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June 13, 2005

EX PARTE – VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: WC Docket. No. 05-65
WC Docket. No. 05-75

Dear Ms. Dortch:

On June 10, 2005, representatives from BT and Savvis Communications Corporation met with FCC staff to provide basic information regarding Internet backbone peering and discuss their concerns regarding the proposed mergers on the Internet backbone services market. The concerns raised were the same ones BT and Savvis had previously raised in their filings of May 10, 2005 (BT in Dkt. 05-65), and April 25 (Savvis in Dkt. 05-65) and May 9 (Savvis in Dkt. 05-75). A listing of the BT and Savvis representatives and FCC staff who attended this meeting is attached as Exhibit A. Their presentation to FCC staff is attached as Exhibit B.

Pursuant to Sec. 1.1206(b)(2) of the Commission's rules, this letter is being filed electronically with the Office of the Secretary. If you have any questions, please contact the undersigned.

Respectfully submitted,

BT Americas Inc.
BT Infonet USA

A. Sheba Chacko, Chief Regulatory Counsel

Enclosure

EXHIBIT A

FCC Participants		
Bill Dever	FCC/WCB/CPD	william.dever@fcc.gov
Pam Arluk	FCC/WCB/CPD	pamela.arluk@fcc.gov
Gail Cohen	FCC/WCB/CPD	gcohen@fcc.gov
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Michael Goldstein	WCB/IATO	michael.goldstein@fcc.gov
C. Anthony Bush	OGC	clarence.bush@fcc.gov
Nicholas Alexander	WCB/CPD	nicholas.alexander@fcc.gov
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Cathy Hsu	IB	cathy.hsu@fcc.gov
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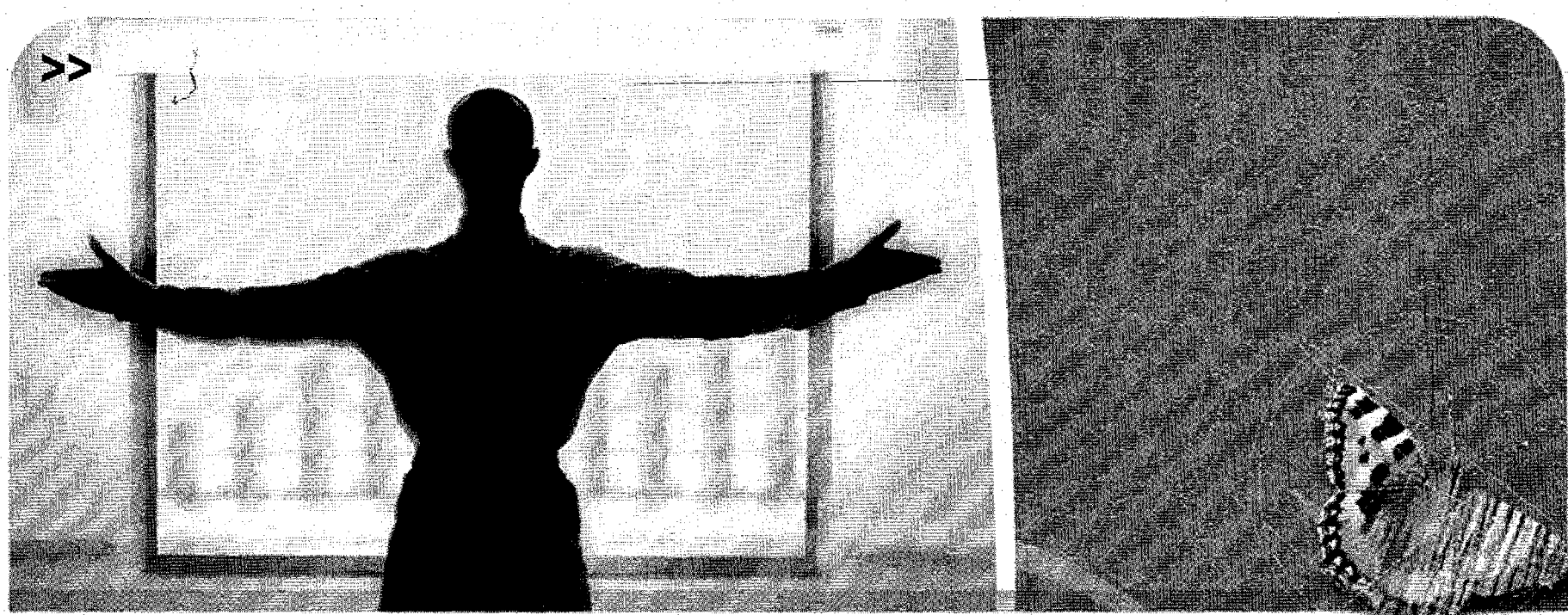
Michele Ellism	OGC	michele.ellism@fcc.gov
BT Representatives		
Sheba Chacko	BT	sheba.chacko@bt.com
Joel Winnik	Hogan & Hartson	jswinnick@hhlaw.com
David Saylor	Hogan & Hartson	djsaylor@hhlaw.com
John Preston	Economists Inc	preston.j@ei.com
Savvis Representatives		
Mathew Dovens	SAVVIS	mathew.dovens@asvvis.net
Joanna Lowry	SAVVIS	joanna.lowry@savvis.net
Bruce Gottlieb	Harris, Wiltshire	bgottlieb@harriswiltshire.com

