ATTACHMENT 2
Page 1

-----Original Message-----
From: Duda, Dorothy
Sent: Wednesday, October 29, 2003 9:50 AM
To: 'chuther@prestongates.com'; 'megant@prestongates.com'; 'mhazzard@kelleydrye.com';
               'terrance.spann@hqda.army.mil'; 'lupita.reyes@verizon.com'; 'bcobb@covad.com';
               'esther.h.northrup@xo.com'; 'kkirby@davisdixon.com'; 'karen.potkul@xo.com';
               'jeff@callamericacom.com'; 'lfinkel@adamsbroadwell.com'; 'cmailloux@turn.org';
               'elaine.duncan@verizon.com'; 'rcosta@turn.org'; Wales, Natalie; 'anitataffrice@earthlink.net';
               'steve.bowen@bowenlawgroup.com'; 'david.discher@sbc.com'; 'jtobin@mofo.com';
               'jk1786@sbc.com'; 'stephanie.krapf@sbc.com'; 'william.harrelson@mci.com'; 'glenn@stoverlaw.net';
               'davidjmiller@att.com'; 'deanhardt@att.com'; 'smalllecs@cwclaw.com'; 'jclark@gmssr.com';
               'michael.morris@algx.com'; 'smalllecs@cwclaw.com'; 'davidmarchant@dwt.com';
               'mmattes@nossaman.com'; 'ens@loens.com'; 'karen.potkul@xo.com'; 'esprague@pacwest.com';
               'mash@mpowercom.com'; 'dlee@snavely-king.com'; 'cronis@wilmer.com';
               'john.felz@mail.sprint.com'; 'arooker@cwa9400.com'; 'pagemont@cox.net'; 'mmulkey@arrival.com';
               'heidineal@momsavesjobs.org'; 'es3982@sbc.com'; 'eric.batongbacal@sbc.com'; 'nnail@caltel.org';
               'cynthia_walker@icgcomm.com'; 'emitchell@angnewspapers.com'; 'pceguera@covad.com';
               'jsumpter@pacwest.com'; 'jgordon@cwa-union.org'; Stevens, Maria E.; Lakritz, Jonathan; Ragsdale,
               Keith; Billingsley, Natalie; Phillips, Paul; Litkouhi, Simin; Koundinya, Sridarshan; Johnston, William;
               Lofaso, Alan; Machado, Carlos
Cc: Banuelos, Victor; Fung, William; Poschl, Christopher
Subject: A.01-02-024 (SBC 2001/2002 UNE Reexamination) Request for Information

Mr. Discher,
I am sending this e-mail to request your assistance in locating on the record all information relating to the "design point" that is part of your LoopCat model. I know that the design point was discussed a bit at the June workshops, but I am particularly interested in having you provide citations to your opening comments, reply or rebuttal filings, or briefs, to explanations of what the design point is, how it was calculated, and how it is used in the LoopCat model.

Please note that I am not asking for you to create new information or a new explanation. I am solely requesting that you assist me in locating where on the record this explanation has already been given. I would appreciate a response as soon as possible.

I will also give other parties the opportunity to provide me citations to any discussion they provide on the Loopcat design point in their reply or rebuttal comments, if there are any.

Thank you for your help on this.

Dorothy J. Duda
Administrative Law Judge
California Public Utilities Commission
415-703-2800
dot@cpuc.ca.gov

