

ATTACHMENT  
WC Docket No. 06-125  
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**MULTIPLE COMPETITORS PROVIDE BROADBAND ENTERPRISE SERVICES  
THROUGHOUT THE COUNTRY AND IN AT&T'S SERVICE TERRITORY**

**A. National and Large Regional Competitors**

***AboveNet.*** AboveNet is a facilities-based services provider that offers wholesale high-capacity local access and transport services in 14 U.S. markets, including “New York/New Jersey Metro Area, Boston, Chicago, Baltimore, Philadelphia, Washington DC/Northern VA, Atlanta, San Francisco/San Jose, Seattle, Portland, Phoenix, Los Angeles, Houston, Dallas.”<sup>1</sup> AboveNet’s Metro Ethernet connects “two or more customer locations providing the ultimate in physical security and scalable bandwidth in an elegant architecture designed to provide unparalleled performance.”<sup>2</sup>

***Cogent Communications.*** Cogent considers itself “one of the top five networks in the world” and the “largest Ethernet Service Provider in the United States.”<sup>3</sup> “Recognized as one of the largest carriers of Internet traffic in the world,” Cogent “spans across North America, across the Atlantic and throughout Western Europe” and provides service to “90 major markets and interconnect with over 2,000 other networks.”<sup>4</sup> Cogent offers “On Net” and “Off Net” Dedicated Internet Access<sup>5</sup> as well as Ethernet Point-to-Point service “in speeds of 100 Mbps to full GigE.”<sup>6</sup>

***Covad.*** Covad operates a “nationwide, broadband network”<sup>7</sup> with “[c]overage in 44 states, 235 metropolitan statistical areas (MSAs), representing over 50% of U.S. homes and businesses.”<sup>8</sup> Covad’s “ideal broadband customers” are “[s]mall or medium-sized businesses.”<sup>9</sup> Covad offers these customers DSL and T1 services,

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<sup>1</sup> AboveNet, *About AboveNet*, <http://www.above.net/about/>.

<sup>2</sup> AboveNet, *AboveNet Metro Ethernet*, <http://www.abovenet.com/products/transport-metroenet.html>.

<sup>3</sup> Cogent Communications, *About Cogent*, <http://www.cogentco.com/htdocs/about.php>.

<sup>4</sup> *Id.*

<sup>5</sup> Cogent Communications, *Products and Services: Dedicated Internet Access Services*, <http://www.cogentco.com/htdocs/dedicated.php>.

<sup>6</sup> Cogent Communications, *Products and Services: Ethernet Point-to-Point Services*, <http://www.cogentco.com/htdocs/ethernet.php>.

<sup>7</sup> Covad, *The Covad Network*, [http://www.covad.com/web/support/covad\\_network.html](http://www.covad.com/web/support/covad_network.html).

<sup>8</sup> Covad, *All About Covad: A Company Overview*, [http://www.covad.com/export/sites/default/downloadables/covad\\_corp\\_overview.pdf](http://www.covad.com/export/sites/default/downloadables/covad_corp_overview.pdf).

<sup>9</sup> Covad, *All About Covad: A Company Overview*, [http://www.covad.com/export/sites/default/downloadables/covad\\_corp\\_overview.pdf](http://www.covad.com/export/sites/default/downloadables/covad_corp_overview.pdf)

SDSL, Enterprise SDSL, and “T1 TeleXtend.”<sup>10</sup> The company claims to “operate[] the nation’s largest ADSL2+ next-generation broadband network.”<sup>11</sup> Covad also increasingly offers “business-grade fixed broadband wireless services,”<sup>12</sup> in a service area that “encompasses over 220 cities across more than 3,000 square miles and covers more than 50,000 small and medium-sized enterprises (SMEs) in population centers that include more than 25 million households.”<sup>13</sup> Covad “offer[s] speeds of up to 9.0 megabits per second downstream and upstream using unlicensed spectrum and up to 100 megabits per second downstream and upstream using licensed spectrum, including spectrum leased from holders of FCC-auctioned spectrum.”<sup>14</sup> This enables Covad to “meet the needs of larger businesses,” in addition to serving small and medium businesses.<sup>15</sup> Covad’s fixed wireless assets “provide[] an alternative to the last-mile copper for delivering data and voice services to business customers.”<sup>16</sup>

***Embarq.*** Embarq “operates in 18 states offering local and long distance voice, data, high speed internet, wireless and entertainment services.”<sup>17</sup> Embarq provides Ethernet Services,<sup>18</sup> Domestic ATM with “high-speed transport up to 10 Gbps,”<sup>19</sup> Frame Relay for the “the transmission of data at a range of speeds,<sup>20</sup> and Private Lines that provide “[e]fficient and economical” transport of “data, voice and video.”<sup>21</sup>

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<sup>10</sup> *Id.*; see also <http://www.covad.com/web/services/dsl/index.html>;  
[http://www.covad.com/web/services/dsl/sdsl\\_telespeed.html](http://www.covad.com/web/services/dsl/sdsl_telespeed.html);  
[http://www.covad.com/web/services/dsl/sdsl\\_ent\\_telespeed.html](http://www.covad.com/web/services/dsl/sdsl_ent_telespeed.html);  
<http://www.covad.com/web/services/t1/index.html>;  
[http://www.covad.com/web/services/t1/bonded\\_t1.html](http://www.covad.com/web/services/t1/bonded_t1.html)

<sup>11</sup> Covad, *High-Speed DSL: DSL Broadband Service Built for Business*, <http://www.covad.com/web/services/dsl/index.html>.

