

August 23, 2005

BY ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: SBC Communications Inc. and AT&T Corp., Applications for
Approval of Transfer of Control, WC Docket No. 05-65

Dear Ms. Dortch:

In an August 1, 2005 letter, AT&T and SBC purport to explain why the AT&T building lists that Global Crossing submitted on July 27, 2005 in response to a Staff request were erroneous. While the Commission ultimately may have to take AT&T and SBC at their word, Global Crossing wishes to highlight a few points to assist the Staff in its consideration of this matter.

As an initial matter, it is useful to clarify Global Crossing's understanding and past use of the building lists. For over three years, Global Crossing has received copies of these lists on a regular basis, typically monthly. Through regular interaction and communication with the AT&T account team, Global Crossing understood these lists to represent the locations where AT&T had direct fiber connections on a Type I basis. Indeed, to the best of Global Crossing's knowledge and belief, AT&T rarely rejected a circuit order because it lacked facilities, even though it now claims that almost 12,000 of the nearly 18,000 locations on the list are invalid.

While interesting, AT&T's explanation as to how the lists were generated raises several questions. If we understand AT&T's explanation correctly, AT&T generated the original building list from information on both AT&T and TCG systems. AT&T explains that TCG was utilizing non-standard CLLI codes, but that TCG coded the ninth character to indicate whether a building was on-net or off-net. Therefore, AT&T Labs was able to write a program to generate a list of on-net buildings. While no mention is made of AT&T's (excluding TCG) own on-net building inventory, presumably AT&T was utilizing Telcordia CLLI codes and therefore its on-net building inventory was accurate.

So based on AT&T's explanation, AT&T's initial list of on-net buildings should have been accurate. It was only when AT&T converted TCG's building list to Telcordia-standard CLLI codes that the errors appeared in the building list. This is a curious situation because, to the best of Global Crossing's knowledge, the building lists remained

fairly consistent since at least 2000 (AT&T acquired TCG in 1999), and the only material change to the list occurred in July 2005 when AT&T suddenly deleted nearly two-thirds of the buildings from the list. According to AT&T, the initial effort should have produced a building list containing between 4,000-5,000 locations. It was only after the conversion to Telcordia-standard CLLI codes that the list should have grown to between 17,000-18,000 locations. Again, to the best of our knowledge, the lists did not change so dramatically, but over time consistently remained in the 17,000-18,000 range. Perhaps it would be useful for AT&T to indicate the timing of these events so that they could be tracked against the various lists it produced over the years.

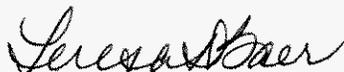
AT&T also asserts that “the majority of the buildings on the list are clearly labeled as supporting only *voice grade DS0* service.” Of the lists submitted by Global Crossing, the only lists which indicate whether DS0 service is supported are the two lists from April and May 2005. None of the five other older lists that Global Crossing submitted indicates whether DS0 service is supported. In any event, Global Crossing purchases some DS0 service from AT&T and an indication that a particular building only supports DS0 service could mean simply that AT&T does not presently have higher capacity equipment at the location. AT&T has indicated to Global Crossing in the past that the indication of service availability contained within some of the building lists is of no real consequence since AT&T can deploy additional equipment if the opportunity warrants it. So the indication on the building lists as to service availability does not necessarily mean that AT&T deployed DS0 circuits over its own network to the location, nor does it indicate that the DS0 circuits are on a Type II basis.

As to AT&T’s incredulity that any “knowledgeable CLEC” would have believed the lists were accurate, Global Crossing finds it equally unbelievable that it should have to verify information received from the AT&T account team with other sources, such as by double-checking that information against AT&T’s SEC filings, rather than relying on the information AT&T’s account team provided to sell it the services. As recently as April 12, 2005, Global Crossing confirmed with its AT&T account team that the lists represented locations where AT&T offered Type I service to its wholesale customers. What is incredible and quite convenient is that, six years after the acquisition of TCG, AT&T only now realizes that the building lists it regularly provided its customers were grossly inaccurate.

Finally, Global Crossing has been comparing its circuit inventory from AT&T with the information on the new building list AT&T provided in July 2005. So far, Global Crossing has found at least four locations where Global Crossing takes service from AT&T, purportedly on a Type I basis, that do not appear on the new list. These

locations were included on previous building lists, however. Perhaps AT&T continues to have difficulties compiling accurate data, but Global Crossing is at a loss to explain this situation.

Respectfully submitted,



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