ATTACHMENT 2
Page 2


```
-----Original Message-----
From: KRAPF, STEPHANIE (Legal) [mailto:sk3578@sbc.com]
Sent: Thursday, October 30, 2003 2:54 PM
To: 'Duda, Dorothy'; 'chuther@prestongates.com';
'megant@prestongates.com'; 'mhazzard@kelleydrye.com';
'terrance.spann@hqda.army.mil'; 'lupita.reyes@verizon.com';
'bcobb@covad.com'; 'esther.h.northrup@xo.com'; 'kkirby@davisdixon.com';
'karen.potkul@xo.com'; 'jeff@callamericacom.com';
'lfinkel@adamsbroadwell.com'; 'cmailloux@turn.org';
'elaine.duncan@verizon.com'; 'rcosta@turn.org'; Wales, Natalie;
'anitataffrice@earthlink.net'; 'steve.bowen@bowenlawgroup.com';
DISCHER, DAVID (Legal); 'jtobin@mofo.com'; KIEREN, JOE (PB);
'william.harrelson@mci.com'; 'glenn@stoverlaw.net';
'davidjmiller@att.com'; 'deanhardt@att.com'; 'smalllecs@cwclaw.com';
'jclark@gmssr.com'; 'michael.morris@algx.com'; 'smalllecs@cwclaw.com';
'davidmarchant@dwt.com'; 'mmattes@nossaman.com'; 'ens@loens.com';
'karen.potkul@xo.com'; 'esprague@pacwest.com'; 'mash@mpowercom.com';
'dlee@snavely-king.com'; 'cronis@wilmer.com';
'john.felz@mail.sprint.com'; 'arooker@cwa9400.com'; 'pagemont@cox.net';
'mmulkey@arrival.com'; 'heidineal@momsavesjobs.org'; STRAW, ELAINE J
(PB); BATONGBACAL, ERIC R (PB); 'nnail@caltel.org';
'cynthia_walker@icgcomm.com'; 'emitchell@angnewspapers.com';
'pceguera@covad.com'; 'jsumpter@pacwest.com'; 'jgordon@cwa-union.org';
Stevens, Maria E.; Lakritz, Jonathan; Ragsdale, Keith; Billingsley,
Natalie; Phillips, Paul; Litkouhi, Simin; Koundinya, Sridarshan;
Johnston, William; Lofaso, Alan; Machado, Carlos; SELHORST, THOMAS
(Legal)
Cc: Banuelos, Victor; Fung, William; Poschl, Christopher
Subject: RE: A.01-02-024 (SBC 2001/2002 UNE Reexamination) Request for
Information


Your Honor:

The following is all the information in the record to our knowledge
that addresses SBC California's "design point."

*    2/7/03 Reply Comments of Joint Applicants, Exh. E (11/11-12/03
Depos. of Smallwood, pp. 139-141, 195-197, 244-248).
*    2/7/03 Reply Declaration of Donovan/Pitkin/Turner (for Joint
Applicants), pp. 35-41.
*    2/7/03 Reply Declaration of Roycroft (for TURN), pp. 44-47.
*    3/12/03 Rebuttal Declaration of Smallwood (for SBC California),
pp. 66-67.
*    Workshop Transcript WS-7, pp. 803-823, 832-838, 844, 887-888,
917, 941-946
*    05/01/03 Errata of SBC California, LROPP guidelines setting forth
definition of "Design Point," CD filepath: Errata
Documents\McNeill\Reply
Declaration Citations, File: longrunoppsep1983.pdf, p. 103.
```

ATTACHMENT 2
Page 3

If you need further assistance, please let us know.

Stephanie Krapf
Attorney for SBC California
PH: (415) 542-7712
Fax: (415) 543-0418