<sup>12</sup> Covad Communications Group Inc., Form 10-K at 5 (SEC filed Feb. 28, 2007).

<sup>13</sup> Covad Wireless, *About Covad Wireless*, <http://www.covadwireless.com/about.html>.

<sup>14</sup> Covad Communications Group Inc., Form 10-K at 5 (SEC filed Feb. 28, 2007).

<sup>15</sup> Covad Press Release, *Covad Expanding Broadband Wireless Network* (Oct. 11, 2006).

<sup>16</sup> Covad Press Release, *Covad Signs Agreement To Acquire NextWeb To Accelerate Entry into Wireless Broadband* (Oct. 5, 2005).

<sup>17</sup> Embarq, *Company Info*, <http://www2.embarq.com/companyinfo/>.

<sup>18</sup> Embarq, *Embarq Ethernet Services*, <http://www.embarq.com/Business/DataAndNetworking/Ethernet/1-5JN9Category43>.

<sup>19</sup> Embarq, *Embarq Domestic ATM*, <http://www.embarq.com/Business/DataAndNetworking/ATM/1-5JK1Category44>.

<sup>20</sup> Embarq, *Embarq Frame Relay*, <http://www.embarq.com/Business/DataAndNetworking/FrameRelay/1-13AN2Category45>.

<sup>21</sup> Embarq, *Networking*, <http://www.embarq.com/Business/DataAndNetworking>.

***Fibertech Networks.*** Fibertech Networks says it is “the alternative fiber infrastructure provider to the legacy telephone and cable companies” “[a]cross 20 mid-size markets in the Northeast and Midwest.”<sup>22</sup> “The company has core networks operational in 21 cities including Buffalo, Syracuse, Rochester, Binghamton, White Plains, and Albany, NY; Providence, RI; Pittsburgh, PA; Indianapolis, IN; Columbus, OH; Hartford, Stamford, Bridgeport, New Haven, New London and Danbury, CT; Worcester and Springfield, MA; Concord, NH; Montgomery County, MD; and Wilmington, DE, with a lesser fiber presence in a number of other markets.”<sup>23</sup> Fibertech connects “business locations via Ethernet with speeds ranging from 3 Mbps to 1 Gbps.”<sup>24</sup> Fibertech also offers a “Private Line suite” “[r]anging in speeds from T1 to OC-192.”<sup>25</sup>

***Global Crossing.*** According to the map on its website, Global Crossing operates networks throughout the country.<sup>26</sup> Global Crossing states that it provides a full range of broadband services for enterprise customers, including ethernet, Frame Relay, ATM, dedicated Internet access, and IP VPNs.<sup>27</sup> Global Crossing states that its “portfolio of *National* and Metropolitan Ethernet services is extensive and includes Global Crossing Ethersphere, Global Crossing Etherline and Global Crossing Bespoke Ethernet.”<sup>28</sup> “Global Crossing can provide Frame Relay service to your business in over 50 countries and 500 cities around the world at speeds from 56/64K to DS3/E3.”<sup>29</sup>

***Level 3.*** Level 3 states that its network “spans 47,000 intercity route miles and delivers services to customers in major markets across the United States and Europe.”<sup>30</sup> Level 3 offers a wide range of broadband enterprise services, including Ethernet, ATM, Frame Relay, and IP-VPN.<sup>31</sup> Its “portfolio of Level 3 Metro Ethernet — dedicated and switched — and Level 3 Intercity Ethernet Private Line services provide superior end-to-end connectivity to corporate enterprises within the

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<sup>22</sup> Fibertech Networks, *About Us*, <http://www.fibertech.com/about.cfm>.

<sup>23</sup> Fibertech Networks, *About Fibertech/Fact Sheet*, [http://www.fibertech.com/about\\_factsheet.cfm](http://www.fibertech.com/about_factsheet.cfm).

<sup>24</sup> Fibertech Networks, *Ethernet*, [http://www.fibertech.com/ent\\_ethernet.cfm](http://www.fibertech.com/ent_ethernet.cfm).

<sup>25</sup> Fibertech Networks, *Private Line*, [http://www.fibertech.com/ent\\_private.cfm](http://www.fibertech.com/ent_private.cfm).

<sup>26</sup> See Global Crossing, *Interactive Map*, [http://www.globalcrossing.com/html/map05\\_11\\_05.html](http://www.globalcrossing.com/html/map05_11_05.html).

<sup>27</sup> Global Crossing, *Enterprise*, [http://www.globalcrossing.com/enterprise/enterprise\\_landing.aspx](http://www.globalcrossing.com/enterprise/enterprise_landing.aspx).

