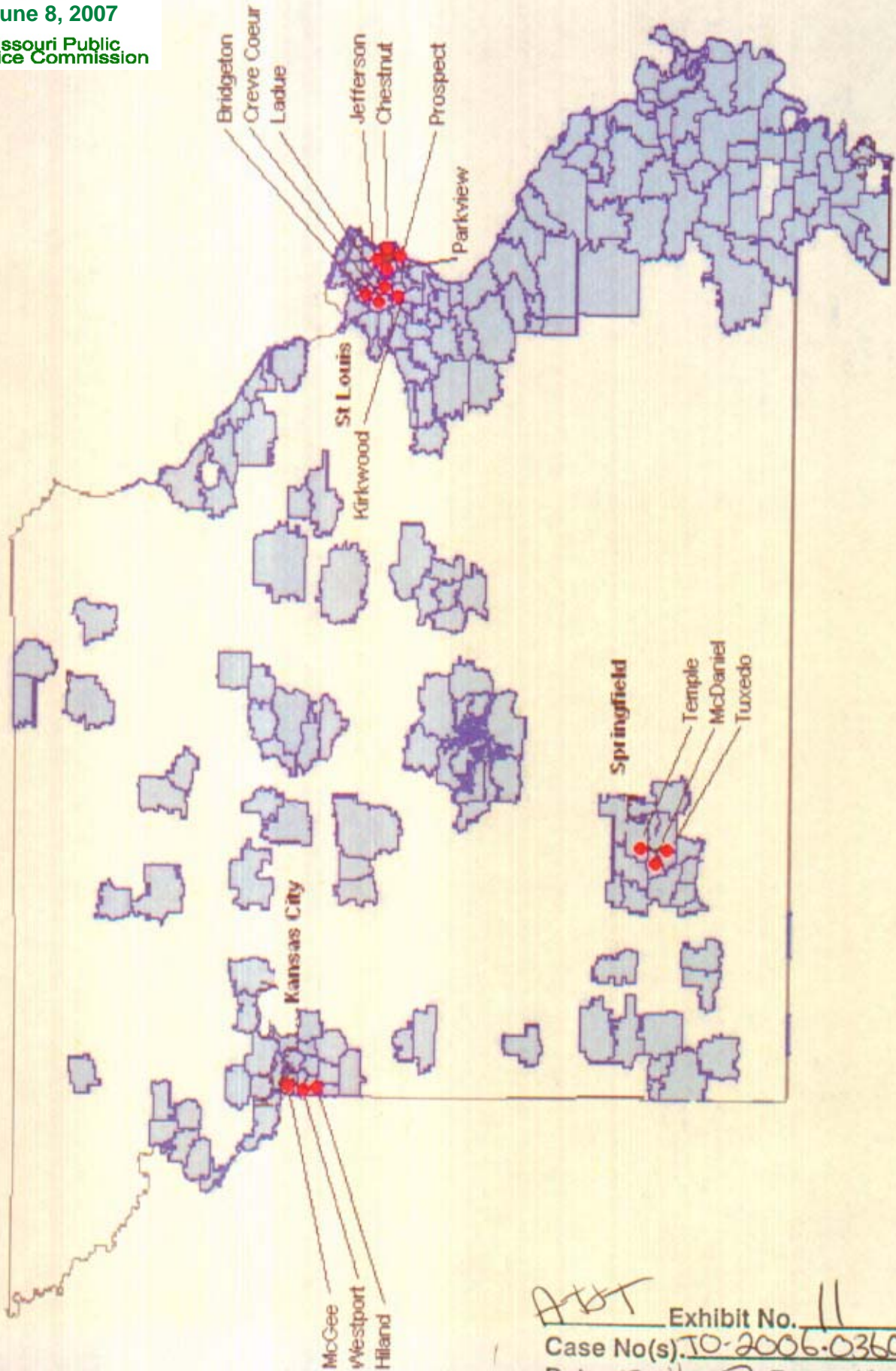


FILED

June 8, 2007

Missouri Public
Service Commission

AT&T Missouri Wire Centers



AT&T Exhibit No. 11
Case No(s) 10-2006-0360
Date 5-16-07 Rptr xx

WIRE CENTER COMMON NAME/CLLI TABLE

WIRE CENTER CLLI CODE	WIRE CENTER NAME
KSCYMO02	Kansas City (Hiland)
KSCYMO05	Kansas City (Westport)
KSCYMO55	Kansas City (McGee)
SPFDMOMC	Springfield (McDaniel)
SPFDMOTE	Springfield (Temple tandem)
SPFDMOTU	Springfield (Tuxedo)
STLSMO01	St. Louis (Chestnut)
STLSMO05	St. Louis (Jefferson)
STLSMO07	St. Louis (Parkview)
STLSMO08	St. Louis (Prospect)
STLSMO21	St. Louis (Ladue)
STLSMO27	St. Louis (Creve Coeur)
STLSMO41	St. Louis (Kirkwood)
STLSMO42	St. Louis (Bridgeton)

