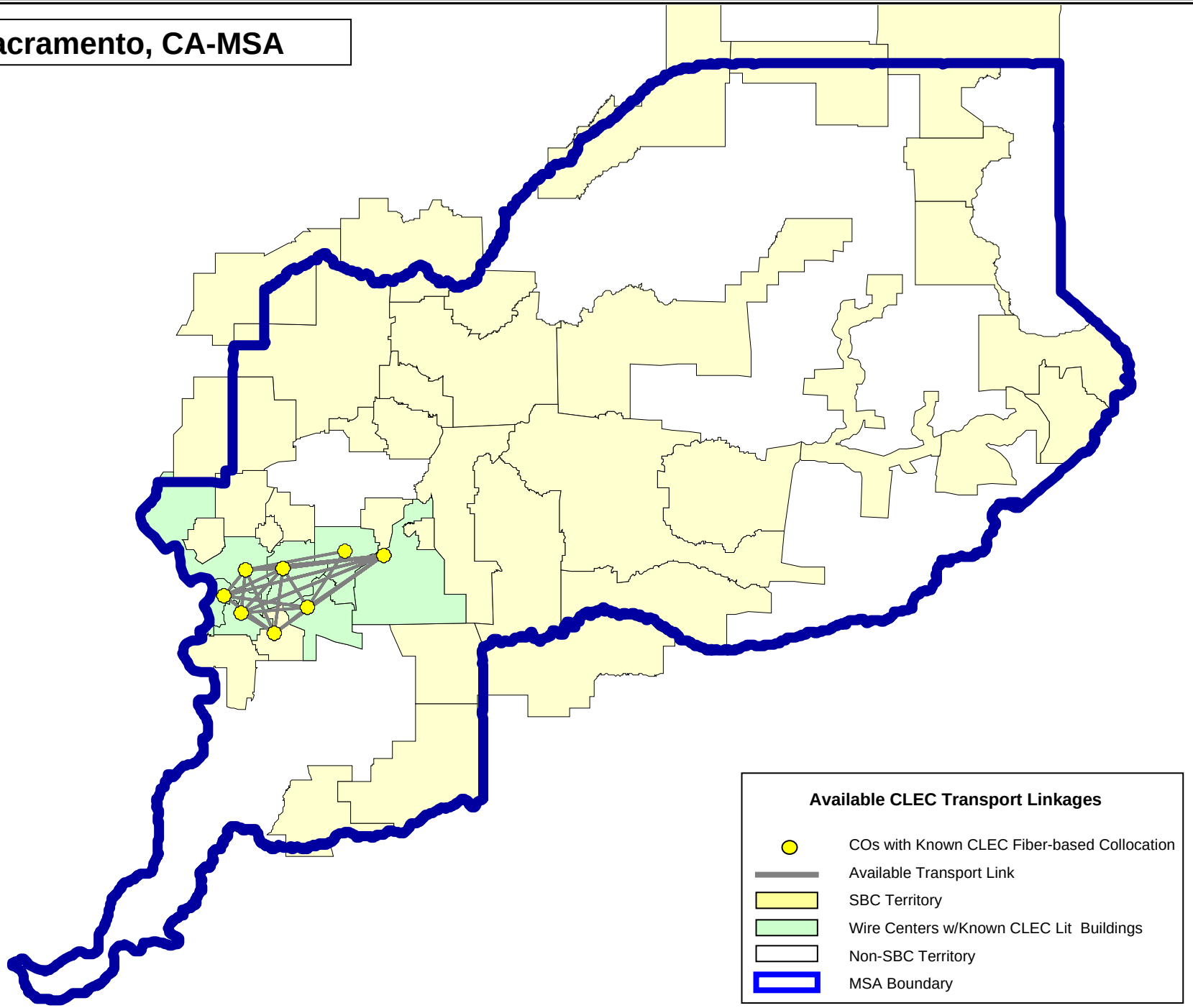

Oklahoma City, OK-MSA
I 35/I 44
I 40
I 44
I 35
Metropolitan Oklahoma City
Known CLEC Fiber and Known
CLEC Lit Buildings
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
MSA Boundary

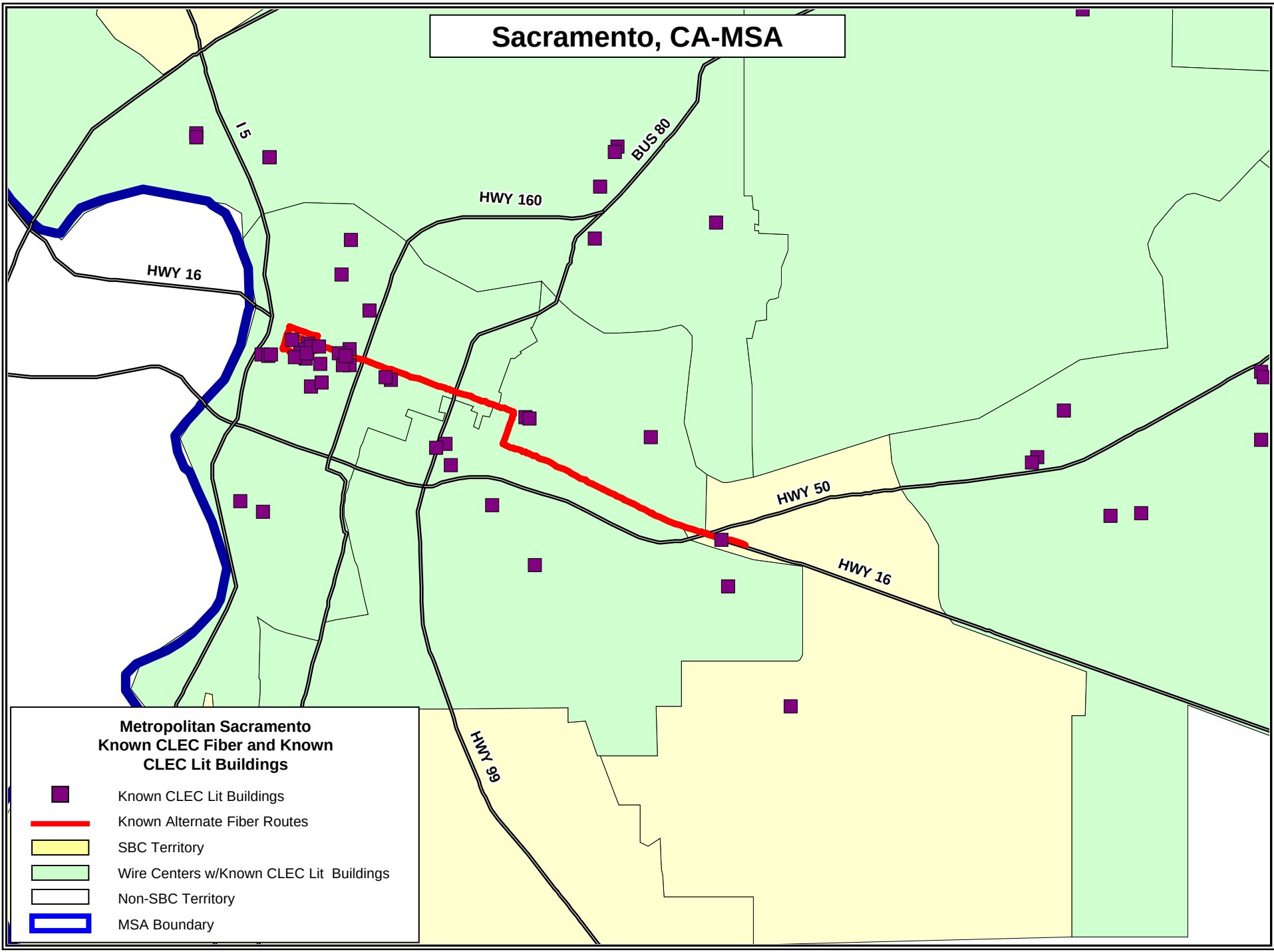

Oklahoma City, OK-MSA
NW 10th St
NW 10th St
N Lee Ave
N Walker Ave
N Hudson Ave
N Harvey Ave
N Robinson Ave
N Oklahoma Ave
Harrison Ave
US Hwy 77
NE 3rd St
NE 2nd St
NW 2nd St
Couch Dr
Colcord Dr
W Main St
Santa Fe Plz
E Main St
E Sheridan Ave
W California Ave
W Reno Ave
S Robinson Ave
Downtown Oklahoma City
Known CLEC Fiber and Known
CLEC Lit Buildings
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
MSA Boundary