<sup>28</sup> Global Crossing, *Ethernet Services*, [http://www.globalcrossing.com/enterprise/managed\\_ethernet/managed\\_ethernet\\_landing.aspx](http://www.globalcrossing.com/enterprise/managed_ethernet/managed_ethernet_landing.aspx) (emphasis added).

<sup>29</sup> Global Crossing, *Frame Relay Service: Availability*, [http://www.globalcrossing.com/enterprise/frame/frame\\_avail.aspx](http://www.globalcrossing.com/enterprise/frame/frame_avail.aspx).

<sup>30</sup> Level 3, *Level 3 Network Reach*, <http://www.level3.com/businessmarkets/reach/index.html>.

<sup>31</sup> Level 3 Press Release, *Level 3 Launches Expansion of Data Networking Services in U.S. and Europe* (Jun. 21, 2004), <http://www.level3.com/newsroom/pressreleases/2004/20040621.html>.

116 metropolitan markets across Level 3's extensive regional, national and international optical network."<sup>32</sup> Its VPN service "lets you connect metro, regional, national or international locations in an E-LINE (point-to-point) or E-LAN (multipoint) fashion, providing Transparent LAN Service (TLS) between two or more locations" using "Level 3's converged Multi-Protocol Label Switching (MPLS) backbone."<sup>33</sup>

***New Edge Networks.*** New Edge, a subsidiary of EarthLink, offers MPLS, ATM, Frame Relay, and Private Line access nationwide.<sup>34</sup> "Through its nationwide backbone network with about 900 switches and Internet routers, New Edge Networks uses various technologies (MPLS, xDSL, frame relay, ATM, private lines, cable, and wireless) for providing high-speed connectivity at any business address in the United States. Network options include any combination of access and network management functions."<sup>35</sup> "New Edge Networks' 'BigFoot' xDSL coverage provides reach to about 90 percent of business locations in the United States through more than 10,000 unique U.S. central offices."<sup>36</sup> New Edge has asserted that it owns "one of the largest, most robust ATM/Frame Relay networks *on the planet*."<sup>37</sup>

***One Communications.*** The company states that its "vast next generation IP network" spans "16 states throughout the Northeast, Mid-Atlantic and Upper Midwest regions of the United States."<sup>38</sup> Business services include "both MPLS and Frame Relay solutions."<sup>39</sup> One Communications also offers "VPN" and "Point to Point" transfer, and their ATM service "provides the customer with the means to deliver economical voice, video and data services over a converged high-speed broadband network."<sup>40</sup>

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<sup>32</sup> Level 3, *Transport Services: Level 3 Intercity Ethernet Private Line and Level 3 Metro Ethernet Services*, [http://www.level3.com/businessmarkets/services/transport\\_services/ethernet\\_services.html](http://www.level3.com/businessmarkets/services/transport_services/ethernet_services.html).

<sup>33</sup> Level 3, *Level 3 Data and Internet Services*, [http://www.level3.com/businessmarkets/services/data\\_and\\_internet/index.html](http://www.level3.com/businessmarkets/services/data_and_internet/index.html).

<sup>34</sup> New Edge Networks, *Company Profile*, [http://www.newedgenetworks.com/about\\_us/](http://www.newedgenetworks.com/about_us/) (as of June 30, 2007).

<sup>35</sup> *Id.*

<sup>36</sup> *Id.*

<sup>37</sup> See AT&T Reply Comments at 27 (quoting Frame Relay brochure, New Edge Networks, then available at: [http://www.newedgenetworks.com/products/frame\\_relay/frame\\_relay.pdf](http://www.newedgenetworks.com/products/frame_relay/frame_relay.pdf) (emphasis added)).

<sup>38</sup> One Communications, *Unique Footprint*, <http://www.onecommunications.com/products/carrier/carrier-network-map.aspx>.

<sup>39</sup> CTC Communications, *Virtual Private Network (VPN)*, [http://www.ctcnet.com/main?sec\\_id=29&page\\_id=53](http://www.ctcnet.com/main?sec_id=29&page_id=53).

<sup>40</sup> CTC Communications, *Asynchronous Transfer Mode (ATM)*, [http://www.ctcnet.com/main?sec\\_id=29&page\\_id=57](http://www.ctcnet.com/main?sec_id=29&page_id=57).

