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Issues: Business Private Line/Dedicated Services  
Witness: Thomas S. DeHahn  
Type of Exhibit: Direct Testimony  
Sponsoring Party: Southwestern Bell Telephone Company  
Case No: TO-2001-467

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SOUTHWESTERN BELL TELEPHONE COMPANY

CASE NO. TO-2001-467

DIRECT TESTIMONY

OF

THOMAS S. DEHAHN

Chicago, IL  
June, 2001

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of the Investigation of the State of  
Competition in the Exchanges of Southwestern Bell  
Telephone Company.

) Case No. TO-2001-467  
)  
)

AFFIDAVIT OF THOMAS S. DEHAHN

STATE OF ILLINOIS

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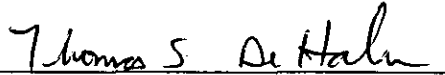
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CITY OF CHICAGO

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I, Thomas S. DeHahn, of lawful age, being duly sworn, depose and state:

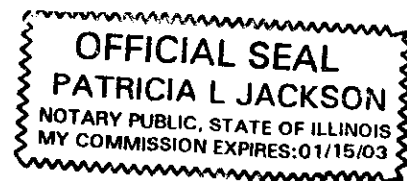
1. My name is Thomas S. DeHahn. I am presently Executive Director – Dedicated Networking Product Management for SBC.
2. Attached hereto and made a part hereof for all purposes is my direct testimony.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.

  
Thomas S. DeHahn

Subscribed and sworn to before this 12<sup>th</sup> day of June, 2001

  
Notary Public

My Commission Expires: 1-15-03



**Southwestern Bell Telephone Company**

**Direct Testimony of Thomas S. DeHahn**

1  
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4  
5 **Q. Please state your name and business address.**

6 A. Thomas S. DeHahn, 225 W. Randolph Street, Room 17B, Chicago, IL 60606

7 **Q. By whom are you employed and in what capacity are you employed?**

8 A. I am employed by Ameritech Corporate as Executive Director, Dedicated Networking  
9 Services. I am responsible for overall Life-cycle product management for SWBT,  
10 Ameritech, Pacific Bell, Southern New England Telephone, and Nevada Bell's retail non-  
11 switched, dedicated communication services.

12 **Q. Please describe your educational background and work history with SBC.**

13 A. I am a graduate of Purdue University with a Bachelor of Science in Industrial  
14 Engineering. I have worked for SBC affiliate companies since 1987 in various positions  
15 including: Engineering, Network Planning, Carrier Services, Market  
16 Management, Product Development, Channel Marketing and Product Management.

17 **Q. Have you previously testified before the Missouri Public Service Commission**  
18 **(Commission)?**

19 A. No.

20 **Q. What is the purpose of your testimony in this proceeding?**

21 A. The purpose of my testimony is to describe (a) the competitive retail marketplace across  
22 the state of Missouri for intraLATA private line/dedicated services, (b) other  
23 technologically equivalent offerings, and (c) the lack of barriers to market entry which

1 demonstrate why it is appropriate for the Commission to confirm competitive classification  
2 for the category of all non-switched, dedicated communication services. Such  
3 Southwestern Bell Telephone Company (SWBT) services include Analog Private Line  
4 (PSC MO No. 29), DS0 (MegaLink ® Digital Service), DS1 (MegaLink 1.5 High Capacity  
5 Digital Service®), Southwestern Bell DS3, Network Reconfiguration Service (NRS) and  
6 GigaMAN<sup>sm</sup> (Digital Link Tariff - PSC MO No. 38)

7 **Q. What are the main points your testimony will demonstrate?**

8 **A.** My testimony will demonstrate that:

- 9     ▪ The Commission found on December 21, 1992, in Case No. TO-93-116, that SWBT's  
10     digital private line services were equivalent services to IXC provided services –  
11     functionally equivalent and completely interchangeable in use and therefore deemed  
12     transitionally competitive. This is further explained in the testimony of Mr. Hughes.
- 13     ▪ There are many alternative providers of non-switched, dedicated private line type  
14     services and the services and functionality they provide are substitutable or technically  
15     equivalent to SWBT's private line services.
- 16     ▪ There are alternatives that existed before competitive local exchange carriers (CLECs)  
17     entered the local market.
- 18     ▪ The alternatives that SWBT competes against for private line services are either not  
19     regulated by the Commission or are at least not price regulated in the same manner as  
20     SWBT.
- 21     ▪ The statutes already contemplate that the market for these services is competitive  
22     because the statutes grant SWBT the ability to utilize Customer Specific Pricing (CSPs)  
23     for private line services.

- Customers will benefit from a competitive classification for SWBT's private line services because SWBT will be able to compete on the same basis as its competitors.

#### **IntraLATA Private Line Services**

**Q. Please describe SWBT's Private Line/Dedicated Services within the state of Missouri.**

A. Private Line services are non-switched, dedicated circuits, where SWBT furnishes the requisite facilities, including channels and network terminating equipment, to enable customers and authorized users to communicate between specified intraLATA locations on a continuous basis. They are most frequently utilized for data transmissions, but are also utilized for transporting voice or integrated data/voice communications in private networks.

Types of private line services include:

#### **Analog service**

A voice grade channel connecting two or more locations providing voice frequency transmission capability in the nominal frequency range of 300 to 3000 Hz with either two-wire or four-wire terminations. These types of services are typically used for low-level data transmissions or telemetry, i.e. meter reading, and/or alarming purposes. Many customers are now migrating to digital services because they are more reliable.

#### **DS0 service**

Digital Channel service providing for the simultaneous two-way transmission of synchronous serial data at speeds of 2.4, 4.8, 9.6, 19.2, 56 or 64 Kbps. These type of services are typically used for low volume data transmissions such as file transfer and

1 transaction processing , for example, Automated Teller networks and Point of Sale  
2 Terminals.

### 3 **DS1 service**

4 DS1 is a high capacity digital channel service providing for the simultaneous two-way  
5 transmission of a serial, bipolar, return-to-zero, isochronous digital signal at a  
6 terminating bit-rate of 1.544 megabits per second (Mbps). DS1 service is offered as a  
7 point-to-point (premises-to-premises) service or channelized (24 DS0 channels). These  
8 services are typically used in private networking applications, for example, Tie Lines  
9 between Private Branch Exchanges (PBXs), and Local Area Network (LAN) connectivity,  
10 Video Conferencing, Access Optimization at Headquarters/Main Office locations, and for  
11 Dedicated Internet Access.