EXHIBIT B



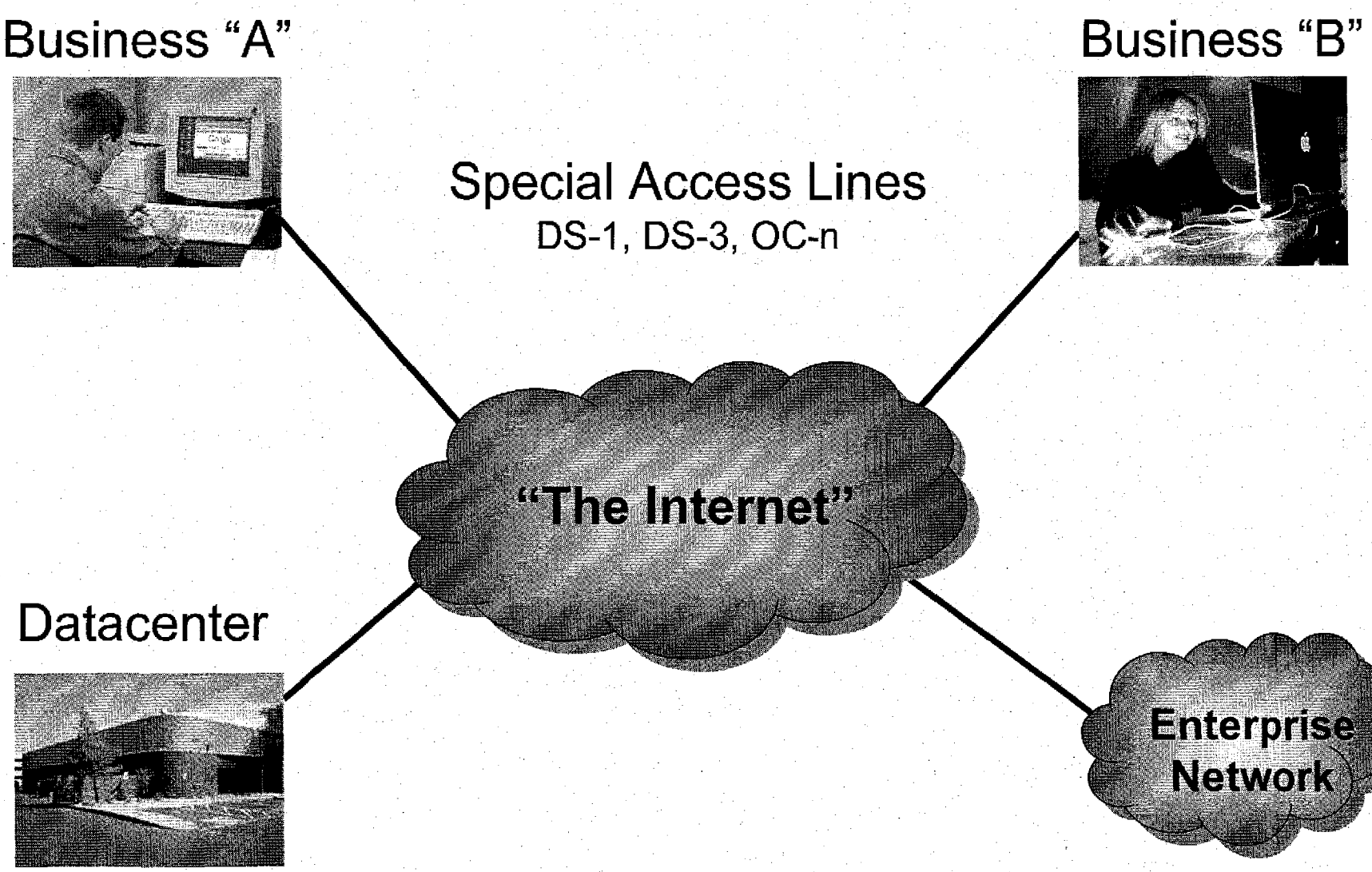
>> Peering

Dr. Mathew P. Dovens

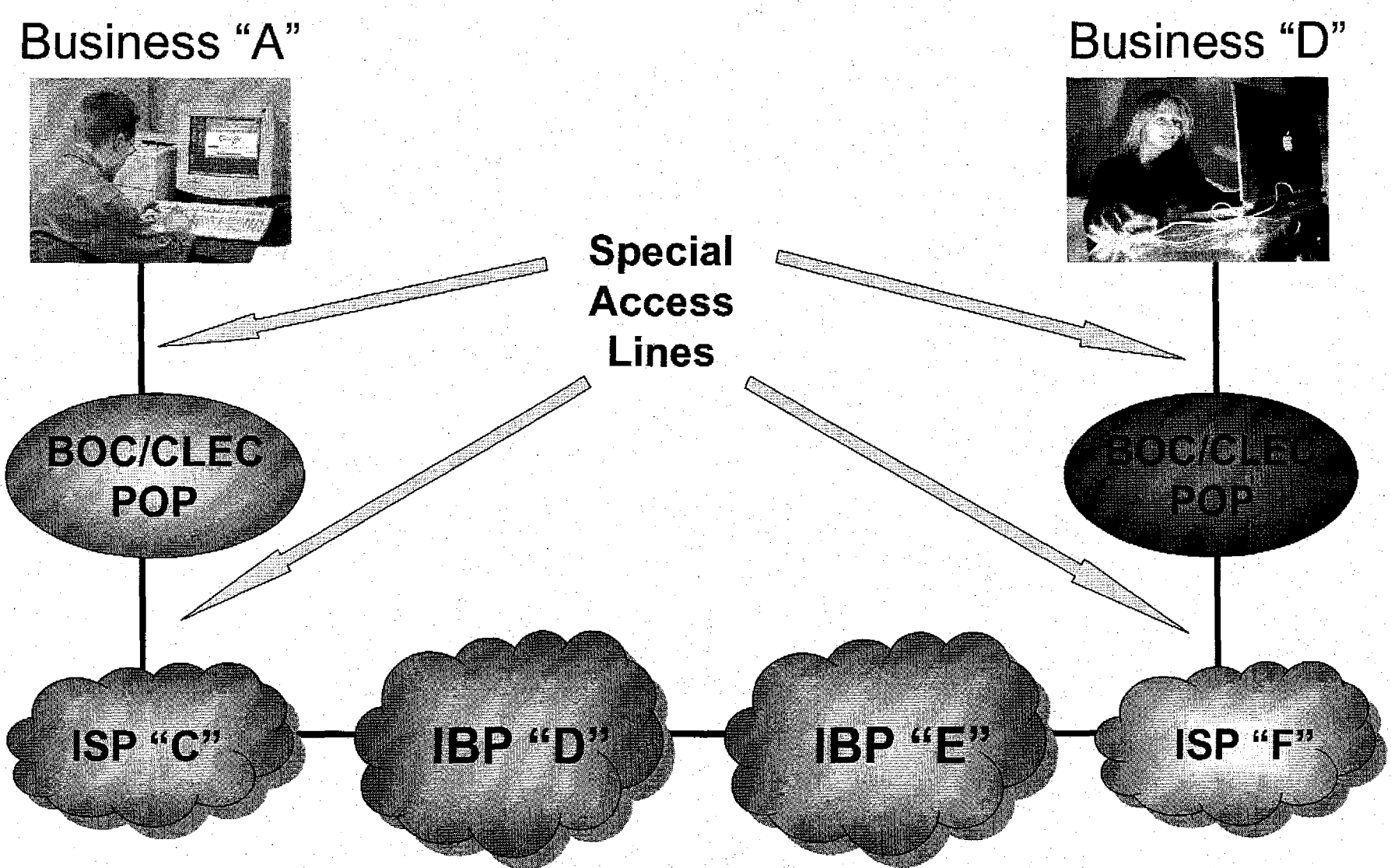
SAVVIS