ATTACHMENT 2
Page 4


```
-----Original Message-----
From: Duda, Dorothy
Sent: Monday, November 03, 2003 10:31 AM
To: 'KRAPF, STEPHANIE (Legal)'; 'chuther@prestongates.com';
'megant@prestongates.com'; 'mhazzard@kelleydrye.com';
'terrance.spann@hqda.army.mil'; 'lupita.reyes@verizon.com';
'bcobb@covad.com'; 'esther.h.northrup@xo.com'; 'kkirby@davisdixon.com';
'karen.potkul@xo.com'; 'jeff@callamericacom.com';
'lfinkel@adamsbroadwell.com'; 'cmailloux@turn.org';
'elaine.duncan@verizon.com'; 'rcosta@turn.org'; Wales, Natalie;
'anitataffrice@earthlink.net'; 'steve.bowen@bowenlawgroup.com';
DISCHER, DAVID (Legal); 'jtobin@mofo.com'; KIEREN, JOE (PB);
'william.harrelson@mci.com'; 'glenn@stoverlaw.net';
'davidjmiller@att.com'; 'deanhardt@att.com'; 'smalllecs@cwclaw.com';
'jclark@gmssr.com'; 'michael.morris@algx.com'; 'smalllecs@cwclaw.com';
'davidmarchant@dwt.com'; 'mmattes@nossaman.com'; 'ens@loens.com';
'karen.potkul@xo.com'; 'esprague@pacwest.com'; 'mash@mpowercom.com';
'dlee@snavely-king.com'; 'cronis@wilmer.com';
'john.felz@mail.sprint.com'; 'arooker@cwa9400.com'; 'pagemont@cox.net';
'mmulkey@arrival.com'; 'heidineal@momsavesjobs.org'; STRAW, ELAINE J
(PB); BATONGBACAL, ERIC R (PB); 'nnail@caltel.org';
'cynthia_walker@icgcomm.com'; 'emitchell@angnewspapers.com';
'pceguera@covad.com'; 'jsumpter@pacwest.com'; 'jgordon@cwa-union.org';
Stevens, Maria E.; Lakritz, Jonathan; Ragsdale, Keith; Billingsley,
Natalie; Phillips, Paul; Litkouhi, Simin; Koundinya, Sridarshan;
Johnston, William; Lofaso, Alan; Machado, Carlos; SELHORST, THOMAS
(Legal)
Cc: Banuelos, Victor; Fung, William; Poschl, Christopher
Subject: Follow-Up Request for Information--A.01-02-024 (SBC 2001/2002
UNE Reexamination)


Ms. Krapf and Mr. Discher:
Reviewing the items below leads me to a follow-up question on the
"design point" used in the LoopCat preprocessor.

The LROPP guidelines, p. 103 (contained in the SBC 5/1 Errata per your
note below) define the design point as "The longest loop in any plant
segment, expressed in feet from the CO."  That leads me to believe the
"design point" is a measure of feeder plus distribution.  At the June
workshop, Mr. Smallwood discussed how the LoopCat model uses half the
design point as a proxy for the average distribution length, and adds
this to actual data on the F1 (feeder) length. (WS-7, 6/26/03, p. 804)
Smallwood also discusses this in his deposition which you reference in
your note below. (Smallwood depo, 11/12/02, p. 244-45.)

So it seems to me that feeder is counted twice if it is already in the
design point measurement, and then half the design point is added to
actual feeder length.  Am I understanding this correctly?  If not,
please explain by providing somewhere else on the record that can help
me understand how loop length is calculated in LoopCat.
```

ATTACHMENT 2
Page 5

As always, I appreciate your prompt response via e-mail, with an
electronic copy to the entire service list. I will incorporate all e-
mail responses into the record at a later date by ruling.
ALJ Dorothy Duda

ATTACHMENT 2
Page 6

-----Original Message-----
From: Duda, Dorothy
Sent: Monday, November 03, 2003 11:14 AM
To: 'KRAPF, STEPHANIE (Legal)'; 'chuther@prestongates.com';
'megant@prestongates.com'; 'mhazzard@kelleydrye.com';
'terrance.spann@hqda.army.mil'; 'lupita.reyes@verizon.com';
'bcobb@covad.com'; 'esther.h.northrup@xo.com'; 'kkirby@davisdixon.com';
'karen.potkul@xo.com'; 'jeff@callamericacom.com';
'lfinkel@adamsbroadwell.com'; 'cmailloux@turn.org';
'elaine.duncan@verizon.com'; 'rcosta@turn.org'; Wales, Natalie;
'anitataffrice@earthlink.net'; 'steve.bowen@bowenlawgroup.com';
'DISCHER, DAVID (Legal)'; 'jtobin@mofo.com'; 'KIEREN, JOE (PB)';
'william.harrelson@mci.com'; 'glenn@stoverlaw.net';
'davidjmiller@att.com'; 'deanhardt@att.com'; 'smalllecs@cwclaw.com';
'jclark@gmssr.com'; 'michael.morris@algx.com'; 'smalllecs@cwclaw.com';
'davidmarchant@dwt.com'; 'mmattes@nossaman.com'; 'ens@loens.com';
'karen.potkul@xo.com'; 'esprague@pacwest.com'; 'mash@mpowercom.com';
'dlee@snavely-king.com'; 'cronis@wilmer.com';
'john.felz@mail.sprint.com'; 'arooker@cwa9400.com'; 'pagemont@cox.net';
'mmulkey@arrival.com'; 'heidineal@momsavesjobs.org'; 'STRAW, ELAINE J
(PB)'; 'BATONGBACAL, ERIC R (PB)'; 'nnail@caltel.org';
'emitchell@angnewspapers.com'; 'pceguera@covad.com';
'jsumpter@pacwest.com'; 'jgordon@cwa-union.org'; Stevens, Maria E.;
Lakritz, Jonathan; Ragsdale, Keith; Billingsley, Natalie; Phillips,
Paul; Litkouhi, Simin; Koundinya, Sridarshan; Johnston, William;
Lofaso, Alan; Machado, Carlos; 'SELHORST, THOMAS (Legal)'
Cc: Banuelos, Victor; Fung, William; Poschl, Christopher
Subject: RE: Follow-Up Request for Information--A.01-02-024 (SBC
2001/2002 UNE Reexamination)