### 12 **DS3 service**

13 DS3 is a high capacity digital channel service providing for the simultaneous two-way  
14 transmission of a serial, bipolar, return-to-zero, isochronous digital signal at a  
15 terminating bit-rate of 44.736 Mbps. DS3 is provisioned over 100% fiber, and the  
16 interface to the customer is an electrical signal. It is offered as point- to-point service, or  
17 channelized (28 DS1 channels). Like DS1 service, it is also typically used for private  
18 networking applications, access optimization, and for Dedicated Internet Access.

### 19 **Network Reconfiguration Service (NRS)**

20 NRS is a service offering that gives customers the ability to reconfigure their dedicated  
21 network services from their premises by utilizing specialized software that issues  
22 commands to SWBT Digital Cross-Connect Systems (DCSs).

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It is most frequently used by customers in disaster recovery plans such as reconfiguring circuits to a designated "back-up" data center or computing facility.

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**GigaMAN**

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GigaMAN is an intraLATA dedicated high capacity channel limited to the transport of data signals between customer stations which provides for the transmission at a discrete bit rate of 1 Gigabit per second (Gbps) in Ethernet format. It is available in a point-to-point configuration. This 100% fiber-based service may be used to provide Local Area Network (LAN) to LAN interconnection service through a transparent, native rate interface.

11 **Q.**

12

13

**Please describe the competitive landscape in Missouri for retail non-switched, intraLATA private line services. How long has this market place been competitive?**

14 **A.**

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The retail intraLATA private line market in Missouri has had established competition for nearly 15 years dating back to the emergence in the 1980's of CAPs, or Competitive Access Providers. The CAPs, such as TCG, MFS and Brooks Fiber, initially focused on providing alternative access to long distance companies. They also targeted commercial business customers as they completed their fiber ring builds and gained access to multi-tenant buildings with their own facilities.

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In the late 1980's it was also commonplace for the major inter-exchange carriers such as AT&T, Sprint, and MCI to compete for retail intraLATA private line services as they bid for data networks that covered intrastate services as well as interstate long-haul services.

1 In 1992, the Commission recognized the competitive forces in the intraLATA private line  
2 market when it found that IXC- provided services, which they were offering through their  
3 state tariffs, were "equivalent" and completely interchangeable with SWBT private line  
4 services. At that time, the Commission granted SWBT's request for re-classification of  
5 private line services to a "transitionally competitive" classification. (Report and Order  
6 Case No. TO-93-116) In the mid to late 1990's, the CAP networks became coveted  
7 crown jewels by the major IXCs for their broad network reach. IXCs completed  
8 acquisitions and moved to vertically integrate these networks to expand their local reach.  
9 AT&T purchased TCG; MCI acquired Brooks Fiber, and LDDS Worldcom purchased  
10 MFS.

11 By this time, the major brand name IXCs such as AT&T, Sprint, and Worldcom were  
12 aggressively competing state-wide across Missouri exchanges for intraLATA private line  
13 services, offering business customers new services and pricing bundles to leverage  
14 private line sales against SWBT.

15 The Telecom Act of 1996 (Act) gave the intraLATA private line market an even greater  
16 competitive boost by requiring SWBT to offer its retail services to CLECs. The Act  
17 required all retail services offered to end users to be available to resellers at discounted  
18 rates – enabling non-facilities based providers to easily enter the market. Providers  
19 such as McLeod began to emerge (see Schedule 1).

20 The Act also gave CLECs the ability to cost-effectively co-locate their equipment in  
21 SWBT central offices and purchase Unbundled Network Elements (UNEs) to lower their  
22 cost structure and expand their network reach.

23 In recent years, the major IXCs used their well- established brands to increase their  
24 presence as intraLATA service provider as evident in their marketing materials that  
25 promote their "local" and "metro" provider focus (see Schedule 2).



1       Aside from the major established carriers such as AT&T, Worldcom, Sprint, and  
2       McLeod, private line services face direct competitive threats from "dark fiber" providers  
3       such as Metropolitan Fiber Networks (MFN) and American Fiber Networks (see  
4       Schedule 2). Such providers are willing to construct private fiber networks or lease  
5       existing dark fibers. End users can piece together their own private telecom network  
6       solutions by purchasing optical networking equipment directly from suppliers such as  
7       Lucent, Nortel and Cisco, turning the dark fiber to "lit" fiber. The customer can then run  
8       company traffic over this private network, electing to bypass SWBT private line services  
9       entirely. Other service providers competing for private line services can also turn to  
10      these "dark fiber" providers to acquire the necessary components needed to totally  
11      bypass SWBT facilities.

12     In the past 15 years, a very robust competitive marketplace for retail intraLATA private  
13     line services has been established. Many providers such as AT&T and Worldcom have  
14     some of the nations most well known brands and provide data services such as private  
15     line services, or alternate technologies which provide similar transport functionality.

16     **Q.    Are the services provided by these alternative providers substitutable or**  
17     **functionally equivalent to SWBT's private line services?**

18     **A.**    Yes. At their basic level, non-switched, private line services provide dedicated  
19     connections or transmission paths between locations and are used for data, voice and  
20     video communications. The dedicated services provided by SWBT's competitors  
21     provide the same functionality as SWBT's private line services. For example, a DS1 or  
22     DS3 provided by AT&T or McLeod is technically the same channel service as SWBT's  
23     DS1 or DS3 offering – based on the same industry standards.

1     **Q.     How do the rates for alternative providers compare to SWBT's rates for Private**  
2     **Line Services in Missouri?**

3             It is often difficult to get an apples-to-apples comparison on other providers "street  
4             pricing" for private lines since they are all price de-regulated. Often tariffs which are filed  
5             by competitive providers are simply used to establish "rack rates" and communicate  
6             basic service terms and conditions. These "rack rates" provide standard, non-  
7             discounted prices which carriers use to offer percentage-off "deals" to their customers.

8             Many of the competitive offers are frequently bundled and discounted based on long  
9             distance, local, toll usage, internet access plans, or total revenue commitments. Overall,  
10            pricing is seen as extremely competitive for such services and often pitched with 100%  
11            installation waivers with significantly discounted monthly recurring rack rates.

12    **Q.     Are there other technologically equivalent offerings or substitute products in the**  
13    **marketplace that compete with private line services?**

14    **A.**     In addition to direct competition for traditional private line services, there are many  
15             service providers in the marketplace offering a variety of networking solutions (with  
16             different technologies) that can meet the same "transport needs" as SWBT wireline  
17             dedicated services. These include:

- 18             • Fast Packet/Cell-Relay Services such as Frame Relay/Asynchronous Transfer  
19             Mode (ATM)
- 20             • The Internet (using ISDN, DSL access, 56 Kbps Dial-up access, Cable Modems,  
21             Dedicated Access)
- 22             • Fixed Wireless Solutions (including CPE- based such as Cisco Aironet)

23             Fast Packet services were first introduced by the IXC's in the early 1990's as a means to  
24             capture more of the existing private line market by offering cheaper "virtual circuits".