TRANSFORMING INFORMATION TECHNOLOGY™

Washington, DC
June 10, 2005

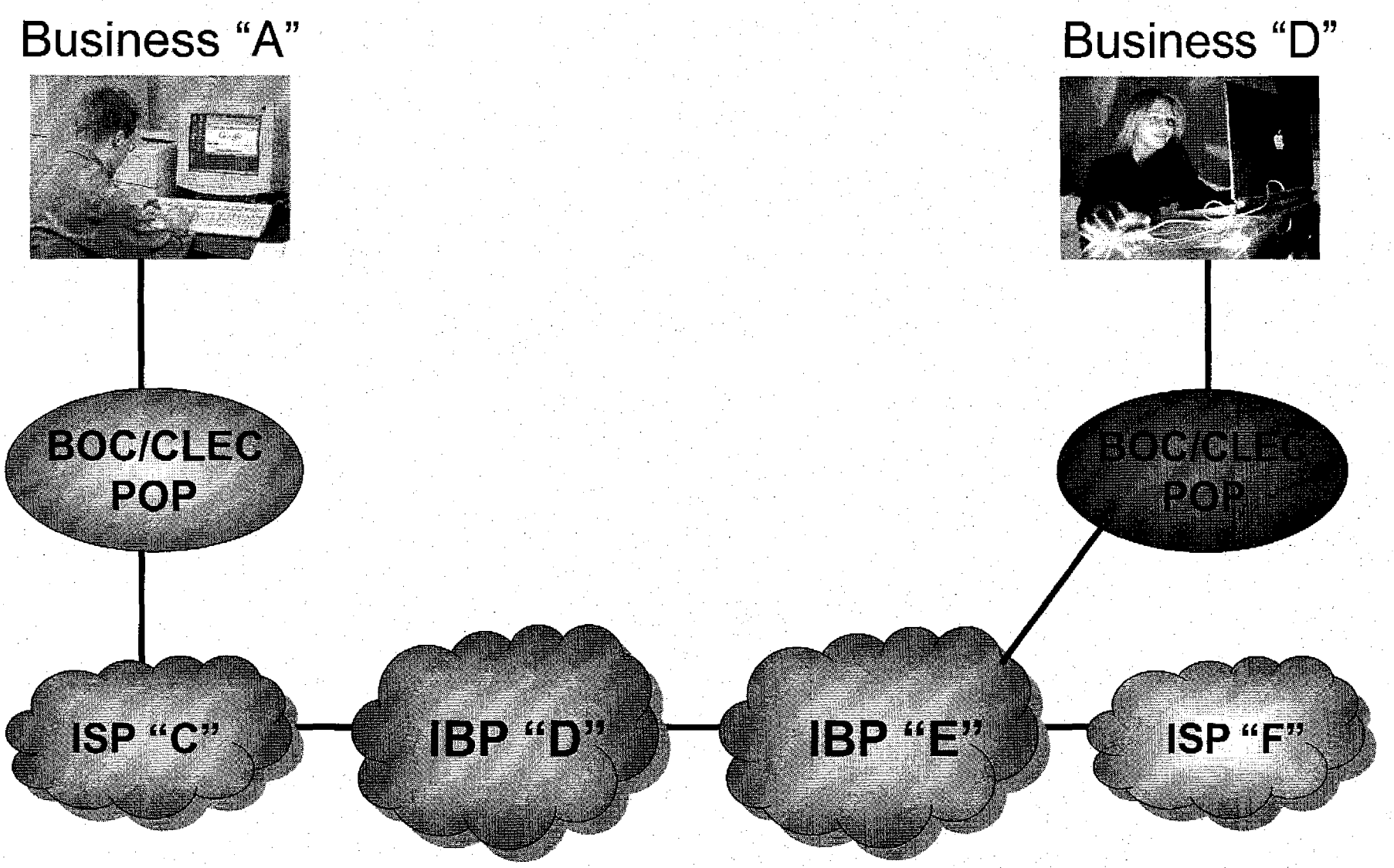
>> Internet Access



