

## **ATTACHMENT 5**

**REPLY DECLARATION OF ERIC J. BRUNO,  
KATHY KOELLE, VERONICA PELLIZZI, AND  
JUDY K. VERSES**

**REDACTED – FOR PUBLIC INSPECTION**

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Verizon Communications Inc. and	)	
MCI, Inc.	)	WC Docket No. 05-75
Applications for Approval of	)	
Transfer of Control	)	

**REPLY DECLARATION OF ERIC BRUNO, KATHY KOELLE,  
VERONICA PELLIZZI, AND JUDY K. VERSES**

1. My name is Kathy Koelle. I am senior vice president – Business Solutions Group Sales & Marketing for Verizon’s Retail Markets Group, a position I have held since December 2003. In am responsible for all sales and marketing for medium-sized businesses that spend less than \$100,000 annually with Verizon, generally those with between 20 and 500 employees. I have been a vice president in the Business Solutions Group since 2000. I have worked in sales and marketing for Verizon and its predecessor Bell Atlantic since 1993.

2. My name is Judy K. Verses. I am Senior Vice President National Marketing and have worked for Verizon for twenty-one years, including positions in Sales and Product Line Management. My current responsibilities include marketing to all mass market Consumer and Business customers, including retention and winback marketing, market intelligence, geographic segmentation, channel and business development, and market planning.

3. My name is Veronica Pellizzi. I am senior vice president of sales for Verizon’s Enterprise Solutions Group. In this position, I have responsibility for development and execution of sales strategies targeted at Verizon’s 10,000 largest customers. I have also served as vice president for Offer Management for Verizon’s Enterprise Solutions Group, with

responsibility for identifying and sourcing products and solutions from multiple internal and external suppliers to create competitive offerings for large business customers.

4. My name is Eric Bruno. I submitted a previous declaration in this proceeding, which contains a description of my qualifications.

**Introduction**

5. The purpose of our declaration is to provide further detail concerning the impact that the combination of Verizon and MCI would have on the provision of retail communications services to medium-sized commercial and institutional customers. These customers include medium-sized business customers, state and local governments, and educational institutions. In addition, we will respond to various points raised by commenting parties concerning the potential impact of the combination on commercial and institutional customers generally.

6. Nothing that any of the commenters has said in their comments alters our view that the commercial and institutional segment is robustly competitive. Systems integrators, equipment vendors, CLECs, and cable companies compete vigorously throughout this segment. The claim that SBC and Verizon do not compete is simply wrong: the companies already compete for commercial and institutional customers in each other's respective traditional service territories. In addition, the evidence shows that the proposed combination will have a limited effect on head-to-head competition at the upper end of the commercial and institutional segment because Verizon and MCI generally bid on different contracts as a result of divergent emphasis and respective strengths.

7. Focusing on medium-sized commercial and institutional customers: these customers are extremely diverse, ranging from single-location businesses with a handful of

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employees, 8 telephone lines, and limited data service needs to multi-location firms with hundreds of employees and a demand for sophisticated data services for dedicated Internet access, integrated voice and data, remote access, multi-location connectivity, and security applications to educational, healthcare, and government institutions. Throughout this segment, Verizon faces fierce competition from CLECs, cable companies, equipment vendors, and systems integrators. The combination with MCI will not affect competition in this segment, because MCI is one of a large number of competitors in this segment, and because emerging technologies – particularly cable telephony and other IP-based applications – will provide a significant source of increased competition going forward.

**Competition Will Remain Robust Throughout the Commercial and Institutional Segment**

8. The earlier Bruno/Murphy declaration – and the additional discussion of competition for medium-sized commercial and institutional customers set forth below – make clear that retail competition for commercial and institutional customers will remain robust after the combination of Verizon and MCI. Throughout the segment, there are a multitude of service providers, and Verizon anticipates that the number and diversity of competitors will continue to grow.

***A Variety of Providers Compete***

9. Among the other formidable competitors in the commercial and institutional segment are systems integrators, CLECs and IP-based providers, and equipment vendors. Verizon’s analysis of a small subset of losing bids on RFPs issued by commercial and

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institutional customers provides some indication of the significance of competition from a variety of sources.

10. Verizon was able to determine the winning bidder of six RFPs for which Verizon competed. **[BEGIN PROPRIETARY]**

**[END PROPRIETARY]**

11. Systems Integrators have won several extremely large contracts for telecommunications and IT applications. For example, Harris Corp. won a \$1.7 billion contract for the nationwide FAA network<sup>1</sup>; Lockheed Martin won the U.S. Postal Service Universal Computing Connectivity contract, worth \$3 billion<sup>2</sup>, EDS and Lockheed Martin won HUD contracts worth \$400 million each<sup>3</sup>; EDS won the Navy's \$8.8 billion NMCI networking contract<sup>4</sup>; General Dynamics won the contract for Pentagon renovation<sup>5</sup>; CSC won the \$2 billion

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<sup>1</sup> Harris Corp., *2002 Annual Report*, <http://www.harris.com/harris/ar/archived-annualreports.html>.

<sup>2</sup> Lockheed Martin Press Release, *Lockheed Martin Selected to Manage U.S. Postal Service Integrated Network Services* (Oct. 10, 2004).

<sup>3</sup> U.S. Department of Housing and Urban Development, *HUD Awards Information Technology Contracts Totaling \$800 Million to Electronic Data Systems and Lockheed Martin Corporation*, <http://www.hud.gov/offices/cpo/primes/hits.cfm>.

<sup>4</sup> J. Perez, *EDS CEO: Navy Contract Under Control*, InfoWorld (Feb. 18, 2004).

<sup>5</sup> F. Tiboni, *General Dynamics wins Pentagon contract*, Federal Computer Week (Aug. 13, 2004).

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WIN-T contract in connection with the Army's Warfighter Information Network project<sup>6</sup>; Northrop Grumman won the Air Force's \$9 billion NetCENTS contract.<sup>7</sup>

12. A recent incident involving the \$1 billion Treasury Enterprise Communications contract illustrates the importance of systems integrators and emerging carriers in the commercial and institutional segment. After the Treasury Department awarded the contract to AT&T, several providers filed protests and GAP decided the contract should be rebid. The protesters included Northrop Grumman, a systems integrator and the incumbent contract holder, Broadwing and Level 3, IP network providers, Qwest and MCI, two IXCs.<sup>8</sup> One analyst called the competition between systems integrators and carriers a "class of the titans."<sup>9</sup>

13. Recent developments also emphasize the emerging importance of international communications companies. For example, British Telecom and Reuters just announced that "BT will become Reuters supplier of network services in a contract under which Reuters is expected to spend in the region of \$3 billion over eight and a half years."<sup>10</sup>

### ***Competition with SBC***

14. Some commenters have claimed that SBC and Verizon do not actively compete against one another. Nothing could be further from the truth. SBC and Verizon compete actively for commercial and institutional customers and that competition can only intensify as a

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<sup>6</sup> CSC News Release, *CSC Wins \$500 Million Forscom Aviation Support Contract* (Aug. 24, 2004) ("The aggregate ceiling value for all four contracts is \$2 billion.").

<sup>7</sup> W.D. Gardner, *USAF To Dole Out \$9 Billion On Beefed Up Network*, Networking Pipeline (Sept. 14, 2004).

<sup>8</sup> M. Mosquera and R. Gerin, *GAO: Treasury agreement with GSA, OMB changed TCE proposal*, Washington Technology (Mar. 18, 2005).

<sup>9</sup> H. Buskirk, *GAO Considers Rebidding Major Treasury Dept. Contract*, Communications Daily (Mar. 21, 2005) (Quoting Warren Suss, a consultant and expert on government contracting issues).

<sup>10</sup> BT Group Press Release, *BT and Reuters Sign Major Contract* (Mar. 10, 2005).

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result of the transaction with MCI. For example, in portions of the Dallas and Los Angeles metropolitan areas where Verizon is the incumbent LEC, SBC is a leading competitor. SBC is collocated in **[BEGIN PROPRIETARY]** **[END PROPRIETARY]** central offices in those two areas. SBC also competes with Verizon within Verizon's traditional service territory. To cite one example, SBC recently announced a five-year, \$60 million contract to manage services for voice and data network requirements of the American Red Cross's Washington D.C.-based corporate headquarters.<sup>11</sup>

15. Just as SBC has become a leading competitor in many areas within Verizon's traditional service territory, Verizon also competes out-of-region with SBC, focusing on areas where Verizon already has a nearby ILEC presence. Verizon has deployed **[BEGIN PROPRIETARY]** **[END PROPRIETARY]** miles of fiber optic facilities in Los Angeles and additional fiber in Dallas and serves medium and large commercial and institutional customers in those areas. Maps of Verizon's out-of-franchise fiber facilities in those two areas are attached hereto as Exhibit 2, Pages 1 and 2. Verizon also competes in 28 other out-of-region cities. Seventeen of those cities are in SBC's traditional service territory, including Austin, Chicago, Cincinnati, Cleveland, Detroit, Hartford, Houston, Indianapolis, Kansas City, Sacramento, San Antonio, San Diego, San Francisco, Santa Ana, Santa Clara, St. Louis, and Stamford.

### ***Cable Competition***

16. Commenters fail to acknowledge the significance of emerging competition from cable companies. Cable companies are already strong competitors for commercial and

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<sup>11</sup> Business Wire, "SBC Announces Five-Year, \$59.7 million Contract with the American Red Cross" (Apr. 18, 2005).

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institutional customers of all sizes, both with cable-modem-based services and with high-capacity fiber-based services. Either directly or through an affiliate, each of the nation's major cable operators is now actively pursuing business customers, both by deploying fiber in urban areas, and by extending their hybrid fiber/coaxial networks to provide cable modem services to business locations. A study by In-Stat/MDR found that 41 percent of "enterprises" and 32 percent of "middle market" businesses were using cable modem service in their main offices for some high-capacity services.<sup>12</sup>

17. The National Cable Telecommunications Association has testified before Congress that cable operators are now "in a position to serve smaller and medium sized businesses. And as the cable modem technology itself is improved so that we can offer usage sensitive and tiered pricing arrangements, increasingly the small business market will be attractive to us."<sup>13</sup> Analysts estimate that nearly 60 percent of "small- to medium-sized businesses (SMB) are located within a few hundred feet of the local hybrid fiber/coaxial network,"<sup>14</sup> and that roughly 25 percent already have a cable drop.<sup>15</sup> It was recently reported

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<sup>12</sup> K. Burney, In-Stat/MDR, *Cash Cows Say "Bye-Bye": The Future of Private Line Services in US Businesses (5+ Employees)* at 19, Tables 9 & 10 (Dec. 2003).

<sup>13</sup> Robert Sachs, President and CEO, NCTA, Testimony Before the Subcommittee on Telecommunications and the Internet of the House Committee on Energy and Commerce, Washington, DC (July 21, 2003).

<sup>14</sup> J. Shim & R. Read, Credit Lyonnais Securities, *The U.S. Cable Industry – Act I* at 196 (Nov. 20, 2002) (estimating six million SMBs within a few hundred feet); see also K. Burney, In-Stat/MDR, *The Big Comeback? Excerpts from 'Business Broadband in a Changed Economy'* at 2, 4 & Fig. 2 (May 2002) (there are an estimated 10.5 million small and medium businesses nationwide (2.2 million with 5-99 employees, 85,000 with 100-999 employees, and 8.2 million characterized as small office/home office)); Citigroup Smith Barney, *Cable: Capitalizing on the SME Opportunity; Detailed Note* (June 4, 2003) (30 to 50 percent of the small- and medium-enterprise market is located within 50 to 100 feet of existing cable modem networks).

<sup>15</sup> J. Shim & R. Read, Credit Lyonnais Securities, *The U.S. Cable Industry – Act I* at 196 (Nov. 20, 2002) (estimating 2.5 million SMBs passed by existing cable infrastructure); D. Sweeney, *Cable's Plumb Position, America's Network* (July 1, 2002) (Jedai Networks, which develops equipment "intended to enable [cable] MSOs to serve business customers," estimates "that roughly 25% of businesses already have a cable drop, including many in downtown office buildings.").

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that “executives from Comcast, Time Warner Cable, Cox and Cablevision Systems [have] spelled out ambitious plans to expand rapidly in commercial-sector telecom services over the next 18 months.”<sup>16</sup>

18. Cable operators are now aggressively extending their fiber to the premises of large office buildings.<sup>17</sup> Comcast “has been delivering service to commercial organizations since 1995 and has thousands of customers leveraging the Comcast network for critical business applications.”<sup>18</sup> Cable companies compete very aggressively on price, offering high bandwidth facilities with no up-front installation charge. Increasingly, cable companies are broadening their efforts to include cable telephony service (based on VoIP technology, but marketed without that emphasis), which will make them increasingly formidable at the lower end of the segment.<sup>19</sup> Our regional sales managers have observed that cable companies are competing very strongly in providing Gigabit Ethernet services to local school districts, municipalities and local governments, universities, and commercial enterprises.

19. The prior Bruno/Murphy Declaration provided a description of some of the leading cable competitors serving commercial and institutional customers; additional details are included here:

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<sup>16</sup> Communications Daily, *Cable* at 7 (May 23, 2005).

<sup>17</sup> See *Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, Report and Order and Order on Remand and Further Notice of Proposed Rulemaking, 18 FCC Rcd 16978 at ¶ 40 (2003); see also D. Chang, EVP, Finance & Strategy, Charter Communications, presentation before the JP Morgan High Yield Conference at 23 (Feb. 2, 2004) (Charter is moving “‘up-market’ to compete in Enterprise RFP environment”).

<sup>18</sup> Comcast Commercial, *Services*, <http://www.comcastcommercial.com/index.php?option=content&task=view&id=6&Itemid=27>.

<sup>19</sup> See Exhibit 1, “Cable Serving Business Customers” Table.

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- a. Time Warner Communications is a very strong competitor in the provision of all fiber-based services, including ATM and metropolitan Ethernet services, which are critical to medium-sized commercial and institutional customers at the higher end of this segment. In addition, Time Warner Communications and Brighthouse Networks market Road Runner Business Class high-speed Internet access product to business throughout its service area.<sup>20</sup>
- b. Charter Business provides dedicated Internet access and Optical Class connectivity and advanced data networking services to businesses within its service area.<sup>21</sup> Charter has announced a strategy of moving “‘up-market’ to compete in Enterprise RFP environment.”<sup>22</sup>
- c. Cox Communications, within its franchise areas, is a leading competitor throughout the medium business segment.<sup>23</sup> In addition to high capacity fiber facilities, Cox has become a leading competitive provider of business communications services. Cox has provided high bandwidth connectivity services to government and businesses in Virginia and in Rhode Island, and in other areas within Verizon’s traditional service area.<sup>24</sup> Cox had \$350 million in

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<sup>20</sup> Road Runner Business Class, *Homepage*, <http://rbiz.com/>.

<sup>21</sup> Charter Media, *Charter Business: Products and Services*, [http://www.chartermedia.com/products\\_business.htm](http://www.chartermedia.com/products_business.htm).

<sup>22</sup> D. Chang, EVP, Finance & Strategy, Charter Communications, presentation before the JP Morgan High Yield Conference (Feb. 2, 2004).

<sup>23</sup> Cox Business Services, *Solutions for Medium Businesses*, <http://www.coxbusiness.com/mdbusiness/>.

<sup>24</sup> See Cox Business Services, *Case Studies*, <http://www.coxbusiness.com/casestudies/>.

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commercial revenue in 2004 and plans to increase this amount to \$1 billion in five years.<sup>25</sup>

- d. Cablevision Systems Corp. is a leading provider of broadband data services over fiber optic facilities in its service area.<sup>26</sup> Cablevision provides high bandwidth services to 1,000 elementary and secondary schools through its “Power to Learn” service. In addition, its Lightpath subsidiary has won numerous business and institutional contracts in New York, New Jersey, and Connecticut, including with hospitals, universities, financial institutions and the FAA.<sup>27</sup> “Cablevision reported revenues of nearly \$200 million in 2004, with 150,000 access lines and facilities reaching more than 1,600 buildings.”<sup>28</sup>
- e. Comcast is likewise a leading provider of broadband data services over fiber optic facilities in its service area. It recently topped \$100 million in annual commercial telecom revenue.<sup>29</sup> In addition to contracts with higher education institutions, our sales personnel report that Comcast won a major contract to provide metropolitan Ethernet services to Medstar Health, a healthcare company in the Washington/Baltimore area.

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<sup>25</sup> Communications Daily, *Cable* at 7 (May 23, 2005).

<sup>26</sup> Cablevision, *Corporate Information: About Cablevision*, [http://www.cablevision.com/index.jhtml?pageType=about\\_cablevision](http://www.cablevision.com/index.jhtml?pageType=about_cablevision).

<sup>27</sup> See Cablevision, *Corporate Information: Cable and Communications*, [http://www.cablevision.com/index.jhtml?pageType=cc\\_lightpath](http://www.cablevision.com/index.jhtml?pageType=cc_lightpath).

<sup>28</sup> M. Harris, *et al.*, *Cable Gets Down to Building Busine\$\$*, Telecommunications Magazine (Mar. 2005).

<sup>29</sup> Communications Daily, *Cable* at 7 (May 23, 2005).

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*Impact of Transaction with MCI*

20. As we previously explained, the transaction with MCI will further Verizon's ability to compete for commercial and national customers on a national level. The transaction will only spur greater competition, not just with SBC, but also with other national and international players.

21. Some commenters have suggested that the combination of MCI and Verizon would have a large share of "in-region" enterprise customers. Even as to enterprises that are concentrated within Verizon's traditional service territories, such comments ignore the robustness of competitors from a variety of providers, including regional CLECs, cable companies, systems integrators, and value added resellers, as discussed further below. In the case of large commercial customers and the federal government, the comment is particularly inapt, because such customers (and many medium-sized commercial enterprises as well) have communications needs that are national and international in scope. For example, Verizon's [BEGIN PROPRIETARY] [END PROPRIETARY] largest customers have an average of nearly [BEGIN PROPRIETARY] [END PROPRIETARY] interconnected sites across the county (not just sites served by Verizon); the next [BEGIN PROPRIETARY] [END PROPRIETARY] have an average of [BEGIN PROPRIETARY] [END PROPRIETARY], and the next [BEGIN PROPRIETARY] [END PROPRIETARY] have an average of [BEGIN PROPRIETARY] [END PROPRIETARY] sites. The same point holds true for medium-sized commercial customers as well – Verizon's Tier II customers (that is, customers that spend between \$250,000 and \$1.8 million annually with Verizon) have an average of [BEGIN PROPRIETARY] [END PROPRIETARY] sites; in many cases,

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those sites are not limited to a single region. A chart summarizing this breakdown is attached as Exhibit 3.

22. Verizon's counsel has undertaken an analysis of competition between MCI and Verizon on RFPs to document the fact that Verizon and MCI rarely compete head-to-head on the various contracts for which the companies bid. Our counsel compared a complete list of Verizon bids on RFPs between October 1, 2004 until about May 1, 2005 with a comparable list prepared by MCI. Hundreds of bids by both companies were analyzed. The number of times that MCI and Verizon bid against each other was tallied. We have not been able to review the MCI list because of its proprietary nature. Our understanding is that an analysis of this bid data is continuing, but that preliminary analysis indicates that a very small minority of bids involved head-to-head competition between the two companies. This analysis is preliminary because it has not yet been determined how many times the two companies were actually competing against each other to provide the same services in response to the same RFP. Nevertheless, the upper-bound estimate demonstrates what our sales representatives report from the field – that Verizon and MCI have different strengths and therefore rarely bid on the same RFP and even more rarely bid to provide the same services under a particular RFP.

23. In sum, retail competition for commercial and institutional customers is robust in all geographic areas and for all sizes of customers. The combination of MCI and Verizon will not affect that.

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**Description of the Medium-Sized Commercial and Institutional Segment**

24. The earlier Bruno/Murphy declaration focused on large commercial and institutional customers, with some discussion of medium-sized commercial and institutional customers. In this declaration, we provide additional detail concerning competition for medium-sized commercial and institutional customers, with greater focus on the lower end of that segment.

25. Verizon has two organizations that manage its relationship with medium-sized commercial and institutional customers. Verizon's Enterprise Services Group ("ESG") serves the needs of both large and medium commercial and institutional customers, usually defined as customers with more than \$100,000 in communications spending with Verizon. Verizon's Business Solutions Group ("BSG") handles businesses that are considered "premium" accounts, including those with at least 8 telephone lines (the cut-off is not rigid, and may be higher in certain geographic areas) but less than \$100,000 in communications services spending with Verizon. Mass-market business customers – generally those with fewer than eight telephone lines – are treated as "national," non-premium accounts within Verizon's Retail Markets group. Whether a customer is handled as a premium or national account depends both on the amount of annual spending and the customer's location.

26. ESG divides its customers among Tier I, Tier II, and Tier III customers, based on the amount of spending each customer has with Verizon. (For this reason, it is possible for a customer to be a Tier II customer for Verizon but a Tier I-level customer for its principal communications service provider.) Tier I customers are generally defined as those that spend

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\$1.8 million annually with Verizon. Tier I accounts are themselves divided among “strategic” accounts – which include large companies such as Citigroup, with nationwide communications needs – and regional accounts, such as state governments. As discussed in the earlier Bruno/Murphy declaration, in the case of strategic accounts, Verizon tends to be a “niche” player with a relatively small portion of overall communications spending.

27. Tier II customers are generally defined as those spending between \$250,000 and \$1.8 million with Verizon. These include financial and healthcare firms, regional commercial enterprises such as grocery store chains, and some educational and government institutions. Verizon has approximately **[BEGIN PROPRIETARY]** **[END PROPRIETARY]** Tier II customers. Tier III includes medium-sized commercial and institutional customers with less than \$250,000 annual spending with Verizon. Verizon has approximately **[BEGIN PROPRIETARY]** **[END PROPRIETARY]** Tier III accounts.

28. Verizon sells its services to Tier II and large Tier III accounts through regional sales organizations, using sales personnel that have personal contact with customers. Larger Tier II accounts and government purchasers frequently solicit bids using a request-for-proposal process. In other cases, Verizon develops relationships with the accounts and seeks to offer services and propose solutions based on those relationships. At the lower end of Tier III, Verizon utilizes sales personnel who manage large number of accounts and have contact with those accounts over the telephone from regional centers, not in person.

29. Verizon’s BSG serves approximately **[BEGIN PROPRIETARY]** **[END PROPRIETARY]** medium business customers. This includes approximately **[BEGIN PROPRIETARY]** **[END PROPRIETARY]** “managed” accounts, which are accounts

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that are assigned to a specific account manager. The remaining **[BEGIN PROPRIETARY]**

**[END PROPRIETARY]** accounts are unmanaged, which means that customers purchase services from Verizon by calling Verizon and ordering services ranging from off-the-shelf voice services to engineered high-capacity facilities. Managed accounts, with an average of **[BEGIN PROPRIETARY]** **[END PROPRIETARY]** lines per account, tend to be larger than unmanaged accounts, which average approximately **[BEGIN PROPRIETARY]** **[END PROPRIETARY]** lines. Verizon believes that there are more than **[BEGIN PROPRIETARY]**

**[END PROPRIETARY]** customers of this size in Verizon's traditional service territory that do not purchase any communications services from Verizon.

30. Given their great diversity in size and sophistication, medium-sized commercial and institutional customers have an equally great diversity of communications needs. On the low end, medium business customers may have relatively simple communications needs – they tend to purchase primarily local and long-distance voice service and off-the-shelf Internet access and e-mail products. At the high end, medium-sized commercial and institutional customers purchase the same set of services – high capacity private lines and dedicated Internet access, fast packet and advanced network services, local and long-distance voice service, and voice and data CPE – as larger commercial and institutional customers.

31. Spending on traditional local and long-distance voice service makes up a higher proportion of communications spending at the low end of the segment; throughout the segment, however, spending on such services is declining both in absolute terms and as a percentage of

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overall communications services spending.<sup>30</sup> By contrast, spending on broadband, data services, CPE, and other services are expected to grow.<sup>31</sup> Medium-sized commercial and institutional customers are very likely to purchase security technologies to protect voice and data communications and Internet connectivity and bandwidth; many of them purchase web hosting services; and Voice IP and IP PBXs are making an increasing impact on the market.<sup>32</sup> Spending on wireless services – voice and data – likewise is growing.<sup>33</sup>

32. At the low end of this segment, medium business customers generally do not require fully customized service solutions, and they generally do not request formal bids for their communications needs. They may look for bundles of services that meet their basic voice communication and limited data requirements. Those customers may purchase all of their services from a single provider or they may use different providers for local, long-distance, and broadband services. At the mid-range, customers employ IT specialists that typically assemble a package of services. Again, they may purchase these services from a single communications

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<sup>30</sup> K. Burney, In-Stat/MDR, *Share of Wallet?: Telecom Trends and Expenditures in the US Business Market, Part Two: US Mid-Sized Businesses (100 to 999 Employees)* at 19 (Sept. 2004) (“expenditures for wireline voice services are expected to decline steadily as a percentage of telecom spending in this market”); K. Barney, In-Stat/MDR, *Share of Wallet?: Telecom Trends and Expenditures in the US Business Market, Part Three: US Small Businesses (5 to 99 Employees)* at 20 (Aug. 2004) (“expenditures on wireline voice have already begun to show a slow and escalating decline”).

<sup>31</sup> K. Burney, In-Stat/MDR, *Share of Wallet?: Telecom Trends and Expenditures in the US Business Market, Part Two: US Mid-Sized Businesses (100 to 999 Employees)* at 19 (Sept. 2004) (“expenditures for wireline voice services are expected to decline steadily as a percentage of telecom spending in this market”); K. Barney, In-Stat/MDR, *Share of Wallet?: Telecom Trends and Expenditures in the US Business Market, Part Three: US Small Businesses (5 to 99 Employees)* at 20 (Aug. 2004) (“The exceptional growth of value-added services is expected to fuel the growth of wireline data services”).

<sup>32</sup> See Maribel D. Lopez, Forrester, *How To Win in SMB Telecom* (July 9, 2004).

<sup>33</sup> J. Armstrong, et al., Goldman Sachs, *Enterprise survey: wireless may determine carriers seat at the table* at 10 (Mar. 2, 2005) (“wireless is where the growth is”).

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provider or from multiple providers. At the upper end of the segment, customers often seek network redundancy by working with a primary and a secondary provider.

***Current Competitors***

33. There is robust competition throughout the medium-sized commercial and institutional segment, as a diverse group of providers compete to provide a variety of communications services to these customers. Broadly speaking, Verizon competes with CLECs, including a variety of regional CLECs, cable companies, and systems integrators and value-added resellers in this segment. At the upper end, for customers like investment banks and other financial institutions with global networking needs, traditional IXCs and systems integrators show particular strength; Verizon has essentially no competitive international offering. In the mid-range, and for upper-end customers with regional networking needs, Verizon faces competition not only from traditional IXCs, but from cable companies, power companies, and regional CLECs, along with systems integrators and value-added resellers. At the lower end, an additional group of CLECs joins the competitive fray.

34. Furthermore, Verizon faces significant competition from traditional ILECs. As noted above, SBC is a leading competitor in many areas where Verizon is the ILEC. Qwest is a significant competitor in portions of the Seattle area served by Verizon, as is BellSouth in the portions of North and South Carolina and Florida served by Verizon. Verizon competes out of region with these ILECs as well; for example, Verizon has deployed fiber facilities in Seattle in Qwest's traditional service territory. (A map is attached as Exhibit 2, Page 3).

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35. In addition to MCI, other interexchange carriers – AT&T, Sprint, and Qwest – compete for medium-sized commercial and institutional customers.<sup>34</sup> At the upper end of the segment, in which companies frequently seek a primary communications provider, AT&T has emerged as the leading competitor. According to one analyst, AT&T was named as a preferred provider by 16 percent of businesses with between 100 and 999 employees, more than any other wireline carrier.<sup>35</sup> Sprint has also shown strength, leveraging its ability to deliver wireless service as part of its overall communications services package.

36. At the lower end of the segment, Verizon generally views MCI as one competitor among many. (Although there is some regional variation, Sprint does not tend to be as active in the low end of the medium business segment, except as a provider of long-distance voice service and wireless services.) In contrast to regional CLECs, MCI has generally limited their marketing efforts among business customers at the lower end of the commercial and institutional segment to direct mail and telemarketing, as opposed to in-person efforts by sales representatives. Furthermore, MCI does not offer a DSL broadband product of its own.

37. Competitive local exchange carriers (CLECs) compete throughout the segment. Successful CLECs have won customers by engaging in targeted, personalized marketing efforts, by establishing price leadership, and by promoting products aggressively. CLECs offer a range of voice and data products, including local and long-distance voice, broadband data, dedicated Internet access, and complex services. Many CLECs offer integrated voice and data services over T1 or fractional T1 lines; others offer voice/DSL bundles.

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<sup>34</sup> The Bruno/Murphy Declaration provides additional description, applicable to the high end of this segment.

<sup>35</sup> K. Burney, In-Stat/MDR, *Share of Wallet?: Telecom Trends and Expenditures in the US Business Market, Part Two: US Mid-Sized Businesses (100 to 999 Employees)* at 16 (Sept. 2004).

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38. CLEC strength varies by region and by the size of customer. A few examples of CLECs that have had substantial success serving high-end medium business customers include:

- a. TelCove is a fiber-based wholesale and enterprise provider serving customers in 52 geographic areas throughout the United States, with concentration in the mid-Atlantic states.<sup>36</sup> TelCove serves government and commercial accounts, offering capacity services. TelCove is the primary telecommunications provider to the Commonwealth of Pennsylvania, having recently won renewal of a multi-million dollar annual contract.
- b. PAETEC Communications, Inc., a national communications solutions provider specializing in IP-based services, has installed over 675,000 access line equivalents on its network as of September 30, 2004. This represents an increase of 166,200 access line equivalents in service over the September 2003 total.<sup>37</sup> Verizon perceives Pae-Tec as among the most significant competitors targeting Tier II business and institutional customers, including higher education, healthcare, and commercial accounts worth millions annually.
- c. XO Communications describes itself as a major facilities-based CLEC with a substantial IP network and a private line network, each of which provides connectivity between major metropolitan areas across the United States.<sup>38</sup> XO has shown particular strength competing for medium-business customers in the mid-Atlantic region and in Florida, Texas, California, and Washington.

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<sup>36</sup> See TelCove, *Company Overview*, <http://www.telcove.com/about/abgl.htm>.

<sup>37</sup> PAETEC Press Release, *PAETEC Exceeds 675,000 Access Lines* (Oct. 14, 2004).

<sup>38</sup> XO Communications, *XO Network*, <http://www.xo.com/about/network/maps.html>.

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- d. CTC Communications serves medium-sized commercial customers throughout the Northeast and mid-Atlantic states, utilizing advanced technology to provide converged voice, data, and Internet services on a broadband, packet-based network, called the PowerPath Network.”<sup>39</sup>

39. Additional CLECs are competing successfully for customers in the mid-range (*i.e.*, Tier III) of medium-sized commercial and institutional customers. They include:

- a. US LEC Corp. is a super-regional telecommunications carrier providing integrated voice, data and Internet services to businesses from the mid-Atlantic to the Southeast.<sup>40</sup> US LEC is among the strongest of Verizon’s regional CLEC competitors, providing service to medium-sized commercial and institutional customers. Its customers in Virginia include large regional customers such as The Supply Room, Briggs Hospitality, Dimensions Healthcare Systems, and universities.<sup>41</sup>
- b. Cavalier Communications is a facilities-based CLEC that offers service to business and institutional customers of all sizes in Virginia, Maryland, Delaware, Pennsylvania, New Jersey and the District of Columbia.<sup>42</sup> Cavalier claims an estimated 30,000 business customers. In addition, Cavalier has won contracts to provide telecommunications services to nine government agencies of the

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<sup>39</sup> CTC Communications, *About CTC*, [http://www.ctcnet.com/main?sec\\_id=21&page\\_id=117](http://www.ctcnet.com/main?sec_id=21&page_id=117).

