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

In the Matter of	)	
	)	
Unbundled Access to Network Elements	)	WC Docket No. 04-313
	)	
Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers	)	CC Docket No. 01-338
	)	

DECLARATION OF JEFFREY D. BEEMON
ON BEHALF OF AT&T CORP.

1. My name is Jeffrey D. Beemon. My business address is 1307 Towne Lake Heights, Woodstock GA, 30189. I am employed by AT&T Corp. ("AT&T") as Manager, Common Language® Standards and Location Code Administration within AT&T's Business Services organization and have held this position since July 1998. I hold a BS in Business Information Systems and have 20 years experience with AT&T in service provisioning, data analysis, systems and process support.

2. My current duties include managing AT&T's utilization of Common Language® Identifier ("CLLI"TM) codes, which are contained within the Telcordia Central On-Line Entry System ("CLONES") database. Carriers use CLLI codes to identify all network equipment locations, including central offices, radio towers, collocations, controlled environmental vaults, nodes, and IXC POPs, in addition to customer locations. The CLONES database is the primary tool used to create and maintain the CLLI codes used by AT&T, as well as by the industry at large.

2. I understand that Verizon and SBC have filed information with the Federal Communications Commission purporting to identify buildings served by CLEC networks

on the basis of searches of Telcordia's CLONES database conducted by GeoResults, a database marketing and consulting firm. SBC contends that "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 [multiplexer] equipment at specific customer locations and connected that equipment to non-ILEC fiber or other means of transport, such as fixed wireless networks." Letter dated August 18, 2004 to Marlene Dortch, Secretary, FCC, from Christopher M. Heinmann, SBC, at 4. Verizon makes similar claims. Letter dated July 2, 2004 to Marlene Dortch, Secretary, FCC, from Michael Glover, Verizon, Attachment 1.

3. Based on my close familiarity with the CLONES database, I disagree that the information contained in this database identifies whether or not equipment at a CLEC customer location is connected to "non-ILEC fiber." Because of the very outdated nature of the AT&T information in the CLONES database, I also disagree that accurate information concerning AT&T customer locations has been obtained from this source. Additionally, I believe that other carriers' information in the CLONES database is likely to be outdated. My conclusions are based on the following facts.

4 When carriers enter CLLI codes and associated equipment information in the CLONES database, other CLONES database users (*i.e.*, parties other than Telcordia and the submitting carrier) can view only the CLLI code and the associated street address. The information available to other users indicates whether the associated street address is a customer location or one of the many other types of location at which network equipment may be situated. However, the information available to other users provides no

information on the level of service serving the location (*i.e.*, DS0, DS1, DS3, OC-3, and above), or whether that service is provided via CLEC-owned fiber or via ILEC special access services. SBC's statement that usage of "non-ILEC fiber" may be determined from this database is therefore incorrect. The information in the CLONES database that is available to other users also does not indicate the type of equipment that is identified by the relevant CLLI code, or even whether the customer premise equipment is owned by the carrier or by the customer.

5. In addition, information contained in the CLONES database is frequently out of date. CLLI codes were developed by Bell Laboratories in the early 1960's, were administered by Bell Communications Research ("BellCore") after the 1984 break-up of AT&T, and are now administered by Telcordia (Bellcore's successor) using the CLONES database. In my experience, carriers generally do little to ensure that information in CLONES is kept up to date. This is because a carrier needs to ensure that equipment and/or facilities are not in use before deleting records from CLONES, which requires laborious and expensive checks of internal systems. A further reason is that carriers have no need to keep accurate data for locations that are no longer in use other than to avoid the database expenses associated with storing obsolete data.

6. AT&T's information contained in the CLONES database contains significant inaccuracies. AT&T routinely enters CLLI code information in the CLONES database for new network equipment locations, including customer premise equipment locations, but until very recently AT&T has not undertaken any significant effort to remove codes that are no longer in active use. Consequently, AT&T had 652,036 CLLI codes in the Telcordia CLONES database on January 1, 2004, including 205,048 customer premise

equipment CLLI codes, and covering all network equipment locations where AT&T had done business in the last 40 years. Since then, AT&T has been engaged in checking these CLLI codes against data in AT&T's internal provisioning systems to identify those that are not in active use and should be deleted. This work has revealed that 259,745 of these codes, comprising approximately forty percent of the total number of AT&T's CLLI codes in the CLONES database and spread across 131,309 building addresses, are no longer active. These CLLI codes no longer in active use include 82,057 customer premise equipment CLLI codes.

7. As described above, inactive CLLI codes have been identified by checking all AT&T's CLLI codes against data in AT&T's provisioning systems to ascertain whether the relevant equipment is still in use. This project has also required AT&T to negotiate special arrangements with Telcordia to remove large numbers of CLLI codes from the CLONES database, and I understand that Telcordia has developed a new software program to accomplish this task. Under these arrangements, Telcordia began deleting AT&T's obsolete CLLI codes from the CLONES database in July 2004 at an approximate rate of rate of 10,000 per week. As of September 27, 2004, 71,003 codes have been deleted, including 12,529 customer premises equipment codes. A further 24,681 customer premise equipment codes are scheduled for deletion this year, and an additional 44,847 customer premise equipment codes will be deleted in 2005.

8. The deletion of these 82,0057 inactive customer premise equipment codes and their associated street addresses from the CLONES database will delete approximately thirty percent of the total number of different AT&T customer location street addresses that were present in the CLONES database on January 1, 2004. Accordingly, any attempt to

identify customer locations served by AT&T on the basis of the information contained in this database is likely to result in a substantial overstatement.

9. I believe that other carriers' CLLI code and customer address information in the CLONES database is also likely to contain significant inaccuracies. While customer locations inevitably change over time, carriers have relatively few incentives to engage in the lengthy process of removing outdated information from the CLONES database for the reasons described above. I also understand from working with Telcordia on the procedures to remove AT&T's outdated codes from the CLONES database that no other carrier has undertaken a similar effort to remove large numbers of outdated codes.

VERIFICATION

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Jeffrey D. Beemon

Jeffrey D. Beemon

October 1, 2004.