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REDACTED – FOR PUBLIC INSPECTION

June 24, 2005

BY HAND

Gary Remondino
Wireline Competition Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

> Re: *In the Matter of Applications for Consent to the Transfer of Control of Licenses and Section 214 Authorizations from AT&T Corp., Transferor, to SBC Communications Inc., Transferee, WC Docket No. 05-65*

Dear Mr. Remondino:

On June 14th and 17th, we provided certain of the clarifications requested by the Staff to the Response of SBC Communications Inc. to Information and Document Request Dated April 18, 2005. In this letter, we provide the remaining responses to the Staff's requests for clarification.

Question: The Staff requested that we provide the information requested in Specification 1.c for retail business customers to which SBC provided services in 2004 in amounts within additional ranges of revenue than originally requested. The Staff further requested that we modify the presentation of this information to conform as closely as possible to AT&T's to facilitate comparison.

Response: The following table provides the requested supplemental information:

Revenue Range	Number of Customers[1]	2004 Total Revenue for those Customers	% of SBC 2004 Revenue[2]
Less than or equal to $250.00			
$250.01 to $7,000.00			
$7,000.01 to $50,000.00		**[REDACTED]**	
$50,000.01 to $1,000,000.00			
$1,000,000.01 to $5,000,000.00			
Greater than $5,000,000.00			

In responding to this request, SBC is providing the revenue range data that it keeps in the ordinary course of business. These data are likely underinclusive[3] because (1) information from some SBC entities (for example, SBC-East, Sterling, and Callisma) is maintained in separate billing databases and is not integrated with other SBC information and (2) the "total revenue" information maintained for each customer does not include certain accounting entries and adjustments (which for accounting purposes are not allocated on a per-customer basis).

Question: The Staff requested that we define or describe the services listed in Column B ("PRODUCT_CD") of Exhibit 3(a)(1)(i).

Response: The table below describes the services listed in Column B of Exhibit 3(a)(1)(i) in further detail (we have omitted services such as DS0, which we believe are self-explanatory):

PRODUCT_CD	FURTHER PRODUCT BREAKDOWN
Access Lines	For example: flat rate lines, measured lines, Lifeline
Centrex / Plexar®	For example: Centrex / Plexar / Plexar II / Plexar Custom[4]

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[1] As with our previous response to Specification 1.c, for the purpose of calculating the number of customers in each range, each government agency that procures services from SBC is counted as a separate customer.

[2] As with our previous response to Specification 1.c, SBC uses as the denominator for this calculation its total revenues for 2004, as reported in its 2004 Annual Report.

[3] SBC already has provided total business revenue by service and segment in Exhibit 3(a)(1)(i), but that revenue was not and cannot completely be broken down by revenue range.

[4] Plexar is the trademarked name for Centrex services in SBC's Southwest region.

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PRODUCT_CD	FURTHER PRODUCT BREAKDOWN
Local Usage	For example: local usage, extended area service
Location, Security & 911 Svcs	For example: 911, E-911, 211, 311, 511 services
Other Core Voice	For example: 900/976, EUCL, inside wire maintenance, USF, TeleBranch®[5]
Trunks	For example: analog, flat, measured, digital, DID, PBX
Vertical Services	For example: caller ID, call waiting, three-way calling, call forwarding, anonymous call rejection, messaging services
CPE / INTEGRATION	For example: routers, PBX equipment, and maintenance associated with data services, voice services, and managed solutions
DSL	The figures reported in Exhibit 3(a)(1)(i) for DSL include business retail billings from SBC Internet Services, Inc. and non-affiliate ISP billings from SBC Advanced Solutions, Inc.
Ethernet	For example: Ethernet services - GigaMAN®,[6] OPT-E-MAN^{SM7}

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[5] TeleBranch enables a business to have a local telephone number in a location where it is not physically located. Callers dial the local telephone number, and the call automatically is forwarded to the business's actual location.

[6] GigaMAN service is a dedicated, fiber-optic, point-to-point gigabit Ethernet service that links local area networks ("LANs") within a metropolitan or regional area. GigaMAN service transmits data at a rate of up to 1.0 gigabits per second – 22 times faster than DS3 service – across the street or across town. GigaMAN service uses the same transmission protocol as a LAN. With GigaMAN service, customers can achieve enterprise LAN speeds while transmitting data between sites.