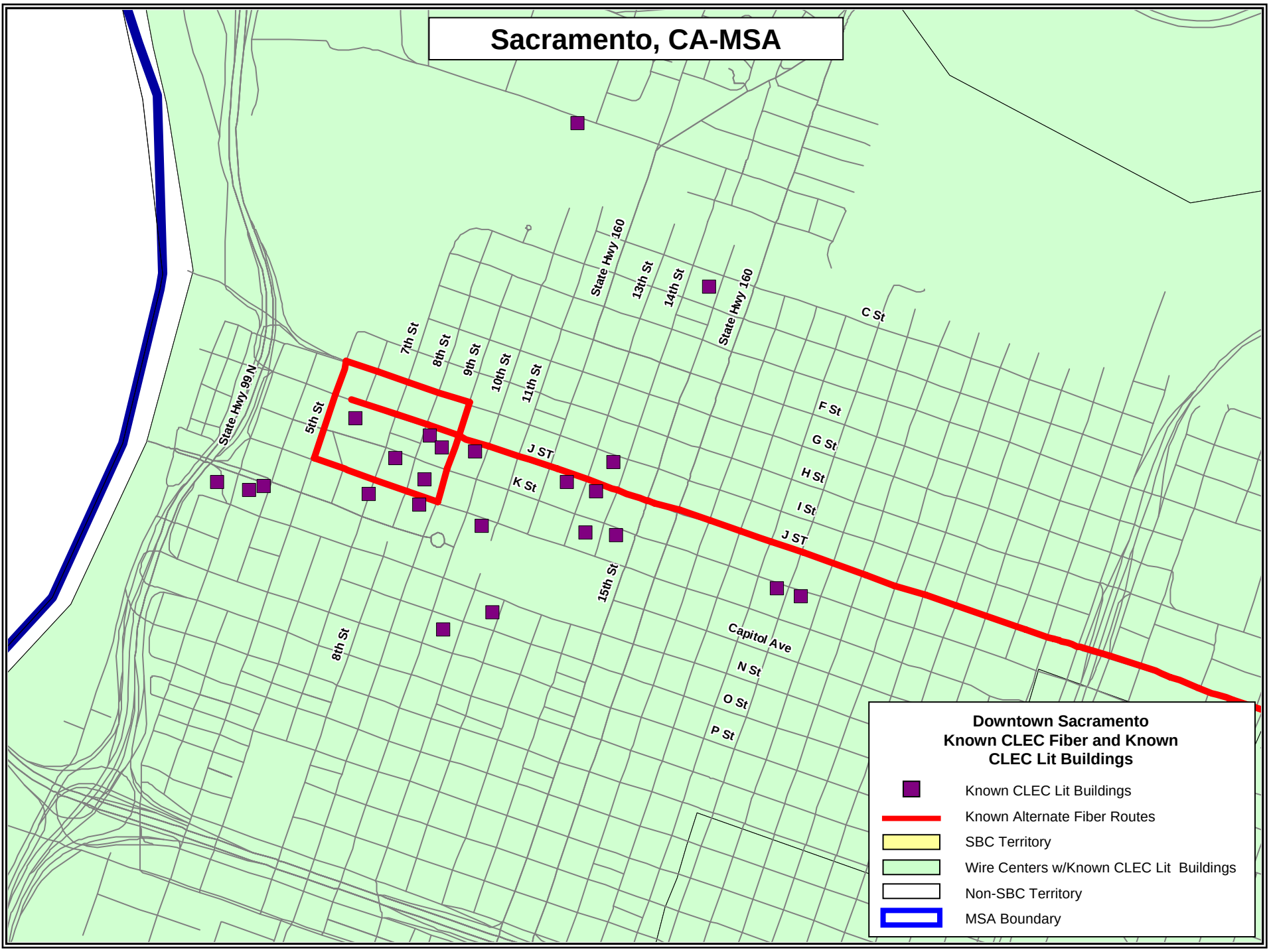
# Sacramento, CA-MSA



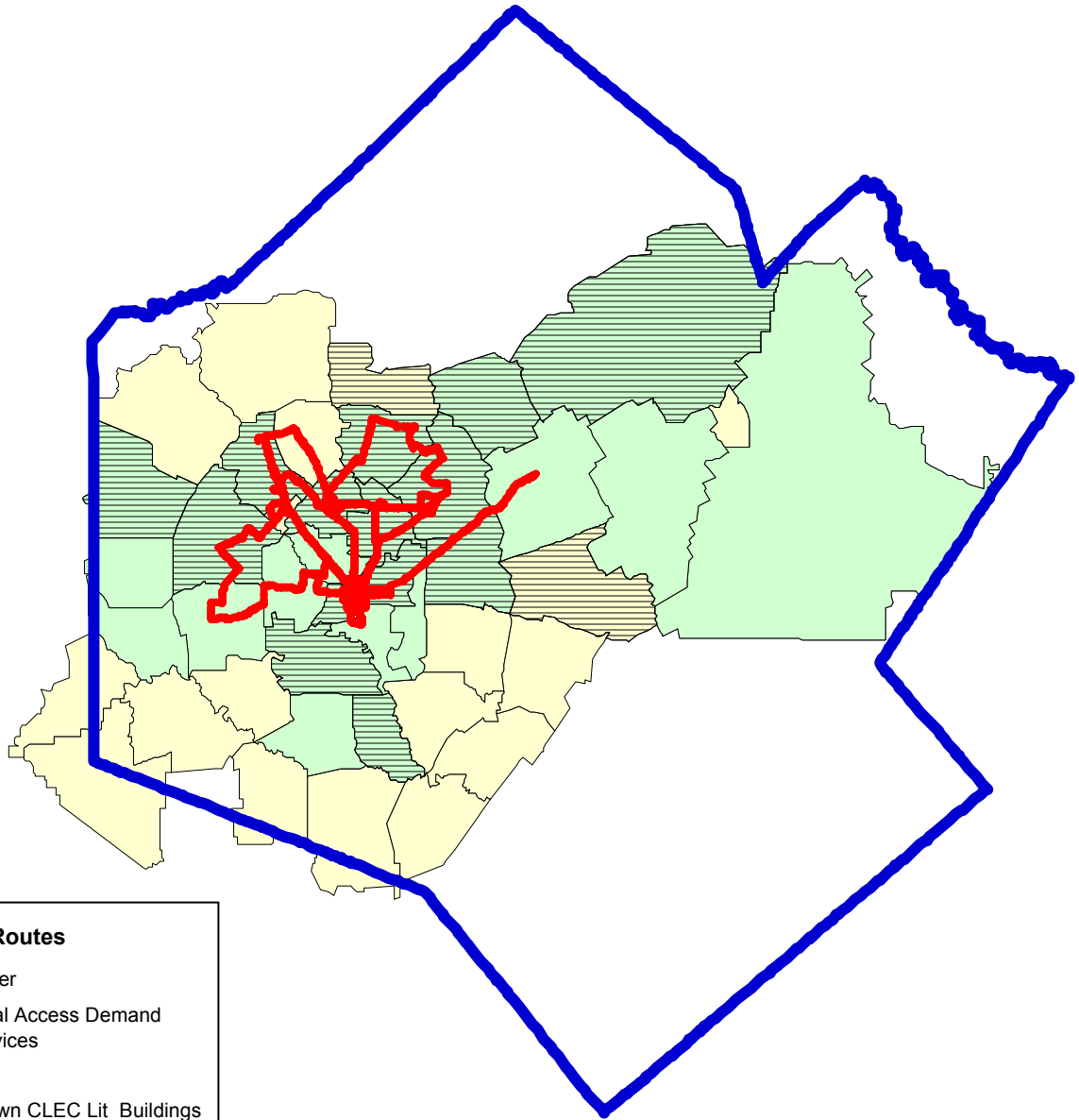
# Sacramento, CA-MSA




Sacramento, CA-MSA
I5
BUS 80
HWY 160
HWY 16
HWY 50
HWY 16
HWY 99
Metropolitan Sacramento
Known CLEC Fiber and Known
CLEC Lit Buildings
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
MSA Boundary