1 These services provide "basic data transport" for customer communications just the  
2 same as private line services – but using alternate technology.

3 These fast-packet/cell relay services are available across the state of Missouri from  
4 numerous providers.

5 Pricing will vary based on network configurations and customer requirements, but these  
6 types of services are frequently displacing private line solutions today and are very  
7 competitively priced. Traditional private line networks, such as those offered by SWBT  
8 and numerous other providers, are rapidly being replaced by these fast-packet, frame  
9 relay and cell relay type of services. This is especially true for customers with four or  
10 more locations.

11 Internet based access for branch offices or small business customers has become a  
12 major technology substitute for analog leased line networks and 56/64 Kbps circuits.  
13 With user-friendly software programs and encryption services, customers are  
14 increasingly sending files via the Internet rather than incurring the monthly expense of  
15 SWBT's private line circuits.

16 The availability of cost-effective Fixed Wireless CPE solutions such as Cisco's Aironet  
17 product line has also been displacing wireline DS1s in campus settings such as school  
18 districts in the K-12 education market (see Schedule 3). These newer CPE- based  
19 wireless solutions often are attractive to such customers because they avoid inside  
20 wiring expenses (in older school buildings) and recurring expense payments for leased  
21 private lines from SWBT or other wireline providers.

The Chart below provides a summary of various technology substitutes for SWBT's private line services:

Dedicated Service Type	Customer Application	Technology Substitutes	Availability
Analog/DS0/DS1	File Transfer/Transaction Processing	Dial-up/56 KB modems Internet Access (DSL, CableModems, Dial-up) Frame Relay	Multiple providers such as AT&T, Worldcom, Sprint, AOL, Intermedia, etc.
DS0/DS1/DS3/GigaMAN <sup>sm</sup>	LAN/WAN Connectivity	Frame Relay/ATM	AT&T, Worldcom, Intermedia, Sprint, etc
DS1/DS3	Tie Lines	Voice over IP (CPE based)	Cisco, Lucent Solutions
DS1/DS3	Local Access	Fixed Wireless	Sprint, Adelphia, Teligent, AT&T Cisco Aironet (CPE)

**Q. Just to clarify, is it correct that the chart above only describes other types of technologies that provide the same functionality as SWBT's private line services?**

**A.** Yes. The chart above shows technology substitutes. Clearly, as I have previously demonstrated, there are alternative providers using the same types of technology as SWBT to provide services that are substitutable for SWBT's private line services.

**Q. Are there any barriers to market entry for non-switched private line services?**

**A.** As previously discussed, the retail private line market in Missouri has been very competitive for over a decade and is marked by ease of entry because:

1. No capital intensive switching systems are needed,
2. Billing is straightforward (since it is industry practice to offer circuits to customers on a flat-rated basis vs. usage based (i.e., one rate per month regardless of how much the service is used))

1           3.       Sales channels do not require complex training.

2  
3           In many cases, service providers start off with private line service offerings and branch  
4           out to include traditional switched services.

5           There are a variety of avenues for service providers to enter (and grow) in the retail  
6           private line marketplace including:

- 7           •   Resale
- 8           •   Facility Based Provider (Total Bypass)
- 9           •   Facility Based Provider w/ Co-location and Unbundled Network Elements  
10           (Hybrid)

11          Competitors may elect to resell private line services of large IXC's and CLECs. They can  
12          also utilize SWBT's interstate dedicated transport services. Competitors may also build  
13          out fiber networks or lease dark fiber from utility companies, cable companies, or private  
14          fiber operators, and co-locate terminating equipment in SWBT central offices, utilizing  
15          Unbundled Network Element Local Loops to provide access to end user customers that  
16          would otherwise be off-network to them. (Note: As of May 15, 2001, there were 35  
17          certified carriers co-located in 85 wire centers in Missouri (approximately 40% of SWBT  
18          wire centers) accounting for 510 Collocation arrangements either completed or finished  
19          and waiting for occupancy.)

20       **Q.       Has the Commission previously recognized that private line services have**  
21       **established competitors with functionally equivalent offerings ?**

1 A. Yes. In 1992, the Commission granted transitionally competitive status to intraLATA  
2 "MegaLink II", "MegaLink III", "MegaLink Data Service" and "High Capacity Service"  
3 private line services (Report and Order Case No. TO-93-116)

4 **Q. Does Missouri statute permit SWBT to utilize Customer Specific Pricing ("CSP")**  
5 **for private line services?**

6 A. Yes. Section 392.200.8 R.S. Mo 2000, which was passed in 1996, permits SWBT and  
7 other providers to use CSPs to offer customer specific pricing for private line services.

8 **Q. What does this indicate about the market for private line services in 1996?**

9 A. I believe it suggests that in 1996 the legislature recognized the private line market to be  
10 sufficiently competitive to permit SWBT and all other regulated competitors the  
11 opportunity to freely price private line services.

12 The Commission should take this opportunity to recognize the intent of the statute and  
13 confirm the competitive classification on a state-wide basis for private line services that  
14 have faced effective competition for well over a decade.

15 **Q. How would the customers in Missouri benefit from a competitive classification for**  
16 **SWBT's private line services?**

17 A. The customers in Missouri would benefit from a competitive classification for SWBT's  
18 private line services because it would insure parity among all providers.

19 It would enable SWBT to adjust its prices, restructure offerings, and modify terms and  
20 conditions to meet customers needs in a more timely manner on the same basis as its  
21 competitors. A competitive classification would provide customers with the full benefits of  
22 a competitive market for private line services.

23

1 Q. **Please summarize your testimony.**

2 A. My testimony has discussed how the retail intraLATA private line services market in  
3 Missouri has evolved over the past 15 years giving customers a robust mix of well-  
4 established competitive providers to choose from. It also outlined how in today's  
5 technologically advanced world, there are many other cost effective substitutes available  
6 to meet customer's needs for "basic transport" of their voice, data, and video services.

7 In addition, I discussed the lack of barriers to entry and various alternatives available to  
8 new providers.

9 In the nine years since the Commission first acknowledged competitive forces which  
10 SWBT faced in these markets, the competitive marketplace has matured greatly. In light  
11 of this information, the Commission should confirm the competitive classification of  
12 SWBT's intraLATA private line services and bring parity to the marketplace to enable  
13 customer's the full benefit of a competitive market.