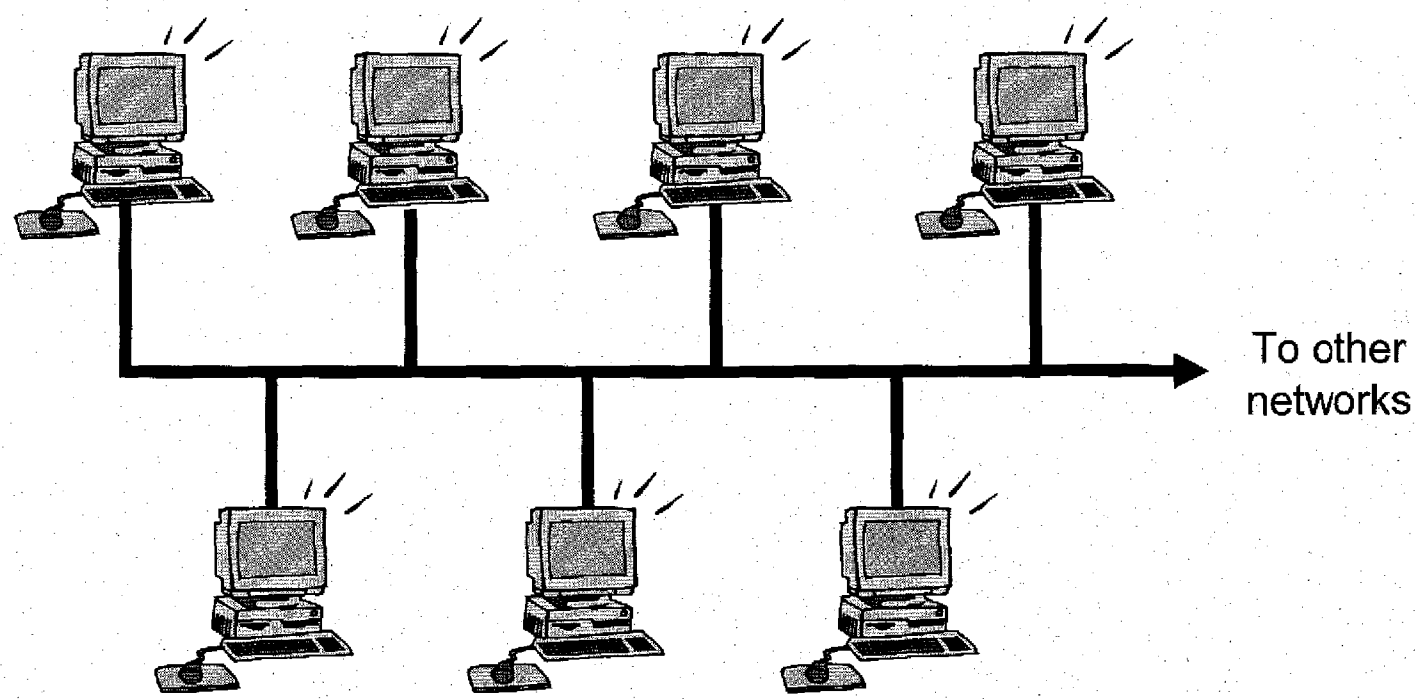
>> Internet Access



>> Internet Access

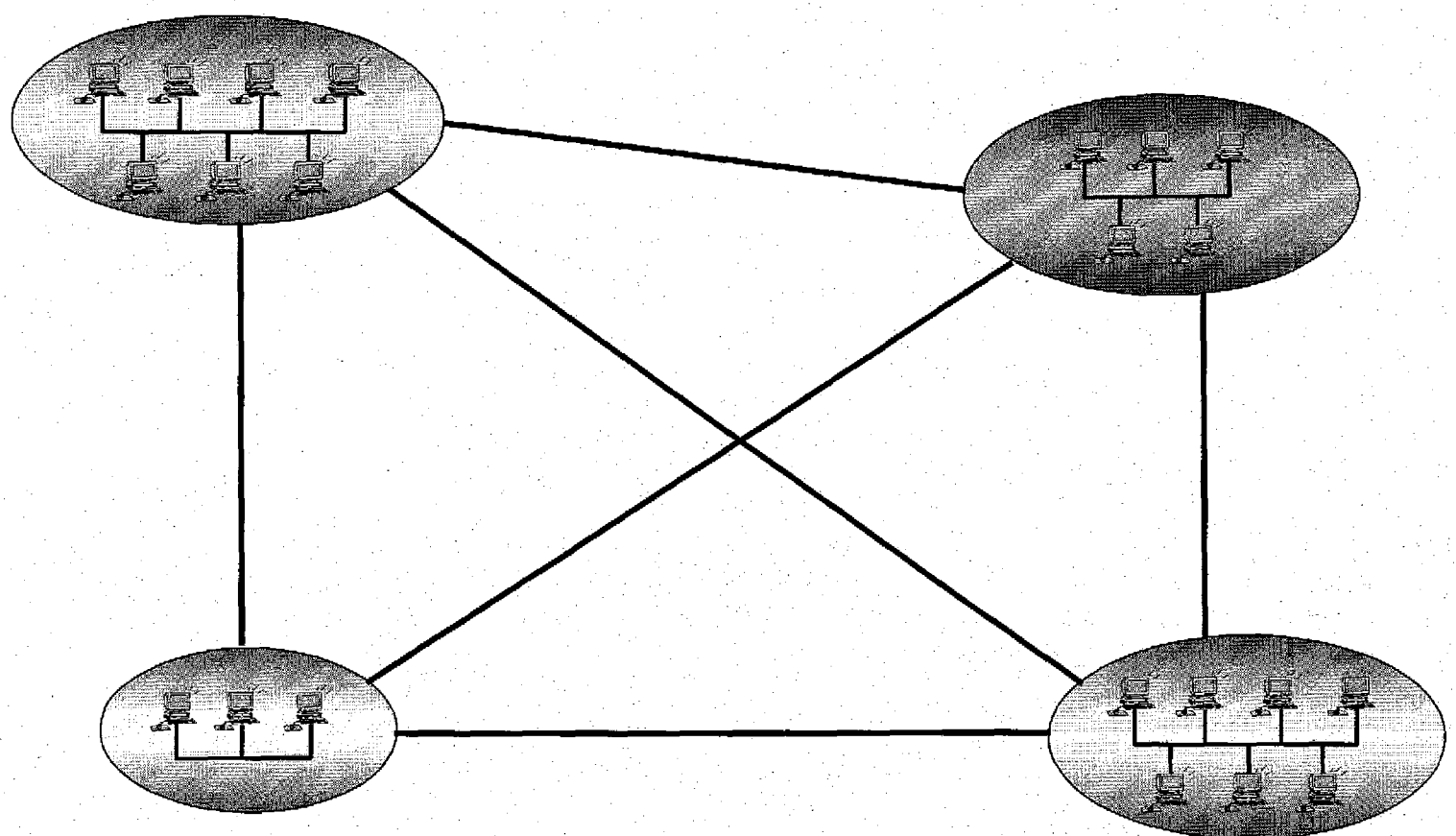


>> What is a network?