Sacramento, CA-MSA
State Hwy 99 N
5th St
7th St
8th St
9th St
10th St
11th St
State Hwy 160
13th St
14th St
State Hwy 160
C St
F St
G St
H St
I St
J ST
J ST
K St
15th St
8th St
Capitol Ave
N St
O St
P St
Downtown Sacramento
Known CLEC Fiber and Known
CLEC Lit Buildings
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
MSA Boundary

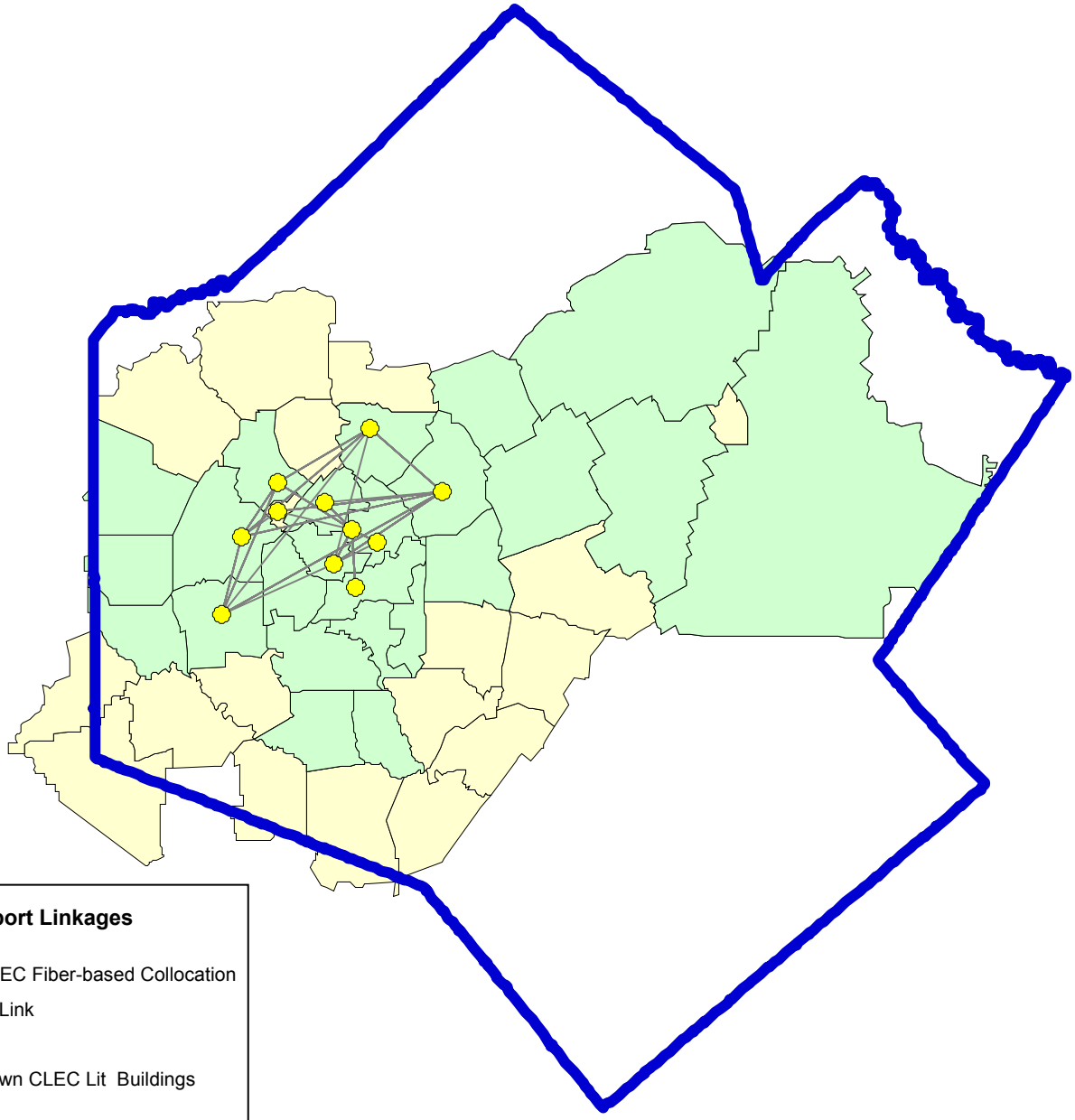
# San Antonio, TX-MSA



**Alternate Fiber Routes**

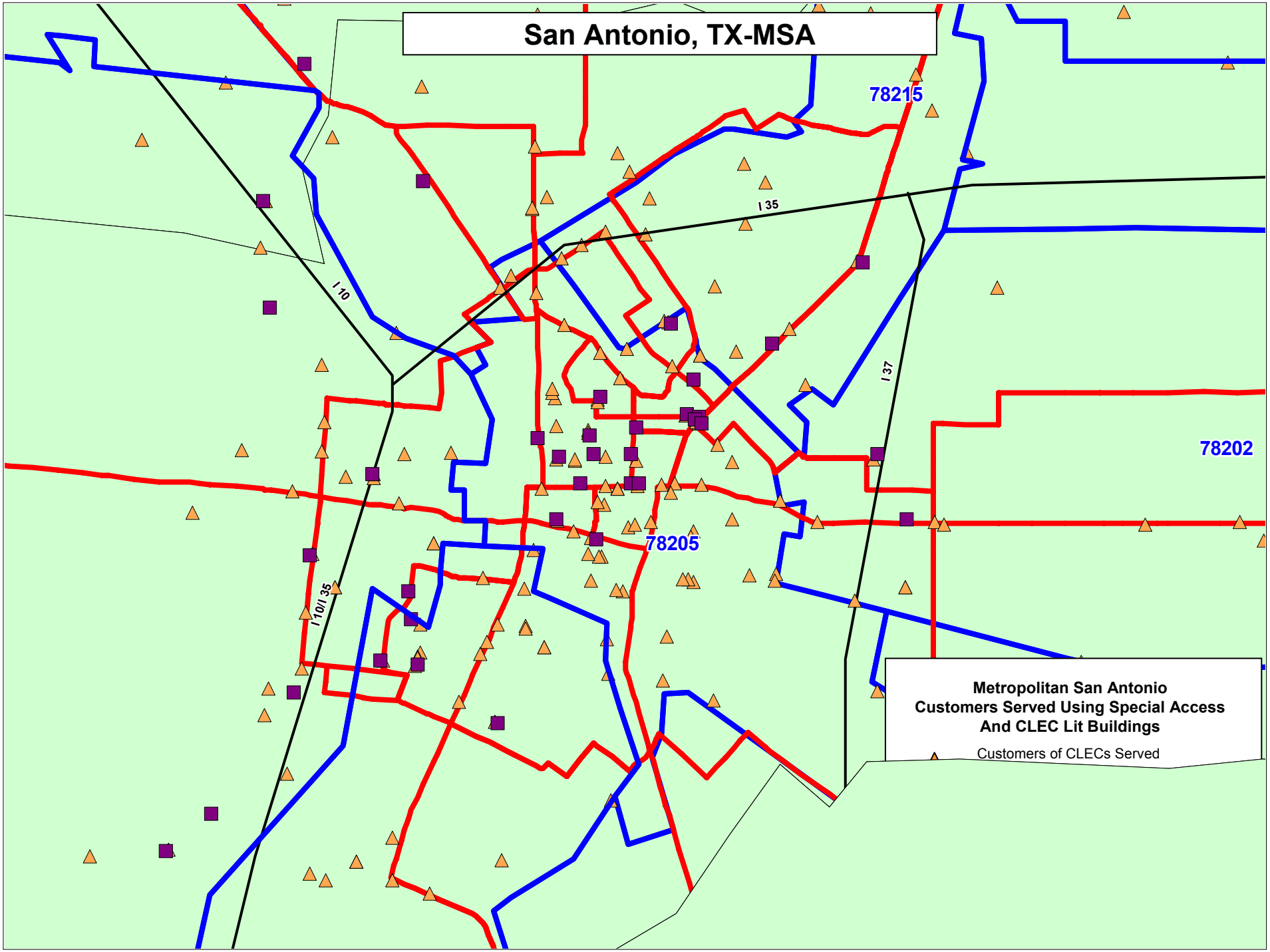
- Known Alternate Fiber
- 80 Percent of Special Access Demand For DS1 & DS3 Services
- SBC Territory
- Wire Centers w/Known CLEC Lit Buildings
- Non-SBC Territory
- MSA Boundary