14 Q. **Does this conclude your testimony?**

15 A. Yes, it does.

# **SCHEDULE 1**

SOUTHWESTERN BELL TELEPHONE COMPANY

CASE NO. TO-2001-467

DIRECT TESTIMONY

OF

THOMAS S. DEHAHN

Chicago, IL  
June, 2001



**Schedule of Rates, Rules and Regulations  
Governing Resale of Local Service  
Provided in the State of Missouri**

**OFFERED BY**

**McLeodUSA Telecommunications Services, Inc.  
6400 C Street SW  
Cedar Rapids, IA 52406-3177**

**Applying generally to its authorized territories within the State of Missouri.  
This tariff applies to the Telephone Company's resale of Southwestern Bell  
Telephone Company (SWBT) services (and only SWBT services), in specified  
exchanges within the Telephone Company's certificated area in the State of Missouri.**

Tariff Reference

SWBT PSC Mo. 38 '3

## 2. PRODUCTS/SERVICES (continued)

## 2.8 Digital Link Services (continued)

2.8.1 MegaLink II<sup>R</sup>

## Local Distribution Section

Per termination of a Local Distribution Section on a customer's premises.

For Transmission Speed of:	Monthly Rate	Service Charge
2.4 kbps (1L7AJ)	\$ 88.21	\$ 323.00
4.8 kbps (1L7BJ)	\$ 89.30	\$ 327.75
9.6 kbps (1L7CJ)	\$ 88.30	\$ 308.75
56 kbps (1L7DJ)	\$ 162.78	\$ 337.25

## - Interoffice Channel

Per V-H mile between Serving offices, between Digital or NRS Hubs and a Serving Office, or Between a Digital or NRS Hub and a Serving Office.  
NRS Hub and a Serving Office. Per V-H mile between Digital or NRS Hubs and a Serving Office, or Between a Digital or NRS Hub and a Serving Office.

Tariff Reference

SWBT PSC Mo. 38 '3

## 2. PRODUCTS/SERVICES (continued)

## 2.8 Digital Link Services (continued)

2.8.1 MegaLink II<sup>®</sup> (continued)

## Local Distribution Section-Continued

Mileage Band	For Transmission Speed of:	Monthly Fixed Charge	Rate per Mile
Over 25 to 50	2.4 kbps (3LBSE)	\$ 73.85	\$ .57
	4.8 kbps (3LBPE)	\$ 69.85	\$ 0.95
	9.6 kbps (3LBQE)	\$ 94.50	\$ 1.90
	56 kbps (3BLE)	\$ 160.50	\$ 3.42
Over 50	2.4 kbps (3LBSF)	\$ 73.01	\$ .52
	4.8 kbps (3LBPF)	\$ 66.38	\$ .95
	9.6 kbps (3LBQF)	\$ 89.82	\$ 1.90
	56 kbps (3BLF)	\$ 152.95	\$ 3.42

MegaLink II<sup>®</sup> is a Registered Trademark of Southwestern Bell.

(T)

Tariff Reference  
SWBT PSC Mo. 38 '4

## 2. PRODUCTS/SERVICES (continued)

## 2.8 Digital Link Services (continued)

2.8.1 MegaLink III<sup>®</sup>

## A. Local Distribution Channel

## B. Interoffice Channel Mileage

-Rate per V-H mile or fraction thereof, per channel

	Fixed Charge	Monthly Rate per Mile
1. 64 KBPS		
Mileage Band		
0 (1)	\$19.86	N/A
Over 0 to 4	\$53.82	\$2.38
Over 4 to 8	\$54.63	\$2.28
Over 8 to 25	\$54.72	\$2.28
Over 25 to 50	\$54.15	\$2.23
Over 50	\$54.15	\$2.23

## 2. 1.544 Mbps

	Monthly Service Rate	Charge
A. Local Distribution Channel		
-per point of termination 1LDPJ	\$213.75	\$650.75

MegaLink III<sup>®</sup> is a Registered Trademark of Southwestern Bell.

(T)

Tariff Reference  
SWBT PSC Mo. 38 '4

## 2. PRODUCTS/SERVICES (continued)

## 2.8 Digital Link Services (continued)

2.8.1 MegaLink III<sup>®</sup> (continued)

## B. Interoffice channel Mileage

-Rate per V-H mile or fraction thereof, per channel

	Monthly	
	Fixed Charge	Rate per Mile
2. 1.544 Mbps (continued)		
<u>Mileage Bands</u>		
0	N/A	N/A
Over 0 to 4	\$95.00	\$47.50
Over 4 to 8	\$95.00	\$57.00
Over 8 to 25	\$76.00	\$57.00
Over 25 to 50	\$76.00	\$57.00
Over 50	\$76.00	\$57.00

Tariff Reference  
SWBT PSC Mo. 38 '4

## 2. PRODUCTS/SERVICES (continued)

## 2.8 Digital Link Services (continued)

2.8.1 MegaLink III<sup>®</sup> (continued)

## Additional Service Features

	<u>Monthly Rate</u>	<u>Service Charge</u>
1. Multiplexing		
DS1 to Voice		
-per arrangement	\$190.00	N/A
DS1 to DSO		
-per arrangement	\$570.00	N/A
DSO to Subrate		
-per arrangement		
-up to twenty 2.4 kbps	\$139.65	N/A
-up to ten 4.8 kbps services	\$276.64	N/A
-up to five 9.6 kbps services	\$528.49	N/A
2. Transfer Arrangement (key activated)		
-per four port arrangement including control channel termination	\$229.43	\$223.25
3. SecureNet		
-per local distribution channel	\$ 90.25	\$634.60

Tariff Reference  
SWBT PSC Mo. 38 '4

## 2. PRODUCTS/SERVICES (continued)

## 2.8 Digital Link Services (continued)

2.8.1 MegaLink III<sup>R</sup>(continued)

## Pricing Flexibility

	Monthly	
	<u>Minimum</u>	<u>Maximum</u>
A. Local Distribution Channel	\$146.00	\$225.00
B. Interoffice Channel Mileage Rate per V-H mile or fraction thereof, per channel		

	Monthly Rates			
	Fixed		Per Mile	
	<u>Minimum</u>	<u>Maximum</u>	<u>Minimum</u>	<u>Maximum</u>
1. 1.544 Mbps				
Mileage bands				
0	\$61.75	\$95.00	\$30.88	\$47.50
Over 0 to 4	\$61.75	\$95.00	\$37.05	\$57.00
Over 4 to 8	\$49.40	\$76.00	\$37.05	\$57.00
Over 8 to 25	\$49.40	\$76.00	\$37.05	\$57.00
Over 25 to 50	\$49.40	\$76.00	\$37.05	\$57.00
Over 50	\$49.40	\$76.00	\$37.05	\$57.00

## **SCHEDULE 2**

**SOUTHWESTERN BELL TELEPHONE COMPANY**

**CASE NO. TO-2001-467**

**DIRECT TESTIMONY**

**OF**

**THOMAS S. DEHAHN**

**Chicago, IL  
June, 2001**



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## Metro Private Line Services

The ultimate metropolitan point-to-point and point-to-multipoint solution

If your business needs to transmit data between one or more locations within the same metropolitan area, WorldCom<sup>SM</sup> Metro Private Line Services (MPL) is an excellent alternative to comparable services offered by your Local Exchange Carrier (LEC).

