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August 12, 2005

**REDACTED  
FOR PUBLIC INSPECTION**

BY HAND DELIVERY

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW – Lobby Level  
Washington, D.C. 20554

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

Dear Ms. Dortch:

As requested by the Commission's staff, SBC is providing a list of fiber-based collocation arrangements within SBC's wire centers. The attached spreadsheet identifies each wire center (identified by 8-digit CLLI code) with fiber-based collocation, the identity of each collocating entity and the total number of collocations within the wire center.

To compile this information, SBC personnel conducted a site visit of each of the wire centers identified as having one or more fiber-based collocation arrangements. The data confirm both AT&T's limited local presence and the existence of many fiber-based competitive carriers in each of the markets in which AT&T has a local presence. For example, the data show that in SBC's almost 3,200 wire centers, there are more than 1,700 non-AT&T collocation arrangements, while AT&T (including its affiliates) has only **[Confidential]** collocation arrangements.<sup>1</sup> AT&T is the sole collocator in only 50 wire centers, or less than 2% of the total wire centers. Significantly, all but seven of those 50 wire centers are within 10 miles of another SBC wire center where at least one CLEC other than AT&T has a fiber-based collocation, and 29 of those 50 wire centers are within five miles of another SBC wire center where at least one other CLEC has a fiber-based collocation (and those 29 wire centers collectively have 176 non-

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<sup>1</sup>Based upon SBC's actual physical inspections of its central offices, SBC and AT&T have determined that the collocation figures that AT&T previously submitted based upon its centralized records identified as non-fiber-based 19 collocations that are, in fact, fiber-based and identified as fiber-based 2 collocations that are, in fact, non-fiber-based or that have been decommissioned. The collocation list submitted with this submission corrects those errors.

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AT&T collocation arrangements). All but one of the 50 wire centers are contiguous with wire centers in which other CLECs have fiber-based collocations.

These collocation data provide further confirmation that the many other facilities-based competitive LECs that compete in the same dense commercial areas in which AT&T has deployed local facilities could readily replace AT&T and are not dependent on AT&T or AT&T's collocation arrangements. Other CLECs can provide direct connections to virtually all of AT&T's on-net buildings (and, in many cases, already do so), and other CLECs have the same (or greater) ability as AT&T economically to serve any remaining buildings (including any building that AT&T serves using leased facilities) by connecting special access circuits (or UNEs) to their metropolitan fiber via fiber-based collocation and providing so-called "partial Type II" service. Please contact me with any questions that you may have.

Sincerely,

SBC Communications Inc.

/s/ Gary L. Phillips

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cc: Marcus Maher  
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