**PAETEC.** PAETEC serves 52 of the top 100 Metropolitan Service Areas in the United States, and offers data services everywhere in the United States and in over 50 countries world-wide.<sup>41</sup> The company’s “robust portfolio of data services offers businesses a wide variety of data solutions and applications including Dedicated Internet Access, Metro Ethernet, MPLS VPN, Frame Relay and ATM private networks - all designed with the strictest of security and performance requirements in mind.”<sup>42</sup>

**Qwest.** Qwest states that it “offers a unique and powerful combination of voice and data solutions for businesses and government agencies – locally and throughout the country,” including “a wide array of broadband communications products and services – from hosted applications and professional services to broadband access, capacity and network management.”<sup>43</sup> “Qwest Data solutions include traditional Layer 1 and 2 WAN/MAN solutions. The Data portfolio includes the following solutions: Metro Ethernet, ATM, Frame, and Private Line.”<sup>44</sup>

**Sprint.** Sprint operates a “15,000-mile fiber network” connecting “almost every city in the U.S. and Canada.”<sup>45</sup> Sprint’s “MPLS VPN” allows customers to “[c]onnect multiple locations while converging voice, video, and data onto a single IP-based network.”<sup>46</sup> Sprint also offers “SprintLink Packet Private Line” which provides “[s]upport of local [e]thernet access” and “[u]nprecedented bandwidth flexibility.”<sup>47</sup>

**Time Warner Telecom.** Time Warner Telecom operates in “75 U.S. metropolitan areas in 30 states and the District of Columbia.”<sup>48</sup> It offers “a comprehensive suite of Internet options, not only traditional connections (TDM) from T1 to OC48 but also Ethernet connections from 10 Mbps ports to 10 Gbps ports.”<sup>49</sup> Time Warner Telecom’s SONET services afford “high capacity channels for

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<sup>41</sup> PAETEC, *Markets Served*, [http://www.paetec.com/strategic/markets\\_served.html](http://www.paetec.com/strategic/markets_served.html).

<sup>42</sup> PAETEC, *Data Services*, <http://www.paetec.com/data/overview.html>.

<sup>43</sup> Qwest, *Business: Solutions: Overview*, <http://www.qwest.com/largebusiness/enterprisesolutions/products.html>.

<sup>44</sup> *Id.*

<sup>45</sup> Sprint, *Milestone Events Making Sprint History: 1899 – 1989: Sprint Nextel: Aiming to be No. 1 in Customer Experience*, <http://www.sprint.com/companyinfo/history/>.

<sup>46</sup> Sprint, *Sprint MPLS VPN*, [http://www.nextel.com/en/solutions/ip\\_data\\_networking/mpls\\_vpn.shtml](http://www.nextel.com/en/solutions/ip_data_networking/mpls_vpn.shtml).

<sup>47</sup> Sprint, *SprintLink Packet Private Line*, [http://www.nextel.com/en/solutions/ip\\_data\\_networking/sprintlink\\_packetprivateline.shtml](http://www.nextel.com/en/solutions/ip_data_networking/sprintlink_packetprivateline.shtml).

<sup>48</sup> See Time Warner Telecom Press Release, *Frost & Sullivan Names Time Warner Telecom’s Larissa Herda CEO of the Year* (Jan. 18, 2007).

<sup>49</sup> Time Warner Telecom, *Internet Services*, [http://www.twtelecom.com/cust\\_solutions/services/ethernet\\_internet.html](http://www.twtelecom.com/cust_solutions/services/ethernet_internet.html).

full duplex, synchronous optical transmission of digital data.”<sup>50</sup> “Time Warner Telecom’s Native LAN service” uses Ethernet to join “multiple business locations,”<sup>51</sup> and its “IP VPN Solutions” provide businesses a “secure connection to locations across the nation.”

**Verizon Business.** “Verizon Business delivers advanced IP, data, voice and wireless solutions to large business and government.”<sup>52</sup> Verizon claims to have “321 offices in 75 countries across six continents” and a “[g]lobal IP footprint serving 2,700+ cities in 150 countries.”<sup>53</sup> Verizon’s Ethernet offerings include Lan Service, Private Line, Virtual Private Line, and Access Services.<sup>54</sup> Other Verizon data services consist of IP VPN, Private IP, VPLS, Frame Relay, ATM, Private Line, Dedicated SONET Ring, and Dedicated Wavelength Ring.<sup>55</sup>

**XO.** XO provides local services in “more than 70 markets” across the country.<sup>56</sup> It states that its customers include “40 percent of the Fortune 1000 and leading cable companies, carriers, content providers, and mobile operators,” which it serves over its “unique and powerful nationwide IP network and extensive local metro networks and broadband wireless facilities.”<sup>57</sup> XO’s network includes more than 9,000 local route miles.<sup>58</sup> Its fixed wireless licenses cover 95 percent of the top U.S. business markets.<sup>59</sup> “XO is the leading Ethernet provider offering businesses a scalable and flexible high-speed connection to the Internet via XO Ethernet transport facilities.”<sup>60</sup> “XO Private Line Services” provide “high-speed, dedicated point-to-point connections” for “extremely time-sensitive and private communications.”<sup>61</sup>

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<sup>50</sup> Time Warner Telecom, *Dedicated High Capacity Services*, [http://www.twtelecom.com/cust\\_solutions/services/ded\\_hi\\_capacity.html](http://www.twtelecom.com/cust_solutions/services/ded_hi_capacity.html).

<sup>51</sup> Time Warner Telecom, *Native Lan (Metro Ethernet)*, [http://www.twtelecom.com/cust\\_solutions/services/native\\_lan.html](http://www.twtelecom.com/cust_solutions/services/native_lan.html).

<sup>52</sup> Verizon Business, *Our Company*, <http://www.verizonbusiness.com/us/about/company/>.

