

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of a Commission Inquiry into)	
the Possibility of Impairment without)	Case No. TO-2004-0207
Unbundled Local Circuit Switching When)	
Serving the Mass Market)	

SBC MISSOURI'S DATA REQUESTS TO MISSOURI CLECS

Southwestern Bell Telephone, L.P., d/b/a SBC Missouri ("SBC Missouri"), pursuant to 4 CSR 240-2.090(2), hereby serves the following data requests upon each Missouri CLEC ("CLEC"). SBC Missouri requests (a) that CLEC respond to each data request separately and fully, in writing and (b) that such responses be accompanied by the signature of a person attesting to the truthfulness and correctness of the answers, (c) that CLEC deliver its answers and all requested documents and materials not later than December 15, 2003. Service should be made to the following address:

Robert J. Gryzmala
SBC Missouri
One SBC Center, Room 3516
St. Louis, MO 63101
Telephone: (314) 235-6060
Fax: (314) 247-0014

INSTRUCTIONS/DEFINITIONS

1. Except as otherwise requested, please reproduce the data requests being responded to before providing the text of the response.
2. With respect to each request, please state: (1) the name(s) and title(s) of the person or persons responsible for preparing the responses; and (2) the administrative unit which maintains the records being produced or maintains the data from which the answer was prepared.
3. These data requests shall be deemed to be continuing. CLEC is requested to change, supplement and correct its answers to conform to all information as it

becomes available to CLEC, including the substitution of actual data for estimated data. Responses to requests for information covering a period not entirely in the past (or for which complete actual data are not yet available) should include all actual data available at that time.

4. Wherever responses include estimated information, include an explanation (or reference to a previous explanation) of the methods and calculations used to derive the estimates.
5. For purposes of these Data Requests, the terms “you,” “your,” “CLEC,” “company,” “your company,” or “the company” as used herein refer to the CLEC in receipt of these Data Requests, and the CLEC’s employees, contractors, agents or others employed by or acting in its behalf.

DR 1

- 1-01. Please provide the 11-digit Common Language® Location Identifier (“CLLI code”) of each switch, whether located either in Missouri or outside Missouri, that you own or use (if owned by another entity) as referenced in the Local Exchange Routing Guide (“LERG”), and that provides or has the ability to provide local exchange service, and/or any “qualifying service” as that term is defined in 47 CFR § 51.5, in the state of Missouri. With respect to each such switch, provide the further information requested by DR 1-02 through 1-10. The attached Excel spreadsheet is preferred as a model for development of responses.
- 1-02. The location of each switch (both by Street address, City, State and zip code, and by the vertical and horizontal (“V&H”) coordinates of the switch from the LERG).
- 1-03. Whether the switch is leased from an ILEC, leased from another source or CLEC-owned. If you lease, rent or otherwise obtain switching capacity on a switch that you do not own, state the name of the entity from whom you have leased, rented or otherwise obtained switch capacity, and, for each such instance, also provide the information requested in the subparts which follow below.
- 1-04. Equipment type and/or identity of the manufacturer of each switch, as well as the locational and functional category of the switch (e.g., either end office or tandem office, and either multi-function, packet, broadband, or other (if “other,” please identify or describe the category)) and the switch processor capacity of the switch (in Centum Call Seconds).
- 1-05. The capacity of the switch (DS0/voice grade equivalent lines).
- 1-06. Individual list of exchanges, wire centers, LATAs and Metropolitan Statistical Areas (“MSAs”) in which your company is currently using that switch to provide local service to one or more customers.
- 1-07. The total number of DS0/voice-grade equivalent access lines for which the switch is equipped and the total number of DS0/voice-grade equivalent access lines served by the switch, for each exchange, wire center, LATA and MSA served by such switch.