### Private Line Product Family

- ☐ Domestic Private Line
- ☐ International Private Line
- ☐ Metro Private Line
  - Metro Private Line SONET
- ☐ SONET

### Customer Resources

- ☐ [WorldCom Fund](#)

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WorldCom, an inter-exchange carrier, now offers local service over its own local network facilities. MPL has the bandwidth capacity to provide your company with a flexible, secure, and cost-effective intraLATA (Local Area Transport Area) private line solution. And because our local network facilities are totally separate from your LEC's facilities (including building access), there are no single points of failure on the WorldCom network. That means MPL is one of the most reliable private line services on the market.

Metro Private Line offers a wide range of different applications. MPL point-to-point services provide full bandwidth and channelized circuit arrangements. The point-to-multipoint services include hubbed and muxed arrangements.

### Metro Private Line Full Bandwidth Services

#### Circuit Availability

- DS0 with VGA or digital
- DS1
- DS3
- OC3
- OC12

#### Applications

**Peer-to-Peer.** MPL provides high-performance, secure dedicated lines between two customer-designated locations for data communications.

**Local Area Networks (LAN).** With appropriate bridges and routers provided by the customer, Ethernet and token ring local area networks (LAN) use Metro Private Line Services for connectivity to other LANs, mainframes, personal computers, or supercomputers.

**Tie Lines.** MPL provides dedicated lines between two customer-designated locations for connectivity to the customer's internal telephone system.

**Videoconferencing.** Customers can establish virtual meeting areas at two customer-designated locations using video conferencing Coder-Decoder (Codec) equipment, monitors, and cameras.

**Imaging.** Using imaging hardware and software, customers can transmit documents between two customer-designated locations.

#### **Customer Premises Equipment (CPE)**

- Customers must provide their own CSUs/DSUs, routers, multiplexing equipment, or other network terminating equipment. Customers are also responsible for the maintenance and repair of their CPE.

#### **Metro Private Line channelized services**

##### **Circuit Availability**

- DS1 channelized into 24 DS0s
- DS3 channelized into 28 DS1s
- OC3 channelized into 3 DS3s
- OC12 channelized into 12 DS3s

##### **Applications**

**Peer-to-Peer.** Provides high-performance, secure, dedicated lines between two customer-designated locations for data communications. Channelized DS1 provides 24 DS0 channels; DS3 provides 28 DS1 channels.

**Tie Lines.** Provides 24 DS0 (channelized DS1) or 28 DS1 (channelized DS3) dedicated lines between two customer-designated locations for connectivity to the customer's internal telephone system.

##### **Multiplexing equipment**

- WorldCom provides, maintains, and repairs the multiplexing functionality equipment (DS1 to DS0 - M10 multiplexer or D4 channel bank or DS3 to DS1 - M13 multiplexer) located within the WorldCom metropolitan network.

#### **Other Customer Premises Equipment (CPE)**

- Customers must provide their own CSUs/DSUs, routers, or other network terminating equipment. Customers are also responsible for the maintenance and repair of their CPE.

#### **Metro Private Line Muxed Services**

##### **Circuit Availability**

- DS1
- DS3

### Applications

**Peer-to-Peer.** Provides high-performance, secure, dedicated lines between a customer's primary location and two or more secondary locations for data communications. Muxed DS1 service provides a DS1 customer interface at the primary customer location and up to 24 DS0 circuits to two or more secondary locations. The muxed DS3 service provides a DS3 customer interface at the primary customer location and up to 28 DS1 circuits to two or more secondary locations.

**Tie Lines.** Provides a DS1 or DS3 customer interface and 24 DS0 or 28 DS1 dedicated lines, respectively, between a customer's primary location and two or more secondary locations for connectivity to the customer's internal telephone system.

### Need More Information?

To order or request additional information on WorldCom<sup>SM</sup> products and services for your business, call 1-800-WORLDCOM (1-800-967-5326) or [contact us](#).

If you have questions regarding an existing account or require Customer Service assistance, please call the toll-free number listed on your invoice for prompt assistance.

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## AT&T Private Line Services



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Your business is growing in a fast-changing, complex and expanding marketplace. You need access to vital information: customer billing records, medical and engineering images, the collaborative efforts of workers in diverse locations, and more.

AT&T knows that sophisticated network users demand powerful data

services that deliver reliable, high-quality service at all times. **AT&T Private Line Services** meets your demand for unsurpassed reliability and flexibility so you can harness the power of your applications across your company to be more productive—and competitive.

### Comprehensive Data Communications Solutions

Whether your needs are local, intrastate, interstate or global, AT&T has the solution. **AT&T Private Line Services** offer your business an array of outstanding service features and powerful options that provide high availability and unsurpassed performance to give you the power, capacity and reliable connections that your business applications demand.

AT&T Private Line Services offer you:

- Bandwidth Options including Single Channel, Fractional T1, T1 and High-Speed Services, including T3, SONET OC3, OC12, OC48 and OC192
- Application Support for a wide range of applications
- End-to-End Service Assurance Warranty for High Speed Services
- A Customer Refund Allowance for Single Channel and Fractional T1 Services
- AT&T Central Office Multiplexing
- Clear Channel Capability
- Enhanced Reliability Option—The Best Service Warranty in the Industry
- Diverse Routing Options—Interoffice Channel and Access
- Interoffice Channel and Access Protection for T1 and T3 Services

### feature

Check out our other services in the Data family.

AT&T's Frame Relay Plus Service - technology to monitor, adapt and control your network.



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# AT&T local private line service



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## Dedicated to Efficient, Cost-Effective, Secure Communications

What is your business doing? Growing, of course, adding sites, expanding locations - and finding that your mission-critical data communications are increasing all the time.

Every minute of the day, companies like yours are connecting LANs. Sharing e-mail. Running POS applications, credit line authorizations, online banking, new-hire training. Managing patient and client records, human resource databases, corporate mergers, Internet access. In short, tapping into virtually every kind of client/server application on the market today.

To do it all, you need what you've always needed - networking speed, efficiency and reliability. Now you can get it in a new, yet reassuringly familiar, way.