<sup>40</sup> US LEC News Release, *US LEC Expands in Virginia* (Jan. 20, 2005).

<sup>41</sup> US LEC Press Release, *US LEC Continues To Gain Market Share in Verizon Territory* (July 14, 2004).

<sup>42</sup> Cavalier Business Communications, *Cavalier Service Areas*, <http://www.cavtel.com/business/>.

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Commonwealth of Virginia, to the State and University of Delaware; and to federal courts in Pennsylvania.<sup>43</sup>

40. In addition, there is a large group of regional CLECs that add to this competition in the lower-end of the medium-business segment. They include:

- a. Broadview Networks is a leading CLEC in the Mid-Atlantic and Southern New England, with over 250,000 access lines in service.<sup>44</sup> Broadview offers voice and data service for businesses, including DSL high-speed Internet access, web hosting, data T1 services, VPNs and web hosting. Verizon considers Broadview to be one of its most dynamic competitors in the New York area.
- b. Conversent Communications is a facilities-based CLEC providing service to 38,000 business customers from Maine to New Jersey.<sup>45</sup> Conversent provides a local and long-distance voice, as well as Internet and data products. Conversent has emerged as the leading CLEC in Massachusetts providing service to business customers and competes strongly in New England in the northern Mid-Atlantic region.
- c. ATX Communications competes primarily in Mid-Altantic States and in the Midwest, offering voice and data products, as well as advanced networking

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<sup>43</sup> Cavalier Press Release, *Cavalier Telephone Saves Virginia Commonwealth Over \$296,000 in 2004* (Dec. 23, 2004); Cavalier Press Release, *State of Delaware Partners with Cavalier Business Communications for Major Data Network Expansion* (Oct. 21, 2004); Cavalier Press Release, *Cavalier Announces Award of US Courts Philadelphia Project* (Sept. 3, 2004).

<sup>44</sup> Broadview Networks, *About Us: Who is Broadview Networks?*, [http://www.broadviewnet.com/aboutus/bvnet\\_advantage.asp?scenario=0](http://www.broadviewnet.com/aboutus/bvnet_advantage.asp?scenario=0); Broadview Networks, *Service Coverage Area*, [http://www.broadviewnet.com/Products\\_Services/Common/Service Area.asp?scenario=0](http://www.broadviewnet.com/Products_Services/Common/Service_Area.asp?scenario=0).

<sup>45</sup> Conversent, *About Us*, <http://www.conversent.com/website/jobs/aboutUs.asp?page=about>.

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applications to businesses.<sup>46</sup> ATX is among the 10 largest CLECs and 10 largest ISPs in the United States, with 1,100 employees and 300,000 commercial and residential customers.

- d. Choice One Communications is an integrated communications provider offering voice, data, and web hosting services to businesses in the Northeast and Midwest.<sup>47</sup> Choice One provides service in 29 second and third tier markets in 12 states, with over 500,000 lines in service.
- e. ITC Deltacom is a facilities-based provider of voice and data service throughout the Southern United States. ITC Deltacom offers a full array of voice and data products to business customers.<sup>48</sup>

41. There are a large number of additional CLECs operating in Verizon's region – including ALLTEL<sup>49</sup>, DSCI Corporation,<sup>50</sup> Bullseye Telecom,<sup>51</sup> and InfoHighway.<sup>52</sup> Covad is a leading competitive DSL provider, with a VoIP offering.<sup>53</sup> These competitors focus on lower-end business customers.

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<sup>46</sup> ATX Communications, *The ATX Story*, [http://www.atx.com/atx\\_story\\_home.html](http://www.atx.com/atx_story_home.html).

<sup>47</sup> Choice One, *Our Company: Company Overview*, <http://choiceonecom.com/ourcompany/>.

<sup>48</sup> ITC Deltacom, *Company Information*, [http://www.itcdeltacom.com/company\\_info.asp](http://www.itcdeltacom.com/company_info.asp).

<sup>49</sup> ALLTEL, *Coverage Maps*, <http://phx.corporate-ir.net/phoenix.zhtml?c=74159&p=irol-coverageMapsExtended>.

<sup>50</sup> DSCI, *Contact Information*, <http://www.dscicorp.com/contact.asp>; DSCI, *DSCI Certified in Vermont*, [http://www.dscicorp.com/newsletters/articles/2004\\_Q3/vermont.html](http://www.dscicorp.com/newsletters/articles/2004_Q3/vermont.html); DSCI News Release, *DSCI Certified to Sell Services in Maine* (Nov. 2, 2004).

<sup>51</sup> BullsEye Telecom, *Company Overview*, <http://www.ca.bullseyetelecom.com/overview.asp>.

<sup>52</sup> InfoHighway, *About Us*, <http://www.infohighway.com/index.php?fuseaction=page&id=34>.

<sup>53</sup> Covad, *Investor Relations: About Covad*, <http://www.covad.com/companyinfo/investorrelations/index.shtml>.

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42. Throughout the segment, cable companies increasingly have become among the most successful competitors, particularly for customers with demand for broadband connectivity within a metropolitan area or region. In many areas, competition from cable companies is a recent development, having intensified in the last two years. The leading cable competitors are described above in ¶¶ 9-12.

43. In addition to cable companies, many power companies have deployed fiber and offer broadband service to medium-sized commercial and institutional customers. Examples include Pennsylvania Power and Light, Connectiv (Delmarva Power), and Consolidated Edison.

44. Finally, as with larger enterprise customers, equipment vendors, systems integrators, and value-added resellers also compete for medium-sized commercial and institutional customers, particularly at the upper end. In addition to the companies identified and described in the Bruno/Murphy declaration, additional companies include Nortel, Cisco, NextiraOne, Presidio, Sycom, Dimension Data, Shared Technologies, Savant, and Coleman Technologies. Many of these companies have a local or regional focus.

45. Exhibit 4 contains profiles of some competing carriers that focus on medium business customers. Based on publicly available information, it provides examples of the business customers they serve, the kinds of services they offer, the areas within Verizon's footprint where they offer these services, and the facilities they own or operate.

#### ***Current Competitive Dynamics***

46. As the foregoing survey illustrates, medium-sized commercial and institutional customers choose among a broad array of communications services providers. Furthermore,

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Verizon anticipates that the market will continue to evolve to reflect the increasing importance of IP-based services and managed services in the segment.

47. Because the segment is extremely diverse, customers' competitive options vary more widely than those of large enterprises, which require primary service providers with national and global reach. Nevertheless, certain generalizations are possible.

48. *First*, there is no service and no region where Verizon does not face competition from a variety of providers. Competitors are very nimble in their ability to bring resources to bear in any area where there are competitive opportunities.

49. *Second*, while Verizon has traditional strength as a provider of local bandwidth for medium-sized commercial and institutional customers, it faces significant competition from cable companies and other fiber-based competitors providing metropolitan Ethernet and other Wide Area Network solutions for commercial and institutional customers at the higher end of the segment. Companies like Time Warner, Comcast, Cablevision, and Cox have all entered this segment aggressively, and are rolling out additional voice and managed services to complement their strength as providers of broadband data services.

50. *Third*, in the recent past, the most significant competitors for business customers at the lower end of this segment (and also, to some degree, into the higher end) have been regional CLECs, several of whom have emerged as the leading competitors in specific geographic areas where they have focused their marketing efforts. Verizon believes that many businesses with localized operations prefer to deal with providers with a local focus, and CLECs have taken advantage of direct relationship and localized sales forces, along with integrated packages of communications services that are aggressively priced. In all areas with significant

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concentrations of medium-sized commercial and institutional customers, regional CLECs have deployed competitive high-capacity facilities to serve customers.

***The Transaction Will Not Reduce Competition***

51. As we noted at the outset, the combination of Verizon and MCI will not reduce competition for commercial and institutional customers; that certainly holds true for the medium-sized commercial and institutional customers that we have been discussing. There are many robust competitors in this segment. There will be no substantial impact on consumer choice in any segment as a result of the combination: customers will continue to be able to choose from a large number of competing, facilities-based providers.

52. There is no geographic area in Verizon's territory where MCI is one of a small number of competing providers of services to medium-sized commercial and institutional customers. To the contrary, throughout Verizon's service territory, customers throughout this segment choose from several competing companies – often a dozen or more.

53. Furthermore, as was noted in the prior Bruno/Murphy declaration and as the RFP data discussed above illustrate, Verizon and MCI have different areas of traditional strength that limits somewhat the overlap between the two companies' product offerings. MCI has been a leader in the provision of IP-based services, including IP/VPN and hosted solutions, international networking, and toll-free long-distance products. None of these products is an area of strength for Verizon; in some areas – particularly international networking – Verizon has no competitive offering. By contrast, Verizon's strength has been in local network-based voice and data services, where MCI has not emerged as a competitor of particular strength.

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54. Industry research confirms both that the medium-sized commercial and institutional segment is unconcentrated and that, except for the largest customers, MCI is not among the leading players. One study showed that only AT&T does business with as much as 30-33 percent of medium-sized business customers (defined as those with between 100 and 999 employees); MCI did not show up in the survey (and thus presumably does business with less than 19-23 percent of such customers).<sup>54</sup> These data suggest that the segment is wide open to competition.

55. Pricing pressures provide further evidence of the highly competitive nature of that market segment. Verizon has observed intense price competition from cable companies and regional CLECs throughout this segment. Analysts agree that “[c]ommercial telecom services industry pricing is intensifying across several fronts” and “[t]hese pressures are likely to be exacerbated . . . as VoIP offerings are deployed.”<sup>55</sup>

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<sup>54</sup> K. Barney, In-Stat/MDR, *Share of Wallet?: Telecom Trends and Expenditures in the US Business Market, Part Three: US Small Businesses (5 to 99 Employees)* at 16 (Aug. 2004); K. Burney, In-Stat/MDR, *Share of Wallet?: Telecom Trends and Expenditures in the US Business Market, Part Two: US Mid-Sized Businesses (100 to 999 Employees)* at 16 (Sept. 2004).

<sup>55</sup> R. Lynch & B. Bath, Lehman Brothers, *Telecom Services – Wireline Industry Update: Commercial Price Declines Still Dominate* at 3 (Mar. 19, 2004).

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 23 2005

A handwritten signature in black ink, appearing to read "Eric J. Bruno", is written over a solid horizontal line.

Eric J. Bruno

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 23, 2005

  
\_\_\_\_\_

Kathy Koelle

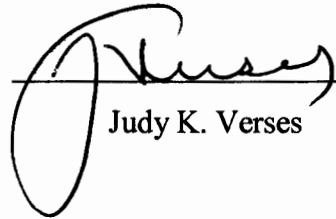
I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 13, 2005

  
Veronica Pellizzi

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 23 2005



Judy K. Verses

REPLY DECLARATION OF ERIC J. BRUNO,  
KATHY KOELLE, VERONICA PELLIZZI, AND  
JUDY K. VERSES

EXHIBIT 1



The following table provides examples of individual cable operators’ efforts to serve business customers.

<b>Cable Serving Business Customers</b>		
	<b>Fiber</b>	<b>Cable Modem</b>
Cablevision	<p>“[Lightpath’s] state-of-the-art, all-digital network comprises more than 2,700 miles of fiber optic cable (nearly 113,000 miles of actual fiber).”<sup>1</sup></p> <p>“Cablevision generated close to \$200 million in 2004 with more than 1,600 buildings on net and 150,000 access lines through its Lightpath business services arm.”<sup>2</sup></p>	<p>Business Class Optimum Online for small businesses offers connection speeds up to 10 Mbps downstream and 1 Mbps upstream.<sup>3</sup></p> <p>“We think there’s a huge opportunity in small businesses. . . . [W]hen we look at our passings . . . we see another 600,000 passings . . . that are essentially small businesses with 20 lines or less. We see a huge opportunity for us to go penetrate those markets, which currently have very high voice and telecommunications rates. And we think we can have very low rates, relatively speaking, and still have very good business margins.”<sup>4</sup></p> <p>“[T]he business sector opportunity has ‘actually helped us build the network into the business areas and business parks.’”<sup>5</sup></p>
Time Warner	<p>“We’ve got an infrastructure there that is just ripe for commercial services. . . .We pass 1.2 million businesses . . . .”<sup>6</sup></p> <p>“[D]elivering cost effective, high capacity access solutions to several Fortune 500 customers.”<sup>7</sup></p> <p>“[Time Warner Cable] now boasts more than 170,000 commercial accounts for its Road Runner Business Class line of data services.”<sup>8</sup></p>	<p>According to the company, “[c]able is not incredibly difficult to get to the business,” and “[m]ost RBOCs, CLECs and ILECs have ignored that space.”<sup>9</sup></p> <p>“[V]iews the SMB market as a high-growth opportunity.”<sup>10</sup></p> <p>“We do have an opportunity to go more aggressively after the enterprise business”<sup>11</sup></p>
Charter	<p>Moving “‘up-market’ to compete in Enterprise RFP environment”<sup>12</sup></p> <p>9 percent of business subscribers are medium or large businesses.<sup>13</sup></p>	<p>“Whether your business is going online for the first time or you want a higher speed service, Charter Business has a great solution for you: Accelerator+... A Great Solution for Small and Medium Businesses.”<sup>14</sup></p> <p>“[O]ver 600,000 small- and medium-sized businesses located within reach of our networks”<sup>15</sup></p>
Comcast	<p>“Comcast Commercial Services leverages the massive network of our parent company. This allows you to have managed access on a carrier class transport network designed for broadband applications. Our reach is broad and deep, with capacity in dense urban, sprawling suburban and even many rural areas others can’t reach.”<sup>16</sup></p> <p>“Comcast has been delivering service to commercial organizations since 1995 and has thousands of customers leveraging the Comcast network for critical business applications. Comcast delivers unique service capabilities on our own national network, which allows you to have reliable service and competitive rates.”<sup>17</sup></p>	<p>Targets “SMBs with 1-100 employees,” “Non-profit orgs, schools, government,” and “SMBs and Enterprises with telecommuters.”<sup>18</sup></p> <p>“[W]e do a good business in terms of high-speed data to small and medium-sized businesses.”<sup>19</sup></p>

<b>Cable Serving Business Customers</b>		
	<b>Fiber</b>	<b>Cable Modem</b>
Cox	<p>“An increase in Cox Business Services customers, with customer locations now surpassing 140,000...”<sup>20</sup></p> <p>“Cox officials believe the commercial sector in their territories alone represents an \$8 billion to \$10 billion opportunity. Narrowing it down to firms within 100 feet of Cox’s cable plant, they see a \$3 billion market.”<sup>21</sup></p> <p>More than 320,000 businesses with “a total telecom spend of roughly \$3.3 billion annually” lie within 100 feet of Cox’s network<sup>22</sup></p>	<p>Cox Business Services offers various products, including high-speed Internet service in 36 markets.<sup>23</sup></p> <p>“Cox Business Internet service can be designed to fit the specific needs of your business and help you operate with greater efficiency in all your data communications.”<sup>24</sup></p>
RCN	<p>“Signed several agreements to expand its business” to provide “voice, video, data, business cable, Internet access, transport,” to “customers including universities, hospitals, and the financial and legal industries.”<sup>25</sup></p> <p>“RCN’s fiber optic Megaband Network delivers the reliable high speed internet service you need to keep your business running.”<sup>26</sup></p>	<p>Targeted towards small businesses, RCN offers high speed Internet at download speeds of up to 10 Mbps.<sup>27</sup></p>

<sup>1</sup>Cablevision Lightpath, *Lightpath’s Network Advantage*, <http://www.lightpath.net/Interior84.html>.

<sup>2</sup>M. Harris, et al., *Cable Gets Down to Building Busine\$\$*, Telecommunications Magazine (Mar. 2005).

<sup>3</sup>Optimum Online, *Business Services*, [http://www.optimum.com/index.jhtml?pageType=info\\_bcool](http://www.optimum.com/index.jhtml?pageType=info_bcool).

<sup>4</sup>Cablevision Systems Corp. at Banc of America Securities Media, Telecommunications and Entertainment Conference – Final, FD (Fair Disclosure) Wire, Transcript 033005af.728 (Mar. 30, 2005) (quoting Cablevision COO Tom Rutledge).

<sup>5</sup>J. Barthold, *Small Business, Big Money, No Guarantees*, Telephony Online (Aug. 12, 2002) (quoting Kevin Curran, senior vice president of marketing and sales for Cablevision Lightpath), [http://telephonyonline.com/mag/telecom\\_small\\_business\\_big/](http://telephonyonline.com/mag/telecom_small_business_big/).

<sup>6</sup>A. Figler, *Turning Businesses into Customers*, CableWorld (Dec. 9, 2002) (quoting Ken Fitzpatrick, senior vice president of commercial services for Time Warner Cable).

<sup>7</sup>Road Runner Business Class, *Internet Access*, <http://www.twcbroadband.com/solutions/internet.cfm>.

<sup>8</sup>M. Harris, et al., *Cable Gets Down to Building Busine\$\$*, Telecommunications Magazine (Mar. 2005).

<sup>9</sup>M. Stump, *Road Runner Gears Up ‘Business Class’ Offer*, Multichannel News (Feb. 25, 2002) (quoting Jason Welz, vice president of commercial services for Road Runner).

<sup>10</sup>J. Barthold, *Small Business, Big Money, No Guarantees*, Telephony Online (Aug. 12, 2002), [http://telephonyonline.com/mag/telecom\\_small\\_business\\_big/](http://telephonyonline.com/mag/telecom_small_business_big/).

<sup>11</sup>Thomson StreetEvents, *TWX – Q2 2004 Time Warner Inc. Earnings Conference Call – Final Transcript* at 8 (July 28, 2004) (quoting Don Logan, Time Warner Inc. Chairman of Media, Communications Group).

<sup>12</sup>D. Chang, EVP, Finance & Strategy, Charter Communications, presentation before the JP Morgan High Yield Conference (Feb. 2, 2004).

<sup>13</sup>Charter Communications, presentation before the UBS Media Week Conference, at 19 (Dec. 11, 2003) (reporting that 91% of business customers are small businesses).

<sup>14</sup>Charter, *Charter Business: Accelerator+ Cable-based Internet Access*, <http://www.charter-business.com/CableInternet.cfm>.

<sup>15</sup>A. Figler, *Turning Businesses into Customers*, CableWorld (Dec. 9, 2002) (quoting Charter Communications spokesman David Andersen).

<sup>16</sup>Comcast Commercial Services, *Telecommunications*, <http://www.comcastcommercial.com/index.php?option=content&task=view&id=33&Itemid=71>.

<sup>17</sup>Comcast Commercial Services, *Services*, <http://www.comcastcommercial.com/index.php?option=content&task=view&id=6&Itemid=27>.

<sup>18</sup>J. Livingood, Director of Comcast Commercial Internet Services, *Overview of Cable Modem Offerings for Businesses in Maryland* (Aug. 15, 2002), available at [http://www.marylandtedco.org/programs/PDF/MACO\\_Comcast.pdf](http://www.marylandtedco.org/programs/PDF/MACO_Comcast.pdf).

<sup>19</sup>*Q4 2004 Comcast Corporation Earnings Conference Call – Final*, Fair Disclosure Wire at 8 (Feb. 3, 2005) (quoting Steve Burke, COO and President, Comcast Cable).

<sup>20</sup>Cox News Release, *Cox Communications Announces Fourth Quarter and Full-Year Financial Results for 2004* (Mar. 16, 2005).

<sup>21</sup>M. Harris, et al., *Cable Gets Down to Building Busine\$\$*, Telecommunications Magazine (Mar. 2005).

<sup>22</sup>Jim Robbins, President and CEO, Cox Communications, presentation to the Sanford Bernstein 19th Annual Strategic Decisions Conference (June 2003); J. Reif-Cohen, et al., Merrill Lynch, *Cox Communications: Chasing Profits and the 4 Million Non-Video Homes* at 6 (July 30, 2004).

<sup>23</sup>Cox Business Services, *Market Locator*, <http://www.coxbusiness.com/systems/>.

<sup>24</sup>Cox Business Services, *Cox Business Internet*, <http://www.coxbusiness.com/products/data/businessinternet.html>.

<sup>25</sup>*Mass Media Notes*, Communications Daily at 7 (Feb. 2, 2004).

<sup>26</sup>RCN, *Small Business Internet Services*, <http://www.rcn.com/smallbusiness/internet.php>.

<sup>27</sup>RCN, *Small Business Internet Services*, <http://www.rcn.com/smallbusiness/internet.php>.

REPLY DECLARATION OF ERIC J. BRUNO,  
KATHY KOELLE, VERONICA PELLIZZI, AND  
JUDY K. VERSES

EXHIBIT 2

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KATHY KOELLE, VERONICA PELLIZZI, AND  
JUDY K. VERSES

EXHIBIT 3

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KATHY KOELLE, VERONICA PELLIZZI, AND  
JUDY K. VERSES

EXHIBIT 4

**EXAMPLES OF CLECS THAT SERVE MEDIUM-SIZED BUSINESS CUSTOMERS**

ALLTEL ..... 3

AT&T..... 4

ATX Communications (Corecomm)..... 12

Broadview ..... 14

Broadwing (formerly Corvis/Focal) ..... 16

BullsEye Telecom..... 18

Cavalier Telephone ..... 20

Choice One Communications ..... 22

Citizens/Electric Lightwave..... 25

Comcast Commercial..... 26

Con Edison Telecom..... 28

Conversent ..... 30

Covad ..... 31

Cox Business Communications ..... 33

CTC Communications ..... 36

DSCI Corporation ..... 39

Global Crossing ..... 40

InfoHighway ..... 42

ITC^DeltaCom..... 43

Lightpath (Cablevision) ..... 45

PAETEC ..... 47

TelCove..... 50

360networks ..... 56

Time Warner ..... 57



US LEC..... 61

WiTel..... 64

XO Communications ..... 66

## EXAMPLES OF CLECS THAT SERVE MEDIUM-SIZED BUSINESS CUSTOMERS

### ALLTEL

*Carrier claims that it serves medium businesses:*

“ALLTEL makes it easier to get your business in front of consumers via the Web. From domain name and e-mail packages to web site hosting, we can accommodate **any need - regardless of size.**”<sup>1</sup>

*Examples of business customers based on public information:*

- Sovereign Bancorp (outsourcing contract to provide more than a dozen different ALLTEL products for the Philadelphia-based company)<sup>2</sup>

*Service offerings:*

ALLTEL offers hosting services, business Internet service, frame relay, and business DSL service.<sup>3</sup> In addition to data services, ALLTEL offers wireless, local, and long-distance phone service to businesses.<sup>4</sup>

*Areas within Verizon’s local service area according to CLEC’s website:*

Pennsylvania<sup>5</sup>

*Jurisdictions in Verizon’s local service areas where CLEC has filed local tariffs:*

*Pennsylvania:* Digital Centrex Service,<sup>6</sup> Private Line Service,<sup>7</sup> ADS BRA<sup>8</sup>, Digital Channel Service (DCS).<sup>9</sup>

Exchange Access through ALLTEL’s Digital Centrex Service is priced depending on the number of lines purchased: 2-10 access lines, 11-65 access lines, 66-125 access lines, and 126 access lines or more.<sup>10</sup>

*CLEC facilities:*

See Attachment A.

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<sup>1</sup> ALLTEL, *Data Services*, [http://www.alltel.com/b2b/business\\_solutions/dataservices/index.html](http://www.alltel.com/b2b/business_solutions/dataservices/index.html) (emphasis added).

<sup>2</sup> ALLTEL News Release, *Sovereign Bancorp signs six-year outsourcing contract with ALLTEL* (Jan. 22, 2003).

<sup>3</sup> ALLTEL, *Data Services*, [http://www.alltel.com/b2b/business\\_solutions/dataservices/index.html](http://www.alltel.com/b2b/business_solutions/dataservices/index.html).

<sup>4</sup> ALLTEL, *Business Solutions*, [http://www.alltel.com/b2b/business\\_solutions/index.html](http://www.alltel.com/b2b/business_solutions/index.html).

<sup>5</sup> ALLTEL, *Coverage Maps*, <http://phx.corporate-ir.net/phoenix.zhtml?c=74159&p=irol-coverageMapsExtended>.

<sup>6</sup> ALLTEL Pennsylvania, Telephone PA P.U.C. No. 1, § S14.1 (issued Apr. 4, 1997).

<sup>7</sup> ALLTEL Pennsylvania, Telephone PA P.U.C. No. 1, § 6.1 (issued Sept. 10, 2002).

<sup>8</sup> ALLTEL Pennsylvania, Telephone PA P.U.C. No. 1, § 10.1.1 (issued Feb. 2, 1996).

<sup>9</sup> ALLTEL Pennsylvania, Telephone PA P.U.C. No. 1, § 10.2.1 (issued May 10, 2002).

<sup>10</sup> ALLTEL Pennsylvania, Telephone PA P.U.C. No. 1, § S14.1 (issued Feb. 1, 2002).

## AT&T

### *Carrier claims that it serves medium businesses:*

“We are one of the nation’s largest business services communications providers, offering a variety of global communications services to over 2 million customers, including large domestic and multinational businesses, small and **medium-sized** businesses and government agencies.”<sup>11</sup>

“AT&T Local Service is a key component of the company’s innovative networking service bundles, such as AT&T Business Network for large and **medium-sized** companies, and AT&T All In One for small businesses.”<sup>12</sup>

Business Class DSL is “[i]deal for small and **medium** businesses.”<sup>13</sup>

“In the Small & **Medium** Business Customer Center, you’ll learn about AT&T BusinessDirect, a valuable online resource that empowers small and growing businesses like yours to manage their AT&T Business voice service accounts online.”<sup>14</sup>

AT&T All In One, a service “[t]ypically for smaller businesses with 1 or 2 locations. . . [c]ombines all basic voice services on one plan.” AT&T Business Network, “for larger businesses with more than 2 locations. . . [c]ombines voice, data and IP services into a single powerful network.” Both are offered as products available to small and **medium** business customers.<sup>15</sup>

### *Examples of business customers based on public information:*

- Blue Cross Blue Shield Association (BCBSA) (contract to provide full portfolio of AT&T services including voice, data, hosting, IP and managed services)<sup>16</sup>
- New York Community Bank (contract to provide local and long-distance voice, data services, and a wide-area network linking 139 branches)<sup>17</sup>
- Northeast Utilities (contract to provide integrated Internet, long distance, local service, call center features, local fiber, microwave, data services and PRI T1.5 services)<sup>18</sup>

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<sup>11</sup> AT&T Corp., Form 10-K (SEC filed Mar. 10, 2005) (emphasis added).

<sup>12</sup> AT&T News Release, *AT&T Receives Award for Highest Customer Satisfaction Among Business Local Telephone Customers* (Feb. 2, 2004) (emphasis added).

<sup>13</sup> AT&T, *DSL Internet Service*, [http://businessesales.att.com/products\\_services/dslinternet\\_catalogdisplay.jhtml](http://businessesales.att.com/products_services/dslinternet_catalogdisplay.jhtml) (emphasis added).

<sup>14</sup> AT&T, *Small & Medium Business Customer Center*, <http://www.att.com/smbcc> (emphasis added).

<sup>15</sup> AT&T, *Small & Medium Business*, <http://businessesales.att.com/common/smbcccommonhome.jhtml> (emphasis added).

<sup>16</sup> AT&T News Release, *AT&T Lands Comprehensive Networking Services Deal with Blue Cross Blue Shield Association* (Mar. 26, 2003).

<sup>17</sup> AT&T News Release, *AT&T Wins \$8.6 Million Deal From New York Community Bank* (Mar. 1, 2004).

*Service offerings:*

The AT&T Business Services segment offers Voice Services, Data Services, Managed Services, Internet Services, Outsourcing Solutions, and Transport Services.<sup>19</sup>

*Areas within Verizon's local service area according to CLEC's website:*

“In addition to our long distance network, we have an extensive local network serving business customers in 91 U.S. cities. Our local network now includes 156 local switches and reaches 6,776 buildings with 8,603 metropolitan SONET rings.”<sup>20</sup>

“We operate one of the largest telecommunications networks in the United States and, through our Global Network Services, provide an array of services and customized solutions in 60 countries and 850 cities worldwide.”<sup>21</sup>

*Jurisdictions in Verizon's local service areas where CLEC has filed local tariffs:*

*California:* AT&T Business Network Service,<sup>22</sup> All In One Service,<sup>23</sup> ACCUNET T1.5 Service,<sup>24</sup> Regional Frame Relay Service,<sup>25</sup> ISDN-PRI.<sup>26</sup>

*Delaware:* AT&T Business Network,<sup>27</sup> All In One Service,<sup>28</sup> ISDN-PRI,<sup>29</sup> ALS Digital Trunks,<sup>30</sup> DS-1 Digital Facilities,<sup>31</sup> Regional Frame Relay Service,<sup>32</sup> ACCUNET T1.5 Service.<sup>33</sup>

*Florida:* AT&T Business Network Service,<sup>34</sup> All In One Service,<sup>35</sup> ACCUNET T1.5 Service,<sup>36</sup> ALS Digital Trunks,<sup>37</sup> ISDN-PRI,<sup>38</sup> DS-1 Digital Facilities,<sup>39</sup> Regional Frame Relay Service.<sup>40</sup>

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<sup>18</sup> AT&T News Release, *Northeast Utilities Awards AT&T Contract To Maximize Network Efficiency* (June 21, 2004).

<sup>19</sup> AT&T Corp., Form 10-K (SEC filed Mar. 10, 2005).

<sup>20</sup> AT&T Corp., Form 10-K (SEC filed Mar. 10, 2005).

<sup>21</sup> AT&T Corp., Form 10-K (SEC filed Mar. 10, 2005).

<sup>22</sup> AT&T Communications of California, Schedule CAL.P.U.C.No. DPL-T, § 7.8.7 (filed Jan. 18, 2005).

<sup>23</sup> AT&T Communications of California, Schedule CAL.P.U.C.No. DPL-T, § 7.8.6 (filed Jan. 18, 2005).

<sup>24</sup> AT&T Communications of California, Schedule CAL.P.U.C.No. C11-T, § 6.1.1 (filed July 29, 2003).

<sup>25</sup> AT&T Communications of California, Schedule CAL.P.U.C.No. C11-T, § 12.1.1 (filed Mar. 20, 2002).

<sup>26</sup> AT&T Communications of California, Schedule CAL.P.U.C.No. DPL-T, § 7.9 (filed Jan. 18, 2005).

<sup>27</sup> AT&T Communications of Delaware, P.S.C. Del.-No. 5, § 8.1 (issued Jan. 9, 2002).

<sup>28</sup> AT&T Communications of Delaware, P.S.C. Del.-No. 5, § 7.11 (issued Jan. 20, 2004).

<sup>29</sup> AT&T Communications of Delaware, P.S.C. Del.-No. 5, § 7.10 (issued Jan. 9, 2002).

<sup>30</sup> AT&T Communications of Delaware, P.S.C. Del.-No. 5, § 7.14 (issued Nov. 1, 2004).

<sup>31</sup> AT&T Communications of Delaware, P.S.C. Del.-No. 5, § 7.9 (issued Nov. 1, 2004).

<sup>32</sup> AT&T Communications of Delaware, P.S.C. Del.-No. 4, § 3.3 (issued Jan. 9, 2002).

<sup>33</sup> AT&T Communications of Delaware, P.S.C. Del.-No. 3, § 3.2 (issued Oct. 22, 2003).

<sup>34</sup> AT&T Communications of the Southern States, Florida, § 9.1.1 (issued Mar. 12, 2003).

<sup>35</sup> AT&T Communications of the Southern States, Florida, § 10.1.1 (issued Mar. 12, 2003).

<sup>36</sup> AT&T Communications of the Southern States, Florida, Schedule 9, § 7.1.1 (issued June 25, 2003).

<sup>37</sup> AT&T Communications of the Southern States, Florida, § 7.13 (issued Sept. 23, 2004).