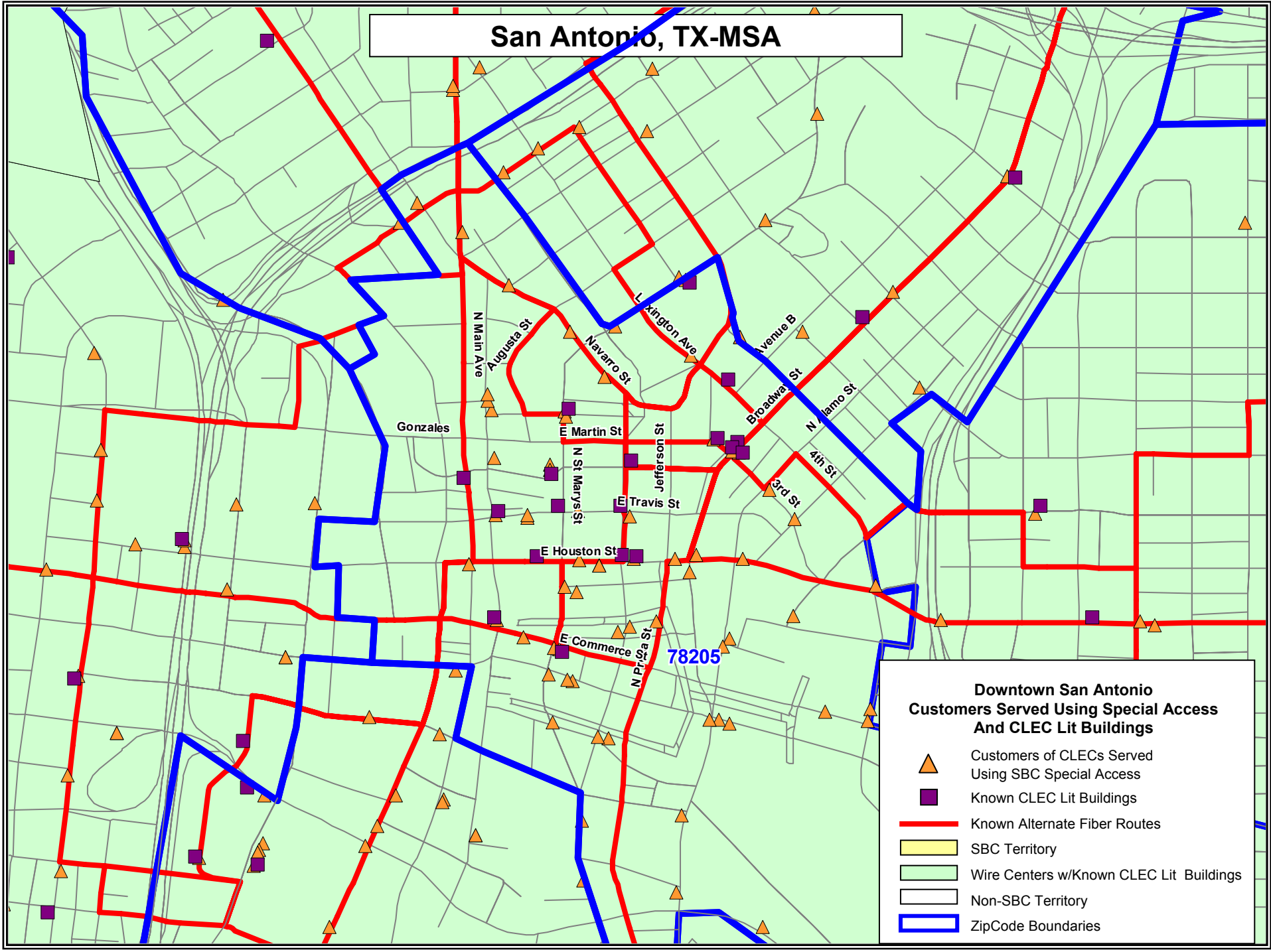
# San Antonio, TX-MSA



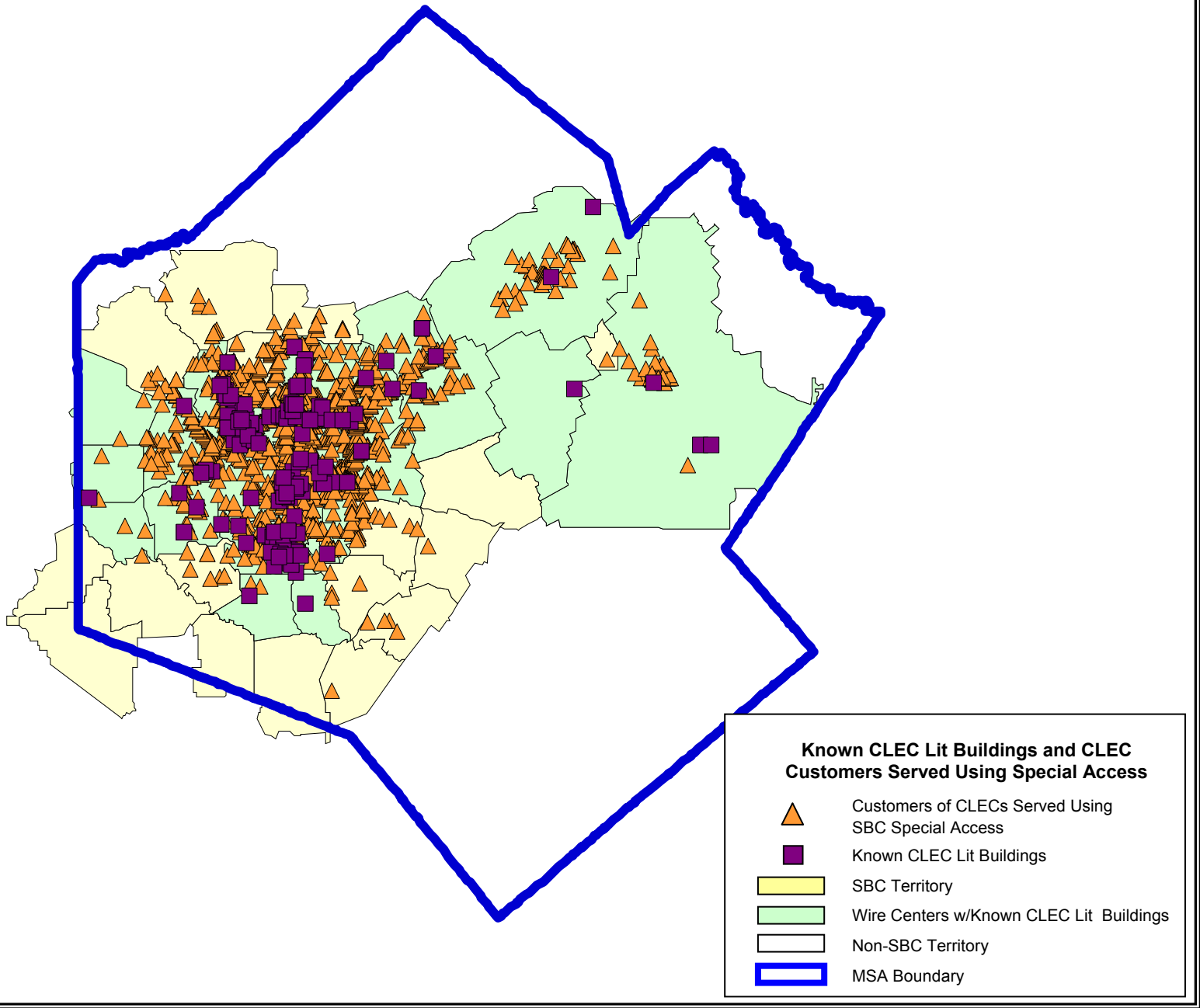
**Available CLEC Transport Linkages**

- COs with Known CLEC Fiber-based Collocation
- Available Transport Link
- SBC Territory
- Wire Centers w/Known CLEC Lit Buildings
- Non-SBC Territory
- MSA Boundary

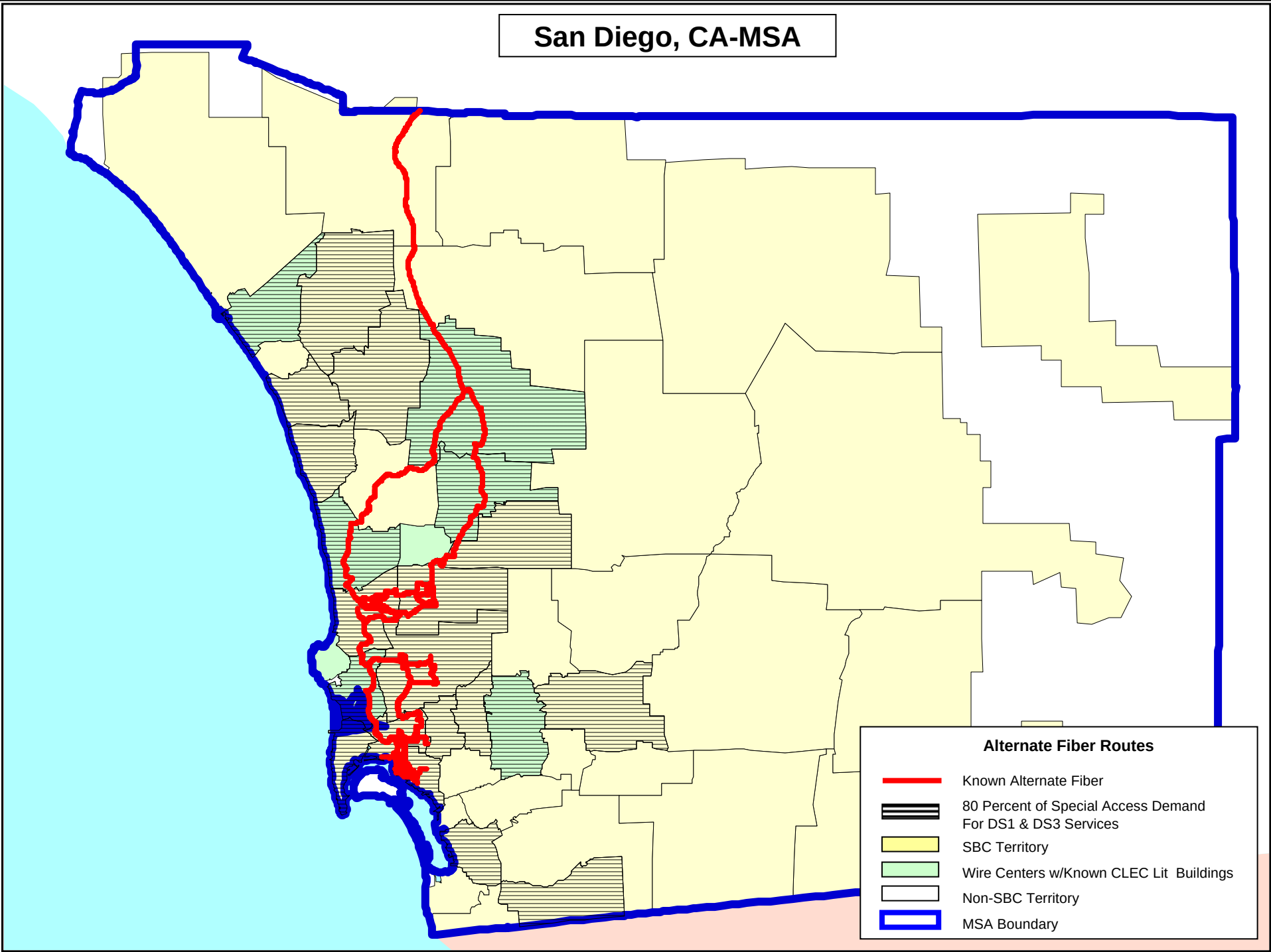

San Antonio, TX-MSA
78215
I 35
I 10
I 37
78202
78205
I 10/I 35
Metropolitan San Antonio
Customers Served Using Special Access
And CLEC Lit Buildings
Customers of CLECs Served


San Antonio, TX-MSA
N Main Ave
Augusta St
Navarro St
Lexington Ave
Avenue B
Broadway St
N Alamo St
Gonzales
E Martin St
N St Mary's St
Jefferson St
E Travis St
4th St
3rd St
E Houston St
E Commerce St
N Presa St
78205
Downtown San Antonio
Customers Served Using Special Access
And CLEC Lit Buildings
Customers of CLECs Served Using SBC Special Access
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
ZipCode Boundaries