Table 1: Summary of Dedicated Transport Designations

WIRE CENTER	3/11/05 Designation	12/16/05 Designation *	12/29/06 Designation	Disputed?
KSCYMO02 (Hiland)	Tier 1	Tier 1	Tier 1	No dispute
KSCYMO05 (Westport)	Tier 1	Tier 1	Tier 1	No dispute
KSCYMO55 (McGee)	Tier 1	Tier 1	Tier 1	No dispute
SPFDMOMC (Springfield McDaniel)	Tier 1	Tier 1	Tier 1	No dispute
SPFDMOTL (Springfield Temple)	Tier 1	Tier 1	Tier 1	No dispute
SPFDMOTU (Springfield Tuxedo)	Tier 1	Tier 2 *	Tier 2 *	Disputed
STLSMO01 (Chestnut)	Tier 1	Tier 1	Tier 1	No dispute
STLSMO05 (Jefferson)	Tier 1	Tier 1	Tier 1	No dispute
STLSMO07 (Parkview)	Tier 1	Tier 2 *	Tier 2 *	No dispute
STLSMO08 (Prospect)	Tier 1	Tier 2 *	Tier 2 *	No dispute
STLSMO21 (Ladue)	Tier 1	Tier 1	Tier 1	No dispute
STLSMO27 (Creve Coeur)	Tier 1	Tier 1	Tier 1	No dispute
STLSMO41 (Kirkwood)	Tier 1	Tier 2 *	Tier 2 *	No dispute
STLSMO42 (Bridgeton)	Tier 1	Tier 2 *	Tier 2 *	No dispute

* Denotes the five wire centers that were reclassified from Tier 1 to Tier 2 upon application of the SBC/AT&T merger commitment (to exclude collocations by pre-merger AT&T Corp.) effective December 16, 2005. As discussed later, the CLECs argue that AT&T Missouri should have backdated the December 16, 2005 wire center reclassifications to Tier 2 by making them retroactive to March 11, 2005. Their argument must be rejected for, among other things, it overlooks the fact that the FCC's rules were properly applied to the facts as they existed in March, 2005 (i.e., neither company was an affiliate of the other), and it also overlooks the solely prospective effect of the AT&T's merger commitment.

Table 2: Summary of High-Capacity Loop Designations

WIRE CENTER	3/11/05 Designation	12/16/05 Designation	12/29/06 Designation	Disputed?
KSCYMO55 (McGee)	DS3 Loops	DS3 Loops	DS3 Loops	No dispute
STLSMO01 (Chestnut)	DS3 Loops	DS3 Loops	DS3 Loops	No dispute
STLSMO21 (Ladue)	DS3 Loops	DS3 Loops	DS3 Loops	Disputed

Rule 47 C.F.R. § 51.5

Business line. A business line is an incumbent LEC-owned switched access line used to serve a business customer, whether by the incumbent LEC itself or by a competitive LEC that leases the line from the incumbent LEC. The number of business lines in a wire center shall equal the sum of all incumbent LEC business switched access lines, *plus the sum of all UNE loops connected to that wire center*, including UNE loops provisioned in combination with other unbundled elements. Among these requirements, business line tallies (1) shall include only those access lines connecting end-user customers with incumbent LEC end-offices for switched services, (2) shall not include non-switched special access lines, (3) *shall account for ISDN and other digital access lines by counting each 64 kbps-equivalent as one line. For example, a DS1 line corresponds to 24 64 kbps-equivalents, and therefore to 24 "business lines."* (emphasis added)

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Unbundled Access to Network Elements)	WC Docket No. 04-313
)	
Review of Section 251 Unbundling Obligations)	CC Docket No. 01-338
Of Incumbent Local Exchange Carriers)	

PETITION FOR RECONSIDERATION

NuVox Communications, Inc.
XO Communications, Inc.

Date: March 28, 2005
(Page 15)

B. Other Adjustments Also Inflate the ARMIS Line Counts

In addition to the 64 kbps-equivalents rule, other adjustments made,, or the elimination of ARMIS adjustments, act to increase the number of business lines counted for purposes of the impairment tests. First, the ARMIS rules exclude non-switched retail lines,¹ but the Commission counts all UNE-L lines provided to CLECs. This would include UNE loops used for non-switched access purposes, such as Internet access or local private lines. Second, the Commission separately counts business access lines and residential lines in the ARMIS data.² All UNE-L lines are included, however, regardless of whether they are used to serve business or residential customers.

¹ FCC Report 43-08 - Report Definition, December 2004, at 18 (limiting lines reported to switched access lines.

² *Id.* at 21. Rule 51.5 counts only business access lines for the impairment criteria.

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(Page 11)

A. The Commission Erred by Counting DS1s and other Digital Lines on a per 64 kbps-equivalent basis

The most egregious over counting of business lines results from the Commission's treatment of digital access lines. Rule 51.5 states that business line tallies "shall account for ISDN and other digital access lines by counting each 64 kbps-equivalent as one line." Thus a DS1 is counted as 24 "lines;" a DS3 is counted as 672 "lines," etc.

BRIEF FOR RESPONDENTS

IN THE UNITED STATES COURT OF APPEALS FOR
THE DISTRICT OF COLUMBIA CIRCUIT

NO. 05-1095
(AND CONSOLIDATED CASES)

COVAD COMMUNICATIONS COMPANY, *ET AL.*,

Petitioners,

v.

FEDERAL COMMUNICATIONS COMMISSION AND
UNITED STATES OF AMERICA,

Respondents.

ON PETITIONS FOR REVIEW OF AN ORDER OF THE
FEDERAL COMMUNICATIONS COMMISSION

September 9, 2005
(Page 75)

4. The CLECs' argument that the ILECs submitted business line counts that do not meet the definition of business lines adopted by the commission (Br. 20) is not properly before the Court. The Commission's test requires ILECs to count business lines on a voice grade equivalent basis. In other words, a DS1 loop counts as 24 business lines, not one. *See* 47 C.F.R. § 51.5 (definition of "business line").