<sup>38</sup> AT&T Communications of the Southern States, Florida, § 7.9 (issued Mar. 12, 2003).

*Illinois:* AT&T Business Network Service,<sup>41</sup> All In One Service,<sup>42</sup> ACCUNET T1.5 Service,<sup>43</sup> Regional Frame Relay Service,<sup>44</sup> ISDN-PRI,<sup>45</sup> DS-1 Digital Facilities,<sup>46</sup> Digital Link Service.<sup>47</sup>

*Indiana:* AT&T Business Network Service,<sup>48</sup> All In One Service,<sup>49</sup> ACCUNET T1.5 Service,<sup>50</sup> Regional Frame Relay Service,<sup>51</sup> ISDN-PRI,<sup>52</sup> DS-1 Digital Facilities,<sup>53</sup> Digital Link Service.<sup>54</sup>

*Maine:* AT&T Business Network Service,<sup>55</sup> All In One Service,<sup>56</sup> Digital Link Service,<sup>57</sup> Commercial Long Distance Service.<sup>58</sup>

*Maryland:* AT&T Digital Link,<sup>59</sup> AT&T Business Local Service,<sup>60</sup> All In One Service,<sup>61</sup> ISDN-PRI,<sup>62</sup> ALS Digital Trunks,<sup>63</sup> DS-1 Digital Facilities,<sup>64</sup> Regional Frame Relay Service, ACCUNET T1.5 Service.<sup>65</sup>

*Massachusetts:* AT&T Business Network Service,<sup>66</sup> All In One Service,<sup>67</sup> AT&T Digital Link,<sup>68</sup> ALS Digital Trunks,<sup>69</sup> Centrex Service,<sup>70</sup> ISDN-PRI,<sup>71</sup> DS-1 Digital Facilities,<sup>72</sup> ACCUNET T1.5 Service,<sup>73</sup> Regional Frame Relay Service.<sup>74</sup>

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<sup>39</sup> AT&T Communications of the Southern States, Florida, § 7.10 (issued Sept. 23, 2004).

<sup>40</sup> AT&T Communications of the Southern States, Florida, § 12.1.1 (issued Mar. 12, 2003).

<sup>41</sup> AT&T Communications of Illinois, ILL. C.C. No. 10, § 7.14 (issued June 24, 2004).

<sup>42</sup> AT&T Communications of Illinois, ILL. C.C. No. 9, § 10.1 (issued Aug. 14, 2002).

<sup>43</sup> AT&T Communications of Illinois, ILL. C.C. No. 11, § 7.1 (issued July 17, 2003).

<sup>44</sup> AT&T Communications of Illinois, ILL. C.C. No. 12, § 12.1 (issued Oct. 28, 2002).

<sup>45</sup> AT&T Communications of Illinois, ILL. C.C. No. 10, § 7.16 (issued Aug. 14, 2002).

<sup>46</sup> AT&T Communications of Illinois, ILL. C.C. No. 10, § 7.15 (issued Sept. 20, 2004).

<sup>47</sup> AT&T Communications of Illinois, ILL. C.C. No. 10, § 9.1 (issued June 30, 2003).

<sup>48</sup> AT&T Communications of Indiana, Tariff I.U.R.C. No. T-1, § 9.1 (effective Feb. 16, 2002).

<sup>49</sup> AT&T Communications of Indiana, Tariff I.U.R.C. No. T-2, § 7.11 (effective Jan. 12, 2004).

<sup>50</sup> AT&T Communications of Indiana, Tariff I.U.R.C. No. T-1, § 7.1 (effective Feb. 16, 2002).

<sup>51</sup> AT&T Communications of Indiana, Tariff I.U.R.C. No. T-1, § 12.1.1 (effective Oct. 14, 2003).

<sup>52</sup> AT&T Communications of Indiana, Tariff I.U.R.C. No. T-2, § 7.10 (effective Feb. 16, 2002).

<sup>53</sup> AT&T Communications of Indiana, Tariff I.U.R.C. No. T-2, § 7.9 (effective Sept. 21, 2004).

<sup>54</sup> AT&T Communications of Indiana, Tariff I.U.R.C. No. T-2, § 9.1 (effective July 11, 2003).

<sup>55</sup> AT&T Communications of New England, Maine P.U.C. No. 2, § 9.1 (issued June 1, 2004).

<sup>56</sup> AT&T Communications of New England, Maine P.U.C. No. 2, § 10.1 (issued June 1, 2004).

<sup>57</sup> AT&T Communications of New England, Maine P.U.C. No. 5, § 9.1 (issued June 1, 2004).

<sup>58</sup> AT&T Communications of New England, Maine P.U.C. No. 2, § 3.1.1 (issued June 1, 2004).

<sup>59</sup> AT&T Communications of Maryland, P.S.C. MD No. 9 – Second Revised, § 9.1 (issued June 25, 2003).

<sup>60</sup> AT&T Communications of Maryland, P.S.C. MD No. 9 – Second Revised, § 8.1 (issued Apr. 17, 2003).

<sup>61</sup> AT&T Communications of Maryland, P.S.C. MD No. 8 – Second Revised, § 10.1 (issued Apr. 17, 2003).

<sup>62</sup> AT&T Communications of Maryland, P.S.C. MD No. 9 – Second Revised, § 7.11 (issued Apr. 17, 2003).

<sup>63</sup> AT&T Communications of Maryland, P.S.C. MD No. 9 – Second Revised, § 7.14 (issued Sept. 21, 2004).

<sup>64</sup> AT&T Communications of Maryland, P.S.C. MD No. 9 – Second Revised, § 7.10 (issued Sept. 21, 2004).

<sup>65</sup> AT&T Communications of Maryland, P.S.C. MD No. 5 – Second Revised, § 7.1.1 (issued Apr. 17, 2003).

<sup>66</sup> AT&T Communications of New England, D.T.E. - Mass. No. 3, § 7.19 (issued May 21, 2004).

<sup>67</sup> AT&T Communications of New England, D.T.E. - Mass. No. 2, § 10.1.1 (issued Mar. 20, 2002).

<sup>68</sup> AT&T Communications of New England, D.T.E. - Mass. No. 3, § 9.1.1 (issued Apr. 24, 2002).

<sup>69</sup> AT&T Communications of New England, D.T.E. - Mass. No. 3, § 9.4 (issued Oct. 8, 2004).

<sup>70</sup> AT&T Communications of New England, D.T.E. - Mass. No. 3, § 7.21 (issued June 14, 2004).

*New Hampshire:* AT&T Business Network Service,<sup>75</sup> All In One Service,<sup>76</sup> ISDN-PRI,<sup>77</sup> ALS Digital Trunks,<sup>78</sup> DS-1 Digital Facilities,<sup>79</sup> Prime Digital Trunk Service,<sup>80</sup> Commercial Long Distance Service.<sup>81</sup>

*New Jersey:* AT&T Business Network Service,<sup>82</sup> All In One Service,<sup>83</sup> ALS Digital Trunks,<sup>84</sup> ISDN-PRI,<sup>85</sup> DS-1 Digital Facilities,<sup>86</sup> Regional Frame Relay Service,<sup>87</sup> ACCUNET T1.5 Service.<sup>88</sup>

*New York:* AT&T Business Network Service,<sup>89</sup> All In One Service,<sup>90</sup> ACCUNET T1.5 Service,<sup>91</sup> Regional Frame Relay Service,<sup>92</sup> ALS Digital Trunks,<sup>93</sup> ISDN PRI.<sup>94</sup>

*North Carolina:* AT&T Business Network Service,<sup>95</sup> All In One Service,<sup>96</sup> ACCUNET T1.5 Service,<sup>97</sup> Regional Frame Relay Service,<sup>98</sup> ISDN-PRI,<sup>99</sup> DS-1 Digital Facilities,<sup>100</sup> ALS Digital Trunks.<sup>101</sup>

*Ohio:* AT&T Business Network Service,<sup>102</sup> All In One Service,<sup>103</sup> ACCUNET T1.5 Service,<sup>104</sup> Regional Frame Relay Service,<sup>105</sup> ISDN-PRI,<sup>106</sup> DS-1 Digital Facilities.<sup>107</sup>

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<sup>71</sup> AT&T Communications of New England, D.T.E. - Mass. No. 3, § 7.9 (issued Mar. 20, 2002).  
<sup>72</sup> AT&T Communications of New England, D.T.E. - Mass. No. 3, § 7.10 (issued Oct. 8, 2004).  
<sup>73</sup> AT&T Communications of New England, D.T.E. - Mass. No. 9, § 7.1 (issued Mar. 20, 2002).  
<sup>74</sup> AT&T Communications of New England, D.T.E. - Mass. No. 11, § 12.1.6 (issued Mar. 20, 2002).  
<sup>75</sup> AT&T Communications of New England, NH P.U.C. No. 1, § 9.1.1 (issued Mar. 10, 2003).  
<sup>76</sup> AT&T Communications of New England, NH P.U.C. No. 1, § 10.1.1 (issued Mar. 10, 2003).  
<sup>77</sup> AT&T Communications of New England, NH Local Exchange Services, § 7.8 (issued June 20, 2003).  
<sup>78</sup> AT&T Communications of New England, NH Local Exchange Services, § 7.11 (issued Jan.20, 2005).  
<sup>79</sup> AT&T Communications of New England, NH Local Exchange Services, § 7.7 (issued Jan.20, 2005).  
<sup>80</sup> AT&T Communications of New England, NH Local Exchange Services, § 18.1 (issued Aug. 14, 2003).  
<sup>81</sup> AT&T Communications of New England, NH P.U.C. No. 1, § 3.1.1 (issued Mar. 10, 2003).  
<sup>82</sup> AT&T Communications of New Jersey, B.P.U.- N.J. No. 1, § 9.1 (issued Mar. 31, 2003).  
<sup>83</sup> AT&T Communications of New Jersey, B.P.U.- N.J. No. 1, § 10.1 (issued May 14, 2003).  
<sup>84</sup> AT&T Communications of New Jersey, B.P.U.- N.J. No. 4, § 7.4 (issued Oct. 5, 2004).  
<sup>85</sup> AT&T Communications of New Jersey, B.P.U.- N.J. No. 4, § 7.1.16 (issued Jan. 17, 2003).  
<sup>86</sup> AT&T Communications of New Jersey, B.P.U.- N.J. No. 4, § 7.1.15 (issued Oct. 5, 2004).  
<sup>87</sup> AT&T Communications of New Jersey, B.P.U.- N.J. No. 3, § 12.1 (issued Mar. 31, 2003).  
<sup>88</sup> AT&T Communications of New Jersey, B.P.U.- N.J. No. 3, § 7.1 (issued Mar. 31, 2003).  
<sup>89</sup> AT&T Communications of New York, P.S.C. No. 12, § 32.1.1 (issued Feb. 2, 2001).  
<sup>90</sup> AT&T Communications of New York, P.S.C. No. 12, § 31.1.1 (issued June 15, 1999).  
<sup>91</sup> AT&T Communications of New York, P.S.C. No. 9, § 5.1 (issued Oct. 1, 2001).  
<sup>92</sup> AT&T Communications of New York, P.S.C. No. 11, § 9.1 (issued July 19, 1999).  
<sup>93</sup> AT&T Communications of New York, P.S.C. No. 15, § 7.22 (issued Sept. 29, 2004).  
<sup>94</sup> AT&T Communications of New York, P.S.C. No. 15, § 7.16 (issued June 21, 2000).  
<sup>95</sup> AT&T, North Carolina Custom Network Services at 24 (effective June 1, 2004).  
<sup>96</sup> AT&T, North Carolina Custom Network Services at 25 (effective Apr. 1, 2005).  
<sup>97</sup> AT&T, North Carolina Private Line Services Schedule 9 at 3 (effective Nov. 5, 2003).  
<sup>98</sup> AT&T, North Carolina Private Line Services Schedule 11 at 23 (effective Nov. 5, 2003).  
<sup>99</sup> AT&T, North Carolina Local Exchange Services, § 1.9 (effective July 19, 2002).  
<sup>100</sup> AT&T, North Carolina Local Exchange Services, § 1.8 (effective Sept. 20, 2004).  
<sup>101</sup> AT&T, North Carolina Local Exchange Services, § 1.14 (effective Sept. 20, 2004).  
<sup>102</sup> AT&T Communications of Ohio, P.U.C.O. No. 5, § 9.1 (issued Dec. 24, 2002).  
<sup>103</sup> AT&T Communications of Ohio, P.U.C.O. No. 5, § 10.1 (issued Dec. 24, 2002).  
<sup>104</sup> AT&T Communications of Ohio, P.U.C.O. No. 6, § 7.1 (issued Dec. 20, 2004).

*Oregon:* AT&T Business Network Service,<sup>108</sup> All In One Service,<sup>109</sup> ACCUNET T1.5 Service,<sup>110</sup> Regional Frame Relay Service,<sup>111</sup> ISDN-PRI,<sup>112</sup> DS-1 Digital Facilities.<sup>113</sup>

*Pennsylvania:* AT&T Business Network Service,<sup>114</sup> All In One Service,<sup>115</sup> ACCUNET T1.5 Service,<sup>116</sup> Regional Frame Relay Service,<sup>117</sup> ISDN-PRI,<sup>118</sup> DS-1 Digital Facilities.<sup>119</sup>

*Rhode Island:* AT&T Business Network Service,<sup>120</sup> All In One Service,<sup>121</sup> Regional Frame Relay Service,<sup>122</sup> ISDN-PRI,<sup>123</sup> DS-1 Digital Facilities,<sup>124</sup> Commercial Long Distance.<sup>125</sup>

*Texas:* AT&T Business Network Service,<sup>126</sup> All In One Service,<sup>127</sup> ACCUNET T1.5 Service,<sup>128</sup> ALS Digital Trunks,<sup>129</sup> ISDN-PRI,<sup>130</sup> DS-1 Digital Facilities,<sup>131</sup> Regional Frame Relay Service.<sup>132</sup>

*Vermont:* AT&T Business Network Service,<sup>133</sup> All In One Service,<sup>134</sup> Digital Link Service.<sup>135</sup>

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<sup>105</sup> AT&T Communications of Ohio, P.U.C.O. No. 6, § 12.1 (issued Dec. 20, 2004).

<sup>106</sup> AT&T Communications of Ohio, P.U.C.O. No. 3, § 18 (issued June 5, 2000).

<sup>107</sup> AT&T Communications of Ohio, P.U.C.O. No. 3, § 17 (issued June 5, 2000).

<sup>108</sup> AT&T, Oregon Custom Network Services at 14 (effective July 29, 2004).

<sup>109</sup> AT&T, Oregon Custom Network Services at 13 (effective Mar. 1, 2005).

<sup>110</sup> AT&T, Oregon Private Line Services at 2 (effective Sept. 28, 2001).

<sup>111</sup> AT&T, Oregon Private Line Services at 57.3 (effective Nov. 20, 2002).

<sup>112</sup> AT&T, Oregon Local Exchange Services, § 1.9 (effective July 19, 2002).

<sup>113</sup> AT&T, Oregon Local Exchange Services, § 1.8 (effective Sept. 20, 2004).

<sup>114</sup> AT&T Communications of Pennsylvania, PA P.U.C.-No. 18, § 9.1 (issued Jan. 30, 2003).

<sup>115</sup> AT&T Communications of Pennsylvania, PA P.U.C.-No. 18, § 10.1 (issued Jan. 30, 2003).

<sup>116</sup> AT&T Communications of Pennsylvania, PA P.U.C.-No. 19, § 7.1 (issued Dec. 5, 2003).

<sup>117</sup> AT&T Communications of Pennsylvania, PA P.U.C.-No. 20, § 12.1 (issued Jan. 30, 2003).

<sup>118</sup> AT&T Communications of Pennsylvania, PA P.U.C.-No. 16, § 7.10.1 (issued Nov. 12, 2004).

<sup>119</sup> AT&T Communications of Pennsylvania, PA P.U.C.-No. 16, § 7.9.1 (issued Nov. 12, 2004).

<sup>120</sup> AT&T Communications of New England, RI P.U.C. No. 2, § 9.1.1 (issued July 2, 2004).

<sup>121</sup> AT&T Communications of New England, RI P.U.C. No. 2, § 10.1.1 (issued Jan. 28, 2002).

<sup>122</sup> AT&T Communications of New England, RI P.U.C. No. 11, § 12.1.1 (issued Jan. 28, 2002).

<sup>123</sup> AT&T Communications of New England, RI P.U.C. No. 4, § 7.9 (issued Jan. 28, 2002).

<sup>124</sup> AT&T Communications of New England, RI P.U.C. No. 4, § 7.10 (issued Jan. 28, 2002).

<sup>125</sup> AT&T Communications of New England, RI P.U.C. No. 2, § 3.1.1 (issued Aug. 22, 2003).

<sup>126</sup> AT&T Communications of Texas, Custom Network Services Tariff, § 9.1 (issued Dec. 17, 2002).

<sup>127</sup> AT&T Communications of Texas, Custom Network Services Tariff, § 10.1.1 (issued Dec. 17, 2002).

<sup>128</sup> AT&T Communications of Texas, Private Line Services Tariff – Schedule 9, § 7.1 (issued Dec. 17, 2002).

<sup>129</sup> AT&T Communications of Texas, Local Exchange Services Tariff, § 7.14 (issued Oct. 20, 2004).

<sup>130</sup> AT&T Communications of Texas, Local Exchange Services Tariff, § 7.10.1 (issued Dec. 16, 2002).

<sup>131</sup> AT&T Communications of Texas, Local Exchange Services Tariff, § 7.9.1 (issued Oct. 20, 2004).

<sup>132</sup> AT&T Communications of Texas, Private Line Services Tariff – Schedule 11, § 12.1.1 (issued Aug. 27, 2004).

<sup>133</sup> AT&T Communications of New England, VPSB No. 1, § 30.1.1 (issued Apr. 9, 2004).

<sup>134</sup> AT&T Communications of New England, VPSB No. 1, § 29.1.1 (issued Feb. 28, 2002).

<sup>135</sup> AT&T Communications of New England, VPSB No. 2, § 9.1.1 (issued June 19, 2003).

*Virginia:* AT&T Business Network Service,<sup>136</sup> All In One Service,<sup>137</sup> ACCUNET T1.5 Service,<sup>138</sup> Regional Frame Relay Service,<sup>139</sup> ISDN-PRI,<sup>140</sup> DS-1 Digital Facilities.<sup>141</sup>

*Washington, DC:* AT&T Business Network Service,<sup>142</sup> All In One Service,<sup>143</sup> Regional Frame Relay,<sup>144</sup> ISDN-PRI,<sup>145</sup> DS-1 Digital Facilities.<sup>146</sup>

*West Virginia:* AT&T Business Network Service,<sup>147</sup> All In One Service,<sup>148</sup> Digital Link Service,<sup>149</sup> ACCUNET T1.5 Service.<sup>150</sup>

*Wisconsin:* AT&T Business Network Service,<sup>151</sup> All In One Service,<sup>152</sup> ACCUNET T1.5 Service,<sup>153</sup> Regional Frame Relay Service,<sup>154</sup> ISDN-PRI,<sup>155</sup> DS-1 Digital Facilities.<sup>156</sup>

AT&T Digital Link Direct Inward Dialing Service requires a subscription to DID number groups . . . DID number groups may be ordered in an initial group of 20 and additional groups of 10.<sup>157</sup>

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<sup>136</sup> AT&T Communications of Virginia, S.C.C.-Va.-No. 8, § 34.1 (issued June 7, 2002).

<sup>137</sup> AT&T Communications of Virginia, S.C.C.-Va.-No. 8, § 33.1 (issued June 7, 2002).

<sup>138</sup> AT&T Communications of Virginia, S.C.C.-Va.-No. 6, § 9.1.1 (issued Oct. 30, 2003).

<sup>139</sup> AT&T Communications of Virginia, S.C.C.-Va.-No. 6, § 16.1 (issued June 7, 2002).

<sup>140</sup> AT&T Communications of Virginia, S.C.C.-Va.-No. 9, § 7.1.16 (issued June 7, 2002).

<sup>141</sup> AT&T Communications of Virginia, S.C.C.-Va.-No. 9, § 7.1.15 (issued Dec. 10, 2004).

<sup>142</sup> AT&T Communications of Washington, DC, P.S.C.-D.C.- No. 4, § 9.1 (issued Apr. 30, 2003).

<sup>143</sup> AT&T Communications of Washington, DC, P.S.C.-D.C.- No. 4, § 10.1 (issued Apr. 30, 2003).

<sup>144</sup> AT&T Communications of Washington, DC, P.S.C.-D.C.- No. 6, § 4 (issued Apr. 30, 2003).

<sup>145</sup> AT&T Communications of Washington, DC, P.S.C.-D.C.- No. 7, § 7.11.1 (issued Apr. 30, 2003).

<sup>146</sup> AT&T Communications of Washington, DC, P.S.C.-D.C.- No. 7, § 7.10.1 (issued Nov. 1, 2004).

<sup>147</sup> AT&T Communications of West Virginia, P.S.C.-W.Va.-No. 8, § 32.1 (issued June 2, 2000).

<sup>148</sup> AT&T Communications of West Virginia, P.S.C.-W.Va.-No. 8, § 31.1 (issued Nov. 6, 2001).

<sup>149</sup> AT&T Communications of West Virginia, P.S.C.-W.Va.-No. 9, § 9.1.1 (issued June 30, 2003).

<sup>150</sup> AT&T Communications of West Virginia, P.S.C.-W.Va.-No. 6, § 3.1 (issued May 18, 1992).

<sup>151</sup> AT&T Communications of Wisconsin, P.S.C. of W. No. 11, § 9.1 (Jan. 7, 2002).

<sup>152</sup> AT&T Communications of Wisconsin, P.S.C. of W. No. 11, § 10.1 (Jan. 7, 2002).

<sup>153</sup> AT&T Communications of Wisconsin, P.S.C. of W. No. 12, § 7.1 (July 18, 2003).

<sup>154</sup> AT&T Communications of Wisconsin, P.S.C. of W. No. 13, § 12.1 (Dec. 15, 2001).

<sup>155</sup> AT&T Communications of Wisconsin, P.S.C. of W. No. 10, § 7.17 (Jan. 7, 2002).

<sup>156</sup> AT&T Communications of Wisconsin, P.S.C. of W. No. 10, § 7.16 (Oct. 15, 2004).

<sup>157</sup> AT&T Communications of Maryland, P.S.C.MD No. 9 – Second Revised, § 9.1.3 (issued June 25, 2003); AT&T Communications of New Jersey, B.P.U.- N.J. No. 4, § 9.1.3 (issued June 30, 2003); AT&T Communications of New England, D.T.E. - Mass. No. 3, § 9.1.3 (issued Mar. 20, 2002).



*CLEC facilities:*

	<b>Facilities</b>
Albany, NY	Lucent 5ESS voice switch
Arlington, VA	Lucent 5ESS voice switch Ericsson STP data switch
Baltimore, MD	Lucent 5ESS voice switch ATM/Frame Relay data switch
Boston, MA	Lucent 5ESS voice switch
Bridgeport, CT	Lucent 5ESS voice switch
Buffalo, NY	Lucent 5ESS voice switch
Cambridge, MA	Lucent 5ESS voice switch
Camden, NJ	Lucent 5ESS voice switch
Cedar Knolls, NJ	Lucent 5ESS voice switch
Cheshire, CT	Nortel DMS-500 voice switch
Chicago, IL	Lucent 5ESS voice switch Nortel DMS-500 voice switch Ericsson STP data switch
Columbia, MD	Nortel DMS-500 voice switch
Dallas, TX	Lucent 5ESS voice switch Nortel DMS-500 voice switch Ericsson STP (1)/ IP (2) data switches
Foxboro, MA	Lucent 5ESS voice switch
Framingham, MA	Lucent 5ESS voice switch
Hamilton Square, NJ	Nortel DMS-500 voice switch
Hartford, CT	Nortel DMS-500 voice switch ATM data switch
Houston, TX	Lucent 5ESS voice switch Nortel DMS-500 voice switch ATM/Frame Relay data switch
Huntington, NY	Nortel DMS-500 voice switch
Los Angeles, CA	Lucent 5ESS voice switch Nortel DMS-500 voice switch Ericsson STP data switch
Lowell, MA	Nortel DMS-10S voice switch
Manhattan, NY	Lucent 5ESS voice switch Nortel DMS-500 voice switch
Marlborough, MA	Lucent 5ESS voice switch IP data switch
Needham, MA	Lucent 5ESS voice switch
Newark, NJ	Lucent 5ESS voice switch ATM/Frame Relay data switch
New Brunswick, NJ	ATM data switch

	<b>Facilities</b>
New York, NY	IP data switch
Philadelphia, PA	Lucent 5ESS voice switch Ericsson STP data switch
Piscataway, NJ	Lucent 5ESS voice switch
Pittsburgh, PA	Lucent 5ESS voice switch Ericsson STP data switch
Portland, OR	Lucent 5ESS voice switch
Providence, RI	Nortel DMS-500 voice switch ATM data switch
Queens, NY	Lucent 5ESS voice switch
Richmond, VA	Lucent 5ESS voice switch
Rochelle Park, NJ	Lucent 5ESS voice switch
Stamford, CT	Nortel DMS-500 voice switch
Tampa, FL	ATM data switch
Washington, DC	Lucent 5ESS voice switch Nortel DMS-500 voice switch IP data switch
Wayne, PA	Lucent 5ESS voice switch
White Plains, NY	Nortel DMS-500 voice switch Ericsson STP data switch
Worcester, MA	Lucent 5ESS voice switch
New Paradigm Resources Group, Inc., <i>CLEC Report 2005</i> , Ch. 6 – AT&T at 6-12 (19th ed. 2005).	

See Attachment A.

## ATX Communications (Corecomm)

*Carrier claims that it serves medium businesses:*

“Securing your network is a critical business necessity, but most small and **medium size enterprises** lack the resources and expertise to effectively protect their data while granting access to those who need it. ATX provides full time, around the clock security professionals who will watch over every aspect of your Internet connection.”<sup>158</sup>

“T1 and FT1 Internet services are typically implemented by small and **medium sized companies**.”<sup>159</sup>

“Advance your company's web strategy with proven web expertise, and enjoy the comfort of working with a firm that combines the resources and stability of a large enterprise with a focus on the **mid-sized client**.”<sup>160</sup>

CoreComm: “These business-focused solutions are designed to meet the dynamic needs of small, **medium** and large organizations, including those with network-based services such as e-mail, web, FTP and the rapidly expanding world of Virtual Private Networks (VPN).”<sup>161</sup>

“With CoreComm CoreConnect, you gain a competitive edge by taking advantage of dedicated Toll and Long Distance Services many times not feasible for most small-to-**medium sized businesses**.”<sup>162</sup>

*Examples of business customers based on public information:*

- Nationwide Realty Investors (contract to serve as the preferred provider of telecommunications services for the Arena District in Columbus)<sup>163</sup>

*Service offerings:*

Voice: Local/long distance, Toll-Free, Calling Card, Conference Calling, Fax Broadcast, Voice Mail.<sup>164</sup>

Data: Frame Relay, Private Line, LAN/WAN Integration, Managed WAN, Network Management, and RAS.<sup>165</sup>

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<sup>158</sup> ATX Communications, *Internet Solutions*, [http://www.atx.com/atx\\_solutions\\_internet.html](http://www.atx.com/atx_solutions_internet.html) (emphasis added).

<sup>159</sup> ATX Communications, *Broadband Connectivity*, [http://www.atx.com/atx\\_solutions\\_internet\\_broadband.html](http://www.atx.com/atx_solutions_internet_broadband.html) (emphasis added).

<sup>160</sup> ATX Communications, *E-business Solutions*, [http://www.atx.com/atx\\_solutions\\_ebus.html](http://www.atx.com/atx_solutions_ebus.html) (emphasis added).

<sup>161</sup> Corecomm, *Dedicated Internet Solutions*, <http://www.core.com/webphp/business/internet/dedicated/index.php> (emphasis added).

<sup>162</sup> Corecomm, *CoreConnect*, <http://www.core.com/webphp/business/coreconnect.php> (emphasis added).

<sup>163</sup> ATX Press Release, *ATX Strengthens Columbus Presence Through Agreements with The Ohio State University and Nationwide Realty Investors* (Apr. 10, 2003).

<sup>164</sup> ATX Communications, *Voice Solutions*, [http://www.atx.com/atx\\_solutions\\_voice.html](http://www.atx.com/atx_solutions_voice.html).

<sup>165</sup> ATX Communications, *Data Solutions*, [http://www.atx.com/atx\\_solutions\\_data.html](http://www.atx.com/atx_solutions_data.html).

Internet: Broadband Connectivity, Managed Internet, ATX FrontLine - Data Backup, ATX FrontLine - E-mail Security, ATX FrontLine - URL Filtering, VPN, ISDN, Dial-up Access.<sup>166</sup>

Other: Wireless Solutions, E-business Solutions, and Integrated Solutions.<sup>167</sup>

*Areas within Verizon’s local service area according to CLEC’s website:*

Philadelphia; Allentown, PA; Towson, MD; Newark, DE; Mt. Laurel, NJ; Vienna, VA.<sup>168</sup>

*Jurisdictions in Verizon’s local service areas where CLEC has filed local tariffs:*

*Maryland:* Exchange Lines, Private Branch Exchange (PBX) trunks, WATS access line, Centrex line and Channel Services.<sup>169</sup>

*New Jersey:* Message Telecommunication Service,<sup>170</sup> CoreConnect Preferred (“CCP”).<sup>171</sup>

*Pennsylvania:* Basic Local Exchange Service,<sup>172</sup> Direct Inward Dialing Service (DID).<sup>173</sup>

*Virginia:* Basic Local Exchange Service,<sup>174</sup> ISDN,<sup>175</sup> Direct Inward Dialing Service (DID).<sup>176</sup>

*CLEC facilities:*

	<b>Facilities</b>
Boston, MA	Lucent 5ESS voice switch
Herndon, VA	Nortel DMS-500 voice switch
Manhattan, NY	Lucent 5ESS voice switch
Philadelphia, PA	Nortel DMS-500 and Nortel DMS-10S voice switches
New Paradigm Resources Group, Inc., <i>CLEC Report 2005</i> , Ch. 6 – Corecomm, Ltd. at 7-8 (19th ed. 2005).	

See Attachment A.

<sup>166</sup> ATX Communications, *Internet Solutions*, [http://www.atx.com/atx\\_solutions\\_internet.html](http://www.atx.com/atx_solutions_internet.html).

<sup>167</sup> ATX Communications, *Solutions for Your Business*, [http://www.atx.com/atx\\_solutions\\_home.html](http://www.atx.com/atx_solutions_home.html).

<sup>168</sup> ATX Communications, *About Us*, [http://www.atx.com/atx\\_story\\_locations.html#9](http://www.atx.com/atx_story_locations.html#9).

<sup>169</sup> ATX Licensing, Inc., MD. P.S.C. Tariff No. 1, § 3.3.2 (issued Feb. 27, 2002).

<sup>170</sup> ATX Telecommunications Services, Ltd., N.J.B.P.U. Tariff No. 1, § 6.2.1 (issued 2001).

<sup>171</sup> ATX Telecommunications Services, Ltd., N.J.B.P.U. Tariff No. 1, § 16.1.3.1 (issued Sept. 17, 2004).

<sup>172</sup> ATX Telecommunications Services, Ltd., Telephone Pa. P.U.C. No. 2, § 5.2 (issued Feb. 10, 1997).

<sup>173</sup> ATX Telecommunications Services, Ltd., Telephone Pa. P.U.C. No. 2, § 5.8.1 (issued Feb. 10, 1997).

<sup>174</sup> ATX Telecommunications Services of Virginia, LLC, Telephone Va. S.C.C. No 1, § 5.2 (issued Feb. 13, 2001).

<sup>175</sup> ATX Telecommunications Services of Virginia, LLC, Telephone Va. S.C.C. No 1, § 5.2 (issued Feb. 13, 2001).