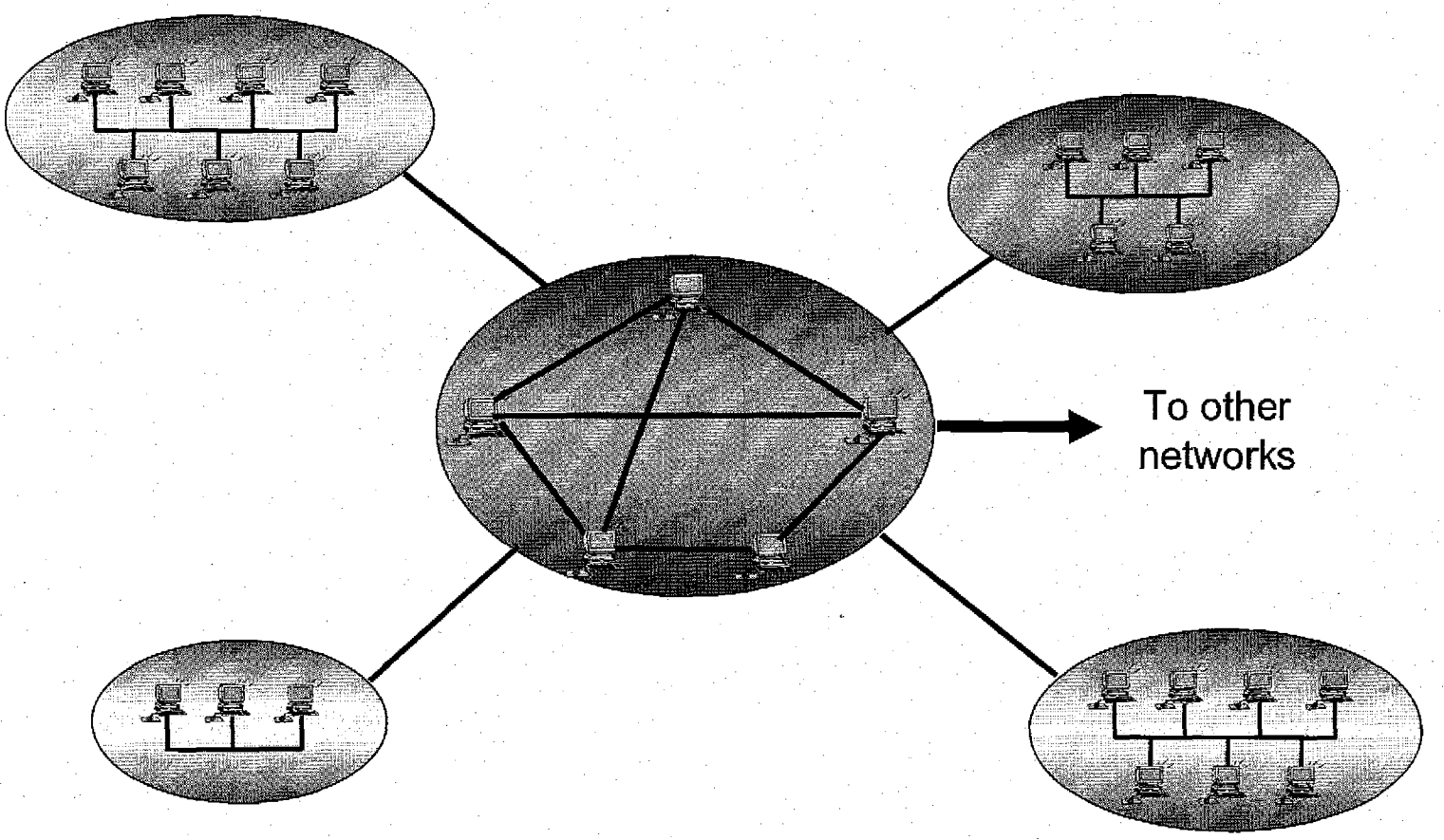
Network = Nodes + Circuits

>> Networks together

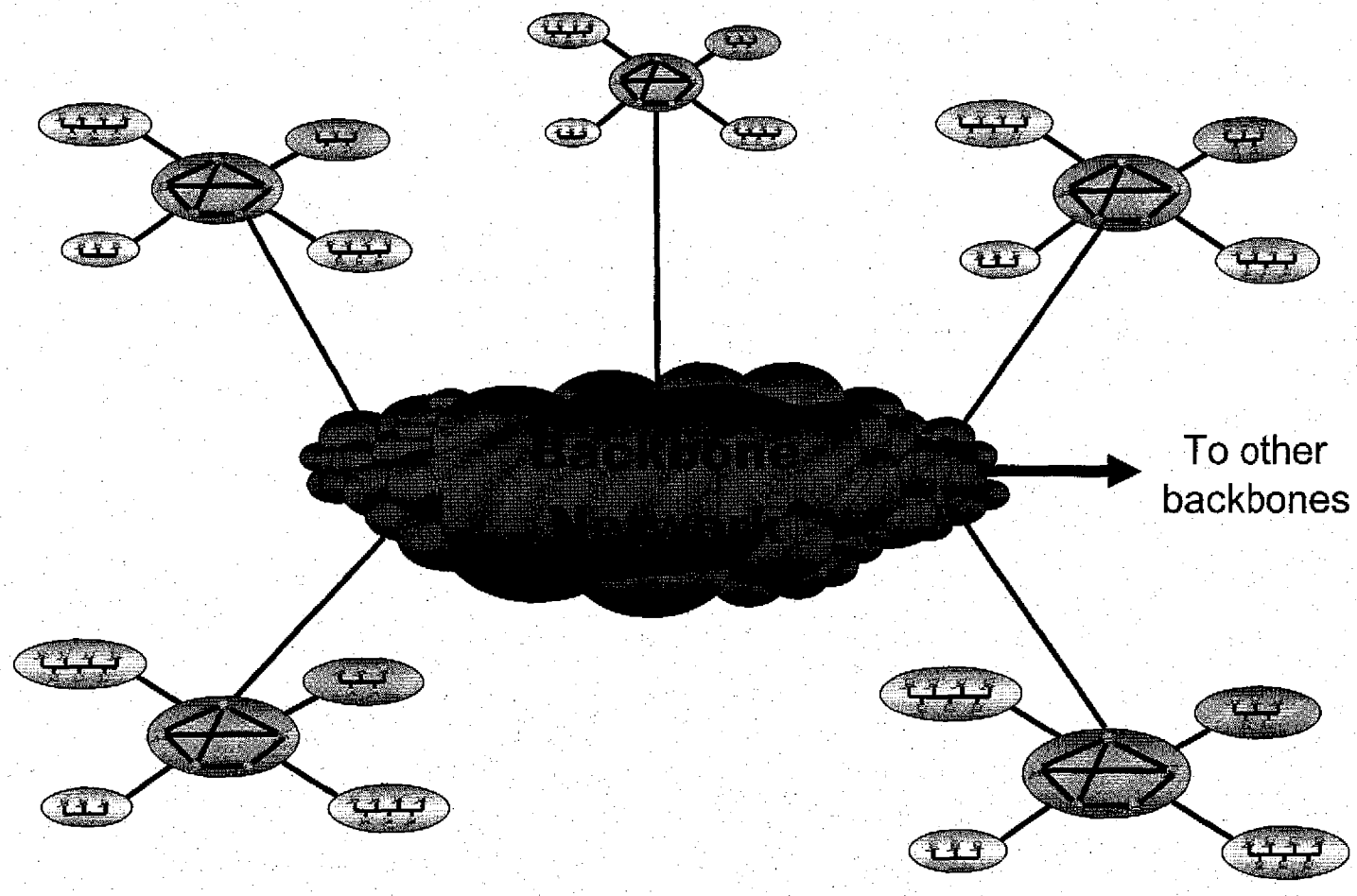


There are about 10,000 large networks!

