

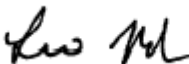
Issue 2

For purposes of the 47 CFR 51.319(d)(2)(iii)(B)(3) Analysis, how many DS0 lines must be supplied to a multi-line DS0 customer before that customer is considered to be an enterprise customer rather than a mass market customer?

SBC Missouri Position: The Commission should adopt a DS0 cutoff of four DS0s, meaning that a customer with four or more DS0s at a location would be part of the enterprise market, while a customer with three or fewer DS0s would be in the mass market.⁷ This cutoff, which is the default cutoff the FCC uses for density Zone 1 in the top 50 MSAs, best satisfies the FCC's criteria,⁸ which requires the Commission to take into account the point at which the increased revenue opportunity at a single location is sufficient to overcome impairment and the point at which multi-lined end-users could be served in an economic fashion by higher capacity loops and a carrier's own switching.⁹ The parties that advocate a higher cutoff point make several errors in their analysis, including the failure to consider the increased revenue opportunities that come with providing service over a DS1 loop, which, under the FCC's rules, are a critical part of the analysis.¹⁰

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⁷ Fleming Direct, p. 27.


⁸ 47 CFR Section 51.319(d)(2)(iii)(B)(4).

⁹ Fleming Direct, pp. 27-34.

¹⁰ Fleming Rebuttal, pp. 3, 18-36.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing document was served to all parties by e-mail on January 20, 2004.



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