<sup>53</sup> *Id.*

<sup>54</sup> Verizon Business, *Products and Services*, <http://www.verizonbusiness.com/us/products/>.

<sup>55</sup> *Id.*

<sup>56</sup> XO, *Our Story: Overview*, <http://www.xo.com/about/ourstory/index.html>.

<sup>57</sup> XO Press Release, *XO Connects 13 Sites for Leading Home Furnishing Company Across Greater Philadelphia Tri-State Area for VoIP and Data* (Aug. 20, 2007), <http://www.xo.com/news/358.html>

<sup>58</sup> XO Communications, Form 10-Q at 15 (SEC filed May 10, 2007).

<sup>59</sup> XO, *Our Story: Network Assets*, <http://www.xo.com/about/ourstory/networkassets.html>.

<sup>60</sup> XO, *Ethernet Dedicated Internet Access (DIA) from XO*, <http://www.xo.com/products/smallgrowing/internet/dia/ethernet.html>.

<sup>61</sup> XO, *Private Line: Overview*, <http://www.xo.com/products/smallgrowing/data/privateline/index.html>.

## B. Cable Operators

**Cox.** Cox “offers a full suite of voice, data and video services for small, medium and large businesses as well as for government and education in more than 36 markets, from California to New England.”<sup>62</sup> It also continues “to expand into new markets throughout the nation.”<sup>63</sup> Cox’s “fiber-based metropolitan networks and nationwide fiber-optic IP backbone”<sup>64</sup> provides “Cox Optical Internet” with “multiple bandwidths” “from the popular 1.5 Mb (T-1) to 10 mg to OC-12 or higher.”<sup>65</sup> Cox Business Internet services include a range of tiers over Cox’s HFC network with speeds as high as 15.0 Mbps downstream and 2.0 Mbps upstream.<sup>66</sup> Cox also offers Private Line service “built on [their] own fiber-based SONET self-healing network” “for all of your stand-alone or integrated data, voice and video needs.”<sup>67</sup> Cox Fibernet is another Cox SONET based service with packages ranging from DS-1 to OC-48.<sup>68</sup>

**Time Warner Cable.** Time Warner Cable Business Class provides business services in 30 states,<sup>69</sup> as well as “MEF-certified and compliant Ethernet services” in New York, California, Texas, Ohio, North Carolina, and South Carolina.<sup>70</sup> Time Warner Cable Business Class serves enterprise customers with a “Dedicated Internet Access” product that offers “connectivity speeds ranging from 1 Mbps to 10 Gbps” over the company’s “high-capacity fiber network” with a “national presence.”<sup>71</sup> In addition, their Metro Ethernet “offers point-to-point, point-to-multipoint and multipoint-to-multipoint fiber optic connectivity for a high-capacity connection between multiple offices over your existing Ethernet lines.”<sup>72</sup>

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<sup>62</sup> Cox Business Services, *About Us*, <http://www.coxbusiness.com/aboutus/index.html>.

<sup>63</sup> *Id.*

<sup>64</sup> Cox Business Services, *Cox Optical Internet*, <http://www.coxbusiness.com/products/data/opticalinternet.html>.

<sup>65</sup> *Id.*

<sup>66</sup> Cox Business Services, *Cox Business Internet: Product Data Sheet*, [http://www.coxbusiness.com/pdfs/CBI\\_Gen-0107.pdf](http://www.coxbusiness.com/pdfs/CBI_Gen-0107.pdf).

<sup>67</sup> Cox Business Services, *Cox Private Line*, <http://www.coxbusiness.com/products/voice/privateline.html>.

<sup>68</sup> Cox Business Services, *Cox Fibernet*, <http://www.coxbusiness.com/products/data/fibernet.html>.

<sup>69</sup> *See* Time Warner Cable, *Coverage Map*, <http://www.twcbc.com/Localization/Corporate.ashx>.

<sup>70</sup> *Time Warner Cable Among First Service Providers To Earn Ethernet Certification*, Business Wire (June 20, 2007).

<sup>71</sup> Time Warner Cable Business Class, *Dedicated Internet Access*, [http://www.twcbc.com/MediaLibrary/1/1/Content%20Management/Products%20and%20Services/Data/pdf/dia\\_brochure.pdf](http://www.twcbc.com/MediaLibrary/1/1/Content%20Management/Products%20and%20Services/Data/pdf/dia_brochure.pdf).

<sup>72</sup> Time Warner Cable Business Class, *Metro Ethernet Solutions*, <http://www.twcbc.com/corporate/products/data/metroethernet.html?menu=85>.