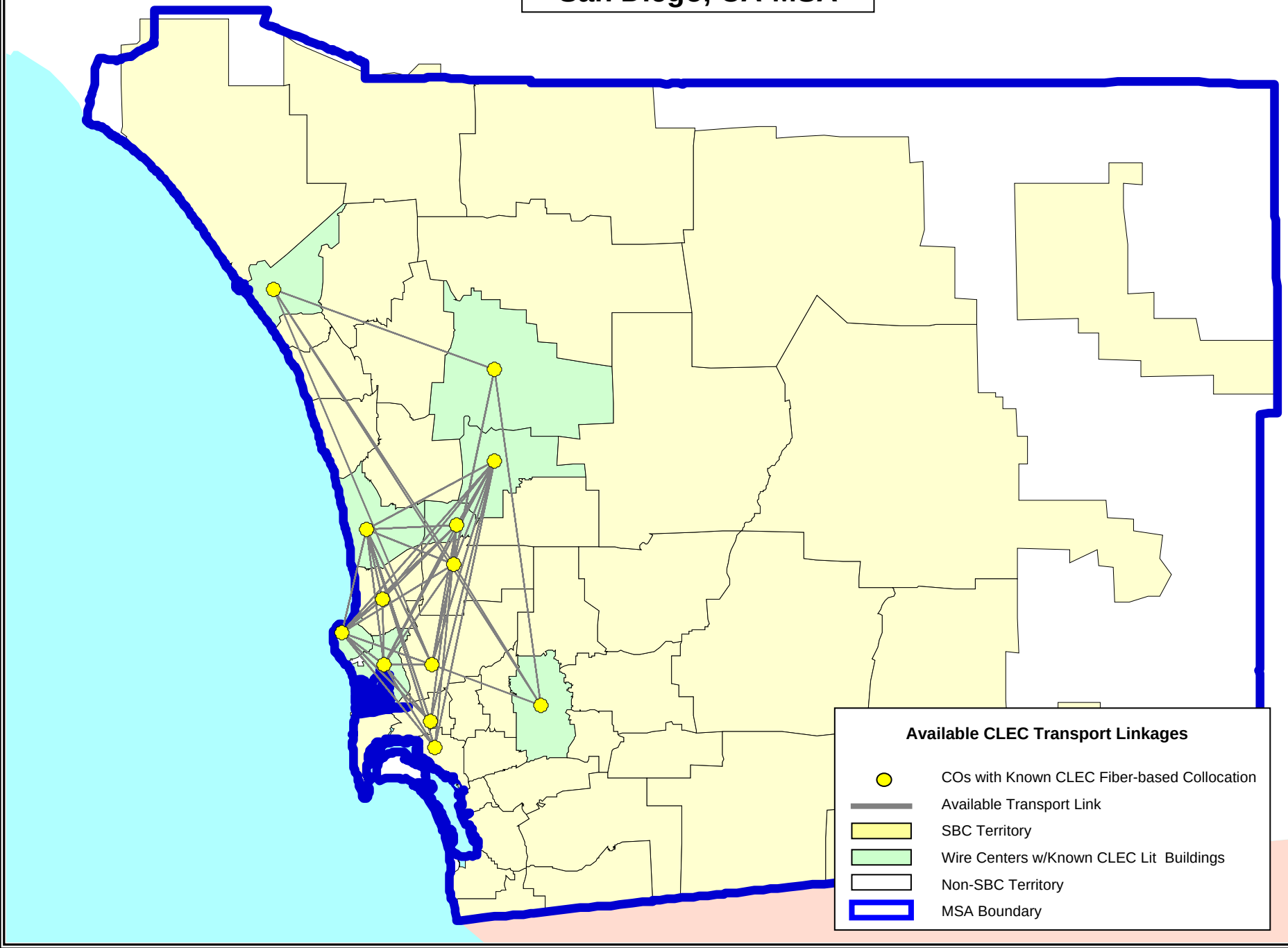
# San Antonio, TX-MSA

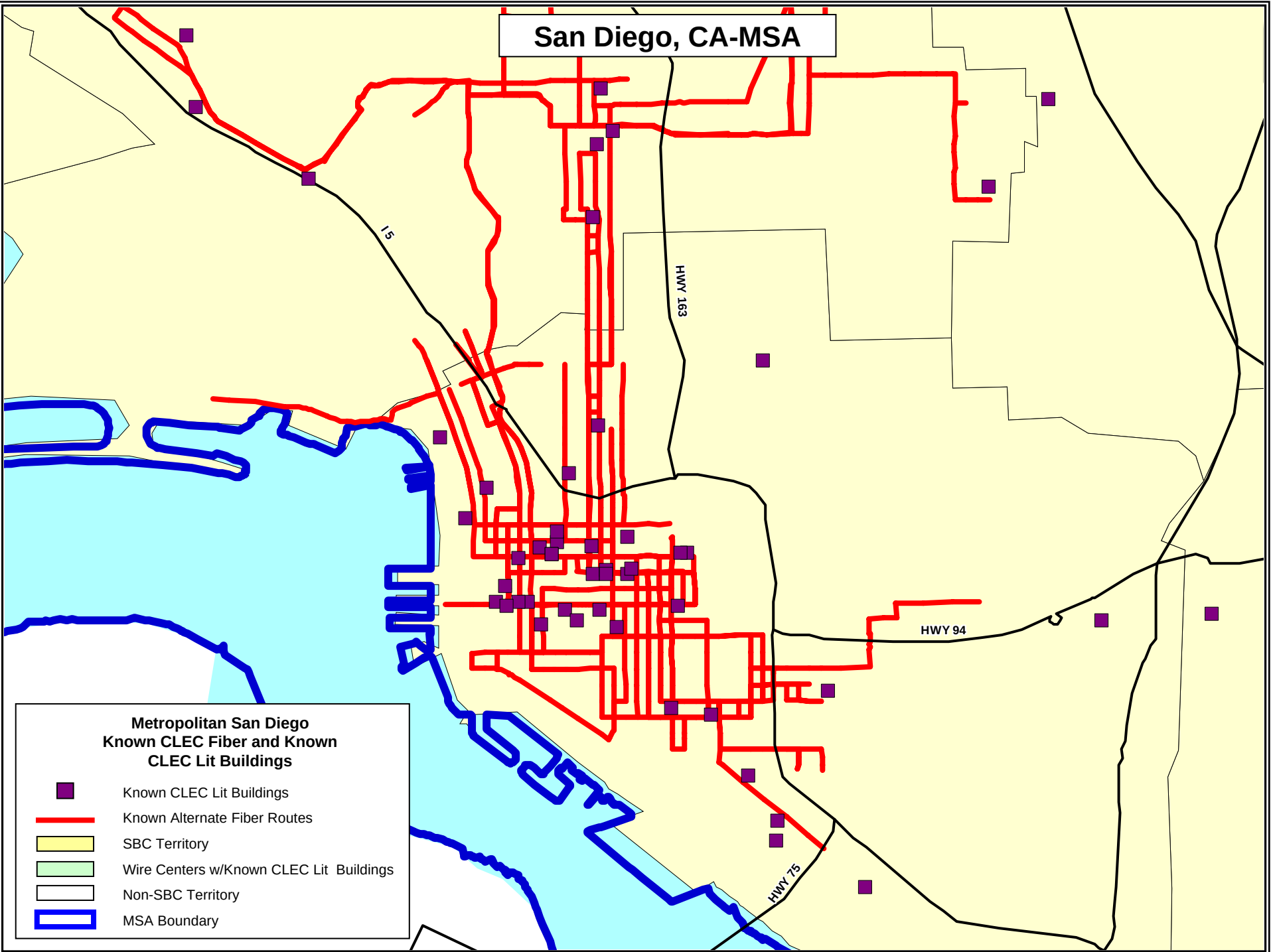


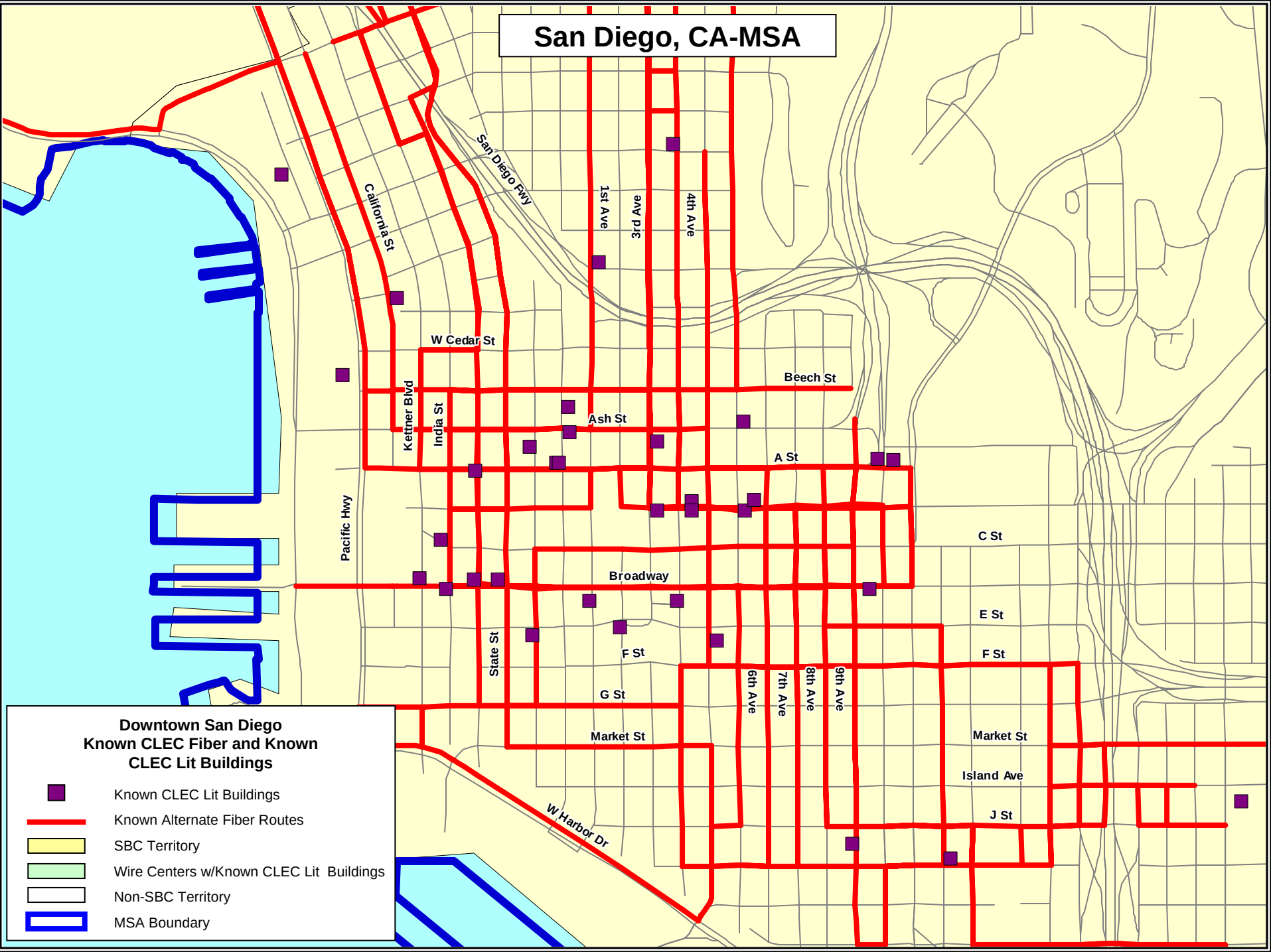
# San Diego, CA-MSA



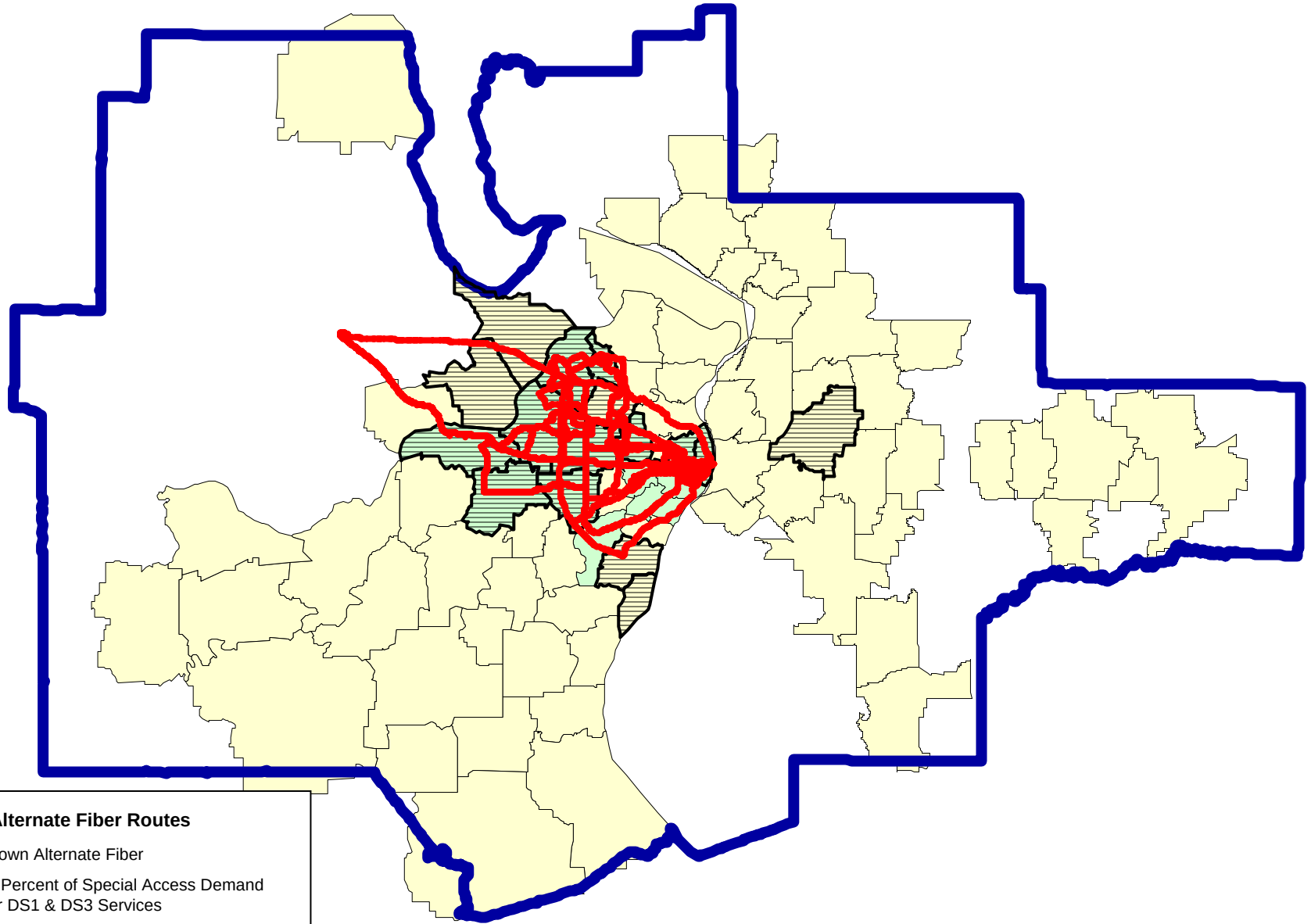
# San Diego, CA-MSA




San Diego, CA-MSA
I 5
HWY 163
HWY 94
HWY 75
Metropolitan San Diego
Known CLEC Fiber and Known
CLEC Lit Buildings
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
MSA Boundary


San Diego, CA-MSA
Downtown San Diego
Known CLEC Fiber and Known
CLEC Lit Buildings
Known CLEC Lit Buildings
Known Alternate Fiber Routes
SBC Territory
Wire Centers w/Known CLEC Lit Buildings
Non-SBC Territory
MSA Boundary
California St
San Diego Fwy
1st Ave
3rd Ave
4th Ave
W Cedar St
Beech St
Kettner Blvd
India St
Ash St
A St
Pacific Hwy
C St
Broadway
E St
State St
F St
F St
6th Ave
7th Ave
8th Ave
9th Ave
G St
Market St
Market St
Island Ave
J St
W Harbor Dr