<sup>176</sup> ATX Telecommunications Services of Virginia, LLC, Telephone Va. S.C.C. No 1, § 5.7.1 (issued Feb. 13, 2001).

## Broadview

*Carrier claims that it serves medium businesses:*

“Broadview Networks is a network-based electronically integrated communications provider (e-ICP) serving small and **medium-sized businesses** and communications-intensive residential customers in the northeastern and mid-Atlantic United States.”<sup>177</sup>

“Broadview Networks is the first competitive local exchange carrier (CLEC) in the area to offer these high-quality converged services to small and **medium businesses**.”<sup>178</sup>

“Broadview Networks, one of the first competitive local exchange carriers in the Albany market, today announced that it is the first to bring small and **medium-sized businesses** the benefits of Voice over DSL (VoDSL) service.”<sup>179</sup>

*Service offerings:*

Voice: Local Phone Service, Regional Phone Service, Long Distance Service, International Cents Long Distance, Voice T1 Service, and Integrated Access Solutions.<sup>180</sup>

Data and Internet: ADSL, SDSL, Dedicated Internet T1, Dial-Up Service, Integrated Access Solutions, Web Hosting.<sup>181</sup>

*Areas within Verizon’s local service area according to CLEC’s website:*

Philadelphia, Albany, Syracuse, Buffalo, Boston, New York City, Newark.<sup>182</sup>

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<sup>177</sup> Broadview Networks Press Release, *BridgeCom and Broadview Networks Complete Merger* (Jan. 26, 2005) (emphasis added).

<sup>178</sup> Broadview Networks Press Release, *Broadview Networks Completes Successful Trial of VoIP for Small Businesses* (Jan. 12, 2004) (emphasis added).

<sup>179</sup> Broadview Networks Press Release, *Broadview Networks Launches Voice Over DSL Service In Albany* (Oct. 3, 2001) (emphasis added).

<sup>180</sup> Broadview Networks, *Voice Services*, [http://www.broadviewnet.com/Products\\_Services/Business/VoiceServices.asp?scenario=0](http://www.broadviewnet.com/Products_Services/Business/VoiceServices.asp?scenario=0).

<sup>181</sup> Broadview Networks, *Data & High-Speed Internet*, [http://www.broadviewnet.com/Products\\_Services/Business/DataHighspeed.asp?scenario=0](http://www.broadviewnet.com/Products_Services/Business/DataHighspeed.asp?scenario=0).

<sup>182</sup> Broadview Networks, *Service Coverage Area*, [http://www.broadviewnet.com/Products\\_Services/Common/ServiceArea.asp?scenario=0](http://www.broadviewnet.com/Products_Services/Common/ServiceArea.asp?scenario=0).

*CLEC facilities:*

	<b>Facilities</b>
Charlestown, MA	Nortel DMS-500 voice switch Cisco ATM data switch
Horsham, PA	Nortel DMS-500 voice switch
New York, NY	Nortel DMS-500 voice switch Cisco ATM data switch
Syracuse, NY	Nortel DMS-500 voice switch Cisco ATM data switch
New Paradigm Resources Group, Inc., <i>CLEC Report 2005</i> , Ch. 6 – Broadview Networks at 9 (19th ed. 2005).	

See Attachment A.

## **Broadwing (formerly Corvis/Focal)**

*Carrier claims that it serves medium businesses:*

“Grow from Switched services (for small-to-**medium** businesses) to Dedicated services (for **medium**-to-large businesses) with a single provider.”<sup>183</sup>

The president of enterprise markets at Broadwing Communications “is responsible for sales and service of bundled services, including voice and data products, to **medium-size** businesses nationwide.”<sup>184</sup>

*Examples of business customers based on public information:*

- CallTower Inc. (“a company that provides outsourced telecommunications services for small to medium size businesses across the nation, is one of Broadwing’s customers currently using Broadwing PRIorityConnect,” – “an Intra/InterLATA service that enables customers to consolidate their end user traffic from branch locations to a single location for call completion.”)<sup>185</sup>
- Petry Media (contract to provide IP-based VPN and Managed Firewall services to interconnect the company’s 22 U.S. locations)<sup>186</sup>
- Big Lots (contract to use Broadwing’s MultiConnect Private Line service to interconnect Big Lots locations nationwide)<sup>187</sup>

*Service offerings:*

Audio Conferencing, Business Continuity Services, Calling Card Services, Capacity Services, CoreConnect; CPE, CPE-Based VPN, Dedicated Internet Access, DSL for Frame Relay, DSL for IP, Enhanced Frame Relay, Enhanced Toll Free Services; Frame Relay/ATM, FrameConnect, International Dedicated Internet Access; International Frame Relay/ATM, International Private Line, International Services, Managed Network Services, Managed Security, Managed WAN, Media Services, MultiConnect, MultiConnect Express, MultiConnect International Extension, MultiConnect ReDirect, Network-Based VPN, Private IP Services, Private Line, Switched & Dedicated Voice, Voice Resale, Voice Services, VoIP, Wavelength, and Wide Area Networking.<sup>188</sup>

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<sup>183</sup> Broadwing, *Voice Services*, <http://www.broadwing.com/enterprise-d5.html> (emphasis added).

<sup>184</sup> Broadwing, *Leadership*, <http://www.broadwing.com/about-b306.html> (emphasis added).

<sup>185</sup> Broadwing Press Release, *Broadwing Communications Launches Broadwing PRIorityConnect* (Oct. 20, 2004).

<sup>186</sup> Broadwing Press Release, *Petry Media Selects Broadwing Communications IP VPN Services* (Apr. 5, 2005).

<sup>187</sup> Broadwing Press Release, *Big Lots Selects Broadwing MultiConnect Private Line Service* (Mar. 23, 2005).

<sup>188</sup> Broadwing, *All Services*, <http://www.broadwing.com/allserv.html>.

*Areas within Verizon’s local service area according to CLEC’s website*

Columbia, MD; Baltimore/Towson; Boston; Marlton, NJ; New York; Philadelphia;  
Reston, VA.<sup>189</sup>

*CLEC facilities:*

	<b>Facilities</b>
Cambridge, MA	Nortel DMS-500 voice switch
Jersey City, NJ	Nortel DMS-500 voice switch
Manhattan, NY	Nortel DMS-500 voice switch
Norristown, PA	Nortel DMS-500 voice switch
Northern New Jersey	Nortel DMS-500 voice switch
Philadelphia, PA	Nortel DMS-500 voice switch Juniper/Foundry data switch
Washington, DC	Nortel DMS-500 voice switch
White Plains, NY	Nortel DMS-500 voice switch
New Paradigm Resources Group, Inc., <i>CLEC Report 2005</i> , Ch. 6 – Broadwing Communications at 10-12 (19th ed. 2005).	

*See Attachment A.*

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<sup>189</sup> Broadwing, *Markets*, <http://www.broadwing.com/about-b5.html>.



## **BullsEye Telecom**

*Carrier claims that it serves medium businesses:*

“BullsEye Telecom is a progressive telecommunications company that provides state-of-the-art data and voice communication solutions that not only meets the needs of small to **medium businesses**, but also provides true integration for the large multi-location customer.”<sup>190</sup>

“With a complete suite of voice services designed for the small and **medium size business**, BullsEye Telecom has invested our efforts in developing a strong infrastructure that gives you a choice.”<sup>191</sup>

“Today DSL is, for the first time, putting high-speed Internet access within the reach of the home, small and **medium-size businesses**.”<sup>192</sup>

*Service offerings:*

Voice Products: Local, IntraLATA (local toll), long distance, international, toll-free, call management features, voice mail, calling card.<sup>193</sup>

Data Products: Fractional and full T-1, DSL, Dial-Up Internet access, Domain Name Services (DNS), web site hosting.<sup>194</sup>

*Areas within Verizon’s local service area according to CLEC’s website:*

“With a national footprint providing local, long distance and high-speed data services, BullsEye Telecom has grown at a rapid pace.”<sup>195</sup>

*Jurisdictions in Verizon’s local service areas where CLEC has filed local tariffs:*

*Connecticut:* Standard Business Local Exchange Service.<sup>196</sup>

*Maryland:* PowerSaver Unlimited.<sup>197</sup>

*Maine:* Standard Business Local Exchange Service.<sup>198</sup>

*Massachusetts:* PowerSaver Unlimited.<sup>199</sup>

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<sup>190</sup> BullsEye Telecom, *Career Opportunities*, <http://www.bullseyetelecom.com/join/employment.htm> (emphasis added).

<sup>191</sup> BullsEye Telecom, *Voice Services*, [http://www.bullseyetelecom.com/dynaframe.asp?page=prod\\_serv/voice.htm](http://www.bullseyetelecom.com/dynaframe.asp?page=prod_serv/voice.htm) (emphasis added).

<sup>192</sup> BullsEye Telecom, *DSL Internet Service*, [http://www.bullseyetelecom.com/prod\\_serv/dsl.htm](http://www.bullseyetelecom.com/prod_serv/dsl.htm) (emphasis added).

<sup>193</sup> BullsEye Telecom, *Corporate Fact Sheet*, [http://www.bullseyetelecom.com/comp\\_info/fact\\_sheet.htm](http://www.bullseyetelecom.com/comp_info/fact_sheet.htm).

<sup>194</sup> BullsEye Telecom, *Corporate Fact Sheet*, [http://www.bullseyetelecom.com/comp\\_info/fact\\_sheet.htm](http://www.bullseyetelecom.com/comp_info/fact_sheet.htm).

<sup>195</sup> BullsEye Telecom, *Company Overview*, <http://www.ca.bullseyetelecom.com/overview.asp>.

<sup>196</sup> BullsEye Telecom, Inc., Connecticut Tariff No. 1, § 5.2 (issued Feb. 7, 2005).

<sup>197</sup> BullsEye Telecom, Inc., PSC MD Tariff No. 1, § 4.5.4 (issued Aug. 11, 2004).

<sup>198</sup> BullsEye Telecom, Inc., Maine PUC, § 5.2 (effective Mar. 17, 2005).

*New Hampshire:* Standard Business Local Exchange Service.<sup>200</sup>

*New Jersey:* New Jersey Unlimited Plan,<sup>201</sup> New Jersey 125 Plan,<sup>202</sup> PowerSaver Unlimited.<sup>203</sup>

*New York:* New York Unlimited Plan,<sup>204</sup> New York 125 Plan,<sup>205</sup> PowerSaver Unlimited.<sup>206</sup>

*Pennsylvania:* Pennsylvania Unlimited Plan,<sup>207</sup> Pennsylvania 125 Plan,<sup>208</sup> PowerSaver Unlimited<sup>209</sup>

*Rhode Island:* Standard Business Local Exchange Service.<sup>210</sup>

*Virginia:* Standard Business Local Exchange Service – Flat Rate,<sup>211</sup> PowerSaver Unlimited.<sup>212</sup>

*West Virginia:* Standard Business Local Exchange Service.<sup>213</sup>

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<sup>199</sup> BullsEye Telecom, Inc., M.D.T.E. Tariff No. 1, § 5.5.1 (issued May 20, 2004).

<sup>200</sup> BullsEye Telecom, Inc., New Hampshire Price List No. 1, § 2.2 (issued Mar. 4, 2005).

<sup>201</sup> BullsEye Telecom, Inc., New Jersey Tariff No. 1, § 5.4.2 (issued Mar. 4, 2005).

<sup>202</sup> BullsEye Telecom, Inc., New Jersey Tariff No. 1, § 5.4.1 (issued Mar. 4, 2005).

<sup>203</sup> BullsEye Telecom, Inc., New Jersey Tariff No. 1, § 5.5.1 (issued Mar. 4, 2005).

<sup>204</sup> BullsEye Telecom, Inc., New York PSC No. 1 – Telephone, § 5.4.2 (issued Mar. 4, 2005).

<sup>205</sup> BullsEye Telecom, Inc., New York PSC No. 1 – Telephone, § 5.4.1 (issued Mar. 4, 2005).

<sup>206</sup> BullsEye Telecom, Inc., New York PSC No. 1 – Telephone, § 5.5.1 (issued May 20, 2004).

<sup>207</sup> BullsEye Telecom, Inc., Tariff Telephone - Pa P.U.C. No. 2, § 5.4.2 (issued Mar. 2, 2005).

<sup>208</sup> BullsEye Telecom, Inc., Tariff Telephone - Pa P.U.C. No. 2, § 5.4.1 (issued Mar. 2, 2005).

<sup>209</sup> BullsEye Telecom, Inc., Tariff Telephone - Pa P.U.C. No. 2, § 5.5.1 (issued May 21, 2004).

<sup>210</sup> BullsEye Telecom, Inc., Rhode Island Tariff No. 1, § 5.2 (issued Jan. 28, 2005).

<sup>211</sup> BullsEye Telecom of Virginia, LLC, VA. S.C.C. No. 1, § 5.3 (issued Oct. 14, 2004).

<sup>212</sup> BullsEye Telecom of Virginia, LLC, VA. S.C.C. No. 1, § 5.4 (issued Oct. 14, 2004).

<sup>213</sup> BullsEye Telecom Inc., West Virginia Tariff No. 1, § 5.2 (issued Feb. 3, 2005).

## Cavalier Telephone

*Carrier claims that it serves medium businesses:*

“Businesses of **every size** and in every industry benefit from Cavalier Business Communications’ comprehensive suite of voice product solutions.”<sup>214</sup>

“[Digital T-1 for] **Mid to large-sized businesses** with premises based switching equipment used for high volume inbound/outbound local and long-distance calling.”<sup>215</sup>

*Examples of business customers based on public information:*

- State of Delaware Department of Technology and Information and the University of Delaware (contract to provide improved data network services to the State of Delaware, includes installation of a redundant fiber connection to the states ISP’s)<sup>216</sup>
- United States District Court Clerk’s Office for the Eastern District of Pennsylvania (five year contract to provide telecommunications services to the clerk’s office)<sup>217</sup>

*Service offerings:*

Local Calling Services, Long Distance, Private Lines, Internet Access T1 to OC-x, Multi-Use T1 (voice & data), DSL to 15 mbps, 128k ISDN, Web Hosting, 56k internet, Domain Name Management, Virtual Private Networks, Phonom VoIP, Phonom IP Centrex, ISDN PRI and BRI, Frame Relay, 10/100 Gig-Ethernet and DS3 - OC-x.<sup>218</sup>

*Areas within Verizon’s local service area according to CLEC’s website:*

Washington, DC; Richmond; Atlantic City, NJ; Philadelphia; Baltimore; Hampton Roads; Fredericksburg, VA; Northern Virginia; Delaware.<sup>219</sup>

*Jurisdictions in Verizon’s local service areas where CLEC has filed local tariffs:*

*Delaware:* Standard Residential/Business Line, Standard Business Trunk, Digital Business Line, Digital Business Trunk, Primary Rate Interface.<sup>220</sup>

*Maryland:* Standard Residential/Business Line, Standard Business Trunk, Digital Business Line, Digital Business Trunk, Primary Rate Interface.<sup>221</sup>

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<sup>214</sup> Cavalier Business Communications, *Voice Solutions*, [http://www.cavtel.com/business/voice\\_solutions.shtml](http://www.cavtel.com/business/voice_solutions.shtml) (emphasis added).

<sup>215</sup> Cavalier Business Communications, *Voice Solutions*, [http://www.cavtel.com/business/voice\\_solutions.shtml](http://www.cavtel.com/business/voice_solutions.shtml) (emphasis added).

<sup>216</sup> Cavalier News Release, *State of Delaware Partners With Cavalier Business Communications For Major Data Network Expansion* (Oct. 21, 2004).

<sup>217</sup> Cavalier News Release, *Cavalier Announces Award of US Courts Philadelphia Project* (Sept. 3, 2004).

<sup>218</sup> Cavalier Business Communications, *Cavalier Business Communications*, <http://www.cavtel.com/business/>.

<sup>219</sup> Cavalier Business Communications, *Cavalier Business Communications*, <http://www.cavtel.com/business/>.

<sup>220</sup> Cavalier Telephone Mid-Atlantic, L.L.C., Delaware Tariff No. 1, § 3.1.4 (issued Oct. 30, 2001).

*New Jersey:* Standard Residential/Business Line, Standard Business Trunk, Digital Business Line, Digital Business Trunk, Primary Rate Interface.<sup>222</sup>

*Pennsylvania:* Standard Residential/Business Line, Standard Business Trunk, Digital Business Line, Digital Business Trunk, Primary Rate Interface.<sup>223</sup>

*Virginia:* Standard Residential/Business Line, Standard Business Trunk, Digital Business Line, Digital Business Trunk, Primary Rate Interface.<sup>224</sup>

*CLEC facilities:*

	<b>Facilities</b>
Bel Air, MD	Nortel DMS-100 voice switch
Herndon, VA	Lucent 5ESS voice switch
Marshallton, DE	Nortel DMS-100 voice switch
New Castle, DE	Nortel DMS-100 voice switch
Newark, DE	Nortel DMS-100 voice switch
Norfolk, VA	Lucent 5ESS voice switch
Philadelphia, PA	Nortel DMS-500 voice switch
Richmond, VA	Lucent 5ESS voice switch
Salisbury, MD	Nortel DMS-100 voice switch
Warminster, PA	Lucent 5ESS voice switch
Wilmington, DE	Nortel DMS-100 voice switch
New Paradigm Resources Group, Inc., <i>CLEC Report 2005</i> , Ch. 6 – Cavalier Telephone at 6-8 (19th ed. 2005).	

Cavalier also manages the Elantic Telecom network under an arrangement that ““makes available to Cavalier Telephone and [its] customers one of the largest and most advanced fiber networks east of the Mississippi.””<sup>225</sup>

See Attachment A.

<sup>221</sup> Cavalier Telephone Mid Atlantic, PSC MD Tariff No. 1, § 5.2 (issued Feb. 13, 2001).

<sup>222</sup> Cavalier Telephone Mid-Atlantic, L.L.C., NJ Telecommunications No. 1, § 3.2 (issued Nov. 2, 2001).

<sup>223</sup> Cavalier Telephone Mid-Atlantic, L.L.C., Telephone Pa. P.U.C. No. 1, § 3.2 (issued Apr. 16, 2000).

<sup>224</sup> Cavalier Telephone, L.L.C, Virginia S.C.C. Tariff No. 1, § 3.2 (issued July 7, 1999).

<sup>225</sup> Cavalier Telephone Press Release, *Cavalier Telephone Announces Second Quarter 2004 Performance* (Aug. 12, 2004) (statement by Cavalier President and COO Robert Keane).

## Choice One Communications

*Carrier claims that it serves medium businesses:*

“Choice One Communications serves over 100,000 business clients in twelve states.”<sup>226</sup>

“Choice One Communications is an Integrated Communications Provider (ICP) offering a full array of local, long distance, high-speed data (including DSL), web hosting, design and development services to small and **medium sized** companies in the Northeast and Midwest United States.”<sup>227</sup>

“We have chosen to target small and **medium sized-business** because they are typically underserved by the incumbent local exchange provider (Baby Bell or Local Independent).”<sup>228</sup>

*Examples of business customers based on public information:*

- New Edge Networks (wholesale contract to provide SDSL broadband access and T-1 services)<sup>229</sup>
- New England Patriots (became the official telecommunications provider (voice and data) for the New England Patriots, Gillette Stadium, the New England Revolution and the Kraft Group)<sup>230</sup>

*Service offerings:*

Choice One provides a full range of local, long distance, high-speed data, web hosting, design and development services.<sup>231</sup>

*Areas within Verizon’s local service area according to CLEC’s website:*

“Choice One currently serves 29 markets in 12 states,” including:

Augusta-Portland, ME; Manchester-Portsmouth, NH; Worcester, MA; Springfield, MA; Providence, RI, Albany, NY; Buffalo, NY; Scranton-Wilkes-Barre, PA; Syracuse, NY; Harrisburg, PA; Allentown, PA; Pittsburgh, PA; Erie, PA; Ft. Wayne, IN.<sup>232</sup>

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<sup>226</sup> Choice One, *Client Testimonials*, <http://www.choiceonecom.com/testimonials/>.

<sup>227</sup> Choice One, *Our Company: Company Overview*, <http://choiceonecom.com/ourcompany/> (emphasis added).

<sup>228</sup> Choice One, *Our Company: Company Overview*, <http://choiceonecom.com/ourcompany/> (emphasis added).

<sup>229</sup> Choice One Press Release, *New Edge Networks Expands Broadband Reach in Midwest and Northeast through Network Agreement with Choice One* (Feb. 9, 2004).

<sup>230</sup> Choice One Press Release, *Choice One Communications Partners with the New England Patriots* (Sep. 8, 2003).

<sup>231</sup> Choice One, *Our Company: Company Overview*, <http://choiceonecom.com/ourcompany/>.

<sup>232</sup> Choice One, *Locations*, <http://choiceonecom.com/ourcompany/officelocations.php>.

*Jurisdictions in Verizon's local service areas where CLEC has filed local tariffs:*

*Indiana:* Choice Xchange Advantage Unlimited, Ultra T-1 Product Set, ISDN PRI Option.<sup>233</sup>

*Maine:* Choice Xchange Advantage Unlimited,<sup>234</sup> Ultra T-1 Product Set,<sup>235</sup> ISDN PRI Option.<sup>236</sup>

*Massachusetts:* Choice Xchange Advantage Unlimited,<sup>237</sup> Ultra T-1 Product Set,<sup>238</sup> ISDN PRI Option.<sup>239</sup>

*New Hampshire:* Choice Xchange Advantage Unlimited,<sup>240</sup> Ultra T-1 Product Set,<sup>241</sup> ISDN PRI Option.<sup>242</sup>

*New York:* Choice Xchange Advantage Unlimited,<sup>243</sup> Ultra T-1 Product Set,<sup>244</sup> ISDN PRI Option.<sup>245</sup>

*Pennsylvania:* Choice Xchange Advantage Unlimited Line,<sup>246</sup> ISDN PRI Option,<sup>247</sup> Ultra T-1 Product Set.<sup>248</sup>

*Rhode Island:* ChoiceExchange Service – Business Line,<sup>249</sup> Dedicated Voice Full T-1/Dedicated Voice Fractional T-1,<sup>250</sup> Integrated T-1,<sup>251</sup> Dedicated Internet,<sup>252</sup> ISDN PRI.<sup>253</sup>

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<sup>233</sup> US Xchange of Indiana, L.L.C. d/b/a Choice One Communications, I.U.R.C. Tariff No. 1, § 9 (issued Jan. 11, 2005).

<sup>234</sup> Choice One Communications of Maine Inc., ME P.U.C. No. 1, § 1.14 (proposed effective May 19, 2004).

<sup>235</sup> Choice One Communications of Maine Inc., ME P.U.C. No. 1, § 1.13.1.5 (proposed effective Jan. 15, 2005).

<sup>236</sup> Choice One Communications of Maine Inc., ME P.U.C. No. 1, § 1.13.1.5.4 (proposed effective Jan. 15, 2005).

<sup>237</sup> Choice One Communications of Massachusetts Inc., M.D.T.E. No. 1, § 4.3.1 (issued Apr. 19, 2004).

<sup>238</sup> Choice One Communications of Massachusetts Inc., M.D.T.E. No. 1, § 4.4 (issued Dec. 15, 2004).

<sup>239</sup> Choice One Communications of Massachusetts Inc., M.D.T.E. No. 1, § 4.4.4 (issued Dec. 15, 2004).

<sup>240</sup> Choice One of New Hampshire, Inc., N.H. P.U.C. Price List No. 1, § 1.21 (Apr. 19, 2004).

<sup>241</sup> Choice One of New Hampshire, Inc., N.H. P.U.C. Price List No. 1, § 1.22 (Jan. 14, 2005).

<sup>242</sup> Choice One of New Hampshire, Inc., N.H. P.U.C. Price List No. 1, § 1.22.5 (Jan. 14, 2005).

<sup>243</sup> Choice One Communications of New York, Inc, New York P.S.C. No. 4- Telephone, § 4.2 (issued Apr. 19, 2004).

<sup>244</sup> Choice One Communications of New York, Inc, New York P.S.C. No. 4- Telephone, § 4.1.6 (issued Dec. 15, 2004).

<sup>245</sup> Choice One Communications of New York, Inc, New York P.S.C. No. 4- Telephone, § 4.1.6.4 (issued Dec. 15, 2004).

<sup>246</sup> Choice One Communications of Pennsylvania, Inc., PA P.U.C. No. 1, § 7.2.5 (issued Apr. 19, 2004).

<sup>247</sup> Choice One Communications of Pennsylvania, Inc., PA P.U.C. No. 1, § 4.1.4 (issued Dec. 17, 2004).

<sup>248</sup> Choice One Communications of Pennsylvania, Inc., PA P.U.C. No. 1, § 4.1.1 (issued Dec. 17, 2004).

<sup>249</sup> Choice One Communications of Rhode Island, Inc., R.I. P.U.C. No. 1, § 12.10.1 (issued Dec. 3, 2002).

<sup>250</sup> Choice One Communications of Rhode Island, Inc., R.I. P.U.C. No. 1, § 12.14.6 (issued Dec. 15, 2004).

<sup>251</sup> Choice One Communications of Rhode Island, Inc., R.I. P.U.C. No. 1, § 12.14.6 (issued Dec. 15, 2004).

<sup>252</sup> Choice One Communications of Rhode Island, Inc., R.I. P.U.C. No. 1, § 12.14.6 (issued Dec. 15, 2004).

<sup>253</sup> Choice One Communications of Rhode Island, Inc., R.I. P.U.C. No. 1, § 12.14.6 (issued Dec. 15, 2004).

*CLEC facilities:*

	<b>Facilities</b>
Albany, NY	Lucent 5ESS voice switch Lucent/Cisco data switch
Allentown, PA	Lucent/Cisco ATM data switch
Buffalo, NY	Lucent 5ESS voice switch Lucent/Cisco data switch
Harrisburg, PA	Lucent/Cisco ATM data switch
Manchester, NH	Lucent/Cisco data switch
New Kensington, PA	Nortel DMS-100 voice switch
Pittsburgh, PA	Lucent 5ESS voice switch Lucent/Cisco data switch
Providence, RI	Lucent 5ESS voice switch Lucent/Cisco data switch
Robinson Township, PA	Lucent 5ESS voice switch
Scranton/Wilkes Barre, PA	Lucent/Cisco ATM data switch
Sharpsburg, PA	Lucent 5ESS voice switch
Springfield, MA	Lucent 5ESS voice switch Lucent/Cisco data switch
Syracuse, NY	Lucent 5ESS & Nortel DMS-100 voice switches Lucent/Cisco data switch
Washington, PA	Lucent 5ESS voice switch
Worcester, MA	Lucent 5ESS voice and data switch
New Paradigm Resources Group, Inc., <i>CLEC Report 2005</i> , Ch. 6 – Choice One Communications at 10-12 (19th ed. 2005).	

See Attachment A.

## Citizens/Electric Lightwave

*Carrier claims that it serves medium businesses:*

“Founded in 1990, Electric Lightwave, LLC (ELI) is one of the nation’s leading Integrated Communications Provider of local telephone, data, network, and long distance services to small and **medium** enterprise businesses, Carriers, and the growing e-commerce market.”<sup>254</sup>

*Service offerings:*

Data Services: Frame Relay DS0, Fractional T1 & DS1, International Frame Relay, Asynchronous Transfer Mode (ATM) DS1 to OC3, Transparent LAN 10 Mbps to 100 Mbps, Managed Router Service, Remote Systems Virtual PortalSM – Wholesale dial-up Internet access, Dedicated Internet Services Fractional DS1 to OC12, Dedicated 10Base T and 100Base T Ethernet, Usage based Internet DS3 to OC3, Usage based 10BaseT and 100BaseT Ethernet, and Web Hosting and E-mail.

Network services: Metro Private Line – DS1 to OC192 and Ethernet, Long Haul Private Line – DS1 to OC48, Collocation, and Data Centers.<sup>255</sup>

Electric Lightwave also provides local and long-distance service as well as bundled services.

*Areas within Verizon’s local service area according to CLEC’s website:*

Newark, New York, and Washington, D.C.<sup>256</sup>

*Jurisdictions in Verizon’s local service areas where CLEC has filed local tariffs:*

*New York:* Private Line Service,<sup>257</sup> ICI/ELI Frame Relay Port Service,<sup>258</sup> TLS Port Service,<sup>259</sup> ATM Port Service,<sup>260</sup> Full Duplex PVC.<sup>261</sup>

*CLEC facilities:*

See Attachment A.

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<sup>254</sup> Electric Lightwave, *About Us*, <http://www.electriclightwave.com/about.html> (emphasis added).

<sup>255</sup> Electric Lightwave, *Fact Sheet*, [http://www.electriclightwave.com/media/company\\_factsheet\\_0410.pdf](http://www.electriclightwave.com/media/company_factsheet_0410.pdf).

<sup>256</sup> Electric Lightwave, *Fact Sheet*, [http://www.electriclightwave.com/media/company\\_factsheet\\_0410.pdf](http://www.electriclightwave.com/media/company_factsheet_0410.pdf).

<sup>257</sup> Electric Lightwave, New York Tariff No. 1, § 6 (issued July 1, 1999).

<sup>258</sup> Electric Lightwave, New York Tariff No. 1, § 5.5.1 (issued July 1, 1999).

<sup>259</sup> Electric Lightwave, New York Tariff No. 1, § 5.5.2 (issued July 1, 1999).

<sup>260</sup> Electric Lightwave, New York Tariff No. 1, § 5.5.3 (issued July 1, 1999).

<sup>261</sup> Electric Lightwave, New York Tariff No. 1, § 5.5.4 (issued Mar. 1, 2000).



## Comcast Commercial

*Carrier claims that it serves medium businesses:*

“Comcast High-Speed Internet, with services flexible to suit small, **medium** and large business needs.”<sup>262</sup>

“**Medium** and Large Enterprises Services: Robust and Reliable Internet Services”<sup>263</sup>

“Comcast Business Communications (CBC) has been established to further leverage Comcast’s domestic cable infrastructure by providing a complete voice, data, and Internet service bundle to small and **medium-sized** businesses in eight key markets served by Comcast Cable.”<sup>264</sup>

*Service offerings:*

“Enterprise INTERNET Service provides dedicated Internet access seamlessly delivered to your existing network infrastructure.”<sup>265</sup>

“Enterprise NETWORK Service delivers intelligent bandwidth across multiple sites and gives you the control you need, door-to-door across our own network. This adaptive network service quickly responds to your changing business needs.”<sup>266</sup>

*Other Services:* Comcast Workplace for smaller offices and branch locations- high-speed Internet access for small businesses or branch offices (up to 7.0 Mbps downloads, 768 Kbps uploads), managed firewall security;<sup>267</sup> Comcast Teleworker for offsite employees- always on Internet access, VPN compatibility, simple backoffice billing and management (rates included).<sup>268</sup>

*Areas within Verizon’s local service area according to CLEC’s website:*

New Jersey North; New Jersey South; Washington DC; Philadelphia; Boston; Los Angeles; Baltimore.<sup>269</sup>

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<sup>262</sup> Comcast Business Communications, *About Us*, <http://www.comcast-ne.com/business/about.html> (emphasis added).

<sup>263</sup> Comcast Business Communications, *Medium and Large Enterprises*, <http://www.comcastcommercial.com/index.php?option=content&task=view&id=20&Itemid=96> (emphasis added).

<sup>264</sup> Comcast Corporation Press Release, *Comcast Reports Strong Second Quarter Results* (Aug. 1, 2001) (emphasis added).

<sup>265</sup> Comcast Business Communications, *Medium and Large Enterprises*, <http://www.comcastcommercial.com/index.php?option=content&task=view&id=20&Itemid=96>.

<sup>266</sup> Comcast Business Communications, *Medium and Large Enterprises*, <http://www.comcastcommercial.com/index.php?option=content&task=view&id=20&Itemid=96>.

<sup>267</sup> Comcast Business Communications, *Comcast Workplace*, <http://www.comcastcommercial.com/index.php?option=content&task=view&id=48&Itemid=87>.