**Charter.** “Charter Communications, Inc., the third-largest publicly traded cable operator in the U.S., serves more than 5.7 million customers in 29 states.”<sup>73</sup> Charter Business runs “over a state-of-the-art, fiber-based network” that gives Charter the “flexibility to accommodate any industry,” including healthcare, education and government sectors.<sup>74</sup> Charter’s Business Internet Plus service has download speeds of up to 10 Mbps and upload speeds of up to 2 Mbps.<sup>75</sup> “Charter Business Fiber Internet” offers businesses “symmetrical access speeds of up to 1Gbps.”<sup>76</sup> “[S]ervice [is] delivered via a standard Ethernet interface after a fiber-optic cable is installed at [the] business. BGP routing and IP address announcement services are also available for connecting with multiple providers.”<sup>77</sup> Additional services for both Business Internet Plus and Business Fiber Internet include such items as VPN, security, and backup capability.<sup>78</sup>

**Comcast.** “The Comcast network spans over 90,000 fiber optic miles nationwide and delivers service in 41 states.”<sup>79</sup> “Comcast Workplace” allows a company to access “crucial business information” by delivering “blazing-fast speed - up to 8.0 Mbps downloads and 1 Mbps uploads.”<sup>80</sup> Comcast’s “Enterprise Internet Service” uses an “[e]thernet interface” to “support large user populations and a wide range of applications” “[f]rom e-mail and file sharing, to web hosting and streaming video.”<sup>81</sup>

### C. Additional Regional Competitors

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<sup>73</sup> Charter Communications, *About Charter*, <http://www.charter.com/Visitors/AboutCharter.aspx?NonProductItem=20>.

<sup>74</sup> Charter Business, *Solutions By Industry*, <http://www.charter-business.com/Charter-Business-Solutions-By-Industry.aspx>.

<sup>75</sup> Charter Business, *Charter Business Internet Plus*, <http://www.charter-business.com/Charter-Business-Internet-Plus-Cable-Based-High-Speed-Business-Internet.aspx>.

<sup>76</sup> Charter Business, *Charter Business Fiber Internet*, <http://www.charter-business.com/Charter-Business-Fiber-Internet-Optical-Class-Services-100-Mbps-1-gigabit.aspx>.

<sup>77</sup> *Id.*

<sup>78</sup> Charter Business, *Charter Business Internet Plus*, <http://www.charter-business.com/Charter-Business-Internet-Plus-Cable-Based-High-Speed-Business-Internet.aspx>; Charter Business, *Charter Business Fiber Internet*, <http://www.charter-business.com/Charter-Business-Fiber-Internet-Optical-Class-Services-100-Mbps-1-gigabit.aspx>.

<sup>79</sup> Comcast, *Connecting People to Information for Over 40 Years*, <http://www.comcastcommercial.com/index.php?option=content&task=view&id=29&Itemid=25>.

<sup>80</sup> Comcast, *Always On, High-Speed Internet Access for Your Small Business*, <http://www.comcastcommercial.com/index.php?option=content&task=view&id=48&Itemid=87>.

<sup>81</sup> Comcast, *Enterprise Internet Service: Scalable High-Speed Dedicated Internet Access*, <http://www.comcastcommercial.com/index.php?option=content&task=view&id=7&Itemid=36>.

***Cavalier Telephone and TV.*** Cavalier operates networks in the “mid-Atlantic, Midwest and southeast regions and serve[s] six of the top 20 markets in the country. [They] have 531 end-office collocations attached to [a] \$1 billion fiber optic network. It consists of 3,000 route miles of metro fiber and 8,000 intercity route miles that extend from Boston to Chicago to North Carolina.”<sup>82</sup> Cavalier’s “robust Data Network” delivers data services ranging from “DS-1 to OC-3 & Ethernet.”<sup>83</sup> It offers IP-based, Frame Relay, and dedicated Internet access services to businesses.<sup>84</sup>

***Cinergy Communications.*** Cinergy Communications serves business customers in Indiana, Kentucky, Tennessee and Ohio.<sup>85</sup> “Cinergy Communications Large Enterprise division provides SONET, DWDM and Ethernet transport services to Fortune 1000 clients. Provided over our extensive metropolitan and regional dedicated Fiber Optic Infrastructure these services allow our customers to more effectively implement and manage their Private Line Connectivity, Business Continuity and Disaster Recovery initiatives.”<sup>86</sup>

***Edison.*** “Edison Carrier Solutions (ECS) provides competitive telecommunications services over [their] own network of 3,000+ route miles of metro area fiber in Southern California.”<sup>87</sup> Edison brands itself as “[t]he largest competitive carrier fiber network in Southern California.”<sup>88</sup> Their SONET service attributes incorporate “Point-to-point DS-3 to OC-48 service using shared rings” and “Dedicated OC-48 service over multi-node rings.”<sup>89</sup>

***FDN Communications.*** “Headquartered in Maitland, Florida, FDN Communications provides business class communication services throughout the Southeastern United States. Serving more than 70,000 satisfied customers with over a quarter million telephone and Internet lines, FDN presents real solutions for

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<sup>82</sup> Cavalier Telephone and TV, *About Us*, <http://www.cavtel.com/about/>.

<sup>83</sup> Cavalier Telephone and TV, *Wholesale Voice, Data and Internet Services*, <http://www.cavtel.com/forenterprise/wholesale.php>.

<sup>84</sup> Cavalier Telephone and TV, *Data Solutions for Businesses*, <http://www.cavtel.com/forbusiness/data.php>.