AT&T Local Private Line Services offer private line, the business world's original solution to exploding data demands, in an extremely cost-effective package. Your business doesn't need to invest in new equipment, or transfer to a switched environment. You can run all your data applications, access all your corporate intranets and extranets, plus integrate your voice services - all with AT&T Local Private Line Services.

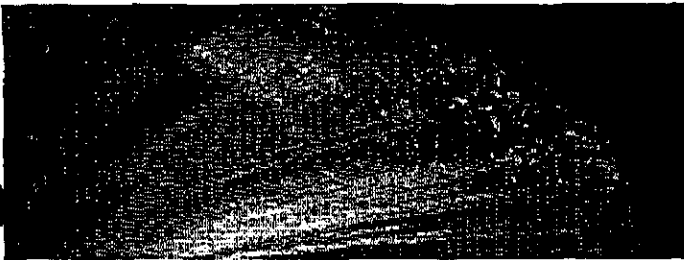
### Speeding Over a Local Network Near You

Delivered over the AT&T Local Service SONET backbone network, AT&T Local Private Line Services are available to your business as point-to-point services between two locations - including two of your locations. From your headquarters on one city block, for example, to your satellite office around the corner. Or from your hospital to your outpatient clinic. From a dormitory to your campus data center, or from your bank to an automatic teller machine in the supermarket.

AT&T Local Private Line can also establish a point-to-point connection from your premises to a carrier's point-of-presence (POP), to an AT&T POP, to your disaster recovery center or even to your ISP for Internet access. These full-duplex services come at the speed you need: 9.6 Kbps, 56 Kbps, T1/E1, DS1, DS3, OC3, OC12 and OC48 transmissions.

### Benefits

- Dedicated, private and secure point-to-point access
- Regional competitive, multi-protocol, multi-vendor
- Cost-effective with no need to invest in new networking equipment
- AT&T's single point-of-contact service and 24x7 monitoring



You'll find that you can grow your business across town or across the US and still take advantage of AT&T Local Private Line Services - in 84 metropolitan areas in 35 states, depending on availability. You'll gain significant bandwidth capacity and efficiency, giving you even more room to grow.

### Pricing and Management for the Local Market

AT&T Local Private Line Services emphasize local, even if your business spans multiple states. That's particularly true when it comes to pricing. Pricing is mileage-based, and the prices are set regionally. You'll find that our pricing is always competitive.

Just as important, you can pare down the complex management of multiple carriers. With AT&T Local Private Line Services, AT&T becomes your "one-stop-shopping" provider, delivering local services to every one of your facilities. So if you have several offices in multiple cities where the AT&T service is available, you don't have to manage three separate local exchange carriers anymore. You'll have a single point-of-contact with AT&T, and a single bill for all your local lines.

You'll also see a reduced cost structure in your voice services through AT&T Local Private Line Services. For example, you can remove your internal "intercom" calling from the external trunks. You'll be reducing the number of local switch trunks needed for your company's PBX. You'll see a cut in toll costs with fixed flat monthly rates. And your long-distance access costs will drop, because dedicated minutes are cheaper than switched access minutes.

### Protecting Your Mission-Critical Data

Because your communications run over AT&T's highly robust Local SONET network, you're assured of their protection -

the reliability you've always known from AT&T. We target a 99.9995% availability, made possible because of the state-of-the-art, self-healing fiber optic network. In fact, the network is designed to recover from disasters such as fiber cuts or electronic component failures within 50 milliseconds!

To proactively guard the service, we monitor the Local SONET network 24 hours a day from the AT&T Network Monitoring Center in Staten Island, New York, backed up by a redundant center in New Jersey.

### Giving New Meaning to Local Service

AT&T Local Private Line Services mean you can grow your business with even more flexibility than ever before - in multiple sites within a city or in different regions of the country. AT&T will deploy local services in virtually every (WILL LEGAL APPROVE THIS? IT AVOIDS USING "where available" YET AGAIN.-deb) metropolitan location you need, at the transmission speeds that make sense for each location.

We'll be one phone call away should you need assistance, providing an end-to-end solution with the quality and customer care you've come to trust from AT&T. Above all, you'll have the advantage of tremendous, national resources at an economical, local level.

**For more information, contact your AT&T Account Representative or AT&T Alliance Program Agent, or call 1-800-288-3199.**



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## High-Speed "Total Service" Access for Multiple Data Services

For large corporations, managing communications connections from state-to-state, or among metro areas within a state, is becoming extremely complex. You're handling LANs, Internet and intranet traffic, e-commerce and much more - taking too much time and costing too much money.

## feature

Check out our other services in the Data family.

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AT&T ACCU-Ring® Network Access Service takes the burden off you. Using AT&T SONET technology, AT&T ACCU-Ring provides dedicated, high-capacity access for digital transmissions, fully managed by AT&T. You can count on:

- Two-way digital transmission of multiple synchronous, asynchronous or Time Division Multiplex (TDM) signals at rates from 1.5 Mbps to 155 Mbps (OC3)
- Aggregation of all access traffic on a single service that is installed, managed and monitored by AT&T
- High reliability and millisecond restoration through the self-healing SONET architecture
- Flexibility in access speeds without a need for special equipment on your premises
- A Service Assurance Warranty (SAW) that provides credit for service interruptions

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AT&T ACCU-Ring® Network Access Service is available in most geographic areas in 49 states (not available in Alaska). It requires customization and tailoring to your environment. For further information, you can contact an AT&T representative by adding the product to your cart. Note: This does not commit you to completing an order.

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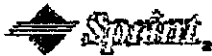
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## Private Line Services



### DigiLink (DDS)

Sprint's DigiLink is a dedicated private line service that delivers high-quality, voice and data connectivity at extremely low error rates. DigiLink provides digi network connectivity for point-to-point or multi-point arrangements at transmission speeds of 2.4, 4.8, 9.6, 19.2, 56 and 64 Kbps, and accommodates all forms of transmissions. Applications include:

- Combination of voice and data between two or more locations
- Perfectly suited for IBM SNA environments
- Database access and management access to host computers from P remote terminals
- Bulk data transfer
- File transfers and maintenance
- On-line research, data collection and inquiry/response
- Transaction processing
- Inventory management, evaluation and control
- Remote batch processing
- Remote CAD/CAM functions
- High-speed imaging

Offering bandwidths of up to 64 Kbps, DigiLink service provides a cost-effective alternative to networks of multiple analog leased lines. There are no usage fees; charges are based on distance between locations and bandwidth required. For businesses that need 24-hour connectivity between two or more locations, DigiLink is a simple, affordable solution.

