

ATTACHMENT D
TO
REPLY POST-HEARING BRIEF OF
AT&T COMMUNICATIONS OF
CALIFORNIA, INC. (U 5002 C)
NINE MONTH PHASE

Exhibit A: Summary of Reasons Why SBC's Trigger Candidates Do Not Meet the Self-Provisioning Trigger

FACTORS SBC'S TRIGGER CANDIDATES DO NOT MEET (Indicated by "x")											
	The CLEC must be unaffiliated with the ILEC or with another CLEC identified as a potential trigger candidate. (TRO, ¶¶ 449, 501)	The CLEC must be presently offering basic telephone service to new customers using its own switch (TRO, ¶ 500)	The CLEC must be offering basic telephone service to both residential and small business customers using its own switch. (TRO, ¶¶ 78, 127, 472, 501; see also 47 C.F.R. §51.319(d)(2)(iii)(A)(1))	The CLEC must be offering service via its own switch throughout the geographic market. (47 C.F.R. § 51.319 (d)(iii)(A)(1))	The CLEC must be serving the mass market and not merely a restricted niche of that market. (TRO, ¶ 472)	The CLEC must serve more than a de minimis number of mass market customers in the defined geographic market. (TRO, ¶¶ 438, 482, 484-485)	The CLEC must offer service that is equivalent to the ILEC's offering in cost, quality and maturity. (TRO, ¶¶ 97, 499, n.1549)	The CLEC must be likely to continue actively serving mass market customers using its own switch. (TRO, ¶ 500)	The CLEC must serve mass market customers using its own switch (excluding a switch serving enterprise customers). TRO, ¶¶ 435, 441, 508; see also 47 C.F.R. § 51.319(d)(2)(iii)(A)(1))	The CLEC must offer basic exchange service to mass market customers as more than an incidental part of its business plan. (TRO, ¶¶ 435, 441, 508)	Where the evidence is unclear, the Commission should not count the CLEC toward satisfaction of the trigger (based on the FCC's national finding of impairment).
Advanced TelCom Group			X	X		X			X		
Allegiance Telecom	X	X	X	X		X		X	X		
AT&T		X	X	X		X			X	X	
Comcast				X		X	X	X	X		
Cox				X		X	X				
ICG		X	X	X		X			X		X
Mpower				X		X	X		X		

Pointe Comm Inc. (Telscape)				X	X	X					
RCN				X		X	X				
TelePacific Communications		X	X	X		X			X	X	
WorldCom (MCI)			X	X		X			X		X
XO Communications			X	X		X			X	X	
Xspedius			X								