<sup>85</sup> Cinergy Communications, *Corporate Information*, <http://www.cinergycom.com/wps-html/CorporateInformation/index.html>.

<sup>86</sup> Cinergy Communications, *Large Enterprise*, <http://www.cinergycom.com/wps-html/Business/LargeEnterprise/>.

<sup>87</sup> Edison Carrier Solutions, *Network*, <http://www.edisonconnect.com/network/default.asp>.

<sup>88</sup> *Id.*

<sup>89</sup> Edison Carrier Solutions, *SONET Service*, <http://www.edisonconnect.com/wireline/sonetservice.asp>.

today's communication challenges.”<sup>90</sup> FDN's service offerings for private networks comprise of Frame Relay, Point-to-Point, VPN, Private IP, and Metro Ethernet.<sup>91</sup>

**FiberNet.** FiberNet “owns and operates integrated colocation facilities and diverse transport routes in the two gateway markets of New York/New Jersey and Los Angeles,” which are “designed to provide comprehensive broadband interconnectivity for the world's largest network operators, including leading domestic and international telecommunications carriers, service providers and enterprises.”<sup>92</sup> FiberNet offers “SONET/SDH services,”<sup>93</sup> and “[s]ecure bandwidth in scaleable, granular increments of 10Mbps for Fast Ethernet and 100Mbps for Gigabit Ethernet connections, even down to 1kbps on request.”<sup>94</sup>

**FPL Fibernet.** FPL Fibernet, a subsidiary of Florida Power and Light, “provides connectivity to the major telecom centers in [Florida], including leading carrier hotels, NAP initiatives, cable heads and large central offices.”<sup>95</sup> FPL Fibernet operates “more than 2,500 route miles of high-quality dark/lit fiber in Florida” and has “access to more than 8,600 miles of fiber optic cable through partnerships with regional providers.”<sup>96</sup> The company offers SONET transport services from DS1 to OC192, Metro Ethernet services up to 1000 Mbps, as well as FTTx and wireless solutions, including point-to-point microwave solutions.<sup>97</sup> FPL's VPN service satisfies customer needs for “Ethernet but also ATM, Frame Relay, TDM traffic [and] Circuit Emulation connections.”<sup>98</sup>

**Frontier.** Frontier serves over 2.4 million access lines in 24 states.<sup>99</sup> Frontier Carrier Services offers “[t]argeted deployment in dense business districts.” Frontier operates a network “with multiple POP's and a hub. . . in Philadelphia.”<sup>100</sup> Frontier

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<sup>90</sup> FDN Communications, *About Us*, <http://www.fdn.com/corporate.cfm>.

<sup>91</sup> FDN Communications, *Private Networks*, [http://www.fdn.com/bus\\_serv.cfm](http://www.fdn.com/bus_serv.cfm).

<sup>92</sup> FiberNet Telecom Group, Inc., Form 10-Q at 17 (SEC filed May 15, 2007).

<sup>93</sup> FiberNet, *FiberNet SONET/SDH Transport Services*, <http://www.ftgx.com/products-services/transport-services/sonet-sdh/>.

<sup>94</sup> FiberNet, *FiberNet Metro Ethernet Transport Services*, <http://www.ftgx.com/products-services/transport-services/metro-ethernet/>.

<sup>95</sup> FPL FiberNet, *Company Information*, <http://www.fplfibernet.com/capabilities/contents/overview.shtml>.

<sup>96</sup> FPL FiberNet, *Why FPL FiberNet?*, [http://www.fplfibernet.com/capabilities/contents/why\\_fpl\\_fibernet.shtml](http://www.fplfibernet.com/capabilities/contents/why_fpl_fibernet.shtml).

<sup>97</sup> FPL FiberNet, *What We Provide*, [http://www.fplfibernet.com/capabilities/contents/products\\_and\\_services.shtml](http://www.fplfibernet.com/capabilities/contents/products_and_services.shtml).

<sup>98</sup> FPL FiberNet, *Ethernet Services*, <http://www.fplfibernet.com/prodserv/ethernet.shtml>.

<sup>99</sup> Frontier, *About Us*, <http://www.frontieronline.com/CompanyInfo/AboutUs.aspx>.

<sup>100</sup> Frontier, *Carrier Services: Network*, [http://www.ctsi1.com/carrier/carrier\\_network.html](http://www.ctsi1.com/carrier/carrier_network.html).

offers ATM, Frame Relay, ISDN, Dedicated Internet, and Point-to-Point Connectivity to business customers.<sup>101</sup>

***Integra Telecom/Electric Lightwave (ELI).*** Integra “owns and operates an eight-market, 2,200 route mile (160,000 fiber miles) metropolitan area network, with direct fiber access into over 580 major commercial buildings.”<sup>102</sup> “The company serves thousands of businesses in the metropolitan areas of Arizona, California, Idaho, Minnesota, North Dakota, Oregon, Utah and Washington.”<sup>103</sup> Integra has “deployed carrier class Ethernet over SONET infrastructure,”<sup>104</sup> and their “voice and data networks are connected to and from the public switched telephone network (PSTN) and the Internet via ATM over multiple fiber-optic SONET rings.”<sup>105</sup>