<sup>268</sup> Comcast Business Communications, *Comcast Teleworker*, <http://www.comcastcommercial.com/index.php?option=content&task=view&id=47>.

<sup>269</sup> Comcast Business Communications, *Teleworker Network Upgrade*, <http://www.comcastcommercial.com/index.php?option=content&task=view&id=68>.

*Jurisdictions in Verizon’s local service areas where CLEC has filed local tariffs:*

*Pennsylvania: Comcast Business Local Connect (CBLC) Digital Trunk Service,<sup>270</sup> ISDN PRI Service,<sup>271</sup> Trunk Provisioning.<sup>272</sup>*

*CLEC facilities:*

	<b>Facilities</b>
Alexandria, VA	Nortel DMS-100/200 voice switch
Baltimore, MD	Nortel DMS-500 voice switch
Burlington, NJ	Nortel DMS-500 voice switch
New Paradigm Resources Group, Inc., <i>CLEC Report 2005</i> , Ch. 6 –Comcast Business Communications at 6-7 (19th ed. 2005).	

*See Attachment A.*

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<sup>270</sup> Comcast Business Communications, Telephone-Pa. P.U.C. No. 2, § 3.4.1 (issued May 9, 2001).

<sup>271</sup> Comcast Business Communications, Telephone-Pa. P.U.C. No. 2, § 3.4.2 (issued Mar. 13, 2002).

<sup>272</sup> Comcast Business Communications, Telephone-Pa. P.U.C. No. 2, § 3.4.3 (issued May 9, 2001).

## Con Edison Telecom

(Note: On Dec. 13, 2004, FiberNet Telecom Group announced its plans to acquire Con Edison.<sup>273</sup>)

*Carrier claims that it serves medium businesses:*

“Con Edison Communications (CEC) understands the technical challenges facing small and **medium** sized businesses. CEC is founded on a tradition of reliability and service quality that you and your business demand. Our flexible, competitively priced Voice and Internet service configurations utilize network transport technologies, including DS-1, DS-3, Ethernet, and SONET, which are best suited to meet your needs. Once your solution is up and running, CEC’s on-going customer service will support your communication needs.”<sup>274</sup>

“CEC serves local and long-distance carriers, Fortune 1000 corporations, small and **medium** businesses, and Internet, cable, wireless and video companies.”<sup>275</sup>

“FiberNet Telecom Group, Inc. deploys, owns and operates fiber-optic networks in the two gateway markets of New York/New Jersey and Los Angeles, designed to provide comprehensive broadband connectivity to other telecommunications service providers and enterprise customers for data, voice and video transmissions.”<sup>276</sup>

*Examples of business customers based on public information:*

- The International Securities Exchange (contract to provide primary and business continuity protection services)<sup>277</sup>

*Service offerings:*

Con Edison Communications offers PowerLan Ethernet Service, PowerProtect Data Backup Service, PowerConnect Co-location Service, PowerWave Wavelength Service, PowerOptic SONET Service, PowerNet Internet Service, PowerCall Voice Service, and PowerCall Plus Service (includes voice and Internet service).<sup>278</sup>

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<sup>273</sup> Con Edison News Release, *FiberNet To Acquire Con Edison Communications* (Dec. 13, 2004).

<sup>274</sup> Con Edison Communications, *Business Services*, <http://www.conedcom.com/businessservices.cfm> (emphasis added).

<sup>275</sup> Con Edison Communications, *About Us*, <http://www.conedcom.com/aboutus.cfm> (emphasis added).

<sup>276</sup> FiberNet Telecom Group News Release, *FiberNet Signs Expanded Service Agreement with BT Americas* (Feb. 1, 2005).

<sup>277</sup> Con Edison Communications News Release, *Con Edison Communications Provides International Securities Exchange with Connection to SIAC’s Communications Infrastructure* (Apr. 29, 2003).

<sup>278</sup> Con Edison Communications, *Products and Services: Overview*: <http://www.conedcom.com/servicesoverview.cfm>.

FiberNet Telecom Group provides Transport Services, Network Services, Colocation Services, and IP Services.<sup>279</sup>

*Areas within Verizon's local service area according to CLEC's website:*

New York, New Jersey<sup>280</sup>

*CLEC facilities:*

*See Attachment A.*

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<sup>279</sup> FiberNet Telecom Group, *Overview: Products and Services*, <http://www.ftgx.com/services.shtml>.

<sup>280</sup> FiberNet Telecom Group, Form 10-K (SEC filed Mar. 30, 2005).

## Conversent

*Carrier claims that it serves medium businesses:*

Markets Served: Small & **Medium-Sized Businesses**, Large Businesses & Enterprises, Education Institutions, Governments.<sup>281</sup>

“The enterprise-class firewall service was designed specifically with small and **medium sized businesses** in mind.”<sup>282</sup>

*Service offerings:*

Voice: Business Lines (Local Service), Centrex Service, Digital T1 Voice Services, ISDN PRI Service, Integrated Service, Long Distance Service, Toll Free Services, Calling Features (Business Line Features and Centrex Line Features), Voice Conferencing, Calling Cards, Voicemail Services.<sup>283</sup>

Internet and Data: DSL, Integrated Service, Dedicated Internet Access, Wireless Services, Dial-Up, Internet Security, Web Hosting, Colocation Services, FTP Hosting, Point-to-Point Services, Secure Private Networks (ATM).<sup>284</sup>

*Areas within Verizon’s local service area according to CLEC’s website:*

“22 offices from Maine to New Jersey.”<sup>285</sup>

*CLEC facilities:*

	<b>Facilities</b>
Hackensack, NJ	Lucent 5ESS voice switch
Melville, NY	Lucent 5ESS voice switch
Nashua, NH	Lucent 5ESS voice switch
Providence, RI	Lucent 5ESS voice switch
Worcester, MA	Lucent 5ESS voice switch
New Paradigm Resources Group, Inc., <i>CLEC Report 2005</i> , Ch. 6 – Conversent Communications at 7-8 (19th ed. 2005).	

See Attachment A.

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<sup>281</sup> Conversent, *Company Fact Sheet*, <http://www.conversent.com/website/jobs/factSheet.asp?page=about> (emphasis added).

<sup>282</sup> Conversent News Release, *Conversent Communications Introduces Affordable Fully-Managed Firewall Service* (Mar. 29, 2005) (emphasis added).

<sup>283</sup> Conversent, *Products and Services*, <http://www.conversent.com/website/products/prodandServ.asp?page=prod>.

<sup>284</sup> Conversent, *Products and Services*, <http://www.conversent.com/website/products/prodandServ.asp?page=prod>.

<sup>285</sup> Conversent, *About Us*, <http://www.conversent.com/website/jobs/aboutUs.asp?page=about>.

## Covad

*Carrier claims that it serves medium businesses:*

“Founded in 1996, Covad owns and operates the only nationwide DSL broadband network in the U.S. We specialize in creating simple yet sophisticated communications solutions for small and **medium** businesses.”<sup>286</sup>

“In June 2004, we completed our acquisition of GoBeam, Inc . . . and introduced our business-class VoIP services to small and **medium**-sized businesses.”<sup>287</sup>

TeleDefend: “[A] security and private networking service that we offer to small and **medium**-sized businesses.”<sup>288</sup>

Email and Web Hosting: “These services allow small and **medium**-sized businesses to have a custom domain name [], as well as business-class email and web hosting.”<sup>289</sup>

*Examples of business customers based on public information:*

- Speakeasy (contract to provide infrastructure to support Speakeasy’s 3.0 Mbps DSL service throughout Covad’s service area)<sup>290</sup>
- Broadwing (contract to support Broadwing DSL services to enterprise customers as an alternative form of last mile access)<sup>291</sup>

*Service offerings:*

Covad offers Broadband Internet Access Services, VoIP Services, and Hosting Services.<sup>292</sup>

Other services marketed toward medium-sized business customers:  
TeleDefend, Email and Web Hosting, and high-speed Internet access.<sup>293</sup>

*Areas within Verizon’s local service area according to CLEC’s website:*

“Covad broadband services are currently available across the nation in 44 states and 235 Metropolitan Statistical Areas (MSAs).”<sup>294</sup>

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<sup>286</sup> Covad, *Covad Corporate Brochure*, <http://www.covad.com/companyinfo/docs/CovadCorpBrochure.pdf> (emphasis added).

<sup>287</sup> Covad Communications Group, Form 10-K (SEC filed Mar. 14, 2005) (emphasis added).

<sup>288</sup> Covad Communications Group, Form 10-K (SEC filed Mar. 14, 2005) (emphasis added).

<sup>289</sup> Covad Communications Group, Form 10-K (SEC filed Mar. 14, 2005) (emphasis added).

<sup>290</sup> Covad News Release, *Covad and Speakeasy Unveil Faster Consumer DSL Service* (Jan. 28, 2004).

<sup>291</sup> Covad News Release, *Covad Communications Announces Strategic Relationship with BroadWing* (Jan. 8, 2004).

<sup>292</sup> Covad, *Products and Services*, <http://www.covad.com/productservices.shtml>.

<sup>293</sup> Covad Communications Group, Form 10-K (SEC filed Mar. 14, 2005).

<sup>294</sup> Covad, *About Covad*, <http://www.covad.com/companyinfo/>.

*Jurisdictions in Verizon’s local service areas where CLEC has filed local tariffs:*

*Pennsylvania: xDSL DataLoop*<sup>295</sup>

*CLEC facilities:*

“[Covad’s] broadband facilities include Digital Subscriber Line Access Multiplexers (DSLAMs), IP routers, and ATM switches in collocated space in over 2000 ILEC central offices across the nation. Connecting those central offices are over 100 “hub” central offices in which customers’ traffic is collected and switched using state-of-the-art ATM switches.”<sup>296</sup>

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<sup>295</sup> DIECA Communications, Inc., d/b/a Covad Communications Company, Telephone-Pa. P.U.C. Tariff No. 1, § 4.1 (issued Mar. 9, 2001).

<sup>296</sup> Comments of Covad at 14, *Unbundled Access to Network Elements; Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, WC Docket No. 04-313, CC Docket No. 01-338 (FCC filed Oct. 4, 2004).

## Cox Business Communications

*Carrier claims that it serves medium businesses:*

“Our state-of-the-art, fiber-optic based broadband network delivers a comprehensive range of advanced communications services, including high-speed Internet access, local and long distance telephone, and digital cable television for small- and **medium-sized** businesses, as well as advanced voice and data transport solutions for larger companies.”<sup>297</sup>

“**Medium** Business- A complete suite of reliable communications solutions built to meet the more sophisticated demands of medium-size businesses like yours.”<sup>298</sup>

“Solutions for **Medium** Business- Cox Business Services can help your medium-size enterprise reach extra-large goals. Cox delivers a full suite of high-capacity voice and data solutions to help you business maximize productivity. We offer the flexibility you need together with the reliability you demand to operate efficiently, all at the best possible value. From local, long distance and toll free services to high-speed Cox Business Internet and even faster fiber-based Cox Optical Internet, all delivered by one local partner.”<sup>299</sup>

“Cox is in a unique position in the commercial services arena,” said Bill Stemper, vice president of Cox Business Services in Atlanta. “All of our pieces – from the network we own and manage, to our architecture with built-in reliability to the business solutions and expertise we offer to small- and **medium-sized** business owners and enterprise alike – contribute to the sense of trust that our customers have with us. Trust is a critical part of doing business in today’s environment and it will contribute to the ongoing success of Cox Business Services.”<sup>300</sup>

“A closer look at Cox’s customers reveals its breadth of reach – encompassing enterprises, small and **medium** businesses as well as government properties and teleworkers/home offices. Many school systems and air force bases, hospitals, enterprises and airports, law firms and teleworkers trust Cox for the delivery of circuit-switched telephone and long distance services, high-speed Internet access, web hosting, VPN and data transport services.”<sup>301</sup>

“Our state-of-the-art, fiber-optic based broadband network delivers a comprehensive range of advanced communications services, including high-speed Internet access, local

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<sup>297</sup> Cox Communications, *Cox Business Services*, <http://www.cox.com/HR/ForYourBusiness.asp> (emphasis added).

<sup>298</sup> Cox Business Services, *Cox Business Services- Home*, <http://www.coxbusiness.com/CBSWeb/index.html> (emphasis added).

<sup>299</sup> Cox Business Services, *Medium Business- Home*, <http://www.coxbusiness.com/CBSWeb/mdbusiness/index.html> (emphasis added).

<sup>300</sup> Cox Business Services News Release, *Technology and Trust Drive Upward Growth of Cox Business Services* (Oct. 27, 2003) (emphasis added).

<sup>301</sup> Cox Business Services News Release, *Technology and Trust Drive Upward Growth of Cox Business Services* (Oct. 27, 2003) (emphasis added).



and long distance telephone, and digital cable television for small- and **medium-sized** businesses.”<sup>302</sup>

“In the small business category, describing businesses with 10 to 99 employees, Jupiter [Research] believes 1.2 million of 1.4 million have Internet access and about 700,000, or 53% have broadband. . . Among the most aggressive to pursue new business customers has been Cox, the nation’s fourth-largest cable operator.”<sup>303</sup>

*Examples of business customers based on public information:*

- Bryant College (contract to serve as high-speed provider, includes installation of an Optical Internet Service Circuit and the ability for the college to connect to Internet2)<sup>304</sup>

*Service offerings:*

Voice: Cox Digital Telephone and Voice Mail, Cox Centrex Telephone, Cox Digital Trunk, Cox Long Distance and Toll Free, Cox Dedicated Long Distance and Toll Free, Cox Private Line.

Data: Cox Business Internet, Cox Optical Internet, Cox Web Hosting and Packages, Cox Fibernet, Cox Transparent LAN, Cox Virtual Private Network.

Video: Cox Commercial Cable.

Other: Cox Carrier Access Service, Cox SmartBill, Cox Commercial Building Service, and Cox Enterprise Connectivity.<sup>305</sup>

*Areas within Verizon’s local service area according to CLEC’s website:*

Orange County, CA; Santa Barbara, CA; Rhode Island; Hampton Roads, VA; Roanoke, VA; Northern Virginia.<sup>306</sup>

*Jurisdictions in Verizon’s local service areas where CLEC has filed local tariffs:*

*Virginia:* Measured Rate ISDN-BRI Service,<sup>307</sup> Cox Connect Trunk,<sup>308</sup> Cox Connect 1.5 Service,<sup>309</sup> Cox Connect Centrex II Service,<sup>310</sup> Cox Connect Centrex,<sup>311</sup> ISDN-PRI Service.<sup>312</sup>

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<sup>302</sup> Cox Business Services, *Hampton Roads- Business Services*, <http://www.cox.com/HR/ForYourBusiness.asp> (emphasis added).

<sup>303</sup> Cox Business Services News Release, *Cable Cos Eye Small Businesses for Internet, Phone Sales* (July 10, 2003).

<sup>304</sup> Cox Business Services News Release, *More Bandwidth for Bryant College Means Greater Internet Access for Faculty, Students* (Mar. 31, 2003).

<sup>305</sup> Cox Business Services, *Medium Business- Home*, <http://www.coxbusiness.com/CBSWeb/mdbusiness/index.html>.

<sup>306</sup> Cox Business Services, *Market Locator*, <http://www.coxbusiness.com/CBSWeb/systems/index.html>.

<sup>307</sup> Cox Virginia Telcom, Inc, VA S.C.C. Tariff No. 1 § 3.1.2.2 (Sept. 16, 2003).

<sup>308</sup> Cox Virginia Telcom, Inc, VA S.C.C. Tariff No. 1 § 3.1.3 (Sept. 16, 2003).

California: Business Access Line,<sup>313</sup> Centrex,<sup>314</sup> Business Trunk,<sup>315</sup> Operator Services,<sup>316</sup> Directory Assistance,<sup>317</sup> Number Referral: Business/Centrex/Direct Inward Dial,<sup>318</sup> Referral,<sup>319</sup> Cox Transparent LAN Connection,<sup>320</sup> Custom Calling Features,<sup>321</sup> Message Telecommunications services (IntraLATA toll services)<sup>322</sup>

*CLEC facilities:*

	<b>Facilities</b>
Chesapeake, VA	Nortel DMS-500 voice switch
Falls Church, VA	Nortel DMS-500 voice switch
Newport News, VA	Nortel DMS-500 voice switch
Norfolk, VA	Nortel DMS-500 voice switch
West Warwick, RI	Nortel DMS-500 voice switch
New Paradigm Resources Group, Inc., <i>CLEC Report 2005</i> , Ch. 6 – <i>Cox Communications</i> at 6-9 (19th ed. 2005).	

See Attachment A.

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<sup>309</sup> Cox Virginia Telcom, Inc, VA S.C.C. Tariff No. 1 § 3.1.3 (Sept. 16, 2003).  
<sup>310</sup> Cox Virginia Telcom, Inc, VA S.C.C. Tariff No. 1 § 3.1.4 (Sept. 16, 2003).  
<sup>311</sup> Cox Virginia Telcom, Inc, VA S.C.C. Tariff No. 1, § 3.1.4 (Sept. 16, 2003).  
<sup>312</sup> Cox Virginia Telcom, Inc, VA S.C.C. Tariff No. 1, § 3.1.5 (Sept. 16, 2003).  
<sup>313</sup> Cox California Telcom, LLC, Schedule Cal. P.U.C. A-1, § 1.1.3 (Nov. 19, 2004).  
<sup>314</sup> Cox California Telcom, LLC, Schedule Cal. P.U.C. C-1, § 1.1.5 (Dec. 20, 2002).  
<sup>315</sup> Cox California Telcom, LLC, Schedule Cal. P.U.C. A-1, § 1.1.6 (Sept. 8, 2003).  
<sup>316</sup> Cox California Telcom, LLC, Schedule Cal. P.U.C. A-1, § 1.1.8 (Dec. 20, 2002).  
<sup>317</sup> Cox California Telcom, LLC, Schedule Cal. P.U.C. A-1, § 1.1.9 (July 29, 2003).  
<sup>318</sup> Cox California Telcom, LLC, Schedule Cal. P.U.C. A-1, § 1.1.5, 17 (Nov. 21, 2003).  
<sup>319</sup> Cox California Telcom, LLC, Schedule Cal. P.U.C. A-1, § 1.1.19 (Sept. 17, 2003).  
<sup>320</sup> Cox California Telcom, LLC, Schedule Cal. P.U.C. A-1, § 1.1.20 (Dec. 17, 2003).  
<sup>321</sup> Cox California Telcom, LLC, Schedule Cal. P.U.C. A-1, § 1.2.7 (Aug. 6, 2004).  
<sup>322</sup> Cox California Telcom, LLC, Schedule Cal. P.U.C. A-1, § 2.1 (Nov. 21, 2001).

## CTC Communications

*Carrier claims that it serves medium businesses:*

“CTC is a ‘next generation’ Integrated Communications Carrier utilizing advanced technology and providing **medium** and larger size business customers with converged voice, data, and Internet services on a broadband, packet-based network, called the PowerPath Network.”<sup>323</sup>

“The company serves small, **medium** and larger business customers from Virginia to Maine.”<sup>324</sup>

“The Company serves **medium** to larger business customers in the most robust telecommunications region in the world in the Mid Atlantic to Northeast corridor.”<sup>325</sup>

*Service offerings:*

Voice: Local, Long Distance, Toll Free, Calling Card, Conference Calling, The Power Call.<sup>326</sup>

Data: Frame Relay, Point to Point, DSL, VPN, ATM, IMA, Digital Private Line Services.<sup>327</sup>

Internet: Internet, E-mail.<sup>328</sup>

Converged Services: PowerPath Network, Optimizer.<sup>329</sup>

*Areas within Verizon’s local service area according to CLEC’s website:*

“We serve companies in the Northeast and Mid-Atlantic States, from Boston to Washington, D.C.”<sup>330</sup>

*Jurisdictions in Verizon’s local service areas where CLEC has filed local tariffs:*

*Delaware:* Local Voice Service, IntraLATA Toll Service, PBX Tie Lines, Outgoing Long Distance Voice Service, Toll Free Calling Services.<sup>331</sup>

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<sup>323</sup> CTC Communications, *About CTC*, [http://www.ctcnet.com/main?sec\\_id=21&page\\_id=117](http://www.ctcnet.com/main?sec_id=21&page_id=117) (emphasis added).

<sup>324</sup> CTC Communications News Release, *CTC Communications and Lightship Telecom to Merge* (Mar. 23, 2005) (emphasis added).

<sup>325</sup> CTC Communications, *Account Executive*, [http://www.ctcnet.com/main?page\\_id=155&sec\\_id=22](http://www.ctcnet.com/main?page_id=155&sec_id=22) (emphasis added).

<sup>326</sup> CTC Communications, *Voice*, [http://www.ctcnet.com/main?sec\\_id=28&page\\_id=48](http://www.ctcnet.com/main?sec_id=28&page_id=48).

<sup>327</sup> CTC Communications, *Data*, [http://www.ctcnet.com/main?sec\\_id=29&page\\_id=53](http://www.ctcnet.com/main?sec_id=29&page_id=53).

<sup>328</sup> CTC Communications, *Internet Solutions*, [http://www.ctcnet.com/main?sec\\_id=30&page\\_id=60](http://www.ctcnet.com/main?sec_id=30&page_id=60).

<sup>329</sup> CTC Communications, *Converged Services*, [http://www.ctcnet.com/main?sec\\_id=45&page\\_id=184](http://www.ctcnet.com/main?sec_id=45&page_id=184).

<sup>330</sup> CTC Communications, *Frequently Asked Questions*, [http://www.ctcnet.com/main?sec\\_id=20&page\\_id=68](http://www.ctcnet.com/main?sec_id=20&page_id=68).

<sup>331</sup> CTC Communications Corp., P.S.C. Del. No. 3, § 6.1 (issued Dec. 14, 2001).

*Maine:* Local Voice Service, IntraLATA Toll Service, PBX Tie Lines, Outgoing Long Distance Voice Service, Toll Free Calling Services.<sup>332</sup>

*Maryland:* Local Voice Service, IntraLATA Toll Service, PBX Tie Lines, Outgoing Long Distance Voice Service, Toll Free Calling Services.<sup>333</sup>

*Massachusetts:* Local Voice Service, IntraLATA Toll Service, PBX Tie Lines, Outgoing Long Distance Voice Service, Toll Free Calling Services.<sup>334</sup>

*New Hampshire:* Local Voice Service, IntraLATA Toll Service, PBX Tie Lines, Outgoing Long Distance Voice Service, Toll Free Calling Services.<sup>335</sup>

*New Jersey:* Local Voice Service, IntraLATA Toll Service #, PBX Tie Lines, Outgoing Long Distance Voice Service, Toll Free Calling Services.<sup>336</sup>

*New York:* Local Voice Service, IntraLATA Toll Service, PBX Tie Lines, Outgoing Long Distance Voice Service, Toll Free Calling Services.<sup>337</sup>

*Pennsylvania:* Local Voice Service, IntraLATA Toll Service, PBX Tie Lines, Outgoing Long Distance Voice Service, Toll Free Calling Services.<sup>338</sup>

*Rhode Island:* Local Voice Service, IntraLATA Toll Service, PBX Tie Lines, Outgoing Long Distance Voice Service, Toll Free Calling Services.<sup>339</sup>

*Vermont:* Local Voice Service, IntraLATA Toll Service, PBX Tie Lines, Outgoing Long Distance Voice Service, Toll Free Calling Services.<sup>340</sup>

*Virginia:* Outgoing Long Distance Voice Access,<sup>341</sup> 1-800 Service,<sup>342</sup> PBX Tie lines,<sup>343</sup> Hub and Spoke Service,<sup>344</sup> Frame Relay Service.<sup>345</sup>

*Washington, DC:* Local Voice Service,<sup>346</sup> Frame Relay Service,<sup>347</sup>

*West Virginia:* Business Flat Rate Calling Service, Measured Rate Services, Private Branch Exchange (PBX) Trunk,<sup>348</sup>

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<sup>332</sup> CTC Communications Corp., Maine Tariff No. 3, § 6.1 (effective May 14, 2001).

<sup>333</sup> CTC Communications Corp., M.P.S.C. - No. 3 – Telephone, § 7.1 (issued Oct. 22, 2001).

<sup>334</sup> CTC Communications Corp., M.D.T.E. No. 3, § 6.1 (issued Feb. 27, 2001).

<sup>335</sup> CTC Communications Corp., NHPUC - No. 1, § 7.1 (issued Apr. 29, 2002).

<sup>336</sup> CTC Communications Corp., NJ B.P.U. No. 1, § 6.1 (issued Nov. 6, 2001).

<sup>337</sup> CTC Communications Corp., New York PSC No. 4, § 6.1 (issued June 15, 2001).

<sup>338</sup> CTC Communications Corp., Telephone-PA. P.U.C. No. 4, § 6.1 (issued Oct. 16, 2001).

<sup>339</sup> CTC Communications Corp., Rhode Island Tariff No. 3, § 6.1 (issued June 6, 2001).

<sup>340</sup> CTC Communications Corp., VPSB No. 3, § 3.2 (issued Nov. 16, 2001).

<sup>341</sup> CTC Communications of Virginia, Inc., S.C.C. - VA No. 4, § 6.1.

<sup>342</sup> CTC Communications of Virginia, Inc., S.C.C. - VA No. 4, § 6.1.

<sup>343</sup> CTC Communications of Virginia, Inc., S.C.C. - VA No. 4, § 6.1.

<sup>344</sup> CTC Communications of Virginia, Inc., S.C.C. - VA No. 4, § 6.1.

<sup>345</sup> CTC Communications of Virginia, Inc., S.C.C. - VA No. 4, § 7.1

<sup>346</sup> CTC Communications Corp., P.S.C. - D.C. No. 2 – Telephone, § 6.2.1 (issued Nov. 6, 2001).

<sup>347</sup> CTC Communications Corp., P.S.C. - D.C. No. 2 – Telephone, § 7.1.1 (issued Nov. 6, 2001).

*CLEC facilities:*

	<b>Facilities</b>
Albany, NY	Cisco 8600/8800 data switch
Baltimore, MD	Cisco 8600/8800 data switch
Bangor, ME	Cisco 8600/8800 data switch
Bedford, NH	Cisco 8600/8800 data switch
Boston, MA	Cisco 8600/8800 data switch
Braintree, MA	Cisco 8600/8800 data switch
Buffalo, NY	Cisco 8600/8800 data switch
Burlington, VT	Cisco 8600/8800 data switch
Danvers, MA	Cisco 8600/8800 data switch
Elmsford, NY	Cisco 8600/8800 data switch
Fairfield, NY	Cisco 8600/8800 data switch
Hartford, CT	Cisco 8600/8800 data switch
Lexington, MA	Cisco 8600/8800 data switch
Manchester, MA	Cisco 8600/8800 data switch
Marlboro, MA	Cisco 8600/8800 data switch
Melville, NY	Cisco 8600/8800 data switch
Meriden, CT	Cisco 8600/8800 data switch
Nanuet, NY	Cisco 8600/8800 data switch
New York, NY	Cisco 8600/8800 data switch
North Attleboro, MA	Cisco 8600/8800 data switch
Philadelphia, PA	Cisco 8600/8800 data switch
Portland, ME	Cisco 8600/8800 data switch
Springfield, MA	Cisco 8600/8800 data switch
Syosset, NY	Cisco 8600/8800 data switch
Syracuse, NY	Cisco 8600/8800 data switch
Waltham, MA	Cisco 8600/8800 data switch
West Springfield	Cisco 8600/8800 data switch
Yorktown Heights, NY	Cisco 8600/8800 data switch
New Paradigm Resources Group, Inc., <i>CLEC Report 2005</i> , Ch. 6 – <i>CTC Communications Group</i> at 10-11 (19th ed. 2005).	

See Attachment A.

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<sup>348</sup> CTC Communications Corp., WVPSC Tariff No. 2, § 1.2.2 (issued Nov. 8, 2001).

## **DSCI Corporation**

*Carrier claims that it serves medium businesses:*

**“Regardless of their size**, all businesses have a need for fast, reliable, "always on" connectivity to the Internet. With a variety of bandwidth options from 56 Kbps to full T-1 to OC3 and above, dedicated Internet access allows you to reach new customers and markets, stay connected and boost productivity.”<sup>349</sup>

*Service offerings:*

Voice (Local, Long Distance, Conferencing), Private Data Networking, Integrated Services, Internet Access, IT Services.<sup>350</sup>

*Areas within Verizon’s local service area according to CLEC’s website:*

Maine, Massachusetts, New Hampshire, Vermont<sup>351</sup>

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<sup>349</sup> DSCI, *Internet Access Solutions*, <http://www.dscicorp.com/internet.asp> (emphasis added).

<sup>350</sup> DSCI, *Product Portfolio*, <http://www.dscicorp.com/portfolio.asp>.

<sup>351</sup> DSCI, Contact Information, <http://www.dscicorp.com/contact.asp>; DSCI, *DSCI Certified in Vermont*, [http://www.dscicorp.com/newsletters/articles/2004\\_Q3/vermont.html](http://www.dscicorp.com/newsletters/articles/2004_Q3/vermont.html); DSCI News Release, *DSCI Certified to Sell Services in Maine* (Nov. 2, 2004).

## Global Crossing

*Carrier claims that it serves medium businesses:*

“Global Crossing has a host of communications solutions for businesses and carriers of **any size**. Our services and solutions let you interact seamlessly with your customers, employees, vendors and partners worldwide.”<sup>352</sup>

*Examples of business customers based on public information:*

- KB Toys, Inc. (contract for high-speed frame relay network linking 1,300 stores nationwide, and includes Dedicated Internet Access, conferencing, long-distance and local telephone service)<sup>353</sup>
- Mayo Foundation (contract provides long distance voice and audio conferencing services, as well as Ready-Access Web Meeting – Global Crossing’s integrated audio-and-Web conferencing solution)<sup>354</sup>
- The Marmon Group, Inc. (agreement to offer audio, video and Web conferencing services for use by the company’s more than 100 member companies worldwide)<sup>355</sup>

*Service offerings:*

Global Crossing offers its enterprise/business customers six types of solutions: Converged IP, Data Transport, Collaboration, Voice, Access, and Managed Services.<sup>356</sup>

*Areas within Verizon’s local service area according to CLEC’s website:*

“Global Crossing Limited provides telecommunications solutions over the world’s first integrated global IP-based network, which reach 500 cities in 50 countries on 6 continents around the globe.”<sup>357</sup>

*Jurisdictions in Verizon’s local service areas where CLEC has filed local tariffs:*

*Pennsylvania:* ISDN PRI<sup>358</sup> and Digital Trunk Service.<sup>359</sup>

*Washington:* ISDN PRI<sup>360</sup> and Local Digital Service.<sup>361</sup>

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<sup>352</sup> Global Crossing, *Enterprise*, <http://www.globalcrossing.com/xml/products/index.xml>.

<sup>353</sup> Global Crossing Press Release, *KB Toys Signs \$10 Million Renewal Agreement for Data and Voice Services with Global Crossing* (Mar. 24, 2003).

<sup>354</sup> Global Crossing Press Release, *Global Crossing Signs Leading Health Provider As New Customer* (Dec. 7, 2004).

<sup>355</sup> Global Crossing Press Release, *Global Crossing to Offer Worldwide Conferencing Services to The Marmon Group* (Oct. 27, 2003).

<sup>356</sup> Global Crossing, *Enterprise Products*, [http://www.globalcrossing.com/xml/services/serv\\_products.xml](http://www.globalcrossing.com/xml/services/serv_products.xml)

<sup>357</sup> Global Crossing, *Investors*, <http://www.globalcrossing.com/xml/investors/index.xml>.

<sup>358</sup> Global Crossing Local Services, PA P.U.C. Tariff No. 1, § 12.1 (issued May 21, 2002).

<sup>359</sup> Global Crossing Local Services, PA P.U.C. Tariff No. 1, § 6.1.1 (issued May 21, 2002).