### Hardware Requirements

Connects to a data service unit (DSU) at the customer's premises, which is connected to the computer's data terminal equipment, such as a host computer or PC. As needs change, the speed, capacity and quality of DigiLink allow you to take advantage of advanced applications, such as LAN bridging, high-speed file transfers, multimedia imaging and voice/data combination applications.

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## Private Line Services



### TransLink (T1)

Sprint's TransLink is a high-quality digital, private line service (T1) providing connectivity for customers with large bandwidth requirements of up to 1.544 TransLink delivers 56 Kbps on up to 24 simultaneous voice, data and video to one location. It connects to a channel service unit (CSU) or channel bank enterprise's premises, which is connected to your data terminal equipment, a host computer.

TransLink provides 24-hour connectivity with no usage fees. Applications that from Sprint's TransLink (T1) service include:

- Integrated voice, data or video
- Replacement for multiple voice-grade circuits
- Interactive processing
- High-speed imaging
- Video conferencing
- Point-to-point voice, data and video
- CAD/CAM transmissions
- Video freeze-frame and full motion
- Tie lines
- Connectivity between two PBXs
- On-line research
- Database access fund management
- Support for transaction-based systems (reservations, billing, etc.)
- Support for batch file transfers (payroll, inventory, etc.)
- Inventory management and control
- Off-premises extensions
- LAN bridging

The price for service is based on the distance between locations. If your enterprise currently manages a complex network of eight or more private analog lines, it will likely save money and provide faster, more reliable network performance.

### Options.

For even greater capacity, 28 T1 lines can be combined into what's known as a circuit, ideally suited to high-bandwidth applications such as broadcast-quality. **Fractional T1** has the flexibility to support the full range of bandwidth below however Fractional T1 typically runs at 384 Kbps, giving you dedicated bandwidth without the cost of adding a full T1 circuit.

### Hardware Requirements.




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## Private Line Services

### LightLink (DS3)



Sprint's LightLink is a private-line, point-to-point or multi-point service providing fiber optic transmission facilities. With LightLink, you get the functionality of private lines over one facility – with an aggregate speed of 44.736 Mbps. This is equivalent to 672 digital communication channels of 64 Kbps each, or 28 T1 lines!

LightLink is capable of providing multiple full-time, dedicated voice, data and connections for customers requiring a large number of private lines and large bandwidth. The channels can be used in varying amounts of bandwidth for both data and video applications, such as:

- Integrating multiple voice, data and video T1 lines
- File transfer
- Full motion video conferencing
- Interactive database access
- CAD and imaging
- Electronic mail
- File transfer
- Resource sharing

### Hardware Requirements

A fiber optic transmission system must be installed between each connected location and that location's serving central office. The DS3 channel can be terminated at a special multiplexer, an M13. The M13 breaks the DS3 channel into 28 DS1 channels. The individual DS1 channels can be further subdivided with channel banks or DS1 rate multiplexers.

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User equipment, such as computer terminals, may be connected by a LAN or router T1 or T3 multiplexer (or subrate multiplexer) at each end of the transmission path. Also required is CSU/DSU at each end of the transmission path, physically located between the multiplexer or router and the circuit. Sprint provides a full line of voice, data and video customer premises equipment to support your T1 networking requirements now, and well into the future.

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## Private Line Point-to-Point

No matter how you do the math, the shortest distance between two points is a straight line.

Now more than ever, information delivery depends on digital transmissions. Enjoy fast, clear transmissions as our state-of-the-art, fiber optic network accommodates all the digital communications traffic of your organization, and only your organization. McLeodUSA Private Line, with its variety of ways to deliver and receive information, is the premiere choice for voice and data transmission.

A variety of bandwidths are available depending on the scope of your business needs. We offer lower bandwidths for handling voice traffic and higher bandwidths useful for your computer or your entire network.

For more information about McLeodUSA services for your business call 1-800-890-2230 or [contact us](#) online.

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Private Line Point-to-Point

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## Private Line Point-to-Point

No matter how you do the math, the shortest distance between two points is a straight line.

Private Line Point-to-Point provides dedicated circuits for the transmission of data and/or voice applications such as: Private Branch Exchange (PBX) voice networking or Local Area Network/Wide Area Network (LAN/WAN) networking needs. Private Line services are typically ordered in the following bandwidth increments:

- Sub-rate 19.2kbps or less
- DS0 or 56/64kbps
- DS1 or 1.544 mbps (megabits per second)
- DS3 or 45 mbps (megabits per second)

The amount of bandwidth you choose depends on the size and function of your organization. The more data you need to deliver the more bandwidth necessary. The more data you need to deliver the more bandwidth necessary.

For more information about McLeodUSA services for your business call 1-800-890-2230 or [contact us](#) online.

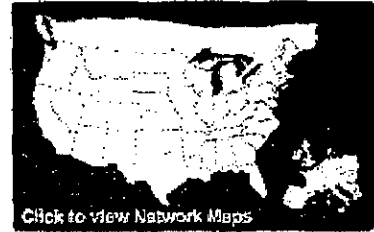
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### *The Worlds Most Demanding Markets*

**Metromedia Fiber Network is changing communications with a single premise:** provide the infrastructure to meet the growing demand for bandwidth.

Servicing some of the largest and busiest markets in the world, MFN is building the end-to-end optical infrastructure capable of meeting the rigorous demands of the world's largest service providers and enterprise customers. With networks being built across North America and Europe, MFN is putting the future of communications in your hands today.



Utilizing the latest fiber optic cabling, with trunks containing up to 864 strands of fiber, MFN's network will extend over 3 million fiber miles when completed. In addition to our extensive metro area builds, our cities are linked together, by one inter-city network creating a seamless, end-to-end optical infrastructure.

MFN's optical infrastructure is optimized for IP traffic and the high bandwidth needs of the Internet. Through our subsidiary AboveNet, customers can gain access to AboveNet's high performance Internet infrastructure, while gaining the advantages of MFN's fiber optic network.

Whether your business is in the US or Europe, MFN is building the infrastructure that is changing the way people and data is communicated. To see where MFN's extensive networks are being built, [click here](#) for network maps.



Select a Map

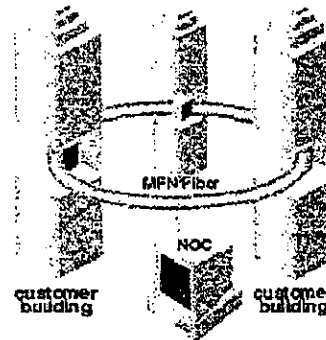




Corporate

Managed Sonet Network

Metromedia Fiber Network has the perfect solution for the company looking for a complete turnkey network solution. With our Managed SONET Network, you enjoy all the advantages of fiber optics – **speed, capacity, flexibility, security, and reliability** – plus, **end-to-end planning, installation, and maintenance** of your network. MFN provides the SONET equipment as an operating lease requiring **no capital outlay**. Our team of telecommunications professionals will work with you to design and maintain a network tailored to your specific requirements.



