



April 7, 2005

Mr. Jerry Gilmore  
Director – Local Performance  
Industry Markets  
SBC Communications, Inc.  
Four Bell Plaza, 7<sup>th</sup> Floor  
311 South Akard Street  
Dallas, Texas 75202-5398

RE: SBC's Fiber-Based Collocator Designation

Dear Jerry:

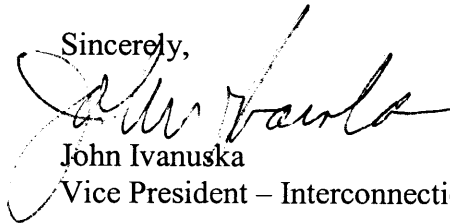
This letter is in response to your April 6, 2005 letter indicating the wire centers in which SBC has named Birch (or ionex) as a fiber-based collocator.

Birch disagrees with SBC's designations naming Birch or ionex as a fiber-based collocator in any of the wire centers in which either entity was so named.

Essentially, Birch disagrees with SBC because in none of the wire centers identified in SBC's April 6 letter does Birch or ionex own or operate a fiber-optic cable or comparable transmission facility that terminates at a collocation arrangement within the wire center and leaves the incumbent LEC wire center premises, as required by the definition found in 47 C.F.R. 51.5.

Please do not hesitate to contact me with any questions.

Sincerely,



John Ivanuska

Vice President – Interconnection & Carrier Relations