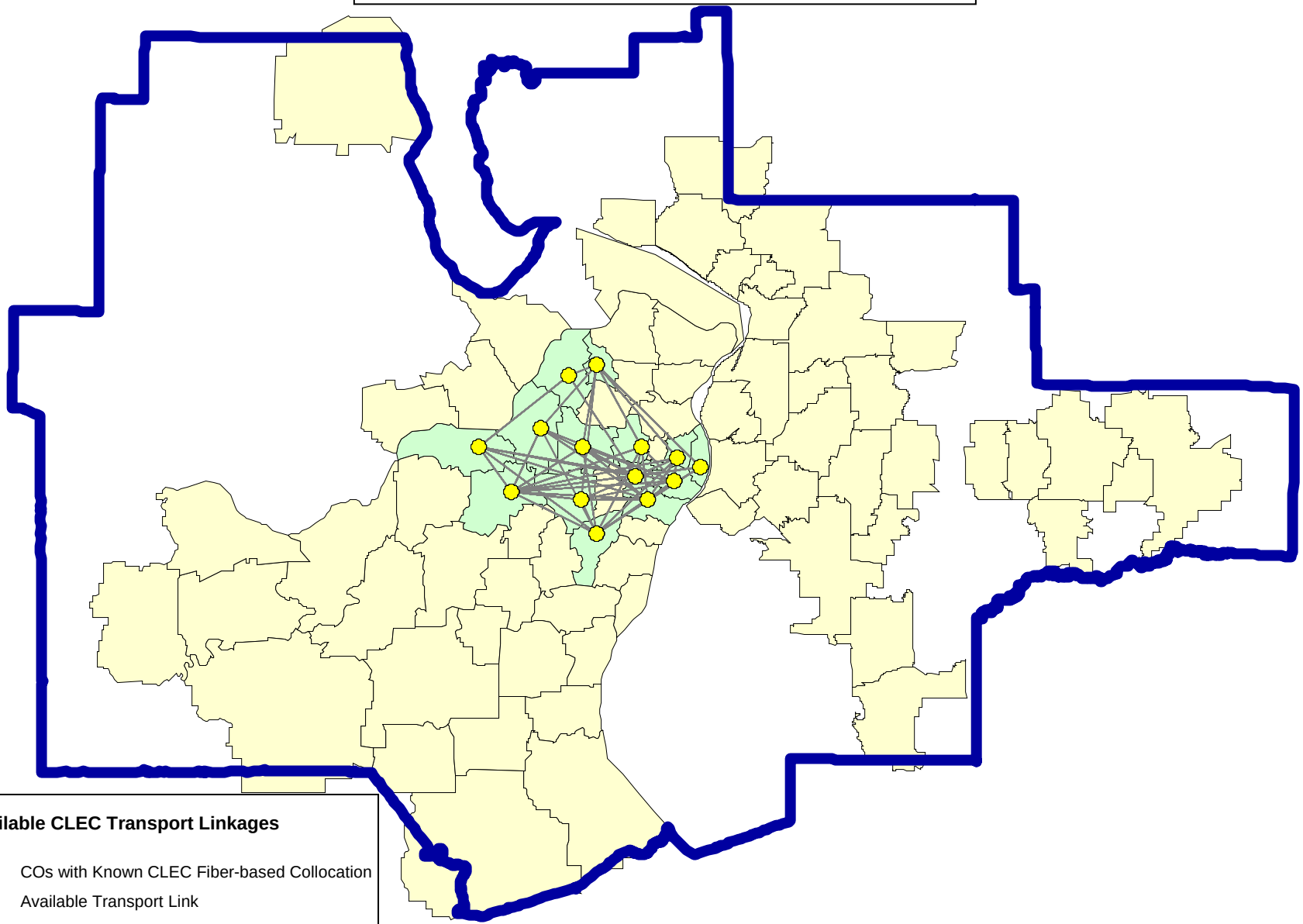
# St. Louis, IL-MO-MSA



**Alternate Fiber Routes**

- Known Alternate Fiber
- 80 Percent of Special Access Demand For DS1 & DS3 Services
- SBC Territory
- Wire Centers w/Known CLEC Lit Buildings
- Non-SBC Territory
- MSA Boundary

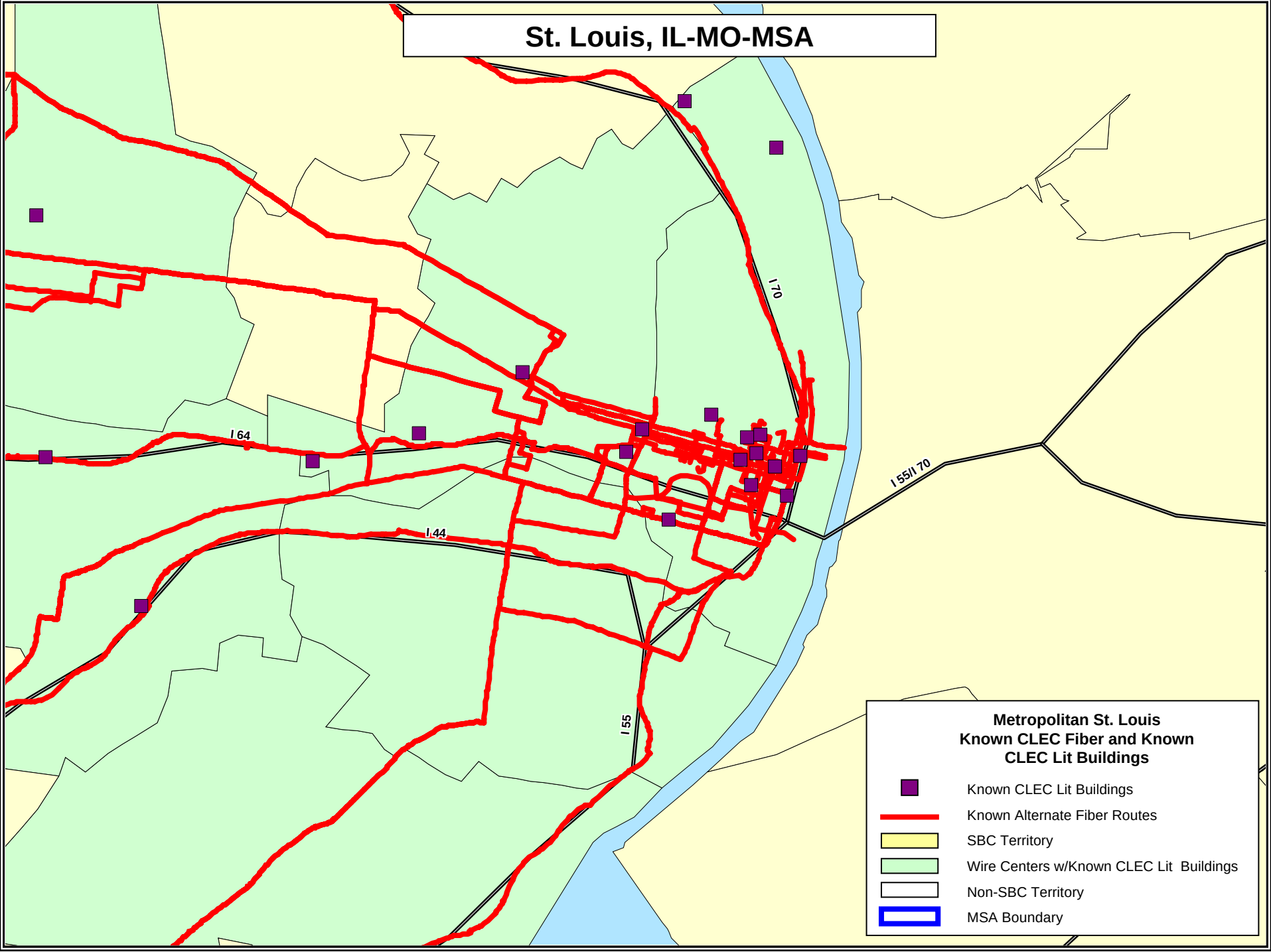
# St. Louis, IL-MO-MSA



**Available CLEC Transport Linkages**

- COs with Known CLEC Fiber-based Collocation
- Available Transport Link
- SBC Territory
- Wire Centers w/Known CLEC Lit Buildings
- Non-SBC Territory
- MSA Boundary

# St. Louis, IL-MO-MSA



# St. Louis, IL-MO-MSA