For DID Service, Global Crossing groups recurring and nonrecurring charges based on the number of lines in the terminal group (1-20 lines in terminal group, 100 lines in terminal group).<sup>362</sup>

*CLEC facilities:*

	<b>Facilities</b>
Boston, MA	Nortel DMS-500 voice switch
Newark, NJ	Nortel DMS-500 voice switch
Washington, DC	Nortel DMS-500 voice switch
New Paradigm Resources Group, Inc., <i>CLEC Report 2005</i> , Ch. 6 – Global Crossing at 5-7 (19th ed. 2005).	

See Attachment A.

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<sup>360</sup> Global Crossing Local Services, State of Washington Local Price List No. 2, § 2.12 (issued Aug. 20, 2001).

<sup>361</sup> Global Crossing Local Services, State of Washington Local Price List No. 2, § 2.2.3 (issued Aug. 20, 2001).

<sup>362</sup> Global Crossing Local Services, PA P.U.C. Tariff No. 1, § 6.1.2 (issued May 21, 2002); Global Crossing Local Services, State of Washington Local Price List No. 2, § 2.6.1 (issued Aug. 20, 2001).



## InfoHighway

*Carrier claims that it serves medium businesses:*

“InfoHighway’s Business Lines and Trunks are ideal for small to **medium business** customers looking for a reliable voice telecommunications service to connect their company to the world.”<sup>363</sup>

“InfoHighway Digital Subscriber Line (DSL) is a state-of-the-art, cost-effective Internet access technology that runs on traditional phone lines. It is available in speeds ranging from 192 Kbps to 1.544 Mbps, making it an ideal solution for small and **medium-sized businesses**.”<sup>364</sup>

“Based in New York, InfoHighway offers local and long distance phone service, as well as data and Internet services to small-to-**medium-sized businesses** in 13 states.”<sup>365</sup>

*Service offerings:*

Voice: Business Lines & Trunks, Centrex, ISDN BRI Services, ISDN BRI Circuits, Integrated Voice & Data T-1 Service, Voice T-1 Service, Dedicated Long Distance, Switched Long Distance, Toll-Free Services.<sup>366</sup>

Data & Internet: Point-to-Point Private Lines, Frame Relay Service, Dedicated Internet T-1 Service, Dedicated Internet T-1 Service, High-Speed Dial-up Service, Web Hosting.<sup>367</sup>

Other Services: Voice Mail Services, Conference Calling On Demand, Calling Card, Custom Calling Features, Inside Wire Maintenance.<sup>368</sup>

*Areas within Verizon’s local service area according to CLEC’s website:*

Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont, Virginia, Washington, DC.<sup>369</sup>

*Jurisdictions in Verizon’s local service areas where CLEC has filed local tariffs:*

*Pennsylvania:* ISDN BRI Services,<sup>370</sup> ISDN PRI Services,<sup>371</sup> InfoHighway Digital PBX Service,<sup>372</sup> Digital Centrex Plus.<sup>373</sup>

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<sup>363</sup> InfoHighway, *Business Lines and Trunks*, <http://www.infohighway.com/?fuseaction=page&id=65> (emphasis added).

<sup>364</sup> InfoHighway, *Digital Subscriber Lines (DSL)*, <http://www.infohighway.com/?fuseaction=page&id=86>.

<sup>365</sup> InfoHighway News Release, *InfoHighway CEO, Joseph A. Gregori, Appointed to Ascent Board of Directors* (Dec. 16, 2002).

<sup>366</sup> InfoHighway, *Local Phone Service*, <http://www.infohighway.com/index.php?fuseaction=page&id=64>; InfoHighway, *Long Distance Service*, <http://www.infohighway.com/index.php?fuseaction=page&id=79>;

<sup>367</sup> InfoHighway, *Data/Internet Services*, <http://www.infohighway.com/index.php?fuseaction=page&id=4>.

<sup>368</sup> InfoHighway, *Other Products & Services*, <http://www.infohighway.com/index.php?fuseaction=page&id=14>.

<sup>369</sup> InfoHighway, *About Us*, <http://www.infohighway.com/index.php?fuseaction=page&id=34>.

## ITC^DeltaCom

*Carrier claims that it serves medium businesses:*

“We serve a wide variety of customers – **medium**-to-large enterprises, small businesses and consumers – and focus our efforts on designing packages to meet our customers’ needs.”<sup>374</sup>

“Simplici-T is a **medium** to large business offering that allows for multi-site connectivity with host/remote site complements. This product provides customers with local, long distance and certain non-regulated features via local lines, trunks or integrated services on a single T-1 at a single location.”<sup>375</sup>

“The Simplici-T Plus Promotion is a small to **medium**-size business offering that utilizes T-1 delivery of line side local exchange service and internet service available to business customers in Alabama, Florida, Georgia, Louisiana, Mississippi, North Carolina, South Carolina and Tennessee.”<sup>376</sup>

“ITC^DeltaCom offers Web hosting options for small, **medium**, and large companies.”<sup>377</sup>

*Service offerings:*

Voice: local, long distance, and enhanced services

Data Connectivity: Internet Protocol Virtual Private Network (IP VPN), Frame Relay, Asynchronous Transfer Mode (ATM), Point-to-Point

Internet Applications: Web Hosting, Internet Access, Managed Firewall, Data Assurance

Equipment & Systems: Telephone systems, IP-based systems, High speed data equipment, Video conferencing systems

Other Products: Colocation, Carrier Solutions, and Integrated Packages<sup>378</sup>

*Areas within Verizon’s local service area according to CLEC’s website:*

Virginia, North Carolina<sup>379</sup>

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<sup>370</sup> A.R.C. Networks, Inc. d/b/a InfoHighway, Telephone - Pa. P.U.C. No. 2, § 3.11 (issued Aug. 7, 2003).

<sup>371</sup> A.R.C. Networks, Inc. d/b/a InfoHighway, Telephone - Pa. P.U.C. No. 2, § 3.12 (issued Aug. 7, 2003).

<sup>372</sup> A.R.C. Networks, Inc. d/b/a InfoHighway, Telephone - Pa. P.U.C. No. 2, § 3.13 (issued Aug. 7, 2003).

<sup>373</sup> A.R.C. Networks, Inc. d/b/a InfoHighway, Telephone - Pa. P.U.C. No. 2, § 3.15 (issued Aug. 7, 2003).

<sup>374</sup> ITC^DeltaCom, *Company Information*, [http://www.itcdeltacom.com/Company\\_info.asp](http://www.itcdeltacom.com/Company_info.asp) (emphasis added).

<sup>375</sup> ITC^DeltaCom, North Carolina Price List – Local, § 3.33 (issued June 1, 2004) (emphasis added).

<sup>376</sup> ITC^DeltaCom, *ITC^DeltaCom's Simplici-T Plus Promotion Tariff*, [http://www.itcdeltacom.com/itc\\_bti\\_tariffs.asp](http://www.itcdeltacom.com/itc_bti_tariffs.asp) (emphasis added).

<sup>377</sup> ITC^DeltaCom, *Web Hosting*, [http://www.itcdeltacom.com/web\\_hosting.asp](http://www.itcdeltacom.com/web_hosting.asp) (emphasis added).

<sup>378</sup> ITC^DeltaCom, *Products + Solutions*, [http://www.itcdeltacom.com/products\\_services.asp](http://www.itcdeltacom.com/products_services.asp).

<sup>379</sup> ITC^DeltaCom News Release, *ITC^DeltaCom Announces Appointment of New CEO* (Feb. 3, 2005).

“[ITC^DeltaCom] is a certified competitive local exchange carrier (CLEC) in Arkansas, Texas, Virginia and all nine BellSouth states.”<sup>380</sup>

*Jurisdictions in Verizon’s local service areas where CLEC has filed local tariffs:*

*North Carolina: Simpli-T Service,*<sup>381</sup> *T-Pac Service,*<sup>382</sup> *Frame Relay Service,*<sup>383</sup> *DUNE Service,*<sup>384</sup> *Simpli-T PRI.*<sup>385</sup>

*CLEC facilities:*

	<b>Facilities</b>
Dallas, TX	1 Frame Relay 1 ATM data switch
Houston, TX	Nortel DMS-500 voice switch
Tampa, FL	Nortel DMS-500 voice switch
New Paradigm Resources Group, Inc., <i>CLEC Report 2005</i> , Ch. 6 – ITC^DeltaCom at 12-16 (19th ed. 2005).	

*See Attachment A.*

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<sup>380</sup> ITC^DeltaCom News Release, *ITC^DeltaCom Announces Appointment of New CEO* (Feb. 3, 2005).

<sup>381</sup> ITC^DeltaCom, North Carolina Price List – Local, § 3.33 (issued June 1, 2004).

<sup>382</sup> ITC^DeltaCom, North Carolina Price List – Local, § 3.28 (issued Nov. 7, 2003).

<sup>383</sup> ITC^DeltaCom, North Carolina Price List – Local, § 3.19 (issued June 22, 2000).

<sup>384</sup> ITC^DeltaCom, North Carolina Price List – Local, § 3.21 (issued Feb. 13, 2001).

<sup>385</sup> ITC^DeltaCom, North Carolina Price List – Local, § 3.33 (issued June 1, 2004).

## Lightpath (Cablevision)

*Carrier claims that it serves medium businesses:*

“Small & **Medium-Sized** Businesses: To meet the demands of your growing business, you require reliable phone service, a secure Internet connection, and fast data transmission. Lightpath provides all of this and more. For more information, read about Lightpath’s ISDN PRI, Toll-Free, Digital Centrex, Frame Relay, Private Line, Lightpath.net, Managed Firewall, and VPN services.”<sup>386</sup>

*Examples of business customers based on public information:*

- Lenox Hill Hospital (contract to serve as the primary provider of voice, data and Internet services for the Manhattan, New York hospital)<sup>387</sup>
- Long Island University (contract to deploy a Metro Gigabit Ethernet network interconnecting the university’s multiple campuses)<sup>388</sup>

*Service offerings:*

ISDN PRI; Toll-Free Services; Digital Centrex; Frame Relay; Private Line; Lightpath.net (“[A] highly reliable Internet service<sup>3</sup> delivered on port access speeds of 256K to OCn. . . Lightpath provisions Lightpath.net dedicated access and includes an IP-ready (Internet-protocol-ready) router for T-1 speeds and below”); Managed Firewall; and VPN services.<sup>389</sup>

Additional Services: Teleconferencing and Calling Card services.<sup>390</sup>

Metro Ethernet and Optical Transport Services (OTS) are also available in the New York Metropolitan area.<sup>391</sup>

*Areas within Verizon’s local service area according to CLEC’s website:*

“Lightpath provides integrated business communications services to a broad array of industries and businesses in the New York metropolitan area . . . Lightpath has become the preferred provider of voice, data, and Internet services for more than 4,000 businesses

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<sup>386</sup> Lightpath, *Small & Medium-Sized Businesses Needs: Lightpath.net*, <http://www.lightpath.net/Interior15.html> (emphasis added).

<sup>387</sup> Lightpath Press Release, *Lenox Hill Hospital Switches to Lightpath for Voice, Data and Internet Services* (Aug. 11, 2003).

<sup>388</sup> *Lightpath Links Long Island University*, Light Reading (Mar. 8, 2004).

<sup>389</sup> Lightpath, *Small & Medium-Sized Businesses Needs: Lightpath.net*, <http://www.lightpath.net/Interior15.html>.

<sup>390</sup> Lightpath, *Teleconferencing: Lightpath.net*, <http://www.lightpath.net/Interior73.html>.

<sup>391</sup> Lightpath, *Lightpath Adds Metro-Ethernet and OTS: Two new suites of services added to Lightpath’s intelligent optical network*, <http://www.lightpath.net/Interior187-3.html> (Nov. 9, 2004).

throughout Long Island, Westchester County, New York City, Connecticut, and New Jersey.”<sup>392</sup>

*CLEC facilities:*

	<b>Facilities</b>
New York, NY (Manhattan, Brooklyn)	Lucent 5ESS voice switch
New Paradigm Resources Group, Inc., <i>CLEC Report 2005</i> , Ch. 6 – <i>Cablevision Lightpath</i> at 8-9 (19th ed. 2005).	

See Attachment A.

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<sup>392</sup> Lightpath, *About Lightpath: Providing Business Communications Services: Lightpath.net*, <http://www.lightpath.net/Interior7.html>.

## PAETEC

*Carrier claims that it serves medium businesses:*

“PAETEC specializes in developing targeted solutions for **medium** and large businesses, governmental organizations, and affinity groups across North America.”<sup>393</sup>

“PAETEC Communications, Inc. . . . is a communications solutions provider offering broadband services, including advanced voice and video, enhanced data and communications management services to **medium-sized** and large businesses, colleges and universities, hospitals, hotels, governmental organizations, financial markets, and affinity groups. Headquartered in Fairport, N.Y., the company boasts one of the highest customer retention rates in the industry.”<sup>394</sup>

In August 2004, PAETEC completed its acquisition of selected assets (including customers, switches, and related facilities) from Covista Communications. According to PAETEC, “[t]his acquisition provides PAETEC with a strong set of new customers that will strengthen our market-leading position in the **medium**-to-large commercial segment throughout the Northeast corridor.”<sup>395</sup>

“PAETEC Communications, a broadband communications provider serving 27 markets nationwide, announced a new service [] that promises to bring flexibility and cost savings to **medium**- and large-sized Internet users. The service, known as Burstable Dedicated Internet, allows the Internet bandwidth of a company to instantly scale up at times needed most, such as after an advertisement airs or during peak times of productivity.”<sup>396</sup>

In January 2004, PAETEC introduced “Value Bundles,” “an integrated package of local and long distance telephone services, high-speed Internet connectivity, and associated Customer Premise Equipment for a single monthly fee,” for small business customers.<sup>397</sup> According to PAETEC, “Value Bundles represent a new strategic business focus for PAETEC, which has traditionally targeted primarily **medium** and large enterprise customers.”<sup>398</sup> ““And with six tiered bundles to choose from, [PAETEC has] created solutions that are perfect for a broad range of small businesses.””<sup>399</sup>

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<sup>393</sup> PAETEC, *Target Industries*, [http://www.paetec.com/2\\_1/2\\_1\\_3\\_\\_1.html/](http://www.paetec.com/2_1/2_1_3__1.html/) (emphasis added).

<sup>394</sup> PAETEC News Release, *PAETEC Named an Approved Government Vendor* (Apr. 7, 2005) (emphasis added).

<sup>395</sup> PAETEC News Release, *PAETEC Completes Acquisition of Covista Assets* (Aug. 19, 2004) (quoting PAETEC Chief Operating Officer Brad Bono) (emphasis added).

<sup>396</sup> PAETEC News Release, *PAETEC Announces Burstable Dedicated Internet Service* (Feb. 9, 2004) (emphasis added).

<sup>397</sup> PAETEC News Release, *PAETEC Announces Integrated Value Bundle Solutions* (Jan. 22, 2004).

<sup>398</sup> PAETEC News Release, *PAETEC Announces Integrated Value Bundle Solutions* (Jan. 22, 2004) (emphasis added).

<sup>399</sup> PAETEC News Release, *PAETEC Announces Integrated Value Bundle Solutions* (Jan. 22, 2004) (quoting PAETEC Co-Chief Operating Officer Brad Bono).

“PAETEC Mail is simple and elegant, yet powerful, designed to solve the needs facing a small- or **medium**-sized business: a domain name with your business’ name, not the ISP’s and tools to connect at the office, or anywhere in the world.”<sup>400</sup>

*Examples of business customers based on public information:*

- Choice Hotels International (contract to provide integrated offering of local, long-distance, toll-free services)<sup>401</sup>
- Manufacturing Jewelers & Suppliers of America (contract to endorse PAETEC as exclusive local, long distance, and Internet services provider to members)<sup>402</sup>
- Bellevue Communications Group (contract to provide undisclosed services to this Philadelphia-based PR firm)<sup>403</sup>

*Service offerings:*

Voice: Integrated T1, Local & Long Distance Operator Services, Audio and Web Conferencing, Calling Card, Domestic and International

Data: Burstable and Dedicated Internet Access, E-mail Managed VPN: IPSEC or MPLS with optional QoS, Video Conferencing, Frame Relay, E-mail Scanning Services

Other: Communications Management Software, Customer Premise Equipment and Professional and Managed Services<sup>404</sup>

*Areas within Verizon’s local service area according to CLEC’s website:*

Albany, Baltimore, Boston, Buffalo, Chicago, Long Island, Los Angeles, Maryland, New Hampshire, New York City, New Jersey, Orange County, Philadelphia, Pittsburgh, Poughkeepsie, Rhode Island, Syracuse, Northern Virginia, Washington DC, and Western Massachusetts, Westchester County.<sup>405</sup>

*Jurisdictions in Verizon’s local service areas where CLEC has filed local tariffs:*

*California:* Business Network Switched Services – includes PBX Trunk Service, PRI T-1 Service, Centrex Service, and Public Access Lines Service.<sup>406</sup>

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<sup>400</sup> PAETEC, *E-mail Overview*, [http://www.paetec.com/1\\_2/1\\_2\\_3\\_\\_1.html](http://www.paetec.com/1_2/1_2_3__1.html) (emphasis added).

<sup>401</sup> Choice Hotels International News Release, *Choice Hotels International Signs PAETEC Communications as Preferred Provider for its Franchisees Across the Country* (Oct. 19, 2004).

<sup>402</sup> PAETEC News Release, *PAETEC Endorsed by Manufacturing Jewelers & Suppliers of America* (Jan. 25, 2005).

<sup>403</sup> Bellevue Communications Group News Release, *Bellevue Communications Group Signs Leading Telecommunications Firm* (Sept. 29, 2003).

<sup>404</sup> PAETEC, *Offerings*, [http://www.paetec.com/1\\_1/1\\_1\\_\\_1.html](http://www.paetec.com/1_1/1_1__1.html).

<sup>405</sup> PAETEC, *Markets Served*, [http://www.paetec.com/2\\_1/2\\_1\\_5\\_\\_2.html](http://www.paetec.com/2_1/2_1_5__2.html).

<sup>406</sup> PAETEC Communications, *California Competitive Local Carrier Tariff No. 2*, First Revised Cal P.U.C. Sheet No. 65-T-76.4-T (filed Sept. 26, 2001). “Carrier provides intrastate telecommunications services within the state of

*Pennsylvania:* PRI T-1 Service,<sup>407</sup> PBX Trunk Service,<sup>408</sup> Centrex Service,<sup>409</sup> Public Access Lines Service.<sup>410</sup>

*Virginia:* PRI T-1 Service,<sup>411</sup> PBX Trunk Service,<sup>412</sup> Centrex Service,<sup>413</sup> Public Access Lines Service.<sup>414</sup>

For PBX Trunk Services, PAETEC groups recurring and nonrecurring charges based on the number of lines in the terminal group (1-20 lines in terminal group, 100 lines in terminal group).<sup>415</sup>

*CLEC facilities:*

“PAETEC utilizes Lucent 5ESS switching platforms to carry local, long distance and data traffic.”<sup>416</sup>

	<b>Facilities</b>
Albany, NY	Lucent 5ESS voice switch
Boston, MA	Lucent 5ESS voice switch
Chicago, IL	Lucent 5ESS voice switch
Los Angeles, CA	Lucent 5ESS voice switch
New York, NY	Lucent 5ESS voice switch
Philadelphia, PA	Lucent 5ESS voice switch
Sterling, VA	Lucent 5ESS voice switch
New Paradigm Resources Group, Inc., <i>CLEC Report 2005</i> , Ch. 6 – PAETEC Communications at 10-12 (19th ed. 2005).	

See Attachment A.

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California to users at locations throughout the State. Carrier concurs in the boundary exchanges of Pacific Bell, GTEC, CTC, and RTC for its local exchange services.” PAETEC Communications, *California Competitive Local Carrier Tariff No. 2*, First Revised Cal P.U.C. Sheet No. 65-T-76.4-T (filed Sept. 26, 2001).

<sup>407</sup> PaeTec Communications, Inc., Telephone-PA P.U.C. No. 3, § 8.2.6 (issued Nov. 21, 2003).

<sup>408</sup> PaeTec Communications, Inc., Telephone-PA P.U.C. No. 3, § 8.2.3 (issued Nov. 21, 2003).

<sup>409</sup> PaeTec Communications, Inc., Telephone-PA P.U.C. No. 3, § 8.2 (issued Nov. 21, 2003).

<sup>410</sup> PaeTec Communications, Inc., Telephone-PA P.U.C. No. 3, § 8.2 (issued Nov. 21, 2003).

<sup>411</sup> PaeTec Communications of Virginia, Inc., VA SCC No. 1, § 7.3 (issued Nov. 5, 2001).

<sup>412</sup> PaeTec Communications of Virginia, Inc., VA SCC No. 1, § 7.2 (issued Nov. 5, 2001).

<sup>413</sup> PaeTec Communications of Virginia, Inc., VA SCC No. 1, § 7.2 (issued Nov. 5, 2001).

<sup>414</sup> PaeTec Communications of Virginia, Inc., VA SCC No. 1, § 7.2 (issued Nov. 5, 2001).

<sup>415</sup> PaeTec Communications of Virginia, Inc., VA SCC No. 1, § 7.2.3 (issued Nov. 5, 2001); PaeTec Communications, Inc., *Telephone-PA P.U.C. No. 3*, § 8.2.3 (issued Nov. 21, 2003).

<sup>416</sup> Comments of PAETEC Communications at 3, *Unbundled Access to Network Elements; Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, WC Docket No. 04-313, CC Docket No. 01-338 (FCC filed Oct. 4, 2004).



## TelCove

*Carrier claims that it serves medium businesses:*

“TelCove’s Local Business Line service is capable of supporting primary voice communications, key system access, dial-up Internet access, fax, and PBX backup applications for **small to large businesses**.”<sup>417</sup>

“Shared Hosting is an economical, flexible Web solution for small to **medium** sized businesses looking to establish an online Web presence.”<sup>418</sup>

*Examples of business customers based on public information:*

- Hershey Foods Corporation (contract to provide local voice and point-to-point data services)<sup>419</sup>
- Hunterdon Medical Center (contract to provide the New Jersey community hospital with high-speed data, Internet, and voice services)<sup>420</sup>
- Law School Admission Council (contract to provide DS-3 for LSAC’s Internet services and local and long distance voice services for its new facility in Newtown, PA)<sup>421</sup>

*Service offerings:*

Voice: Business Lines, Business Trunks, ISDN BRI, ISDN PRI, Centrex, Voice Messaging, Auto Attendant, Long Distance, and Toll-free.<sup>422</sup>

Data: Local Private Line, Private Local SONET Ring, Intercity Private Line, Frame Relay, ATM, and Ethernet.<sup>423</sup>

Internet: Dedicated Access, Remote Access VPN, Dial-Up Access, Data Center Solutions.<sup>424</sup>

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<sup>417</sup> TelCove, *Company Brochure* at 9, <http://www.telcove.com/prroom/CompanyBrochure.pdf> (emphasis added).

<sup>418</sup> TelCove, *Shared Web Hosting*, [http://www.telcove.com/p\\_s/Files%20to%20Delete/internet\\_dcs\\_swh.htm](http://www.telcove.com/p_s/Files%20to%20Delete/internet_dcs_swh.htm) (emphasis added).

<sup>419</sup> TelCove Press Release, *Hershey Foods Corporation Renews Its Communications Services With TelCove* (Dec. 3, 2003).

<sup>420</sup> TelCove Press Release, *TelCove Chosen To Provide Telecommunications Services To Hunterdon Medical Center* (Aug. 9, 2004).

<sup>421</sup> TelCove Press Release, *TelCove Provides Highly-Reliable Internet Services For Law School Admission Council* (Aug. 4, 2004).

<sup>422</sup> TelCove, *Voice Services*, [http://www.telcove.com/p\\_s/voice.htm](http://www.telcove.com/p_s/voice.htm).

<sup>423</sup> TelCove, *Data Services*, [http://www.telcove.com/p\\_s/data.htm](http://www.telcove.com/p_s/data.htm).

<sup>424</sup> TelCove, *Internet Services*, [http://www.telcove.com/p\\_s/internet.htm](http://www.telcove.com/p_s/internet.htm).

*Areas within Verizon's local service area according to CLEC's website:*

Albany; Allentown, PA; Baltimore; Buffalo; Burlington, VT; Central New Jersey; Danville, VA; Erie, PA; Fredericksburg, VA; Harrisburg, PA; Harrisonburg, VA; Lancaster, PA; Lynchburg, VA; Newark, NJ; Norfolk; Philadelphia; Pittsburgh; Richmond; Roanoke, VA; Rome-Utica; Scranton; State College, PA; Staunton, VA; Syracuse; Tampa; Winchester, VA; York, PA.<sup>425</sup>

*Jurisdictions in Verizon's local service areas where CLEC has filed local tariffs:*

*Delaware:* Frame Relay Service,<sup>426</sup> Centrex-Type Service,<sup>427</sup> Public Access Line Service,<sup>428</sup> PBX Trunk Service,<sup>429</sup> ISDN-PRI,<sup>430</sup> Basic Business Line Service,<sup>431</sup> Voice Grade Service DS-0,<sup>432</sup> Digital Data Service,<sup>433</sup> DS-1 Service,<sup>434</sup> DS-3 Service,<sup>435</sup> Private Local SONET,<sup>436</sup> Dark Fiber Services.<sup>437</sup>

*Florida:* Frame Relay Service,<sup>438</sup> Centrex-Type Service,<sup>439</sup> Public Access Line Service,<sup>440</sup> PBX Trunk Service,<sup>441</sup> ISDN-PRI,<sup>442</sup> Basic Business Line Service,<sup>443</sup> Digital Data Service.<sup>444</sup>

*Indiana:* Frame Relay Service,<sup>445</sup> Centrex-Type Service,<sup>446</sup> Public Access Line Service,<sup>447</sup> PBX Trunk Service,<sup>448</sup> ISDN-PRI,<sup>449</sup> Basic Business Line Service,<sup>450</sup> Voice

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<sup>425</sup> TelCove, *Local City Network Maps*, [http://www.telcove.com/network/maps\\_contacts.htm](http://www.telcove.com/network/maps_contacts.htm).

<sup>426</sup> TelCove Operations, DE P.S.C. Tariff No. 1, § 5.15 (issued June 23, 2004).

<sup>427</sup> TelCove Operations, DE P.S.C. Tariff No. 1, § 7.2.3 (issued June 23, 2004).

<sup>428</sup> TelCove Operations, DE P.S.C. Tariff No. 1, § 7.2.2 (issued June 23, 2004).

<sup>429</sup> TelCove Operations, DE P.S.C. Tariff No. 1, § 7.2.3 (issued June 23, 2004).

<sup>430</sup> TelCove Operations, DE P.S.C. Tariff No. 1, § 7.2.3 (issued June 23, 2004).

<sup>431</sup> TelCove Operations, DE P.S.C. Tariff No. 1, § 7.2 (issued June 23, 2004).

<sup>432</sup> TelCove Operations, DE P.S.C. Tariff No. 3, § 5.3.1 (issued June 23, 2004).

<sup>433</sup> TelCove Operations, DE P.S.C. Tariff No. 3, § 5.3.2 (issued June 23, 2004).

<sup>434</sup> TelCove Operations, DE P.S.C. Tariff No. 3, § 5.3.3 (issued June 23, 2004).

<sup>435</sup> TelCove Operations, DE P.S.C. Tariff No. 3, § 5.3.4 (issued June 23, 2004).

<sup>436</sup> TelCove Operations, DE P.S.C. Tariff No. 3, § 5.3.10 (issued June 23, 2004).

<sup>437</sup> TelCove Operations, DE P.S.C. Tariff No. 3, § 5.3.7 (issued June 23, 2004).

<sup>438</sup> Adelpia Business Solutions Investment, LLC d/b/a TelCove, FL P.S.C. Price List No. 1, § 5.16 (issued July 26, 2001).

<sup>439</sup> Adelpia Business Solutions Investment, LLC d/b/a TelCove, FL P.S.C. Price List No. 1, § 7.2.4 (issued July 16, 2001).

<sup>440</sup> Adelpia Business Solutions Investment, LLC d/b/a TelCove, FL P.S.C. Price List No. 1, § 7.2.2 (issued July 16, 2001).

<sup>441</sup> Adelpia Business Solutions Investment, LLC d/b/a TelCove, FL P.S.C. Price List No. 1, § 7.2.3 (issued July 16, 2001).

<sup>442</sup> Adelpia Business Solutions Investment, LLC d/b/a TelCove, FL P.S.C. Price List No. 1, § 7.2.7 (issued June 19, 2003).

<sup>443</sup> Adelpia Business Solutions Investment, LLC d/b/a TelCove, FL P.S.C. Price List No. 1, § 12.22.1 (issued July 16, 2001).

<sup>444</sup> Adelpia Business Solutions Investment, LLC d/b/a TelCove, FL P.S.C. Price List No. 1, § 12.40.4 (issued Feb. 5, 2003).

<sup>445</sup> Adelpia Business Solutions Operations, IN U.R.C. Tariff No. 1, § 5.16.

<sup>446</sup> Adelpia Business Solutions Operations, IN U.R.C. Tariff No. 1, § 7.2.4 (issued Feb. 7, 2001).

<sup>447</sup> Adelpia Business Solutions Operations, IN U.R.C. Tariff No. 1, § 7.2.2 (issued Feb. 7, 2001).

