

August 5, 2005

By Hand and via ECFS

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

**Re: DA 05-656, WC Docket No. 05-65
DA 05-762, WC Docket No. 05-75**

Dear Ms. Dortch:

On June 24, 2005, AT&T and SBC (Applicants) submitted detailed maps of four SBC metropolitan areas (Cleveland, Milwaukee, Chicago, and Los Angeles) on which merger opponents had focused their advocacy.¹ These maps demonstrate that: (1) CLECs have substantially more local fiber than AT&T in these areas; (2) CLECs have deployed fiber in the very same locations as AT&T; and (3) virtually all on-net AT&T buildings are in close proximity to existing CLEC fiber. In submitting these maps, Applicants noted that the maps clearly *understate* the amount of competitive fiber. Indeed, we observed, by way of example, that the GeoTel data, which we used to identify CLEC fiber routes, includes neither MCI's nor Time Warner's fiber in Milwaukee, notwithstanding that both companies have deployed substantial amounts of fiber in that metropolitan area.²

At staff's request, Applicants hereby provide the Commission with a complete set of maps for the MSAs in which AT&T has local facilities in SBC's service area. Like the other fiber maps, these maps show CLEC fiber routes reported by GeoTel along with AT&T's actual fiber routes and buildings lit by AT&T. They therefore show *all* AT&T fiber and on-net buildings, but not all CLEC fiber.³ For example, GeoTel does not report route information for MCI in Sacramento or Time Warner Telecom in Dayton, both of which are known to have fiber in those MSAs. Nor does GeoTel report route information for Cox, a known and active CLEC provider in San Diego with extensive fiber. This omission is particularly significant insofar as AT&T's San Diego network is based primarily on fiber IRUs purchased from Cox, which means that Cox generally has fiber on the exact same routes as AT&T.

¹ *Ex parte* letter from Gary Phillips, SBC, and Larry Lafaro, AT&T, to Marlene H. Dortch, Secretary, FCC, June 24, 2005.

² Additional explanation of the contents of the GeoTel data are explained more fully at page 4 of the June 28th, 2005 *ex parte* presentation of Dennis Carlton and Hal Sider. See letter from Peter J. Schildkraut, Arnold and Porter, to Marlene H. Dortch, Secretary, FCC, June 29, 2005.

³ To avoid confusion the maps do not separately depict each individual CLEC's network.

Notwithstanding these and presumably other significant omissions of CLEC fiber, the maps we are submitting provide further confirmation that the merger will have no material impact on special access competition. Like the maps we previously submitted, these maps show that CLECs have blanketed the very areas in which AT&T has deployed metro fiber with their own fiber, and that CLEC fiber passes directly in front of or in close proximity to virtually all of the relatively few AT&T on-net buildings. These maps therefore confirm, not only that CLECs can deploy their own fiber to virtually every on-net AT&T building that they do not already serve, but also that CLECs have every bit as much ability as AT&T to serve many more buildings by interconnecting leased ILEC loop and/or transport facilities to their extensive fiber rings.

If you have any questions regarding this submission or any other matter, please do not hesitate to contact us.

Sincerely,

AT&T CORPORATION

SBC COMMUNICATIONS, INC.

/s/ Lawrence J. Lafaro

/s/ Gary L. Phillips

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