Ms. Krapf and Mr. Discher:
I forgot to mention that a source for my confusion on this design point
topic stems from statements at the workshop that "the design point is a
distribution length only" (Smallwood, 6/26/03, TR. at 837-8.) This
seems to contradict the LROPP guidelines which define design point as
furthest distance from the CO.
Thank you for your help in sifting through the record to help me
understand this.
Dorothy Duda

R.01-02-024 et al. DOT/tcg

ATTACHMENT 2
Page 7

```
-----Original Message-----
From: SELHORST, THOMAS (Legal) [mailto:ts1912@sbc.com]
Sent: Wednesday, November 05, 2003 3:37 PM
To: 'Duda, Dorothy'; KRAPF, STEPHANIE (Legal);
'chuther@prestongates.com'; 'megant@prestongates.com';
'mhazzard@kelleydrye.com'; 'terrance.spann@hqda.army.mil';
'lupita.reyes@verizon.com'; 'bcobb@covad.com';
'esther.h.northrup@xo.com'; 'kkirby@davisdixon.com';
'karen.potkul@xo.com'; 'jeff@callamericacom.com';
'lfinkel@adamsbroadwell.com'; 'cmailloux@turn.org';
'elaine.duncan@verizon.com'; 'rcosta@turn.org'; Wales, Natalie;
'anitataffrice@earthlink.net'; 'steve.bowen@bowenlawgroup.com';
DISCHER, DAVID (Legal); 'jtobin@mofo.com'; KIEREN, JOE (PB);
'william.harrelson@mci.com'; 'glenn@stoverlaw.net';
'davidjmiller@att.com'; 'deanhardt@att.com'; 'smalllecs@cwclaw.com';
'jclark@gmssr.com'; 'michael.morris@algx.com'; 'smalllecs@cwclaw.com';
'davidmarchant@dwt.com'; 'mmattes@nossaman.com'; 'ens@loens.com';
'karen.potkul@xo.com'; 'esprague@pacwest.com'; 'mash@mpowercom.com';
'dlee@snavely-king.com'; 'cronis@wilmer.com';
'john.felz@mail.sprint.com'; 'arooker@cwa9400.com'; 'pagemont@cox.net';
'mmulkey@arrival.com'; 'heidineal@momsavesjobs.org'; STRAW, ELAINE J
(PB); BATONGBACAL, ERIC R (PB); 'nnail@caltel.org';
'cynthia_walker@icgcomm.com'; 'emitchell@angnewspapers.com';
'pceguera@covad.com'; 'jsumpter@pacwest.com'; 'jgordon@cwa-union.org';
Stevens, Maria E.; Lakritz, Jonathan; Ragsdale, Keith; Billingsley,
Natalie; Phillips, Paul; Litkouhi, Simin; Koundinya, Sridarshan;
Johnston, William; Lofaso, Alan; Machado, Carlos
Cc: Banuelos, Victor; Fung, William; Poschl, Christopher
Subject: A.01-02-024, etc. (SBC 2001/2002 UNE Reexamination) -- SBC
Califo rnia's Response to Follow-Up Request for Information of ALJ Duda
[REDACTED/PUBLIC VERSION]


Your Honor,

In response to your e-mails to us dated November 3, 2003, feeder is not
double-counted in LoopCAT's calculation of loop lengths.  It is correct
that the design point is defined in the LROPP guidelines as the
furthest point from the Central Office ("CO").

However, as Mr. McNeill explained at the workshop:
"You've [got] cumulative feeder lengths, that is central office to that
feeder section that serves the distribution area; you have the
distribution lengths, which is really from the end of that feeder
section to the design point; and then both added together give you your
total loop length to the design point."  (Mr. McNeill for SBC
California, Workshop Tr., 811:27 -
812:5.)

SBC California's LEIS database contains the actual feeder distance to
serve every loop in each distribution area or DA ("The feeder distance
is an actual distance that is recorded by the engineer." Smallwood
```