- 1-08. In addition, please provide:
- a) Information by individual exchange on the number of voice grade equivalent lines served by business customers to whom you provide <24 lines;
 - 1) The number of voice grade equivalent lines by customer and loop type.
 - b) Information by individual exchange on the number of voice grade equivalent lines served by business customers to whom you provide ≥ 24 lines;
 - 1) The number of voice grade equivalent lines by customer and loop type.
 - c) Information by individual exchange on the number of voice grade equivalent lines served by business customers to whom you provide 1 through 3 lines at one location;
 - 1) The number of voice grade equivalent lines by customer and loop type.
 - d) Information by individual exchange on the number of voice grade equivalent lines served by business customers to whom you provide 4 through 24 lines at one location;
 - 1) The number of voice grade equivalent lines by customer and loop type.
 - e) Information by individual exchange on the number of voice grade equivalent lines provided to residential customers.
- 1-09. Identify, by eight digit CLLI code, each wire center district served by the switch (i.e., the territory served by the switch) and further identify, with respect to each such district, the number of DS0/voice grade equivalent lines that serve customer locations using 3 or fewer lines in the wire center district identified.
- 1-10. Whether the switch is used to provide retail service to your own customers or whether it is used by another carrier to provide service to its own customers; if the latter, then identify the carrier.
- 1-11. State the total number of voice grade equivalent business lines you lease for UNE-P.
- 1-12. If applicable, state what should the process/timeframe for an ILEC's hot cut process be for purposes of transitioning customers off UNE-P.



"DR 1 - Excel.xls"

DR 2

- 2-01. State whether your company is providing, or plans to provide, through a wholesale, lease, resale or other arrangement, capacity on any switches you own or operate in Missouri, or that own or operate in another state and that you use to provide local service in Missouri, to an unaffiliated entity. For each such

- instance, (a) identify the entity to whom you are currently providing or plan to provide switch capacity; (b) identify the rates, terms, and conditions under which you are making or will make that switch capacity available; (c) identify the types of service, if known, that are provided by the carriers to whom you provide or plan to provide switching capacity; (d) identify whether you will provide switching capacity to any requesting carrier; and, (e) further identify for each such instance whether the arrangement involves current provisioning or prospective provisioning. Also, identify each wire center district (by CLLI code) in which wholesale switching is available.
- 2-02. If the answer to DR 2-01 is “yes”, please state whether your company is making or plans to make a local loop available to the end user in conjunction with the wholesale unbundled local switching to CLECs. If so, please provide the terms, conditions, and rates under which your company is providing or plans to provide the loop in conjunction with the switching component. If the terms, conditions, and rates are not available, please provide a timeframe in which the information will be made available.
- 2-03. If the answer to DR 2-01 is “yes”, please provide the following information regarding each switch identified by you:
- a. the make, model, age, and current software upgrades of each switch;
 - b. the geographic location of each switch,
 - c. the footprint or geographic area served by each switch, including a list of each exchange served by each switch;
 - d. the features and functions (including software upgrades) available in each switch;
 - e. the capacity of each switch, including:
 - i. percentage of switch capacity in use;
 - ii. percentage of switch capacity reserved for your company’s own use and future use; and
 - iii. percentage of current and future capacity of each switch that will be made available for CLEC use.
 - iv. the anticipated service life of each identified switch;
 - v. whether your company intends to utilize the identified switch for the full anticipated service life.
 - f. Is the CLEC aware of any features being provided within the wire center(s) served by this switch by the ILEC that CLEC’s switch is incapable of offering? If so, explain what they are and what classes of customer use such features.
- 2-04. For each switch identified in DR 2-03, please further indicate the number of analog ports that CLEC currently can make available at wholesale at a collocation space within a ILEC wire center.
- 2-05. For each switch identified in DR 2-03 above, please state in detail if CLEC is willing to expand its switch capacity to meet increased demand and, if so, (a) the anticipated service life of each identified switch, (b) whether your company intends to utilize the identified switch for the full anticipated service life; and (c) the existing plans and protocols for ordering and implementing software upgrades.