Grade Service DS-0,<sup>451</sup> Digital Data Service,<sup>452</sup> DS-1 Service,<sup>453</sup> DS-3 Service,<sup>454</sup> Private Local SONET,<sup>455</sup> Dark Fiber Services.<sup>456</sup>

*Maryland:* Basic Business Line Service,<sup>457</sup> Frame Relay Service,<sup>458</sup> Centrex-Type Service,<sup>459</sup> Public Access Lines Service,<sup>460</sup> PBX Trunk Service,<sup>461</sup> ISDN-PRI,<sup>462</sup> Voice Grade Service DS-0,<sup>463</sup> Digital Data Service,<sup>464</sup> DS-1 Service,<sup>465</sup> DS-3 Service,<sup>466</sup> Private Local SONET.<sup>467</sup>

*New Hampshire:* Frame Relay Service,<sup>468</sup> Centrex-Type Service,<sup>469</sup> Public Access Line Service,<sup>470</sup> Basic Business Line Service,<sup>471</sup> ISDN-PRI,<sup>472</sup> PBX Trunk Service,<sup>473</sup> Voice Grade Service DS-0,<sup>474</sup> Digital Data Service,<sup>475</sup> DS-1 Service,<sup>476</sup> DS-3 Service,<sup>477</sup> Private Local SONET,<sup>478</sup> Dark Fiber Services.<sup>479</sup>

*New Jersey:* Frame Relay Service,<sup>480</sup> Centrex-Type Service,<sup>481</sup> PBX Trunk Service,<sup>482</sup> Basic Business Line Service,<sup>483</sup> ISDN-PRI,<sup>484</sup> Voice Grade Service DS-0,<sup>485</sup> Digital Data

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- <sup>448</sup> Adelphia Business Solutions Operations, IN U.R.C. Tariff No. 1, § 7.2.3.  
<sup>449</sup> Adelphia Business Solutions Operations, IN U.R.C. Tariff No. 1, § 7.2.3 (issued Feb. 7, 2001).  
<sup>450</sup> Adelphia Business Solutions Operations, IN U.R.C. Tariff No. 1, § 7.2.1.  
<sup>451</sup> Adelphia Business Solutions Operations, IN U.R.C. Tariff No. 3, § 5.3.1 (issued Apr. 8, 2002).  
<sup>452</sup> Adelphia Business Solutions Operations, IN U.R.C. Tariff No. 3, § 5.3.2 (issued Apr. 8, 2002).  
<sup>453</sup> Adelphia Business Solutions Operations, IN U.R.C. Tariff No. 3, § 5.3.3 (issued Apr. 8, 2002).  
<sup>454</sup> Adelphia Business Solutions Operations, IN U.R.C. Tariff No. 3, § 5.3.4 (issued Apr. 8, 2002).  
<sup>455</sup> Adelphia Business Solutions Operations, IN U.R.C. Tariff No. 3, § 5.3.10.  
<sup>456</sup> Adelphia Business Solutions Operations, IN U.R.C. Tariff No. 3, § 5.3.7 (issued Apr. 8, 2002).  
<sup>457</sup> TelCove Operations, PSC MD Tariff No. 2, § 3.24.3 (issued July 15, 2004).  
<sup>458</sup> TelCove Operations, PSC MD Tariff No. 2, § 3.23 (issued July 15, 2004).  
<sup>459</sup> TelCove Operations, PSC MD Tariff No. 2, § 3.24.5 (issued July 15, 2004).  
<sup>460</sup> TelCove Operations, PSC MD Tariff No. 2, § 3.24.2 (issued July 15, 2004).  
<sup>461</sup> TelCove Operations, PSC MD Tariff No. 2, § 3.24.4 (issued July 15, 2004).  
<sup>462</sup> TelCove Operations, PSC MD Tariff No. 2, § 3.24.8 (issued July 15, 2004).  
<sup>463</sup> TelCove Operations, PSC MD Tariff No. 1, § 3.6.1 (issued July 15, 2004).  
<sup>464</sup> TelCove Operations, PSC MD Tariff No. 1, § 3.6.2 (issued July 15, 2004).  
<sup>465</sup> TelCove Operations, PSC MD Tariff No. 1, § 3.6.3 (issued July 15, 2004).  
<sup>466</sup> TelCove Operations, PSC MD Tariff No. 1, § 3.6.4 (issued July 15, 2004).  
<sup>467</sup> TelCove Operations, PSC MD Tariff No. 1, § 3.6.9 (issued July 15, 2004).  
<sup>468</sup> Adelphia Business Solutions Operations, New Hampshire P.U.C. Price List No. 1, § 23 (issued Apr. 30, 2002).  
<sup>469</sup> Adelphia Business Solutions Operations, New Hampshire P.U.C. Price List No. 1, § 29 (issued Apr. 30, 2002).  
<sup>470</sup> Adelphia Business Solutions Operations, New Hampshire P.U.C. Price List No. 1, § 27 (issued Apr. 30, 2002).  
<sup>471</sup> Adelphia Business Solutions Operations, New Hampshire P.U.C. Price List No. 1, § 26 (issued Apr. 30, 2002).  
<sup>472</sup> Adelphia Business Solutions Operations, New Hampshire P.U.C. Price List No. 1, § 28 (issued Apr. 30, 2002).  
<sup>473</sup> Adelphia Business Solutions Operations, New Hampshire P.U.C. Price List No. 1, § 28 (issued Apr. 30, 2002).  
<sup>474</sup> Adelphia Business Solutions Operations, New Hampshire P.U.C. Price List No. 1, § 37 (issued Apr. 30, 2002).  
<sup>475</sup> Adelphia Business Solutions Operations, New Hampshire P.U.C. Price List No. 1, § 37 (issued Apr. 30, 2002).  
<sup>476</sup> Adelphia Business Solutions Operations, New Hampshire P.U.C. Price List No. 1, § 37 (issued Apr. 30, 2002).  
<sup>477</sup> Adelphia Business Solutions Operations, New Hampshire P.U.C. Price List No. 1, § 37 (issued Apr. 30, 2002).  
<sup>478</sup> Adelphia Business Solutions Operations, New Hampshire P.U.C. Price List No. 1, § 37 (issued Apr. 30, 2002).  
<sup>479</sup> Adelphia Business Solutions Operations, New Hampshire P.U.C. Price List No. 1, § 37 (issued Apr. 30, 2002).  
<sup>480</sup> TelCove Investment, NJ B.P.U. No. 1, § 5.15 (issued May 24, 2004).  
<sup>481</sup> TelCove Investment, NJ B.P.U. No. 1, § 7.2.4 (issued May 24, 2004).  
<sup>482</sup> TelCove Investment, NJ B.P.U. No. 1, § 7.2.3 (issued May 24, 2004).  
<sup>483</sup> TelCove Investment, NJ B.P.U. No. 1, § 7.2.1 (issued May 24, 2004).  
<sup>484</sup> TelCove Investment, NJ B.P.U. No. 1, § 7.2.3 (issued May 24, 2004).

Service,<sup>486</sup> DS-1 Service,<sup>487</sup> DS-3 Service,<sup>488</sup> Private Local SONET,<sup>489</sup> Dark Fiber Services.<sup>490</sup>

*New York:* Frame Relay Service,<sup>491</sup> Centrex-Type Service,<sup>492</sup> PBX Trunk Service,<sup>493</sup> Basic Business Line Service,<sup>494</sup> ISDN-PRI,<sup>495</sup> Public Access Line Service,<sup>496</sup> Voice Grade Service DS-0,<sup>497</sup> Digital Data Service,<sup>498</sup> DS-1 Service,<sup>499</sup> DS-3 Service,<sup>500</sup> Private Local SONET,<sup>501</sup> Dark Fiber Services.<sup>502</sup>

*Ohio:* Frame Relay Service,<sup>503</sup> Centrex-Type Service,<sup>504</sup> PBX Trunk Service,<sup>505</sup> ISDN-PRI,<sup>506</sup> Basic Business Line Service,<sup>507</sup> Public Access Line Service.<sup>508</sup>

*Pennsylvania:* Frame Relay Service,<sup>509</sup> PBX Trunk Service,<sup>510</sup> ISDN-PRI,<sup>511</sup> Basic Business Line Service,<sup>512</sup> Centrex-Type Service,<sup>513</sup> Voice Grade Service DS-0,<sup>514</sup> Digital Data Service,<sup>515</sup> DS-1 Service,<sup>516</sup> DS-3 Service,<sup>517</sup> Private Local SONET,<sup>518</sup> Dark Fiber Services,<sup>519</sup> Ethernet Service.<sup>520</sup>

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<sup>485</sup> TelCove Investment, NJ B.P.U. No. 3, § 5.3 (issued May 24, 2004).

<sup>486</sup> TelCove Investment, NJ B.P.U. No. 3, § 5.3 (issued May 24, 2004).

<sup>487</sup> TelCove Investment, NJ B.P.U. No. 3, § 5.3 (issued May 24, 2004).

<sup>488</sup> TelCove Investment, NJ B.P.U. No. 3, § 5.3 (issued May 24, 2004).

<sup>489</sup> TelCove Investment, NJ B.P.U. No. 3, § 5.3 (issued May 24, 2004).

<sup>490</sup> TelCove Investment, NJ B.P.U. No. 3, § 5.3 (issued May 24, 2004).

<sup>491</sup> Adelphia Business Solutions Operations, NY P.S.C. Tariff No. 1, § 5.16 (issued Nov. 8, 2001).

<sup>492</sup> Adelphia Business Solutions Operations, NY P.S.C. Tariff No. 1, § 7.2.4 (issued Nov. 8, 2001).

<sup>493</sup> Adelphia Business Solutions Operations, NY P.S.C. Tariff No. 1, § 7.2.3 (issued Nov. 8, 2001).

<sup>494</sup> Adelphia Business Solutions Operations, NY P.S.C. Tariff No. 1, § 7.2.1 (issued Nov. 8, 2001).

<sup>495</sup> Adelphia Business Solutions Operations, NY P.S.C. Tariff No. 1, § 7.2.3 (issued Nov. 8, 2001).

<sup>496</sup> Adelphia Business Solutions Operations, NY P.S.C. Tariff No. 1, § 7.2.2 (issued Nov. 8, 2001).

<sup>497</sup> Adelphia Business Solutions Operations, NY P.S.C. Tariff No. 3, § 5.3.1 (issued Nov. 8, 2001).

<sup>498</sup> Adelphia Business Solutions Operations, NY P.S.C. Tariff No. 3, § 5.3.2 (issued Nov. 8, 2001).

<sup>499</sup> Adelphia Business Solutions Operations, NY P.S.C. Tariff No. 3, § 5.3.3 (issued Nov. 8, 2001).

<sup>500</sup> Adelphia Business Solutions Operations, NY P.S.C. Tariff No. 3, § 5.3.4 (issued Nov. 8, 2001).

<sup>501</sup> Adelphia Business Solutions Operations, NY P.S.C. Tariff No. 3, § 5.3.10 (issued Nov. 8, 2001).

<sup>502</sup> Adelphia Business Solutions Operations, NY P.S.C. Tariff No. 3, § 5.3.7 (issued Nov. 8, 2001).

<sup>503</sup> Adelphia Business Solutions Operations, P.U.C.O. Tariff No. 1, § 5.15 (issued Nov. 20, 2001).

<sup>504</sup> Adelphia Business Solutions Operations, P.U.C.O. Tariff No. 1, § 7.2.4 (issued June 12, 2000).

<sup>505</sup> Adelphia Business Solutions Operations, P.U.C.O. Tariff No. 1, § 7.2.3 (issued Nov. 20, 2001).

<sup>506</sup> Adelphia Business Solutions Operations, P.U.C.O. Tariff No. 1, § 7.2.3 (issued June 12, 2000).

<sup>507</sup> Adelphia Business Solutions Operations, P.U.C.O. Tariff No. 1, § 7.2.1 (issued June 12, 2000).

<sup>508</sup> Adelphia Business Solutions Operations, P.U.C.O. Tariff No. 1, § 7.2.2 (issued June 12, 2000).

<sup>509</sup> Adelphia Business Solutions of Pennsylvania, PA P.U.C. Tariff No. 1, § 5.14 (issued June 27, 2001).

<sup>510</sup> Adelphia Business Solutions of Pennsylvania, PA P.U.C. Tariff No. 1, § 7.2.3 (issued June 27, 2001).

<sup>511</sup> Adelphia Business Solutions of Pennsylvania, PA P.U.C. Tariff No. 1, § 7.2.7 (issued Jan. 11, 2002).

<sup>512</sup> Adelphia Business Solutions of Pennsylvania, PA P.U.C. Tariff No. 1, § 7.2.1 (issued June 27, 2001).

<sup>513</sup> Adelphia Business Solutions of Pennsylvania, PA P.U.C. Tariff No. 1, § 5.3 (issued June 27, 2001).

<sup>514</sup> Hyperion Telecommunications of Pennsylvania, PA P.U.C. Tariff No. 3, § 5.3 (issued Sept. 24, 1998).

<sup>515</sup> Hyperion Telecommunications of Pennsylvania, PA P.U.C. Tariff No. 3, § 5.3 (issued Sept. 24, 1998).

<sup>516</sup> Hyperion Telecommunications of Pennsylvania, PA P.U.C. Tariff No. 3, § 5.3 (issued Sept. 24, 1998).

<sup>517</sup> Hyperion Telecommunications of Pennsylvania, PA P.U.C. Tariff No. 3, § 5.3 (issued Sept. 24, 1998).

<sup>518</sup> Adelphia Business Solutions of Pennsylvania, PA P.U.C. Tariff No. 3, § 5.3 (issued Sept. 28, 2001).

<sup>519</sup> Adelphia Business Solutions of Pennsylvania d/b/a TelCove, PA P.U.C. Tariff No. 3, § 5.3 (issued Mar. 12, 2004).

*Vermont:* Frame Relay Service,<sup>521</sup> PBX Trunk Service,<sup>522</sup> Centrex-Type Service,<sup>523</sup> ISDN-PRI,<sup>524</sup> Basic Business Line Service,<sup>525</sup> (Voice Grade Service DS-0, Digital Data Service, DS-1 Service, DS-3 Service, Private Local SONET, Dark Fiber Services, Voice Grade Service DS-0, Digital Data Service, DS-1 Service, DS-3 Service, Private Local SONET, Dark Fiber Services.)<sup>526</sup>

*Virginia:* Frame Relay Service,<sup>527</sup> PBX Trunk Service,<sup>528</sup> Centrex-Type Service, ISDN-PRI,<sup>529</sup> Basic Business Line Service,<sup>530</sup> Voice Grade Service DS-0,<sup>531</sup> Digital Data Service,<sup>532</sup> DS-1 Service,<sup>533</sup> DS-3 Service,<sup>534</sup> Private Local SONET,<sup>535</sup> Dark Fiber Services.<sup>536</sup>

*West Virginia:* Frame Relay Service,<sup>537</sup> PBX Trunk Service,<sup>538</sup> Centrex-Type Service,<sup>539</sup> ISDN-PRI/BRI,<sup>540</sup> Basic Business Line Service,<sup>541</sup> Voice Grade Service DS-0,<sup>542</sup> Digital Data Service,<sup>543</sup> DS-1 Service,<sup>544</sup> DS-3 Service,<sup>545</sup> Private Local SONET,<sup>546</sup> Dark Fiber Services.<sup>547</sup>

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<sup>520</sup> Adelphia Business Solutions of Pennsylvania d/b/a TelCove, PA P.U.C. Tariff No. 3, § 5.3 (issued Dec. 12, 2003).

<sup>521</sup> TelCove of Vermont, VPSB Tariff No. 2, § 5.17 (issued July 14, 2004).

<sup>522</sup> TelCove of Vermont, VPSB Tariff No. 2, § 7.2.3 (issued July 14, 2004).

<sup>523</sup> TelCove of Vermont, VPSB Tariff No. 2, § 7.2.4 (issued July 14, 2004).

<sup>524</sup> TelCove of Vermont, VPSB Tariff No. 2, § 7.2.7 (issued July 14, 2004).

<sup>525</sup> TelCove of Vermont, VPSB Tariff No. 2, § 7.2.1 (issued July 14, 2004).

<sup>526</sup> TelCove of Vermont, VPSB Tariff No. 1, § 3.3 (issued July 14, 2004).

<sup>527</sup> TelCove of Virginia, VA S.C.C. Tariff No. 1, § 5.16 (issued Aug. 5, 2004).

<sup>528</sup> TelCove of Virginia, VA S.C.C. Tariff No. 1, § 7.2.3 (issued Aug. 5, 2004).

<sup>529</sup> TelCove of Virginia, VA S.C.C. Tariff No. 1, § 7.2.4 (issued Aug. 5, 2004).

<sup>530</sup> TelCove of Virginia, VA S.C.C. Tariff No. 1, § 7.2.1 (issued Aug. 5, 2004).

<sup>531</sup> TelCove of Virginia, VA S.C.C. Tariff No. 3, § 5.3.1 (issued Aug. 5, 2004).

<sup>532</sup> TelCove of Virginia, VA S.C.C. Tariff No. 3, § 5.3.2 (issued Aug. 5, 2004).

<sup>533</sup> TelCove of Virginia, VA S.C.C. Tariff No. 3, § 5.3.3 (issued Aug. 5, 2004).

<sup>534</sup> TelCove of Virginia, VA S.C.C. Tariff No. 3, § 5.3.4 (issued Aug. 5, 2004).

<sup>535</sup> TelCove of Virginia, VA S.C.C. Tariff No. 3, § 5.3.10 (issued Aug. 5, 2004).

<sup>536</sup> TelCove of Virginia, VA S.C.C. Tariff No. 3, § 5.3.7 (issued Aug. 5, 2004).

<sup>537</sup> TelCove Operations, W.V. P.S.C. Tariff No. 1, § 5.15 (issued July 19, 2004).

<sup>538</sup> TelCove Operations, W.V. P.S.C. Tariff No. 1, § 7.2.3 (issued July 19, 2004).

<sup>539</sup> TelCove Operations, W.V. P.S.C. Tariff No. 1, § 7.2.4 (issued July 19, 2004).

<sup>540</sup> TelCove Operations, W.V. P.S.C. Tariff No. 1, § 7.2.3 (issued July 19, 2004).

<sup>541</sup> TelCove Operations, W.V. P.S.C. Tariff No. 1, § 7.2.1 (issued July 19, 2004).

<sup>542</sup> TelCove Operations, W.V. P.S.C. Tariff No. 3, § 5.3.1 (issued July 19, 2004).

<sup>543</sup> TelCove Operations, W.V. P.S.C. Tariff No. 3, § 5.3.2 (issued July 19, 2004).

<sup>544</sup> TelCove Operations, W.V. P.S.C. Tariff No. 3, § 5.3.3 (issued July 19, 2004).

<sup>545</sup> TelCove Operations, W.V. P.S.C. Tariff No. 3, § 5.3.4 (issued July 19, 2004).

<sup>546</sup> TelCove Operations, W.V. P.S.C. Tariff No. 3, § 5.3.10 (issued July 19, 2004).

<sup>547</sup> TelCove Operations, W.V. P.S.C. Tariff No. 3, § 5.3.7 (issued July 19, 2004).

*CLEC facilities:*

	<b>Facilities</b>
Burlington, VT	Lucent 5ESS voice switch
Piscataway, NJ	Lucent 5ESS voice switch
Pittsburgh, PA	Lucent 5ESS voice switch
Scranton, PA	Lucent 5ESS voice switch
State College, PA	Lucent 5ESS voice switch
Syracuse, NY	Lucent 5ESS voice switch
Tampa, FL	Lucent 5ESS voice switch
York, PA	Lucent 5ESS voice switch
New Paradigm Resources Group, Inc., <i>CLEC Report 2005</i> , Ch. 6 – TelCove at 13-16 (19th ed. 2005).	

*See Attachment A.*

### **360networks**

*Carrier claims that it serves medium businesses:*

“360networks is a leading US provider of fiber optic network communications products and services in 15 western states. . . . We provide products and services to **mid**, large and carrier customers.”<sup>548</sup>

*Service offerings:*

Wavelength, optical transport, dark fiber & conduit, collocation, and dedicated Internet services.<sup>549</sup>

*Areas within Verizon’s local service area according to CLEC’s website:*

Baltimore, Boston, Dallas, Los Angeles, New York, Newark, Philadelphia, Pittsburgh, Seattle, Tampa, Washington, DC.<sup>550</sup>

*CLEC facilities:*

See Attachment A.

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<sup>548</sup> 360networks, *About Us*, [http://www.360.net/About\\_Us/](http://www.360.net/About_Us/) (emphasis added).

<sup>549</sup> 360networks, *Our Services*, [http://www.360.net/Our\\_Services/](http://www.360.net/Our_Services/).

<sup>550</sup> 360networks, *Markets Served*, [http://www.360.net/Our\\_Networks/Markets\\_Served/](http://www.360.net/Our_Networks/Markets_Served/).

## Time Warner

*Carrier claims that it serves medium businesses:*

“With Time Warner Telecom, businesses benefit from an end-to-end integrated solution, managed and maintained based on Time Warner Telecom’s high quality service standards. Now small and **medium**-sized business customers have a means to combine local voice, long distance, and Internet into a single service allowing them to minimize equipment investment and installation charges.”<sup>551</sup>

“Whether you are a small, **medium**, or large-size business, Time Warner Telecom has just the right product or solution to meet your communication needs.”<sup>552</sup>

Through Time Warner Telecom’s Integrated Business Line service (IBL), “Now small and **medium**-sized business customers have a means to combine local voice, long distance, and Internet into a single service allowing them to minimize equipment investment and installation charges.”<sup>553</sup>

“IBL and VersiPak packages bundle voice and Internet services with discounted prepackaged long distance plans to create a value-packed solution for small to **medium** sized business customers.”<sup>554</sup>

“Connect your **medium** & large-size business to the right solution. Time Warner Telecom offers a complete suite of voice, data, and Internet products to fit your business needs.”<sup>555</sup>

“Small and Middle-sized Businesses - Road Runner Business Class provides businesses with more than 5 employees solutions that help them expand their business and communicate quickly and efficiently with their customer base. With Road Runner Business Class, networking, security, website hosting, and extra tiers of Internet access speed can be cost-effectively combined into a solution that meets your specific needs.”<sup>556</sup>

“Small and Middle-Sized Business Solutions- Road Runner Business Class reduces your overall costs of doing business by connecting you with solutions that help your entire staff work more efficiently. From high-speed Internet solutions that speed workflow to specialized features that protect files, Road Runner Business Class targeted products and

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<sup>551</sup> Time Warner Telecom, *Integrated Business Line (iBL)*,

[http://www.twtelecom.com/cust\\_solutions/services/ibl.html](http://www.twtelecom.com/cust_solutions/services/ibl.html) (emphasis added).

<sup>552</sup> Time Warner Telecom, *Enterprise Customers*, [http://www.twtelecom.com/cust\\_solutions/enterprise.html](http://www.twtelecom.com/cust_solutions/enterprise.html) (emphasis added).

<sup>553</sup> Time Warner Telecom, *Integrated Business Line*, [http://www.twtelecom.com/cust\\_solutions/services/ibl.html](http://www.twtelecom.com/cust_solutions/services/ibl.html) (emphasis added).

<sup>554</sup> Time Warner Telecom of California, *California Competitive Local Carrier Tariff No.3-T*, Original Sheet 79.2 (filed May 30, 2003) (emphasis added).

<sup>555</sup> Time Warner Telecom, *Small and Medium Business Solutions*, [http://www.twtelecom.com/cust\\_solutions/sm\\_med\\_biz\\_sol.html](http://www.twtelecom.com/cust_solutions/sm_med_biz_sol.html) (emphasis added).

<sup>556</sup> Road Runner, *Business Solutions*, [http://rrbiz.com/RoadRunner/sec\\_tabs.asp?TRACKID=&CID=12&DID=16](http://rrbiz.com/RoadRunner/sec_tabs.asp?TRACKID=&CID=12&DID=16) (emphasis added).



services can enhance your company's productivity - while improving your bottom line."<sup>557</sup>

*Examples of business customers based on public information:*

- Outback Steakhouse (contract to provide integrated voice and data services to company headquarters)<sup>558</sup>
- Landacorp (contract to provide secure data services, including switched Native LAN services and multiple T1s)<sup>559</sup>
- Blue Cross & Blue Shield of North Carolina (contract to provide storage transport services between main data center and disaster recovery site)<sup>560</sup>

*Service offerings:*

Medium and Large Business Solutions

Internet & Data: Co-location Services, Dedicated Internet Access, Dedicated Web Hosting, Native LAN, Storage Transport Services, Switched Native LAN.

Switched & Transport: Business Switch Services, Dedicated High Capacity Services (DS1/DS3), Digital Trunks, ISDN PRI, Long Distance, Multi-location Solutions, Regional Networks.

Packaged Solutions: IBL (Integrated Business Line), VersiPak.<sup>561</sup>

Cable Modem Service (Road Runner):

Access: "Always-on high-speed Internet access up to 100 times faster than dial-up modems, and much larger capacity for instant downloads and transmissions."<sup>562</sup>

Service is offered in multiple tiers: 256 Kbps – 5 Mbps (Downstream) and 192 Kbps – 768 Kbps (Upstream).<sup>563</sup>

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<sup>557</sup> Road Runner, *Business Solutions*,

[http://rrbiz.com/RoadRunner/sec\\_formatted.asp?TRACKID=&CID=16&DID=21](http://rrbiz.com/RoadRunner/sec_formatted.asp?TRACKID=&CID=16&DID=21) (emphasis added).

<sup>558</sup> Time Warner Telecom News Release, *Time Warner Telecom Serving Up Integrated Voice and Data Services to Outback Steakhouse -Ethernet-based Native LAN 100 Mbps service links data cent* (Mar. 2, 2004).

<sup>559</sup> Time Warner Telecom News Release, *Time Warner Telecom Metro Ethernet Meets Unique Needs of Health Care Solutions Provider Landacorp* (Feb. 3, 2004).

<sup>560</sup> Time Warner Telecom News Release, *Time Warner Telecom Protects Blue Cross and Blue Shield of North Carolina Against Data Loss With Redundant Fibre Channel Storage Transport Service* (Dec. 8, 2003).

<sup>561</sup> Time Warner Telecom, *Small and Medium Business Solutions*,

[http://www.twtelecom.com/cust\\_solutions/sm\\_med\\_biz\\_sol.html](http://www.twtelecom.com/cust_solutions/sm_med_biz_sol.html).

<sup>562</sup> Road Runner, *Product and Services – Access*,

[http://rrbiz.com/RoadRunner/sec\\_unformatted.asp?TRACKID=&CID=24&DID=29](http://rrbiz.com/RoadRunner/sec_unformatted.asp?TRACKID=&CID=24&DID=29).

<sup>563</sup> Road Runner, *Product and Services – Access*,

[http://rrbiz.com/RoadRunner/sec\\_unformatted.asp?TRACKID=&CID=24&DID=29](http://rrbiz.com/RoadRunner/sec_unformatted.asp?TRACKID=&CID=24&DID=29).

Dedicated Access Solutions: Point-to-Point Connectivity, Point-to-Multipoint Connectivity, Teleworker Aggregation, and Internet Access.<sup>564</sup>

Other Services Available: E-mail Solutions, Web Hosting, Managed Security, Personal Security Suite, Static IP, Domain Name Services, Managed Storage, and Dial Access.<sup>565</sup>

*Areas within Verizon's local service area according to CLEC's website:*

Time Warner Telecom: Albany, NY; Binghamton, NY; Manhattan, NY; Raleigh, NC; Los Angeles, CA; Orange County, CA; Jersey City, NJ.<sup>566</sup>

Road Runner cable modem service: New York, NY; Philadelphia, PA; Los Angeles, CA; Albany, NY; Troy, NY; Syracuse, NY; Portland, ME; Durham, NC; Binghamton, NY.<sup>567</sup>

*Jurisdictions in Verizon's local service areas where CLEC has filed local tariffs:*

*California:* Primary Rate ISDN PRI,<sup>568</sup> VersiPak,<sup>569</sup> Digital PBX Trunk Service,<sup>570</sup> IBL VersiPak Service Packages.<sup>571</sup>

*North Carolina:* Basic Business Line Service,<sup>572</sup> Primary Rate ISDN PRI,<sup>573</sup> VersiPak Mach2,<sup>574</sup> VersiPak IPRI Service,<sup>575</sup> Digital PBX Trunk Service,<sup>576</sup> PBX Analog Trunk Service.<sup>577</sup>

Time Warner Telecom through its PBX Trunk Service provides DID Numbers in blocks of 10, 20 or 100.<sup>578</sup>

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<sup>564</sup> Road Runner, *Products and Services – Dedicated Access*,  
[http://rrbiz.com/RoadRunner/sec\\_unformatted.asp?TRACKID=&CID=348&DID=463](http://rrbiz.com/RoadRunner/sec_unformatted.asp?TRACKID=&CID=348&DID=463).

<sup>565</sup> Road Runner, *Products and Services*,  
[http://rrbiz.com/RoadRunner/sec\\_formatted.asp?TRACKID=&CID=5&DID=5](http://rrbiz.com/RoadRunner/sec_formatted.asp?TRACKID=&CID=5&DID=5).

<sup>566</sup> Time Warner Telecom, Form 10-K (SEC filed Mar. 17, 2005).

<sup>567</sup> Road Runner, *Road Runner Help & Member Services Site Selector*,  
[http://help.rr.com/AA/rrwhotext.aspx?ReturnUrl=/HMSLogic/main\\_contentwell.aspx](http://help.rr.com/AA/rrwhotext.aspx?ReturnUrl=/HMSLogic/main_contentwell.aspx).

<sup>568</sup> Time Warner Telecom of California, California Competitive Local Carrier Tariff No.3-T, Original Sheet 72.6 (filed Aug. 18, 2003).

<sup>569</sup> Time Warner Telecom of California, California Competitive Local Carrier Tariff No.3-T, Original Sheet 79.4 (filed May 30, 2003) (“VersiPak IPRI is an integrated, packet-based access solution designed to deliver PRI and Internet services over a single DS-1 (1.536 Mbps) transport facility.”)

<sup>570</sup> Time Warner Telecom of California, California Competitive Local Carrier Tariff No.3-T, Original Sheet 67.1 (filed May 30, 2003).

<sup>571</sup> Time Warner Telecom of California, California Competitive Local Carrier Tariff No.3-T, Original Sheet 79.2 (filed May 30, 2003).

<sup>572</sup> Time Warner Telecom of North Carolina, Local Service Price List No.1, § 4.2.1 (Mar. 27, 2002).

<sup>573</sup> Time Warner Telecom of North Carolina, Local Service Price List No.1, § 4.2.5 (Nov. 2, 2001).

<sup>574</sup> Time Warner Telecom of North Carolina, Local Service Price List No.1, § 4.2.10 (Sept. 16, 2003).

<sup>575</sup> Time Warner Telecom of North Carolina, Local Service Price List No.1, § 4.2.11 (Sept. 16, 2003).

<sup>576</sup> Time Warner Telecom of North Carolina, Local Service Price List No.1, § 4.2.3 (Sept. 16, 2003).

<sup>577</sup> Time Warner Telecom of North Carolina, Local Service Price List No.1, § 4.2.2 (Sept. 16, 2003).

*CLEC facilities:*

	<b>Facilities</b>
Albany, NY	Lucent 5ESS voice switch Fore/Alcatel/Lucent/Ascend data switch
Binghamton, NY	Lucent 5ESS voice switch Fore/Lucent/Ascend data switch
Jersey City, NJ	Lucent 5ESS voice switch
Los Angeles, CA	Lucent 5ESS voice switch
Manhattan, NY	Lucent 5ESS voice switch
Orange County, CA	Lucent 5ESS voice switch
Raleigh-Durham, NC	Lucent 5ESS voice switch Fore/Alcatel/Lucent/Ascend data switch
New Paradigm Resources Group, Inc., <i>CLEC Report 2005</i> , Ch. 6 – Time Warner Telecom at 16-18 (19th ed. 2005).	

See Attachment A.

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<sup>578</sup> Time Warner Telecom of California, California Competitive Local Carrier Tariff No.3-T, Eighth Revised Sheet 68.1(filed May 29, 2003).

## US LEC

*Carrier claims that it serves medium businesses:*

“Based in Charlotte, NC, US LEC is a leading telecommunications carrier providing integrated voice, data and Internet services to **medium** and large businesses and enterprise organizations throughout 15 Eastern states and the District of Columbia.”<sup>579</sup>

US LEC has “[m]ore than 23,000 **mid**-to-large-sized businesses and enterprise organizations.”<sup>580</sup>

“With more than 1,300 **medium** and large sized business customers and enterprise organizations in the Baltimore/D.C. metro area, US LEC successfully targets business customers in other vertical industries that include the automotive, construction, education, entertainment, financial, government, hospitality, manufacturing, professional/legal, real estate and transportation sectors.”<sup>581</sup>

“ADVANTAGE Power T is ideal for **medium**-sized customers who may have needs for fewer lines and greater Internet and/or data bandwidth. . .”<sup>582</sup>

“Frame Relay is an ideal solution for small to **medium** sized companies with varying needs that require dedicated access, but are further away than a dedicated private circuit would economically permit. Frame Relay can also be an effective choice for organizations with multiple locations.”<sup>583</sup>

*Examples of business customers based on public information:*

- Universal Health Services (contract to provide voice, data, Internet services to 14 facilities within the US LEC footprint)<sup>584</sup>
- Carlyle & Co. (contract to serve as single-source provider for voice and data services)<sup>585</sup>

*Service offerings:*

Voice: Local and Long Distance Service.

Data: Frame Relay Service, ATM Product Suite, Digital Private Line (DPL), Managed Router Service.

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<sup>579</sup> US LEC News Release, *US LEC Expands in Virginia* (Jan. 20, 2005) (emphasis added).

<sup>580</sup> US LEC, *About US LEC*, <http://www.uslec.com/Site-Company-1001> (emphasis added).

<sup>581</sup> US LEC News Release, *Washington, D.C. – Area Hospitals Choose US LEC* (Mar. 1, 2004) (emphasis added).

<sup>582</sup> US LEC, *ADVANTAGE Power T*, <http://www.uslec.com/Site-ADVANTAGE+Power+T-1166> (emphasis added).

<sup>583</sup> US LEC, *Frame Relay Service*, <http://www.uslec.com/Site-Frame%20Relay-1024> (emphasis added).

<sup>584</sup> US LEC News Release, *Universal Health Services Chooses US LEC* (Jan. 21, 2003).