R.01-02-024 et al. DOT/tcg

ATTACHMENT 2
Page 8

Depo., 245:3-4). Because LEIS does not contain the length of each
distribution cable from the end of the feeder or FDI, the longest piece
of distribution cable is divided by two:
Q.   Where do you pull the maximum length for the distribution in a
distribution area; where do you actually get that information from?
A.   That's pulled from LEIS.
Q.   Okay.
A.   It's part of the data set for that working loop record; there
will be a length for the feeder and a length for the distribution, and
that distribution length is based on the design information for that DA
as opposed to an actual measurement for each individual working loop,
how far it is from the FDI to the serving terminal. (Smallwood Depo.,
245:6-17.)
...
Q.   Is that design point, the halfway point, is it off the maximum
distribution length in the DA or is it off -- what is it calculated off
of what you called the design point?
A.   Again, just for clarification, for the record, I use the term
design point. I don't know if that's a technical term. That's a term
I use. ...[T]hat would be the maximum distribution length for that
distribution area, and then we divide that in half to get an
approximation of what the average would be for that distribution area.
(Smallwood Depo., 246:5-8, 19-22.)

That the "divide by 2" was applied only to the distribution length and
not the total loop distance (which would include feeder) was further
clarified in Mr. Smallwood's deposition as follows:
Q.   At this point, the one field that I know exists in this analysis
is the distribution length. Would you characterize that as being the
average loop length or the average distribution length for loops in
that distribution area, this value that you have calculated?
A.   I'm sorry. To which value are you referring?
Q. I'm referring to your testimony that the design point, as you
called it, which is the mid point of the longest distribution length in
a distribution area, I'm asking if you believe that that represents the
average of the loops that are in that distribution area; the average
distribution length of the loops in that distribution area.
A.   I think the way I characterized is we believe it's an estimation
of what we believe the average to be. Obviously, if we don't have
lengths from a SAC box to a serving terminal, we can't calculate the
average to check it. But we believe it's a reasonable approximation of
what the average would be for all of those distribution lengths.
(Smallwood Depo., 260:20 - 261:8.)

In reference to what was divided by two, Mr. Smallwood explicitly
stated that because we know feeder distances, it was only the
distribution lengths that were divided by two not total loop length:
A.   ...The data in the database is a design point -- what I refer to
as a design point data. It's the maximum length for the distribution
area. When we process that information consistent with what we have
done in the past using LEIS data, we divide that by two to get an
approximation of the distribution length.

ATTACHMENT 2
Page 9

Q.   Where do you pull the maximum length for the loop from?
A.   It's not a maximum length of the loop. The feeder distance is an actual distance that is recorded by the engineer. It's the distribution length. (Smallwood Depo., 244:18 - 245:5.)

At paragraphs 73 and 74 of the Donovan/Pitkin/Turner Reply Declaration on behalf of WorldCom/AT&T, Joint Applicants themselves acknowledge that SBC California's maximum distance of distribution is divided by 2 and added to actual feeder lengths.

Finally, a review of the loop length data used in LoopCAT validates that the feeder length is not "double-counted." Specifically, at tab "PreProcess" in LoopCAT, the distribution and feeder lengths are shown for each central office. A cursory review of this data reveals that there are numerous examples where the distribution is less than half the feeder length, which would be impossible if feeder were included in the calculation of distribution length. As an example, attached is an extract from LoopCAT, clearly showing that the feeder length cannot be included as part of the distribution length. [This Attachment contains proprietary & confidential information; a redacted version is attached hereto. A follow-up e-mail containing the unredacted version will be sent separately to Judge Duda, other CPUC personnel and any parties who have executed a Non-disclosure and Protective Agreement with SBC California in this proceeding.]

We note that this question has arisen after the close of the record. Had this question been raised when the record was open, SBC California would have provided further dispositive facts. We also note that parties had access to LEIS and had the ability to check for any double-counting of feeder length. (See, e.g., Law & Motion Hearing (Dec. 16, 2002), 5 Tr. 214:20 - 225:6.)

