

TO-2005-0336

**Chapman Direct
Schedule CAC-1**



Federal Communications Commission
Washington, D.C. 20554

February 4, 2005

Via Facsimile and First Class Mail

James C. Smith
Senior Vice President
SBC
1401 I Street, N.W., Suite 1100
Washington DC 20005

**Re: Unbundled Access to Network Elements, WC Docket No. 04-313; Review of Section 251
Unbundling Obligations for Incumbent Local Exchange Carriers, CC Docket No. 01-338**

Dear Mr. Smith:

On February 4, 2005, the Commission released its *Triennial Review Remand Order*, adopting rules governing the unbundling obligations of incumbent LECs regarding, among other things, dedicated transport and high-capacity loops.¹ In crafting impairment thresholds for these elements that relied on readily ascertainable, quantitative criteria, the Commission sought to facilitate prompt implementation of its revised rules, and to minimize disputes regarding the scope of an incumbent LEC's unbundling obligations in any particular case. The Bureau is mindful of the need for certainty within the industry regarding the scope of unbundling obligations. Such certainty depends on the timely incorporation of the *Triennial Review Remand Order's* fact-dependent rules into revised interconnection agreements. To this end, we ask that you provide the Bureau a list identifying by Common Language Location Identifier (CLLI) code² which wire centers in your company's operating areas satisfy the Tier 1, Tier 2, and Tier 3 criteria for dedicated transport, and identifying by CLLI code the wire centers that satisfy the nonimpairment thresholds for DS1 and DS3 loops.³ We ask that you submit this information into the above-referenced dockets by February 18, 2005.

The Bureau believes that this information will expedite the implementation of the Commission's rules implementing the Act. I thank you in advance for your prompt reply to this request.

Sincerely,

/s/

Jeffrey J. Carlisle
Chief, Wireline Competition Bureau

¹ *Unbundled Access to Network Elements; Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, WC Docket No. 04-313, CC Docket No. 01-338, Order on Remand (*Triennial Review Remand Order*).

² The CLLI code is an eight character code that identifies a particular wire center.

³ *Id.* at para. 120 (defining Tier 1 wire centers); *id.* at para. 126 (defining Tier 2 wire centers); *id.* at para. 131 (defining Tier 3 wire centers); *id.* at para. 185 (defining wire center nonimpairment threshold for DS3 loops); *id.* at para. 189 (defining wire center nonimpairment threshold for DS1 loops); *see also id.*, App. B, 47 C.F.R. §§ 51.319(a)(4)(i), (a)(5)(i), (e)(3).