- 2-06. Please provide the following information regarding anticipated use of switches that your company owns but are not in use today, or for new switches that your company may use in the future as a result of CLEC demand for providing unbundled local switching in the State of Missouri: the terms, conditions, and rates you expect to require of a wholesale customer for providing capacity for new switches; including contract terms, take or pay requirements. State whether your company will ensure that the calling scopes and features that are offered to wholesalers will be the same that the ILEC offers.
- 2-07. If the answer to DR 2-01 is “yes”, please provide the operational support system interface capabilities, including version number and a copy of the methods and procedures, that your company uses or will use when offering unbundled local switch capability to CLECs in the State of Missouri.
- 2-08. If the answer to DR 2-01 is “yes”, please provide your company’s mean time to repair and other response intervals for servicing existing switches.
- 2-09. If the answer to DR 2-01 is “yes”, please provide your company’s signaling capability and signaling redundancy that will be used in making available the unbundled local switching to CLECs in the State of Missouri.
- 2-10. If the answer to DR 2-01 is “yes”, please provide a copy of your company’s methods and procedures to prevent or minimize service degradation, including but not limited to delay and/or echo return loss attenuation, to a CLEC that utilizes your company’s unbundled local switching in Missouri.
- 2-11. If the answer to DR 2-01 is “yes”, please provide the following information with respect to your company's ability to offer and to provide transport:
- a. Does your company intend to offer or to make available transport as a stand-alone service to CLECs within the State of Missouri;
 - b. Does your company intend to offer or to make available transport in conjunction with provision of unbundled local switching capacity to CLEC;
 - c. Provide the total available capacity of your company's network to provide transport;
 - d. Provide all terms, conditions and rates in which your company is willing to provide transport as a stand-alone or in conjunction with provision of unbundled local switching capacity to CLECs in Missouri (if this information is not available, please provide a timeframe by which it will be made available); and
 - e. State whether your company's network facilities have the capability to provide redundancy for transport, and whether such redundancy, to the extent that it exists, will be provided in conjunction with your company's provision of transport.
- 2-12. If the answer to DR 2-01 is yes, please state whether your network facilities:
- a. Use fiber to the customer's premises;
 - b. Use cable television lines to the customer's premises;
 - c. Use twisted copper pair to the customer's premises;
 - d. Use fixed wireless technology to the customer's premises;

- e. For each category, please affirmatively state whether your company has agreements or contracts with any entity that allows your company to provide telecommunications services in the State of Missouri.
- 2-13. If the answer to DR 2-01 is yes, please state whether your company utilizes or has in place DLC capability in incumbent local exchange carrier ("ILEC") facilities (answer yes or no for each of the following):
 - a. ILEC-owned remote terminals;
 - b. ILEC-owned cabinets; and
 - c. ILEC-owned Distribution Points.
- 2-14. If the answer to DR 2-01 is yes, please provide the percentage of your company's DLC capability that is located in one or more of ILEC-owned remote terminals, cabinets or Distribution Points.
- 2-15. If the answer to DR 2-01 is yes, please state whether your company has analog line ports:
 - a. installed and/or in use in the DLC; or
 - b. connected with or to an ILEC-owned switch.
- 2-16. If the answer to DR 2-01 is "yes", please provide the total number of ports installed.
- 2-17. If the answer to DR 2-01 is "yes", please provide the percentage of analog line ports 1) via DLC, or 2) that connect within the ILEC Central Office that your company owns and operates that provides telecommunications services to end use customers in rural areas in the State of Missouri.

DR 3

- 3-01. For each ILEC location in which your company is collocated, state the collocation arrangement central office CLLI code, the V&H coordinates, and the street address, city, and zip code. Please further provide the following with respect to each location identified by you:
 - a. The type of collocation (*e.g.*, caged, cageless, shared or virtual);
 - b. The type of equipment (*e.g.*, DLC, remote switches, multiplexers, transmission terminals, etc.) and the number of equivalent DS0/voice grade channels for all services in the collocation space (*e.g.*, DLC, remote switches, multiplexers, transmission terminals, etc.);
 - c. The cost and capacity of each item of equipment identified above;
 - d. The transmission facilities and the number of equivalent DS0/voice grade channels for all services used to connect the office to your switch or non-ILEC switching provider (*e.g.*, ILEC UNEs, ILEC special access, self provision, third party provision);
 - e. The amount of unused or excess space in each collocation space;
 - f. The approximate number of days between the date collocation space was turned over to the carrier and the date equipment in the collocation space was first used to provide local service. If the collocation space has not been used to provide local service, or was so used in the past but is not

now, so state and provide the date, if any, on which you intend to use the space to provide local service.

- 3-02. For each shared or non-ILEC locations (*e.g.*, “collocation hotels”) in which your company is located, state:
- The type of collocation or sharing/leasing of space for placement of equipment (*e.g.*, caged, cageless, shared or virtual);
 - The type of equipment and the number of equivalent DS0/voice grade channels for all services in the collocation space (*e.g.*, DLC, remote switches, multiplexers, transmission terminals, etc.);
 - The cost and capacity of each item of equipment identified above;
 - The transmission facilities and the number of equivalent DS0/voice grade channels for all services used to connect the office to your switch or non-ILEC switching provider (*e.g.*, ILEC UNEs, ILEC special access, self provision, third party provision).
- 3-03. For each of the collocation arrangements described in your responses to DR 3-01 and DR 3-02 above, please list the types of services (*e.g.*, local, broadband, etc.) that are provided utilizing such an arrangement.