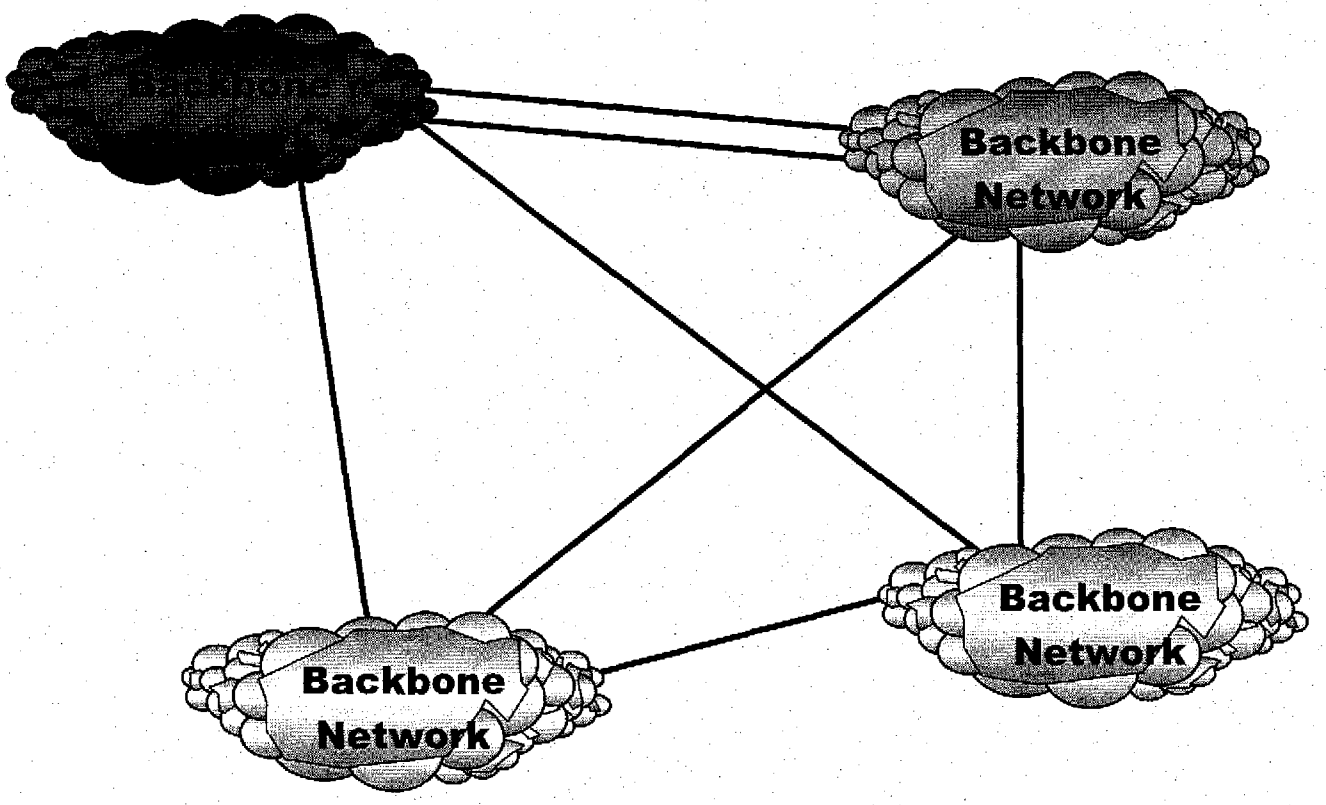
>> Networks together



>> More Networks Together

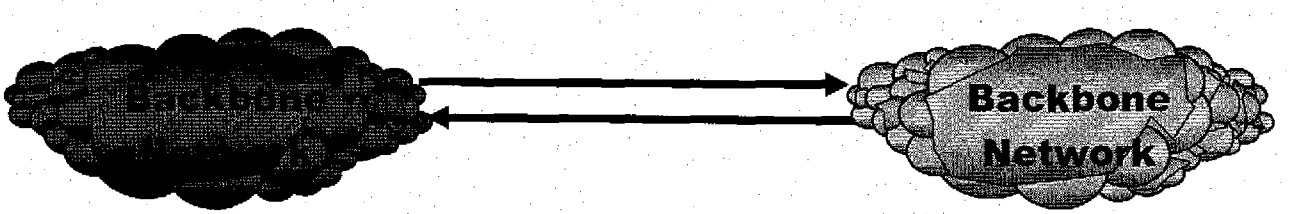


>> Backbones



»Backbones connect to each other: they PEER

>> Route Announcements



- Networks announce routes to one another
- Peers announce only their own address space
- Peers only accept traffic destined for themselves

The Internet consists of about 10,000 interconnected networks (Autonomous Systems, or AS's) which in turn are linked to larger, backbone networks in the USA