*The Managed SONET Network includes:*

**Dark Fiber Optic Network** – available with diverse routing, entrances, and risers.

**Sonet Netork** – available from OC3 to OC192 Optic backbone configurations, with service drops available in DS1/3, OC3/12/48, ethernet and ATM. Configurations can include either ring or linear design, with n-n or n-1 redundancy

**Installation** – complete system installation of Fiber Optic Network and SONET ADMs. MFN provides Project Management to ensure effective scheduling, communication, and implementation.

**Maintenance** – MFN's Technicians provide all necessary maintenance of the Fiber Optic Network and SONET ADMs.

**Customer Support** – the MFN Network Operations Center (NOC) is in operation 24 hours a day, 365 days a year. Our skilled technicians will monitor the network for potential faults and proactively remedy identified problems. The NOC will respond to customer trouble reports, identifying the failing component and dispatching a MFN technician to remedy the problem.

**Network Provisioning** – MFN offers upgrade and provisioning support for the addition of new services to the SONET network.

 [click here to download a PDF description of this product](#)



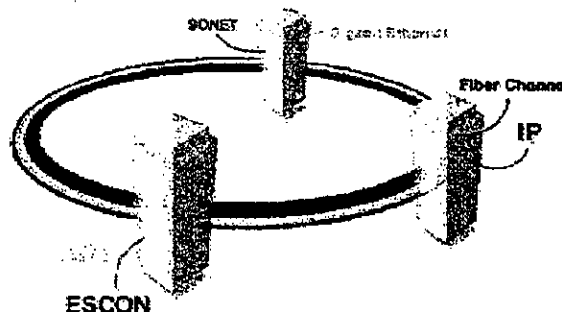


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Wavechannel Optical Network

One network for voice, data and video – scalable, upgradeable, protocol-independent and forecast tolerant. WaveChannel™ Optical Network provides this capability today through an integration of MFN dark fiber and Nortel Networks OPTera Metro™ technology.

Utilizing MFN dark fiber and DWDM technology, WaveChannel™ gives you a private optical network to transport all current applications and protocols while preparing you to meet unpredictable future bandwidth requirements. This single private network replaces the traditional metered services you use today, simplifying your operation and greatly increasing your flexibility and control.



**WaveChannel™ Optical Network includes:**

**Dedicated Optical Fiber** – all the advantages of MFN dark fiber, including a ring-based network topology and diverse fiber routing for a secure and reliable network.

**Turnkey Operation** – your network solution is complete from end-to-end, including fiber, equipment, engineering, installation and ongoing network operations and maintenance. Our NOC provides 24x7 network monitoring to ensure best-in-class availability.

**Optical networking equipment** – Nortel Networks OPTera Metro™ wavelength-based optical networking equipment provides the flexibility to implement a true multi-service network.

Your network will simultaneously transport virtually any optical signal, regardless of protocol, including:

- ATM
- IP
- SONET
- Gigabit Ethernet
- ESCON Fibre Channel

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Corporate

Metro Gig-E Gigabit Ethernet Solution

### *A network to grow your business*

Capacity requirements for desktop and server applications are exploding while traditional Metropolitan Area Networks (MAN) backbone services and their high cost have constrained growth. Without a faster communication infrastructure, your business productivity and bottom-line potential may not be achieved. Recognizing this problem, Metromedia Fiber Network has created an integrated optical solution for your business – Metro Gig-ETM, a Gigabit Ethernet Optical Network.

By integrating MFN's dark fiber with Cisco's Catalyst® switch technology, Metro Gig-ETM allows you to easily expand your LAN into a MAN, connecting multiple sites on a completely private optical network.

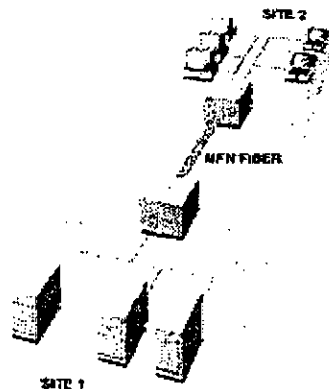
*Metro Gig-E gives you:*

**Dedicated Optical Fiber** – the industry's choice for today's bandwidth intensive communication applications, your fiber network is 100% dedicated to your business needs.

**Gigabit Ethernet** – a LAN extension providing full 1 Gigabit (1000 Mbps) of bandwidth, using the industry's most popular technology to support the latest applications.

**Fully Managed Solution** – a total solution including fiber, equipment, engineering, installation and ongoing network operations.

**Leading Optical Equipment** – the network is powered by proven equipment supplied by Cisco Systems, Inc., the worldwide leader in networking for the Internet.



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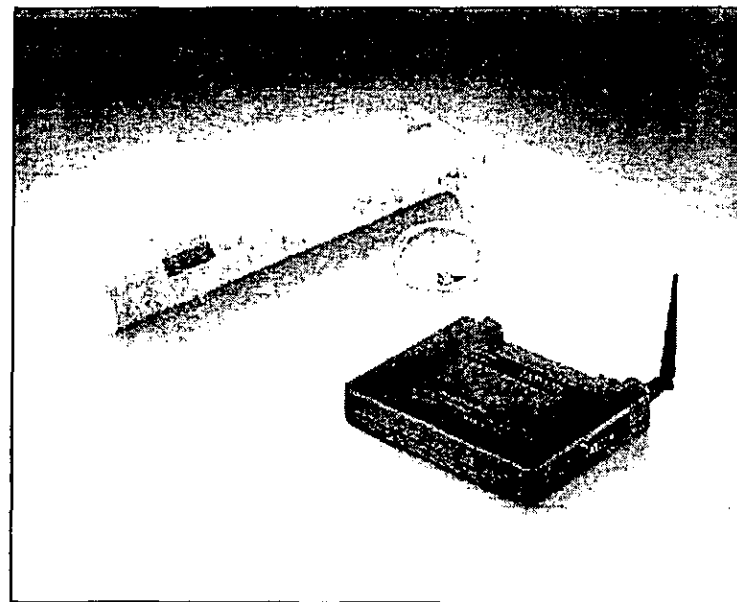
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THOMAS S. DEHAHN

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June, 2001

# Cisco Aironet 340 Series Bridges

- **Building-to-Building connectivity at up to 25 miles (line of sight)**
- **Cost effective alternative to leased line/T1**
- **Rapid, simple deployment and re-deployment**
- **Point-to-Point and Point-to-Multipoint**
- **No government license required**



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