DR 4

- 4-01. Provide a list of all the ILEC wire centers in Missouri to which you have deployed your own transport facilities (*i.e.*, any facilities that, directly or indirectly, provide connections to wire centers) or are currently in the process of deploying such facilities.
- 4-02. Provide a list of all the ILEC wire centers in Missouri to which you have obtained transport facilities (*i.e.*, any facilities that, directly or indirectly, provide connections to wire centers) from a supplier other than the incumbent LEC (including wholesale providers and non-certificated providers, and the names of such providers).
- 4-03. For each ILEC wire center or pair of ILEC wire centers identified in your previous responses, state the amount of capacity (*e.g.*, DS-1, DS-3) obtained on each route and the level of capacity the facility is capable of supporting.
- 4-04. Provide a list of all the ILEC wire centers in Missouri to which you have provided transport facilities (*i.e.*, any facilities that, directly or indirectly, provide connections to wire centers) to another carrier, including the name of such providers.
- 4-05. For each ILEC wire center or pair of ILEC wire centers identified in your previous response, state the amount of capacity or type (*e.g.*, DS1, DS3) provided on each route and the level of capacity the facility is capable of supporting.
- 4-06. Provide a list of all ILEC wire centers in Missouri in which you offer transport facilities to other carriers, and for each identify the capacity or type of transport you offer (*e.g.*, DS1, DS3, or dark fiber).
- 4-07. Identify the points within Missouri at which you connect your local network facilities to the networks of carriers other than the incumbent LEC, including interconnection with other CLECs, interexchange carriers, or internet service

- providers at any point of presence (“POP”), network access point (“NAP”), collocation hotel, data center, or similar facility.
- 4-08. For each transport facility identified in your previous responses, please identify the cost of the facility, including the installation cost for any facilities that you have deployed yourself, and the rates, terms and conditions of any transport facilities that you obtain through a wholesale, lease, or resale arrangement, from any entity other than an ILEC.
 - 4-09. Please produce all information your company has regarding whether any or all of the conditions listed in 47 C.F.R. § 51.319(e)(2)(i)(B)(1)-(4) have been met along any route in your service areas in Missouri.
 - 4-10. Please produce all information your company has regarding the factors listed in 47 C.F.R. § 51.319(e)(2)(ii) for any particular route where your company provides services in Missouri.
 - 4-11. Please produce all information your company has regarding whether three or more competing providers not affiliated with each other or with SBC Missouri have deployed dark fiber facilities (including any facilities obtained on a long-term, indefeasible right of use bases) along any particular route in Missouri, and whether those facilities terminate at a collocation arrangement at each end of the transport route that is located at an ILEC’s premises and in a similar arrangement at each end of the transport route that is not located at an ILEC’s premises.
 - 4-12. Please identify all routes in your company’s services areas in Missouri that meet any or all of the conditions listed in 47 C.F.R. § 51.319(e)(3)(i)(B)(1)-(4) and provide all information that the company has regarding the same.
 - 4-13. Please produce all information your company has regarding the factors listed in 47 C.F.R. § 51.319(e)(3)(ii) for any particular route where your company provides services in Missouri.
 - 4-14. Provide a list of all fiber rings in Missouri you own or control and identify the location (by street address and/or V&H coordinates) of each add-drop multiplexer or comparable facility for connecting other transport facilities (e.g., wire centers, loops, other fiber rings) to the fiber ring.
 - 4-15. Provide a list of all ILEC wire centers in Missouri at which you connect a collocation arrangement to a facility or collocation arrangement belonging to another carrier, and for each, identify the carrier and the capacity or type of connection.
 - 4-16. Provide a list of all ILEC wire centers in Missouri at which you were denied the ability to connect a collocation arrangement to a collocation arrangement or facility belonging to another carrier.
 - 4-17. State whether you are affiliated with the ILEC in any way or with any other carrier (including intermodal providers) that serves the same transport route. If so, please describe the affiliation.
 - 4-18. State whether you have any long-term (10 or more years) dark fiber indefeasible right of use (IRUs) between any two central offices in the same LATA, in which you maintain an active physical collocation arrangement.
If the above question is answered in the affirmative, please answer the following
 - a. As to each pair of central offices, identify:

- i. The common name, address and CLLI code for each pair of central offices;
 - ii. The number of dark fiber pairs terminating at each of the physical collocation facilities;
 - iii. Whether the facilities have been lit by the carrier attaching its own optronics, and if so, the transmission level of each such lit circuit, and the term of the IRU.
- 4-19. For each Missouri CLLI to CLLI (ILEC central office to ILEC central office) transport route for which your company has self-provisioned transport facilities (to provide service to your company's customers or used by another carrier to provide service to its customers), state the following (for this and the following questions, the term "collocation arrangement" means ILEC-provided, shared, or non ILEC-provided locations (e.g., collocation hotels) in which your company is collocated with other carriers):
 - a. the collocation arrangement central office CLLI code;
 - b. the collocation arrangement street address, city and zip code;
 - c. the collocation arrangement V&H coordinate;
 - d. the type of collocation arrangement (e.g., caged, cageless, virtual);
 - e. the number of transport circuits connecting the collocation facilities at each end of the route;
 - f. the type of dedicated transport (e.g., dark fiber, DS1, DS3), and the number of dark fibers, DS1 circuits, and/or DS3 circuits, as applicable;
 - g. the connected collocation arrangement central office CLLI code;
 - h. the connected collocation arrangement street address, city and zip code;
 - i. the connected collocation arrangement V&H coordinate;
 - j. whether this transport facility is used to provide service to your own retail customers; and
 - k. whether this transport facility is used by another carrier to provide service to its customers.

DR 5

- 5-01. State whether your company has deployed DS1, DS3 and dark fiber loops.
- 5-02. State whether your company is affiliated with the ILEC. If so, please describe the affiliation.
- 5-03. For each DS1 and/or DS3 loop you have deployed, state (i) whether you own (i.e., have legal title to) or have a long-term (10 or more years) indefeasible right of use ("IRU") of the entire DS1/DS3 loop facilities (i.e., no UNEs, no special access circuits or the transmission facilities obtained from other carriers); (ii) whether you have deployed DS1/DS3 facilities by attaching your own optronics to activate dark fiber transmission facilities obtained under a long-term IRU; (iii) whether you are currently serving customers via such DS1/DS3 facilities.
- 5-04. For all dark fiber you have deployed, state whether you own (i.e., have legal title to) or have a long-term (10 or more years) indefeasible right of use of the entire dark fiber loop facilities. (Loops offered via UNEs, special access circuits or the

transmission facilities obtained from other carriers are not “owned” and should not be included.)

- 5-05. For the DS1 or DS3 loops you have deployed, state:
- a. Whether you provide to other unaffiliated carriers desiring to serve customers at that location access to DS1 and/or DS3 loops on a wholesale basis and, if so, the transmission level(s) at which such wholesale service has been provisioned to wholesale customers;
 - b. Whether you make such DS1 and/or DS3 facilities widely available on a wholesale basis;
 - c. Whether you offer such wholesale loops on a common carrier or private carriage basis;
 - d. How you offer the wholesale loops to unaffiliated carriers (e.g., through tariffs, standard contracts, individually negotiated contracts);
 - e. Whether the DS1 and/or DS3 services provided are a point-to-point service or a ring configuration, and what other units can be reached from each customer specific location and multi-tenant building suite;
 - f. Whether you have access to the entire customer location, including each individual unit within that location;
 - g. The amount of spare DS1 and/or DS3 facilities you have to that specific customer location; and
 - h. The amount of cross-connect/termination capacity available at your collocation space for wholesale facilities provided.
- 5-06. For each relevant loop, state (i) whether you are collocated in a central office that serves that building; (ii) the amount of cross-connect/termination capacity available at your collocation space for wholesale facilities provided; and (iii) the time it takes to provision to another carrier that is collocated as well as configure a connection to a carrier that is not collocated in the same central office.
- 5-07. For each dark fiber, DS1 and/or DS3 loop you have deployed, state the following:
- a. the name, street address, city and zip code of the customer served by the loop;
 - b. the customer’s V&H coordinates;
 - c. the customer’s serving wire center’s eight digit CLLI code;
 - d. the customer’s serving wire center’s V&H coordinates;
 - e. the number of dark fibers serving the customer’s location and/or the number of DS1 circuits serving the customer’s location and/or the number of DS3 circuits serving the customer’s location, as applicable;
 - f. if your company has access to the entire customer location, then state the number of individual units within the location, and if your company does not have access to the entire customer location, then state what number of served units relative to the number of all units situated at the location that your company has access to;
 - g. whether the customer location is served entirely by your company’s facilities;
 - h. whether the customer location is served by attaching your company’s optronics to activate dark fiber facilities provided by another carrier;
 - i. whether the customer location is served via an unaffiliated carrier to which your company has provided dark fiber;