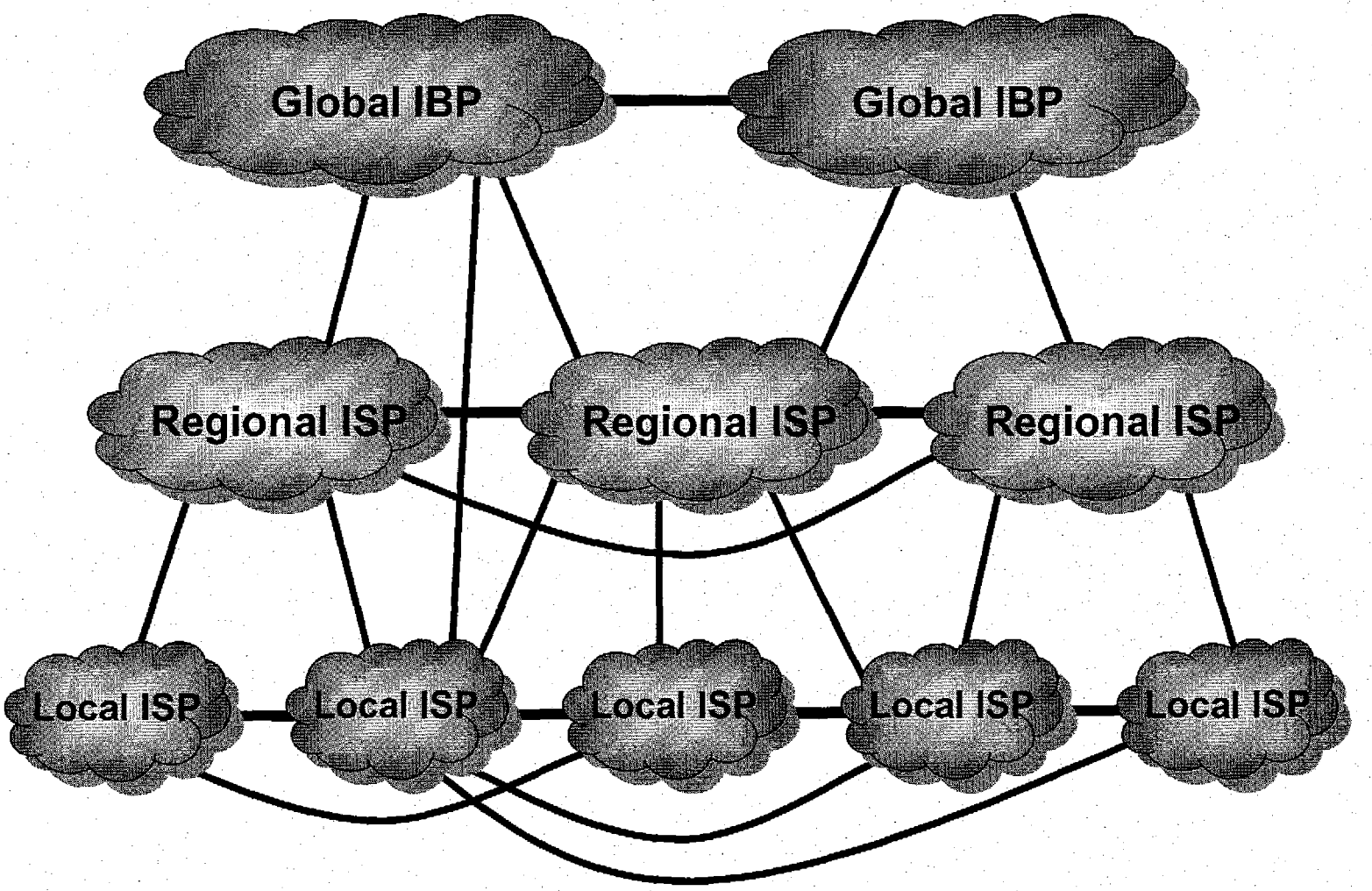
Backbones typically **peer** with one another and sell **transit** allowing access to their own and other interconnected networks

What is peering?

Peering is a settlement-free exchange of IP traffic whereby IP Networks provide connectivity to each others customers

Settlement free peering is the preferred method of interconnections between networks of similar value

>> Peering Hierarchy



>> Peering vs. Transit

TRANSIT

» Customers receive the full global Internet table
  » Approximately 144,000 routes
  » All SAVVIS direct routes
  » All SAVVIS peer routes
» Customers can send traffic for any destination
» Customers pay

PEERING

» Peers receive SAVVIS owned routes only
  » Approximately 38,000 routes
  » If they meet the requirements of the Savvis peering policy
» Peers can send only traffic destined for SAVVIS
» Peers do not pay

Savvis directly announces about a quarter of the Internet as its own space (38,00 out of 144,000)

>> Whom to peer with?

Backbone networks engage in peering relationships with each other if:

- They are of similar scope, size, geographic coverage
- Have similar sized customer base, content
- Have mutual and similar benefit from this relationship

Companies' rules for peering are defined in a network peering policy

- Peering policies distinguish who pays and who peers
- Peering policies are a form of self regulation
- Each network decides on its criteria
- Equitable application of peering policies avoids regulatory scrutiny

>> Sample Peering Policy

Backbone

- Redundant US national backbone network of suitable size (OC-192c)
- Survivable network nodes in 9 geographic areas

Traffic

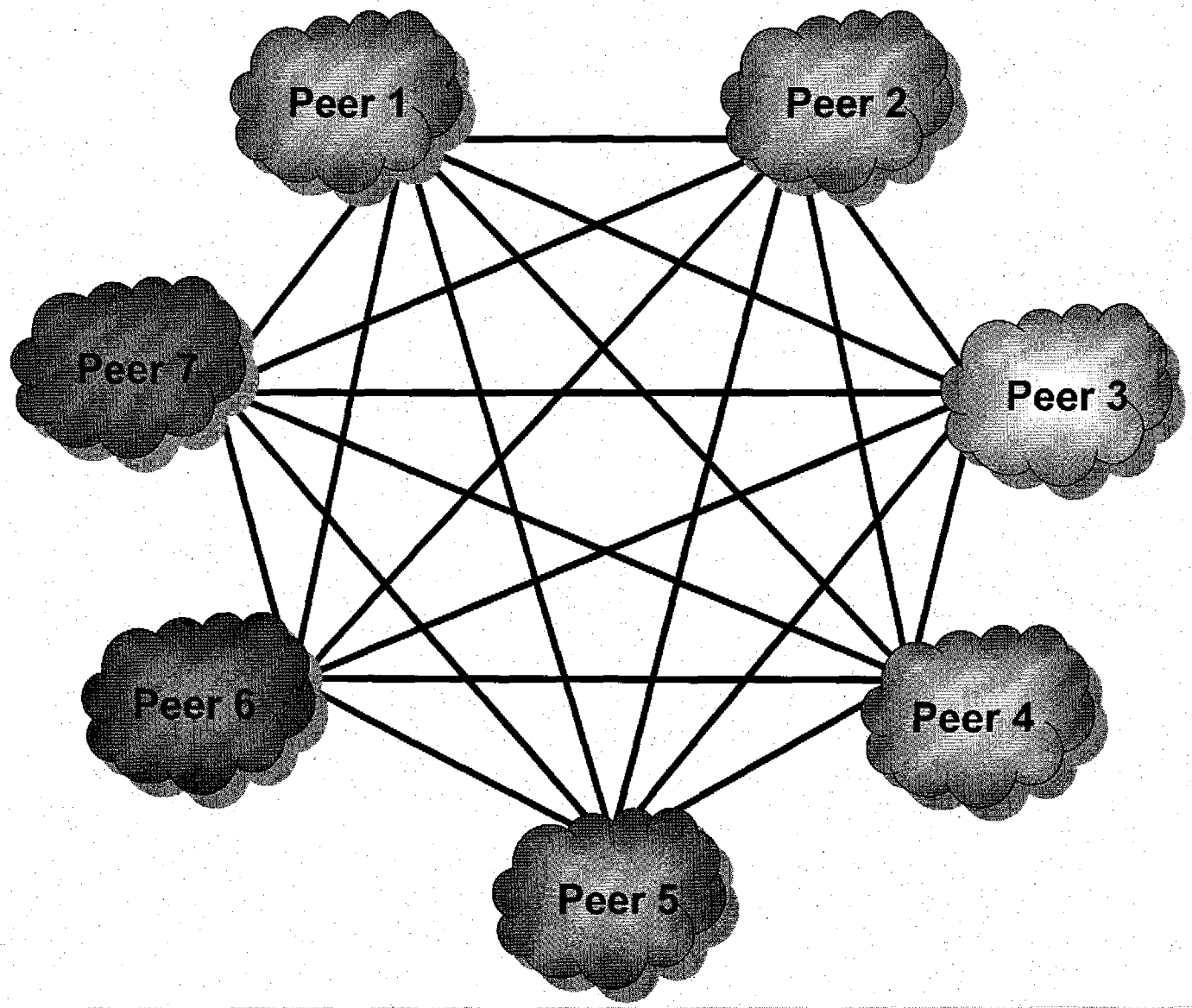
- Traffic volume 1 Gbps or more (90 percentile)
- Minimum of 6 interconnections @ OC12 or more
- Traffic imbalance 2 : 1 or less??