***ITC^Deltacom.*** ITC^Deltacom (also known as Deltacom)<sup>106</sup> operates a 15,500 route-mile fiber-optic network “with extensive coverage of the southeast, allowing the company to offer a comprehensive suite of voice and data services uniquely positioned to support the enterprise space.”<sup>107</sup> Its network covers 14 states with 240 PoPs and 300 collocations.<sup>108</sup> Deltacom offerings include an “IP enabled MPLS (Multi-Protocol Label Switching) network” and IP VPN.<sup>109</sup> Deltacom’s MPLS network was created “over [their] existing Frame, ATM and Private IP network to allow maximum flexibility for businesses who have a variety of connection speeds and access types.”<sup>110</sup>

***McLeodUSA.*** McLeodUSA is a facilities-based competitor that provides data services to “small and medium-sized business in nearly 500 cities [in 20 states] throughout the Midwest, Rocky Mountain, Southwest and Northwest regions.”<sup>111</sup>

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<sup>101</sup> Frontier, *Data and Internet*, <http://www.frontieronline.com/Products/ProductCategory51.aspx>.

<sup>102</sup> Integra Telecom, *Network and Facilities*, [http://www.integratelecom.com/about/network\\_and\\_facilities.asp](http://www.integratelecom.com/about/network_and_facilities.asp).

<sup>103</sup> Integra Telecom, *About Us*, <http://www.integratelecom.com/about/>.

<sup>104</sup> Integra Telecom, *Ultra Ethernet – MAN*, <http://www.integratelecom.com/products/network/ethernet.asp>.

<sup>105</sup> Integra Telecom, *Network and Facilities*, [http://www.integratelecom.com/about/network\\_and\\_facilities.asp](http://www.integratelecom.com/about/network_and_facilities.asp).

<sup>106</sup> DeltaCom Press Release, *ITC^DeltaCom Communications, Inc. Changes Name to DeltaCom, Inc. and Introduces New Logo and Tag Line* (Apr. 11, 2006).

<sup>107</sup> Deltacom Press Release, *Deltacom Selects Infinera for Southeastern Network* (June 15, 2007).

<sup>108</sup> Deltacom, *About Us > Our Network*, <http://www.deltacom.com/network.asp>.

<sup>109</sup> Deltacom, *Data Services / Simpli-Data*, <http://www.deltacom.com/simpli-data.asp>.

<sup>110</sup> *Id.*

<sup>111</sup> McLeodUSA, *About Us: Corporate Profile*, <http://www.mcleodusa.com/CompanyInformation/CorporateProfile.do>; McLeodUSA, *About Us: The McLeodUSA Network*, <http://www.mcleodusa.com/CompanyInformation/OurNetwork.do>.

McLeodUSA service offerings include Private Line service at speeds up to OC3 (155 Mbps),<sup>112</sup> McLeodUSA's network spans approximately 17,000 total route miles, with approximately 1,500 buildings on-net.<sup>113</sup> McLeod's business solutions include VPN Service, managed dedicated internet access, and private line.<sup>114</sup>

***NTS Communications.*** NTS provides business customers with “point-to-point and point-to-multipoint solutions” using NTS’s “intelligent state-of-the-art fiber optic network as a backbone.”<sup>115</sup> “[T]he company now serves retail customers in Texas, Oklahoma, Kansas, New Mexico, Nevada, Colorado and Arizona.”<sup>116</sup> NTS business data solutions include options such as Frame Relay and ATM.<sup>117</sup>

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<sup>112</sup> McLeodUSA, *Internet & Data Services: Private Line*, [http://www.mcleodusa.com/ProductDetail.do?com.mcleodusa.req.PRODUCT\\_ID=340920](http://www.mcleodusa.com/ProductDetail.do?com.mcleodusa.req.PRODUCT_ID=340920).

<sup>113</sup> *NPRG 2007 Competitive Carrier Report*, Ch. 6 – McLeodUSA, Inc. at 1.

<sup>114</sup> McLeodUSA, *Internet & Data Services*, [http://www.mcleodusa.com/ProductCategory.do?com.mcleodusa.req.MARKET\\_SEGMENT=BUSINESS&com.mcleodusa.req.PRODUCT\\_TYPE=4](http://www.mcleodusa.com/ProductCategory.do?com.mcleodusa.req.MARKET_SEGMENT=BUSINESS&com.mcleodusa.req.PRODUCT_TYPE=4).

<sup>115</sup> NTS Communications, *Business: Data*, [http://www.ntscom.com/business\\_data.php?id=smenu2](http://www.ntscom.com/business_data.php?id=smenu2).

<sup>116</sup> NTS Communications, *About Us*, <http://www.ntscom.com/about.php?id=smenu5>.

<sup>117</sup> NTS Communications, *Business: Data*, [http://www.ntscom.com/business\\_data.php?id=smenu2](http://www.ntscom.com/business_data.php?id=smenu2).