Yours very truly,

Tom Selhorst, for Mr. Discher and Ms. Krapf
Senior Paralegal
Pacific Bell Telephone Company
dba SBC California
Legal/Regulatory, 15th Floor
140 New Montgomery Street
San Francisco, CA 94105
phone: 415.542.7715
fax: 415.543.0418
e-mail: thomas.selhorst@sbc.com

R.01-02-024 et al. DOT/tcg

ATTACHMENT 2
Page 10

```
-----Original Message-----
From: Miller,David J - LGCRP [mailto:davidjmiller@att.com]
Sent: Friday, November 07, 2003 3:59 PM
To: SELHORST, THOMAS (Legal); Duda, Dorothy; KRAPF, STEPHANIE (Legal);
chuther@prestongates.com; megant@prestongates.com;
mhazzard@kelleydrye.com; terrance.spann@hqda.army.mil;
lupita.reyes@verizon.com; bcobb@covad.com; esther.h.northrup@xo.com;
kkirby@davisdixon.com; karen.potkul@xo.com; jeff@callamericacom.com;
lfinkel@adamsbroadwell.com; cmailloux@turn.org;
elaine.duncan@verizon.com; rcosta@turn.org; Wales, Natalie;
anitataffrice@earthlink.net; steve.bowen@bowenlawgroup.com; DISCHER,
DAVID (Legal); jtobin@mofo.com; KIEREN, JOE (PB);
william.harrelson@mci.com; glenn@stoverlaw.net; Deanhardt,W C (Clay) -
LGCRP; smalllecs@cwclaw.com; jclark@gmssr.com; michael.morris@algx.com;
smalllecs@cwclaw.com; davidmarchant@dwt.com; mmattes@nossaman.com;
ens@loens.com; karen.potkul@xo.com; esprague@pacwest.com;
mash@mpowercom.com; dlee@snavely-king.com; cronis@wilmer.com;
john.felz@mail.sprint.com; arooker@cwa9400.com; pagemont@cox.net;
mmulkey@arrival.com; heidineal@momsavesjobs.org; STRAW, ELAINE J (PB);
BATONGBACAL, ERIC R (PB); nnail@caltel.org; cynthia_walker@icgcomm.com;
emitchell@angnewspapers.com; pceguera@covad.com; jsumpter@pacwest.com;
jgordon@cwa-union.org; Stevens, Maria E.; Lakritz, Jonathan; Ragsdale,
Keith; Billingsley, Natalie; Phillips, Paul; Litkouhi, Simin;
Koundinya, Sridarshan; Johnston, William; Lofaso, Alan; Machado, Carlos
Cc: Banuelos, Victor; Fung, William; Poschl, Christopher
Subject: RE: A.01-02-024, etc. (SBC 2001/2002 UNE Reexamination) -- JA
Response To SBC California's Response to Follow-Up Request for
Information of ALJ Duda
```

Your Honor,

Pursuant to your October 29, 2003 e-mail, Joint Applicants wish to
emphasize the following record references regarding the "design point."
Joint Applicants believe it is important to note that the design point
does not represent actual loop lengths or cable distances in SBC's
existing network. Instead, the design point is a data point used in
long range planning to plan for the longest potential loop that may
theoretically exist at some time in the future. The following
references relate to this point:

One "goal" of Long Range Outside Plant Planning ("LROPP") guidelines,
which SBC relies on for the definition of "design point," is "[t]o
develop and document the existing AND ULTIMATE configuration of feeder
and route boundaries." It is "based on growth expectations for the
next 20 years." (Errata of SBC California, 05/01/03, LROPP guidelines,
CD filepath: Errata Documents\McNeill\Reply Declaration Citations,
File: longrunoppsep1983.pdf, p. 2) (emphasis added) (hereinafter "LROPP
Guidelines").

ATTACHMENT 2
Page 11

LROPP Distribution Areas ("DAs") include "ultimate living units" and "vacant land." (LROPP Guidelines, p. 20)

Definition of "Distribution Area," defined below "design point," specifies it considers "ULTIMATE living units based on the proposed land usage (not necessarily what exists today)." (LROPP Guidelines, p. 103) (emphasis in original)

Workshop Transcript, 6/26/03, p 838:
15   MR. POSCHL: On the design point, if you know this,
16   what percentage of the design points are actually customers
17   versus noncustomers?
18   MR. MC NEILL: My guess is about 75 percent. Again 75
19   percent are real. Perhaps another 25 percent are --
20   MR. PEARSONS: Designed.
21   MR. POSCHL: Thank you.

The maps SBC relied on at the June workshops provide numerous illustrations of cases in which the "design point" is much further out than the farthest existing customer.

Respectfully submitted,

David J. Miller
Senior Attorney
AT&T Law & Government Affairs
795 Folsom Street, Room 2159
San Francisco, CA 94107
(415) 442-5509 (voice)
(281) 664-9478 (fax)

(END OF ATTACHMENT 2)