Other

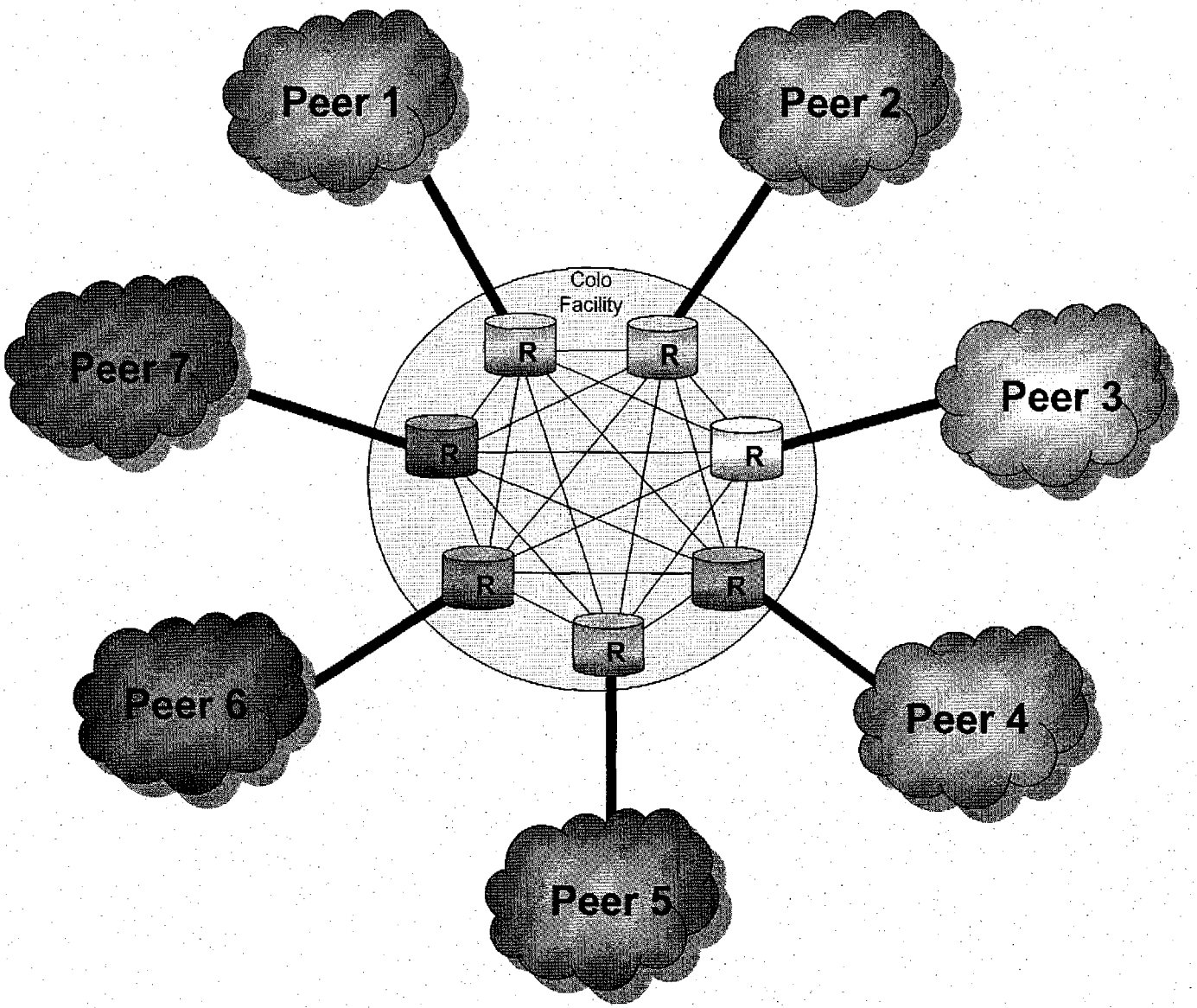
- Must not buy transit from any other network
- 24x7 NOC
- Presence in Europe/Asia??
- Share loop costs

Savvis peering policies are public:
http://www.savvis.com/peering

>> Traditional Peering



>> Telehouse Peering



>> Telehouse Locations

Equinix
San Jose, CA
Santa Clara, CA
Dallas, TX
Chicago, IL
Secaucus, NJ
Newark, NJ
Ashburn, VA
5 Outside US

Switch & Data
Atlanta, GA
Dallas,TX
Los Angeles, CA
Mountain View, CA
New York City, NY
Palo Alto, CA
Philadelphia, PA
San Francisco, CA
San Jose, CA
Seattle, WA
Vienna, VA

Europe
London
Paris
Frankfurt
Amsterdam

>> Thank You

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