<sup>585</sup> US LEC News Release, *Carlyle & Co. Chooses US LEC* (June 22, 2004).

Internet: Fastnet Dedicated Internet, Managed Firewall/TMS & IP/VPN, Fastnet Dialup Internet, Web Hosting, Email Services, Fastnet DSL, Managed Router.

Collocation: NetConnect Colocation, Data Center Colocation.

Other: Market-Specific Services, Electronic CDR Delivery, SLA Reporting, and Internet Value Service.<sup>586</sup>

*Areas within Verizon's local service area according to CLEC's website:*

Washington, DC; Delaware; Maryland; New Jersey; New York; North Carolina; Pennsylvania; Virginia.<sup>587</sup>

*Jurisdictions in Verizon's local service areas where CLEC has filed local tariffs:*

*North Carolina (Durham):* ISDN PRI Digital Trunks,<sup>588</sup> ATM Service,<sup>589</sup> ADVANTAGE Power T,<sup>590</sup> Connectivity and Co-location Service.<sup>591</sup>  
(Refers to "Direct Access in GTE South Incorporated regions")

*Pennsylvania:* Frame Relay Service,<sup>592</sup> Flat Rate Exchange Service,<sup>593</sup> Digital Data Service,<sup>594</sup> Connectivity and Co-location Service (CCS),<sup>595</sup> ATM Service,<sup>596</sup> ADVANTAGE Power T.<sup>597</sup>

*Virginia:* Business Basic Trunk Service,<sup>598</sup> Digital Data Service,<sup>599</sup> Frame Relay Service,<sup>600</sup> Connectivity and Co-location Service (CCS),<sup>601</sup> ADVANTAGE Power T.<sup>602</sup>

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<sup>586</sup> US LEC, *Products & Services*, <http://www.uslec.com/Site-Customer%20Satisfaction-1017>.

<sup>587</sup> US LEC, *Network Map*, <http://www.uslec.com/NetworkMap-Network%20Map-1036>.

<sup>588</sup> US LEC of North Carolina, Price List Relating to the Provision of Basic Local Exchange and Exchange Access Services at 3 (effective Nov. 1, 2003).

<sup>589</sup> US LEC of North Carolina, Price List Relating to the Provision of Basic Local Exchange and Exchange Access Services at 32 (effective Nov. 1, 2003).

<sup>590</sup> US LEC of North Carolina, Price List Relating to the Provision of Basic Local Exchange and Exchange Access Services at 24 (effective June 1, 2003).

<sup>591</sup> US LEC of North Carolina, Price List Relating to the Provision of Basic Local Exchange and Exchange Access Services at 18.

<sup>592</sup> US LEC of Pennsylvania, Telephone-PA P.U.C. No. 1, § 6.5 (issued Jan.31, 2002).

<sup>593</sup> US LEC of Pennsylvania, Telephone-PA P.U.C. No. 1, § 6.1 (issued Oct. 9, 2003).

<sup>594</sup> US LEC of Pennsylvania, Telephone-PA P.U.C. No. 1, § 6.4 (issued Jan.31, 2002).

<sup>595</sup> US LEC of Pennsylvania, Telephone-PA P.U.C. No. 1, § 6.6 (issued Nov. 27, 2002).

<sup>596</sup> US LEC of Pennsylvania, Telephone-PA P.U.C. No. 1, § 6.10 (issued Jan. 31, 2002).

<sup>597</sup> US LEC of Pennsylvania, Telephone-PA P.U.C. No. 1, § 7.1 (issued May 1, 2003).

<sup>598</sup> US LEC of Virginia, Virginia S.C.C. No. 1, § 5.3 (issued Nov. 27, 2002).

<sup>599</sup> US LEC of Virginia, Virginia S.C.C. No. 1, § 6.7 (issued Jan. 29, 2002).

<sup>600</sup> US LEC of Virginia, Virginia S.C.C. No. 1, § 6.8 (issued Jan. 29, 2002).

<sup>601</sup> US LEC of Virginia, Virginia S.C.C. No. 1, § 6.9 (issued Nov. 27, 2002).

<sup>602</sup> US LEC of Virginia, Virginia S.C.C. No. 1, § 7.1 (issued Nov. 27, 2002).

*CLEC facilities:*

	<b>Facilities</b>
Baltimore, MD	Lucent 5ESS voice switch Lucent CBX500 data switch
New York, NY	Santera One voice switch
Norfolk, VA	Lucent 5ESS voice switch Lucent CBX500 data switch
Philadelphia, PA	Lucent 5ESS voice switch
Pittsburgh, PA	Lucent 5ESS voice switch Lucent CBX500 data switch
Richmond, VA	Lucent 5ESS voice switch Lucent CBX500 data switch
Roanoke/Blacksburg, VA	Lucent CBX500 data switch
Washington, DC	Lucent 5ESS voice switch
Williamsburg, VA	Lucent CBX500 data switch
New Paradigm Resources Group, Inc., <i>CLEC Report 2005</i> , Ch. 6 – US LEC at 11-14 (19th ed. 2005).	

See Attachment A.

## WilTel

*Carrier claims that it serves medium businesses:*

“Ethernet has become the world’s most widely deployed local area networking technology for one reason: it’s simple. Wiltel now extends that same technology to the wide area network, improving capacity, improving scalability and simplifying the interconnection of facilities – a key for growing enterprises in volatile markets.”<sup>603</sup>

“WilTel Communications is a leading provider of customized communications solutions to enterprises, carriers, and the federal government.”<sup>604</sup>

*Examples of business customers based on public information:*

- NDC Corporation (contract to provide network services and collocation infrastructure services to power IP backbone)<sup>605</sup>
- New York State Education and Research Network (contract to provide dense wavelength division multiplexing (DWDM) and Internet Protocol (IP) network services to member institutions)<sup>606</sup>

*Service offerings:*

Access Solutions, Data Services (includes ATM services, Ethernet WAN, Frame Relay, FocalPoint, International Services, Optical Wave and Private Line), IP Services, Managed Services, Professional Services, Video Services, and Voice Services.<sup>607</sup>

*Areas within Verizon’s local service area according to CLEC’s website:*

California, Delaware, Florida, Maine, Massachusetts, New Hampshire, New Jersey, New York, North Carolina, Ohio, Pennsylvania, Rhode Island, Vermont, Virginia, Washington.<sup>608</sup>

*Jurisdictions in Verizon’s local service areas where CLEC has filed local tariffs:*

*California:* Interoffice Local Transport Service, Private Line Service.<sup>609</sup>

*Maryland:* Colocation,<sup>610</sup> Occasional Interexchange Service- “Occasional Interexchange Service provides One-Way or Two-Way, POP to POP transmission designed for use in

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<sup>603</sup> WilTel, *Cross Industry Solutions*,

[http://www.wiltel.com/market\\_segments/content/enterprise/cross\\_industry.htm](http://www.wiltel.com/market_segments/content/enterprise/cross_industry.htm).

<sup>604</sup> WilTel, *Company Overview*, <http://www.wiltel.com/overview/index.htm>.

<sup>605</sup> WilTel News Release, *NDC Selects WilTel To Power IP Backbone* (Oct. 19, 2004).

<sup>606</sup> WilTel News Release, *NYSERNet Selects WilTel to Provide Network Solution for Research, Education Institutions in New York* (Dec. 13, 2004).

<sup>607</sup> WilTel, *Products & Solutions*, <http://www.wiltel.com/products/index.htm>.

<sup>608</sup> Williams Local Network, <http://www.wiltel.com/overview/content/regulatory.htm>.

<sup>609</sup> Williams Local Network, LLC, Schedule Cal. P.U.C. CLC 1-T, § A-1.

video and associated audio transmission applications on a Preemptible basis. One-Way Occasional Interexchange Service provides one System M-NTSC video channel and up to three associated audio channels (50Hz to 15kHz),<sup>611</sup> and Hub Reservation management.<sup>612</sup>

*Massachusetts:* DS1 1.544 Mbps Digital Service, DS3 44.736 Mbps Service.<sup>613</sup>

*New Hampshire:* Interoffice Local Transport Service (Private Line Service), DS3, OC3, OC12, OC48, Direct Local Transport Service (Private Line Service).<sup>614</sup>

*New York:* Interoffice Local Transport Service, Direct Local Transport Service, DS3, OC3, OC12, OC48,<sup>615</sup> Occasional Service,<sup>616</sup> Hub Management Services,<sup>617</sup> Colocation.<sup>618</sup>

*Ohio:* Interoffice Local Transport Service.<sup>619</sup>

*Pennsylvania:* Colocation,<sup>620</sup> Hub Reservation Management Service.<sup>621</sup>

*Washington:* Dedicated, private line transmission services: DS-1, DS-3,<sup>622</sup> “Terms and conditions of competing services are very similar. Many of these carriers offer a variety of dedicated local transport services, such as ATM, frame relay, IP, xDSL, and ISDN.”<sup>623</sup>

*CLEC facilities:*

See Attachment A.

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<sup>610</sup> Williams Communications Inc, LLC, Maryland PSC Tariff No. 1, § 2.12.

<sup>611</sup> Williams Communications LLC, Maryland Public Service Commission No. 1, § 5.1.

<sup>612</sup> Williams Communications LLC, Maryland Public Service Commission No. 1, § 6.1.

<sup>613</sup> Williams Communications, LLC, M.D.T.E. Tariff No. 1, § 2.17-3.4.

<sup>614</sup> Williams Local Network, LLC, New Hampshire Tariff, § 1.

<sup>615</sup> Williams Communications, LLC, New York PSC Tariff No. 1, § 3.1-3.2.

<sup>616</sup> Williams Communications, LLC, New York Public Service Commission No. 1, § 5.1-5.5.

<sup>617</sup> Williams Communications, LLC, New York Public Service Commission No. 1, § 6.1.

<sup>618</sup> Williams Communications, LLC, New York Public Service Commission No. 1, § 2.12.

<sup>619</sup> Williams Communications, LLC, P.U.C.O. Tariff No. 1, § 4.1-4.2.

<sup>620</sup> Williams Communications, LLC, Supplement No. 1 to PA PUC Tariff No. 1, § 2.12, 6.1.

<sup>621</sup> Williams Communications, LLC, Supplement No. 1 to PA PUC Tariff No. 1, § 2.1.14.

<sup>622</sup> Williams Communications, LLC. Washington Price List, § 2.

<sup>623</sup> Williams Communications, LLC. Washington Price List, Attachment 2, Part C.



## XO Communications

*Carrier claims that it serves medium businesses:*

The president of Commercial Sales at XO Communications “oversees the sale of services to all of XO’s corporate customers, ranging from small and **medium** businesses to Fortune 100 customers.”<sup>624</sup>

“The XO product suite offers **businesses of every size** flexible and powerful communications solutions.”<sup>625</sup>

“XO Communications is a full-service provider of communications services for **small & growing** businesses, larger enterprises and carriers.”<sup>626</sup>

“XO is a full-service provider of communications solutions designed exclusively for businesses, from **growing companies to Fortune 500 enterprises**.”<sup>627</sup>

“XO Communications is a leading broadband communications service provider offering voice and data services over its own state-of-the-art, high-speed OC-192 backbone. Dedicated to serving the needs of small and **medium** to large enterprise customers, offers a complete set of communications services, including: local and long distance voice, Internet access, virtual private networking (VPN), Ethernet, wavelength, Web hosting and integrated voice and data services.”<sup>628</sup>

“The acquisition of Allegiance Telecom significantly expands XO’s local market coverage across the country, allowing XO to serve an greater number of business customers. . . The expansion will increase XO’s local presence in many of the largest markets in the U.S., including Atlanta, Boston, Chicago, Dallas, Houston, Los Angeles, Miami, New York, Philadelphia, San Francisco and Washington, DC. In addition to an enhanced ability to serve a wider business market, XO will also be better position to sell local access services. . . With the addition of Allegiance’s services, including its specialized services for small-to-**medium sized** businesses, the new XO will be able to offer an even broader range of services to businesses of all sizes.”<sup>629</sup>

“XO Dedicated Long Distance, sometimes called ‘T-1’ service, is a leased line service most often used by **medium** and large sized companies that want circuits (trunks) dedicated specifically to carrying high-volume long distance traffic.”<sup>630</sup>

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<sup>624</sup> XO Communications, *XO Communications- Matt Harty*, <http://www.xo.com/about/executives/harty.html> (emphasis added).

<sup>625</sup> XO Communications, *Products and Services*, <http://www.xo.com/about/factsheet.html> (emphasis added).

<sup>626</sup> XO Communications, *About XO – Our Story*, <http://www.xo.com/about/ourstory/index.html> (emphasis added).

<sup>627</sup> XO Communications, *About XO Communications*, <http://www.xo.com/about/factsheet.html> (emphasis added).

<sup>628</sup> XO Communications, *XO Investor Relations*, <http://www.xo.com/about/investors/> (emphasis added).

<sup>629</sup> XO Communications, *Press Release- XO Communications Completes Acquisition of Allegiance Telecom*, <http://www.xo.com/news/189.html> (emphasis added).

<sup>630</sup> XO Communications, *Products & Programs- Long Distance, XO Dedicated Long Distance*, <http://www.xo.com/products/smallgrowing/voice/longdistance/dedicated/index.html> (emphasis added).

“Outsourcing is a less expensive and more expedient route for many organizations, especially small-to-**medium** sized businesses that do not have large IT staffs.”<sup>631</sup>

“**Mid-tier customers** will value the convenience, reliability and flexibility that Managed Services offers.”<sup>632</sup>

“Basic Business Lines provide **small, growing** and large businesses with low-cost, flexible telephone service.”<sup>633</sup>

“‘XO Options DSL Packages’- Ideal for **growing** businesses. . . ”<sup>634</sup>

“XO One has created a unique bundle of network and telephony equipment along with professional services for the **mid-tier** business market.”<sup>635</sup>

“Small and **medium-sized** businesses need solutions allowing them easy transitions to integrated IP environments for voice and data communications,” said Steve Hilton, senior analyst for the Yankee Group’s SMB Strategies division.

“Service providers that offer flexible solutions like XOptions Flex with capabilities such as unlimited local and long distance calling and dynamic bandwidth allocation help small and **medium**-sized businesses overcome some of their unique business constraints and allow them to focus on their core businesses.”<sup>636</sup>

“In addition to owning an award-winning Internet backbone network reaching over 60 U.S. major metropolitan markets, XO delivers product solutions that address the entire range of business communication needs, from voice to Web hosting, from Internet access and private data networking solutions, in any combination that suits the way your business works.”<sup>637</sup>

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<sup>631</sup> XO Communications, *Products & Programs: Private Data Networking- XO VPN, Frequently Asked Questions*, <http://www.xo.com/products/smallgrowing/security/vpn/faqs.html> (emphasis added).

<sup>632</sup> XO Communications, *Products & Programs- XO One Managed Services*, <http://www.xo.com/products/xoone/whymanaged.html> (emphasis added).

<sup>633</sup> XO Communications, *Products & Programs- Voice Services, Basic Business Lines*, <http://www.xo.com/products/smallgrowing/voice/local/businesslines/index.html> (emphasis added).

<sup>634</sup> XO Communications, *Products & Programs- Integrated Services, Xoptions*, <http://www.xo.com/products/smallgrowing/integrated/xoptions/dslpackage.html> (emphasis added).

<sup>635</sup> XO Communications, *Products & Programs- XO One Managed Services*, <http://www.xo.com/products/xoone/whymanaged.html> (emphasis added).

<sup>636</sup> XO Communications Press Release, *XO Communications Brings Industry-Leading Voice over IP Services Bundle to Businesses in Washington, DC Metro Area* (Mar. 15, 2005) (emphasis added).

<sup>637</sup> XO Communications, *XO Fact Sheet*, <http://www.xo.com/about/factsheet.html>.

*Examples of business customers based on public information:*

- Abercrombie & Fitch (contract to upgrade the company's network to an OC-48 infrastructure in an effort to handle their increased voice, data, and Internet needs)<sup>638</sup>
- American Management Systems (contract to provide local voice services to the AMS campus, including its U.S. headquarters in Fairfax, VA)<sup>639</sup>

*Service offerings:*

Voice: Local and Long Distance Services, Conferencing Services, Hosted IVR, Advanced Directory, and Calling Card.<sup>640</sup>

Private Data Networking: VPN, Ethernet Services, Private Line, MultiTransport Networking Service (MTNS).<sup>641</sup>

Internet Access: Dial Access, DSL, Dedicated Internet Access.<sup>642</sup>

Hosting Services: Web Sites, Dedicated Hosting.<sup>643</sup>

Integrated Services: XOptions (bundled solution of local, long distance, Internet access and Web hosting) and Integrated Access.<sup>644</sup>

*Areas within Verizon's local service area according to CLEC's website:*

Washington, DC; Philadelphia, PA; Harrisburg, PA; Reading, PA; Boston, MA; Los Angeles, CA; Baltimore, MD; Pittsburgh, PA; Seattle, WA; Allentown, PA; Michigan; Portland, OR; Bergen, NJ.<sup>645</sup>

*Jurisdictions in Verizon's local service areas where CLEC has filed local tariffs:*

*California:* X OPTION Service offerings:<sup>646</sup> local exchange, DSL, shared hosting, Dedicated Internet Access, PRI access facility for voice and Internet delivery, Centrex,

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<sup>638</sup> XO Communications Press Release, *XO Communications Signs Networking Contract with Abercrombie & Fitch* (Dec. 13, 2004).

<sup>639</sup> XO Communications Press Release, *XO Communications Signs Multi-Year Communications' Services Contract With AMS* (Mar. 4, 2003).

<sup>640</sup> XO Communications, *XO Voice Services: Overview*, <http://www.xo.com/products/smallgrowing/voice/index.html>.

<sup>641</sup> XO Communications, *XO Private Data Networking: Overview*, <http://www.xo.com/products/smallgrowing/data/index.html>.

<sup>642</sup> XO Communications, *XO Internet Access: Overview*, <http://www.xo.com/products/smallgrowing/internet/index.html>.

<sup>643</sup> XO Communications, *XO Hosting Services: Overview*, <http://www.xo.com/products/smallgrowing/hosting/index.html>.

<sup>644</sup> XO Communications, *XO Integrated Services: Overview*, <http://www.xo.com/products/smallgrowing/integrated/index.html>.

<sup>645</sup> XO Communications, *Complete Network Assets*, [http://www.xo.com/about/network/maps/complete\\_normal.html](http://www.xo.com/about/network/maps/complete_normal.html).

long distance, XO High Capacity Local Loop Service “an intraLATA service, which provides a dedicated transmission path between two customer designated premises,”<sup>647</sup> Multiple Service Discount: IntraLATA, InterLATA, 800 toll service, calling card,<sup>648</sup> Integrated Access Service: ISDN, Call Forwarding options,<sup>649</sup> Basic/Advanced Analog & Digital Trunks;<sup>650</sup> National Local Service,<sup>651</sup> Private Line Service, Network Access Services, Multi-Tenant Buddy Program, Toll Free Service, Toll Service, Flex Routing, Directory Assistance & Call Completion,<sup>652</sup> IntraLATA Toll calls,<sup>653</sup> InterLATA calls,<sup>654</sup> Dedicated Access Rates, XO Long Distance,<sup>655</sup> XO Toll-Free Service,<sup>656</sup> Private Line Service,<sup>657</sup> Dedicated Long Distance,<sup>658</sup> InterLATA Network Access,<sup>659</sup> IntraLATA Network Access,<sup>660</sup> Calling Card Service,<sup>661</sup> Across America 1+.<sup>662</sup>

*Pennsylvania:* Basic Business Lines: Touchtone, One White Pages Directory Listing, One Yellow Pages Directory Listing, 911 Access, Caller ID Blocking- Per Call, Blocking Restrictions,<sup>663</sup> Business Trunks (Basic Local Trunk, Business Trunk),<sup>664</sup> Digital Interface,<sup>665</sup> Remote Call Forwarding,<sup>666</sup> XO Centrex,<sup>667</sup> PRI ISDN,<sup>668</sup> XO Integrated Access Service,<sup>669</sup> Inbound PRI,<sup>670</sup> XOPTION Service,<sup>671</sup> Premium XOPTION,<sup>672</sup> Multiple Service Discount,<sup>673</sup> IntraLATA Private Line,<sup>674</sup> Deluxe XOPTION,<sup>675</sup> XO Integrated Access Service II.<sup>676</sup>

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<sup>646</sup> XO Communications Services, Inc, Cal P.U.C. Schedule CLC 2-T, § 4.18.

<sup>647</sup> XO Communications Services, Inc, Cal P.U.C. Schedule CLC 2-T, § 4.20.

<sup>648</sup> XO Communications Services, Inc, Cal P.U.C. Schedule CLC 2-T, § 4.19.

<sup>649</sup> XO Communications Services, Inc, Cal P.U.C. Schedule CLC 2-T, § 4.22.

<sup>650</sup> XO Communications Services, Inc, Cal P.U.C. Schedule CLC 2-T, § 4.22.

<sup>651</sup> XO Communications Services, Inc, Cal P.U.C. Schedule CLC 2-T, § 4.27.

<sup>652</sup> XO Communications Services, Inc, Schedule Cal. P.U.C. No. 4-T, 5th Revised Sheet 8.

<sup>653</sup> XO Communications Services, Inc, Schedule Cal. P.U.C. No. 4-T, 4th Revised Sheet 11.

<sup>654</sup> XO Communications Services, Inc, Schedule Cal. P.U.C. No. 4-T, 4th Revised Sheet 11.

<sup>655</sup> XO Communications Services, Inc, Schedule Cal. P.U.C. No. 4-T, 4th Revised Sheet 11.1.

<sup>656</sup> XO Communications Services, Inc, Schedule Cal. P.U.C. No. 4-T, 4th Revised Sheet 12.

<sup>657</sup> XO Communications Services, Inc, Schedule Cal. P.U.C. No. 4-T, 4th Revised Sheet 14.7.1-14.9.4.

<sup>658</sup> XO Communications Services, Inc, Schedule Cal. P.U.C. No. 4-T, 4th Revised Sheet 14.10-14.11.

<sup>659</sup> XO Communications Services, Inc, Schedule Cal. P.U.C. No. 4-T, 4th Revised Sheet 14.19-14.22.

<sup>660</sup> XO Communications Services, Inc, Schedule Cal. P.U.C. No. 4-T, 4th Revised Sheet 14.23-14.27.

<sup>661</sup> XO Communications Services, Inc, Schedule Cal. P.U.C. No. 4-T, 4th Revised Sheet 19.

<sup>662</sup> XO Communications Services, Inc, Schedule Cal. P.U.C. No. 4-T, 4th Revised Sheet 20.

<sup>663</sup> XO Pennsylvania, Inc, Telephone PA P.U.C. No. 12 § 3.1.3.1 (Mar. 7, 2002).

<sup>664</sup> XO Pennsylvania, Inc, Telephone PA P.U.C. No. 12, § 3.1.4 (Mar. 15, 2002).

<sup>665</sup> XO Pennsylvania, Inc, Telephone PA P.U.C. No. 12, § 3.1.5 (Mar. 15, 2002).

<sup>666</sup> XO Pennsylvania, Inc, Telephone PA P.U.C. No. 12, § 3.1.7 (Dec. 20, 2002).

<sup>667</sup> XO Pennsylvania, Inc, Telephone PA P.U.C. No. 12, § 3.1.8 (Mar. 15, 2002).

<sup>668</sup> XO Pennsylvania, Inc, Telephone PA P.U.C. No. 12, § 3.1.9, 3.1.16 (Mar. 15, 2002).

<sup>669</sup> XO Pennsylvania, Inc, Supplement No. 7 to Telephone PA P.U.C. No. 12, § 3.1.11 (Dec. 20, 2002).

<sup>670</sup> XO Pennsylvania, Inc, Supplement No. 6 to Telephone PA P.U.C. No. 12, § 3.1.12 (Aug. 6, 2002).

<sup>671</sup> XO Pennsylvania, Inc, Telephone PA P.U.C. No. 12, § 3.1.13 (Dec. 20, 2002).

<sup>672</sup> XO Pennsylvania, Inc, Supplement No. 7 to Telephone PA P.U.C. No. 12, § 3.1.14 (Dec. 20, 2002).

<sup>673</sup> XO Pennsylvania, Inc, Telephone PA P.U.C. No. 12, § 3.1.15 (Mar. 15, 2002).

<sup>674</sup> XO Pennsylvania, Inc, Supplement No. 4 to Telephone PA P.U.C. No. 12, § 3.1.19 (July 5, 2002).

<sup>675</sup> XO Pennsylvania, Inc, Supplement No. 7 to Telephone PA P.U.C. No. 12, § 3.1.20 (Dec. 20, 2002).

<sup>676</sup> XO Pennsylvania, Inc, Supplement No. 7 to Telephone PA P.U.C. No. 12, § 3.1.21 (Dec. 20, 2002).

*Virginia:* Basic Business Lines: Touchtone, One White Pages Directory Listing, One Yellow Pages Directory Listing, 911 Access, Caller ID Blocking- Per Call, Blocking Restrictions,<sup>677</sup> Business Trunks (Basic, Digital Switched T-1, PBX Analog Trunk),<sup>678</sup> PRI ISDN,<sup>679</sup> Centrex,<sup>680</sup> Inbound PRI,<sup>681</sup> Remote Call Forwarding,<sup>682</sup> X OPTION (Bundle Service),<sup>683</sup> Multiple Service Discount,<sup>684</sup> Premium Integrated Access Service,<sup>685</sup> Deluxe Xoption,<sup>686</sup> Metra Xoption.<sup>687</sup>

*Washington:* Basic Business Lines: Touchtone, One White Pages Directory Listing, One Yellow Pages Directory Listing, Caller ID Blocking- Per Call,<sup>688</sup> Optional Features,<sup>689</sup> Centrex,<sup>690</sup> PRI ISDN,<sup>691</sup> Basic Rate Interface (BRI),<sup>692</sup> Inbound PRI,<sup>693</sup> Business Trunks,<sup>694</sup> Deluxe Xoption,<sup>695</sup> Mini Bundle,<sup>696</sup> Multiple Service Discount,<sup>697</sup> XO High Capacity Local Loop,<sup>698</sup> Premium Integrated Access Service,<sup>699</sup> IntraLATA Private Line,<sup>700</sup> Remote Call Forwarding,<sup>701</sup> XO Integrated Access Service, ISDN, PRI ISDN, Business Trunks (Analog PBX, Fractional T1, Digital Switched T1), Dial Tone- Small Business Package Rates and Charges, Xoption, Integrated Access Service, Premium Xoption.

*CLEC facilities:*

“XO now has almost 150 Class 5 circuit switches (Nortel DMS500 and Lucent 5ESS) and VoIP softswitches (Sonus). It also has deployed 7,136 route miles of its own fiber optic facilities composed of 884,827 fiber miles of meTRO fiber transport facilities.”<sup>702</sup>

<sup>677</sup> XO Virginia, LLC, VA SCC Tariff #1, § 4.1.1.4 (Mar. 20, 2002).

<sup>678</sup> XO Virginia, LLC, VA SCC Tariff #1, § 4.1.2.6 (Mar. 20, 2002).

<sup>679</sup> XO Virginia, LLC, VA SCC Tariff #1, § 4.1.10 (Apr. 9, 2001).

<sup>680</sup> XO Virginia, LLC, VA SCC Tariff #1, § 4.1.12 (Mar. 20, 2002).

<sup>681</sup> XO Virginia, LLC, VA SCC Tariff #1, § 4.1.14 (Feb. 16, 2001).

<sup>682</sup> XO Virginia, LLC, VA SCC Tariff #1, § 4.13 (Jan. 10, 2003).

<sup>683</sup> XO Virginia, LLC, VA SCC Tariff #1, § 5.0 (Aug. 20, 2002).

<sup>684</sup> XO Virginia, LLC, VA SCC Tariff #1, § 5.2 (Oct. 24, 2001).

<sup>685</sup> XO Virginia, LLC, VA SCC Tariff #1, § 5.5 (Aug. 27, 2003).

<sup>686</sup> XO Virginia, LLC, VA SCC Tariff #1, § 5.6 (Aug. 27, 2003).

<sup>687</sup> XO Virginia, LLC, VA SCC Tariff #1, § 5.7 (Aug. 27, 2003).

<sup>688</sup> XO Washington, Inc, Local Exchange Services Price List No. 1, § 3.1.2 (Apr. 26, 2002).

<sup>689</sup> XO Washington, Inc, Local Exchange Services Price List No. 1, § 3.1.2.2 (Apr. 26, 2002).

<sup>690</sup> XO Washington, Inc, Local Exchange Services Price List No. 1, § 3.1.3 (Apr. 26, 2002).

<sup>691</sup> XO Washington, Inc, Local Exchange Services Price List No. 1, § 3.1.4 (Apr. 26, 2002).

<sup>692</sup> XO Washington, Inc, Local Exchange Services Price List No. 1, § 3.1.5 (Apr. 26, 2002).

<sup>693</sup> XO Washington, Inc, Local Exchange Services Price List No. 1, § 3.1.5.A (Dec. 3, 2002).

<sup>694</sup> XO Washington, Inc, Local Exchange Services Price List No. 1, § 3.1.6 (Apr. 26, 2002).

<sup>695</sup> XO Washington, Inc, Local Exchange Services Price List No. 1, § 3.1.3 (Dec. 3, 2002).

<sup>696</sup> XO Washington, Inc, Local Exchange Services Price List No. 1, § 3.1.4.(A) (June 22, 2001).

<sup>697</sup> XO Washington, Inc, Local Exchange Services Price List No. 1, § 3.1.4-5 (June 22, 2001).

<sup>698</sup> XO Washington, Inc, Local Exchange Services Price List No. 1, § 3.1.6 (Mar. 2, 2001).

<sup>699</sup> XO Washington, Inc, Local Exchange Services Price List No. 1, § 3.1.7 (Dec. 3, 2002).

<sup>700</sup> XO Washington, Inc, Local Exchange Services Price List No. 1, § 3.1.10 (Aug. 30, 2002).

<sup>701</sup> XO Washington, Inc, Local Exchange Services Price List No. 1, § 3.1.11 (Jan. 21, 2003).

<sup>702</sup> Comments of the Loop and Transport CLEC Coalition at 21, *Unbundled Access to Network Elements; Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, WC Docket No. 04-313, CC Docket No. 01-338 (FCC filed Oct. 4, 2004).

	<b>Facilities</b>
Baltimore, MD	Nortel DMS-500 voice switch Lucent 5ESS 2000 voice switch Sonus Data Switch
Boston, MA	Nortel DMS-500 voice switch Lucent 5ESS 2000 voice switch Sonus data switch
New York, NY	Nortel DMS-500 voice switch Lucent 5ESS 2000 voice switch Sonus data switch
Newark, NJ	Nortel DMS-500 voice switch Sonus data switch
Philadelphia, PA	Nortel DMS-500 voice switch Lucent 5ESS voice switch Sonus data switch
Pittsburgh, PA	Lucent 5ESS voice switch
Portland, OR	Nortel DMS-500 voice switch Sonus data switch
Seattle, WA	Nortel DMS-500 voice switch Lucent 5ESS 2000 voice switch Sonus data switch
Secaucus, NJ	Lucent 5ESS 2000 voice switch
Washington, DC	Nortel DMS-500 voice switch Lucent 5ESS 2000 voice switch Sonus data switch
Los Angeles, CA	Nortel DMS-500 voice switch Lucent 5ESS 2000 voice switch Sonus data switch
New Paradigm Resources Group, Inc., <i>CLEC Report 2005</i> , Ch. 6 – XO Communications at 10-14 (19th ed. 2005).	

See Attachment A.

REPLY DECLARATION OF ERIC J. BRUNO,  
KATHY KOELLE, VERONICA PELLIZZI, AND  
JUDY K. VERSES

EXHIBIT 4  
ATTACHMENT A

REDACTED – FOR PUBLIC INSPECTION

**REDACTED – FOR PUBLIC INSPECTION**