[7] OPT-E-MAN is a metro Ethernet product that provides customers with flexible bandwidth options from 5 Mbps to 1 Gbps. OPT-E-MAN will support various data transport configurations – including point to point, point to multi-point, or multi-point to multi-point – using physical and virtual connections to meet specific business needs. OPT-E-MAN service is available in two standard interfaces: (1) 10/100 Mbps Base T, a

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PRODUCT_CD	FURTHER PRODUCT BREAKDOWN
Internet Services	Some SBC accounting systems do not distinguish among types of Internet Services (for example, Dedicated Internet Access, IP Hosting - Dedicated / Shared); therefore, one accounting system uses this classification.
Internet Services - Other	Some SBC accounting systems do not distinguish among types of Internet Services (for example, Dedicated Internet Access, IP Hosting - Dedicated / Shared); therefore, certain of those accounting systems use this classification.
Dedicated IP - IP Access - Dedicated	For example, Dedicated Internet Access
IP Hosting Services	Some SBC accounting systems do not distinguish among types of IP Hosting Services (for example, IP Hosting - Advanced Hosting / Data Center / Shared); therefore, those accounting systems use this classification.
IP Hosting - Advanced Hosting	Web hosting managed by SBC via high-performance servers and onsite technical support
IP Hosting - Data Center	An equipment housing service that offers onsite technical support in a fault-tolerant, secure environment and provides the customer with a virtual Data Center
IP Hosting - Shared	A web hosting service that coexists with other web sites on the same physical server and allows the customer to outsource its hosting needs
ISDN	ISDN - BRI[8] / PRI[9] / Centrex

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copper handoff with a bandwidth limitation of 100 Mbps; and (2) 1 Gbps Ethernet, a fiber handoff with a bandwidth limitation of 1 Gbps.

[8] Integrated Services Digital Network Basic Rate Interface ("ISDN - BRI") is a digital communications technology that transmits data and voice traffic simultaneously over one line and among multiple sites. Using the basic rate interface, ISDN transmits data digitally over the two 64 Kbps channels on a common, twisted-pair copper phone line. The 64 Kbps channels provide high bandwidth for carrying the voice, data, and video

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PRODUCT_CD	FURTHER PRODUCT BREAKDOWN
MON	Multi-service Optical Network[10]
Other Data	For example: VPOP - DAS,[11] EUCL - ISDN - BRI / PRI
Long Distance	For example: switched interLATA, switched intraLATA, international

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signals the customer sends. A third, 16 Kbps channel carries signaling information that controls the 64 Kbps channels.

[9] Integrated Services Digital Network Primary Rate Interface ("ISDN - PRI") is a complex voice and data service that provides high-volume access to the public switched telephone network ("PSTN"). This service lets one transmit data at high speeds to accommodate voice, data, image, and video over the same digital facilities. ISDN - PRI provides 23 digital channels over one transport line (a twenty-fourth channel carries signaling information). This service offers a customer one T1 circuit with 23 separate voice lines or a combination of services. ISDN - PRI simplifies PBX access to many applications, including LAN-to-LAN connectivity and videoconferencing. When used for trunking, ISDN - PRI improves PBX capacity and enables the customer to transmit voice, WATS, toll-free, and circuit-switched data calls.

[10] MON service provides high volume optical transport utilizing multiplexing technology in a point-to-point configuration. Multiple data signals are transmitted over fiber optic cable using different wavelengths of light. Each of these wavelengths represents a transmission channel in the MON system and is protocol independent of every other channel in the system. MON service can be used to extend customer networks to off-site locations. These include, but are not limited to, disaster recovery, Storage Area Networking connections ("SANS"), data center mirroring, and mainframe-to-mainframe communications. MON service offers up to 320 Gbps (protected) or 640 Gbps (unprotected) of dedicated DWDM capacity in ring architecture. Dedicated DWDM nodes transport up to 32 lambdas on a single pair of fibers with a diverse path in a ring configuration. Customers can utilize two types of nodes, central office nodes and customer premises nodes, with a maximum of eight nodes. The minimum configuration would consist of a two-node solution. Universal ports are capable of supporting a variety of speeds up to 2.5 Gbps and are located at the ends of lambdas. Lambdas can be lit up to carry the following data services to each port on the node of the ring: Dedicated SONET (155 Mbps to 10 Gbps); Gigabit Ethernet; Fast Ethernet 100BaseT; 10 Gigabit Ethernet ("WAN-PHY"); 10 Gigabit Ethernet ("LAN-PHY"); Fibre Channel ("FC"); ESCON; FICON; and D1 Video.

[11] Virtual Point of Presence – Dial Access Service ("VPOP-DAS") is a service that utilizes an ISDN - PRI platform to allow ISPs to aggregate their dial-up traffic to transport it more efficiently to a network access point.

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PRODUCT_CD	FURTHER PRODUCT BREAKDOWN
Other Services	For example: billing and collections, late-payment fees, white pages listings

      Please let me know if you have any questions regarding this submission or any other information SBC has provided related to this proceeding.

Sincerely,

Thomas F. Hughes