



Date: **March 3, 2005**

Number: **CLECALL05-037**

Effective Date: **N/A**

Category: **Loop-Transport (UNE)**

Subject: **(BUSINESS PROCESSES) SBC's¹ Loop-Transport Non-Impaired Wire Center Information**

Related Letters: **CLECALL05-019 Loop/Transport Order Rejection; Attachment: No
CLECALL05-020 Loop/Transport Price
Increase/Transition Period; and CLECALL05-027 and
CLECALL05-031 Loop/Transport Non-Impaired Wire
Center Identification**

States Impacted: **13-States**

Issuing SBC ILECS: **SBC Indiana, SBC Ohio, SBC Michigan, SBC Wisconsin, SBC California,
SBC Nevada, SBC Arkansas, SBC Illinois, SBC Kansas, SBC Missouri,
SBC Oklahoma, SBC Texas and SBC Connecticut**

Response Deadline: **March 10, 2005**

Contact: **See Contact in this AL**

Conference Call/Meeting: **N/A**

To: **SBC's Wholesale Customers**

The purpose of this Accessible Letter is to provide additional information regarding the wire centers that meet the FCC's non-impairment thresholds for Dedicated DS1, DS3 and Dark Fiber Transport routes and DS1 and DS3 loops as set forth in the FCC's new Rule 51.319 and the Triennial Review Remand Order (TRRO), released on February 4, 2005. Additionally, to the extent notice is required under interconnection agreements, this Accessible Letter provides notice that CLEC-specific collocation data may be disclosed for purposes of implementing the FCC's TRRO and Rule 51.319.

On February 22, 2005, SBC, via Accessible Letters **CLECALL05-027** and **CLECALL05-031**, provided information which identified wire centers where CLECS are not impaired without unbundled Dedicated DS1, DS3 and Dark Fiber Transport and unbundled DS1 and DS3 loops under the FCC's new unbundling criteria, and where CLECs therefore will not be able to order new facilities as of the effective date of the FCC's TRRO, i.e., March 11, 2005.

SBC has received requests for additional data regarding 1) the number of ARMIS 43-08 business lines, business UNE-P lines and UNE-loops and/or 2) the number of unaffiliated fiber-based collocators in the identified wire centers. SBC is providing such information for the sole purpose of allowing requesting carriers to fulfill their obligation to conduct the required "reasonably diligent inquiry" before self-certifying that any request for high-capacity unbundled loops or dedicated transport does not include facilities for which there is no impairment. This is to advise you that such data will be available to counsel pursuant to the Protective Order issued by the FCC in the TRRO proceeding (DA 04-3152, released September 29, 2004) at the following location:

Kellogg, Huber, Hansen, Todd, Evans and Figel P.L.L.C.
1615 M Street, N.W., Suite 400
Washington, D.C. 20036

Such information will be designated "copying prohibited" pursuant to paragraph 7 of the Protective Order.

To schedule an appointment to view the information, please call Kevin Walker at 202-367-7820.

¹ References to "SBC" in this Accessible Letter encompass, as applicable, the Issuing SBC ILECs identified at the beginning of this letter.