- j. whether the loop is used to provide service to your company's retail customers; and if so, the price charged by you to the customer(s) for each such loop; and
- k. whether the loop is used by another carrier to provide service to its retail customers; if so, the price charged by you to the carrier with respect to each such loop.

DR 6

- 6-01. With respect to each of the lines in each of the exchanges, wire centers, LATAs and MSAs identified in your response to DR 1-07, indicate the types of loop over which local service is being provided (*e.g.*, an unbundled loop leased from the incumbent LEC, a copper or fiber loop leased from a third party, a self-supplied copper or fiber loop, or a coaxial cable loop).
- 6-02. With respect to each of the lines in each of the exchanges, wire centers, LATAs and MSAs identified in your response to DR 1-07, state the current average total monthly revenues earned per line served in Missouri and specify the source of those revenues by service type.
- 6-03. For each switch identified in your response to DR 1, state the initial cost of that switch, including installation and engineering costs, and the number of initial equipped lines. Describe in detail any instances in which your company is using through a wholesale, lease, or resale arrangement, the switch of an entity other than and unaffiliated with an ILEC (*e.g.*, another competitive local exchange carrier) to provide local exchange service to end users in Missouri. Include in your response the rates, terms, and conditions under which you are obtaining switching on a wholesale, lease, or resale basis.
- 6-04. State whether and to what extent your company provides, or plans to provide, local exchange services using IP-based technology.

DR 7

- 7-01. With respect to each switch identified in response to DR 1, does this switch service customer locations with:
 - a. 1 line only?
 - b. 2 or fewer lines?
 - c. 3 or fewer lines?
 - d. 4 or fewer lines?
 - e. 5 or fewer lines?
 - f. 6 or fewer lines?
 - g. 7 or fewer lines?
 - h. 8 or fewer lines?
 - i. 9 or fewer lines?
 - j. 10 or fewer lines?
- 7-02. For each grouping of customer locations identified in DR 7-01 (locations with 1 line, locations with 2 or few lines, etc.), provide:

- a. The individual customer locations. Initially, it will be sufficient to provide these locations by wire center service area. If that information is not readily available, then the information should be provided by actual customer address. To explain further, this question asks you to provide, initially by wire center service area, the number of customer locations you serve that you have one line, two lines or fewer, three lines or fewer, etc. If you cannot provide the information by wire center service area, then provide this information by actual customer location, i.e., Customer A is located at 1234 Broadway, St. Louis, Missouri, and has one line, and so forth;
 - b. The number of lines at each location that are used to provide voice service, and the number of lines that are used to provide data service, identified separately. If each line is used to provide both voice and data, so indicate;
 - c. If you know that the specific customer location is served by lines provided by another CLEC, or by an ILEC, provide the number of DS0/voice grade equivalent lines provided at each customer location by other CLECs or ILECs;
- 7-03. State whether you have any plans to terminate your service in any geographic area in Missouri that is currently served by the switches identified in response to DR 1 and/or DR 7. If you do, identify the geographic areas where you intend to terminate service.

DR 8

Please provide a copy of each of your responses to data requests or other discovery submitted to you by the Staff of the Missouri Public Service Commission, including but not limited to responses to Staff's DRs 2501, and 2513 through and including 2518. Also identify your company representative(s) who prepared each of those responses.

Respectfully submitted

SOUTHWESTERN BELL TELEPHONE, L.P.

BY 

PAUL G. LANE #27011
 LEO J. BUB #34326
 ROBERT J. GRYZMALA #32454
 MIMI B. MACDONALD #37606

Attorneys for Southwestern Bell Telephone, L.P.

One SBC Center, Room 3516

St. Louis, Missouri 63101

314-235-6060 (Telephone)

314-247-0014 (Facsimile)

robert.gryzmala@sbc.com