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February 18, 2005

VIA ELECTRONIC SUBMISSION

Mr. Jeffrey J. Carlisle
Chief
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Memorandum of Ex Parte Presentation
WC Docket 04-313, Review of the Section 251 Unbundling
Obligations of Incumbent Local Exchange Carriers

Dear Mr. Carlisle:

In response to your February 4, 2005 letter, SBC is submitting a list of wire centers¹ that meet the non-impairment thresholds established by the Commission in the *Triennial Review Remand Order*. Specifically, A - D attachments identify offices that meet the criteria² established by CFR § 51.319:

- Attachment A includes a list of CLLI codes for Tier 1 wire centers that contain at least four fiber based collocators, at least 38,000 business lines, or both. It also includes tandem switching locations that have no line side switching facilities. Pursuant to CFR § 51.319(e)(2)(ii) and CFR § 51.319(e)(2)(iii) there is no impairment for DS1 and DS3 transport on routes connecting these wire centers.
- Attachment B includes a list of CLLI codes for Tier 2 wire centers that contain at least three fiber based collocators, at least 24,000 business lines, or both and are not included as Tier 1 wire centers. Pursuant to CFR § 51.319(e)(2)(iii) there is no impairment for DS3 transport on routes connecting these wire centers and on routes connecting these wire centers with any of the Tier 1 wire centers identified in Attachment A.

¹ As defined in CFR § 51.5 - A wire center is the location of an incumbent LEC local switching facility containing one or more central offices.

² The wire center business line data includes retail business, resale, and coin lines from the 2003 ARMIS 43.08 report and UNE-P business lines, stand alone UNE loops, and EELs adjusted for 64 kbps-equivalents. SBC's December 7 and December 10, 2004 filings used different criteria that did not account for voice grade equivalents for the UNE lines (CFR § 51.5). SBC also performed a physical inventory of CLEC fiber collocation pursuant to the guidelines provided by the Commission's order in wire centers meeting these criteria.

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- Attachment C includes a list of CLLI codes for wire centers that meet the non-impairment threshold for DS1 loops. These wire centers contain at least four fiber based collocators and at least 60,000 business lines. Pursuant to CFR § 51.319(a)(4) there is no impairment for DS1 loops in these wire centers.
- Attachment D includes a list of CLLI codes for wire centers that meet the non-impairment threshold for DS3 loops. These wire centers contain at least four fiber based collocators and at least 38,000 business lines. Pursuant to CFR § 51.319(a)(5) there is no impairment for DS3 loops in these wire centers.

Additionally, you requested information on Tier 3 wire centers as defined by the Commission pursuant to CFR § 51.319(c)(3)(iii). Those wire centers are contained in Attachment E to this letter.

SBC provides this information publicly to assist the Commission as it moves forward in the implementation of the new rules.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter and the attachments are being electronically filed. I ask that this letter be placed in the files for the proceedings identified above.

Please call me should you have any questions.

Sincerely,

/s/ James C. Smith

CC: Michelle Carey
Tom Navin
Jeremy Miller
Ian Dillner