

EXHIBIT A

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
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RCN CORPORATION, <u>et al.</u> ,	:	Case No. 04-13638 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	
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**DECLARATION OF ANTHONY M. HORVAT IN SUPPORT OF
DEBTORS' FIFTH OMNIBUS OBJECTION TO CLAIMS**

I, Anthony M. Horvat, hereby declare that the following is true to the best of my knowledge, information and belief:

1. I am the individual designated by the Debtors with the responsibility of reconciling proofs of claim filed against RCN Corporation the other Debtors in their above-captioned chapter 11 cases.
2. I submit this declaration in support of the Debtors' Fifth Omnibus Objection Pursuant to Bankruptcy Code sections 105(a) and 502(b) and Bankruptcy Rules 3001 and 3007 (the "Fifth Omnibus Objection").¹ I make this declaration on the basis of my review of the Debtors' books and records (the "Books and Records") and the proofs of claim (the "Proofs of Claim") relating to the Disputed Claims, together with any supporting or related documentation.
3. To date, holders of claims have filed approximately 2,075 proofs of claim in these chapter 11 cases.

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Fifth Omnibus Objection.

4. I have been personally involved in the review of each of the Proofs of Claim and the Debtors' extensive efforts in reconciling the claims asserted by the Claimants with the Books and Records. In this regard, I participated in the review of the claims, identifying those claims that should potentially be allowed, disallowed, or subordinated, and read the Fifth Omnibus Objection and the corresponding proposed order. Accordingly, I am familiar with the information contained therein. During the claims reconciliation process, in the event there was uncertainty as to the legal validity of a claim, I consulted with and followed the advice of counsel.

5. Based on these efforts, the Debtors and I have determined the following:

Honeywell International Inc. ("Claim No. 7"). Claim No. 7 is a general unsecured pre-petition claim in the amount of \$835.99 on account of security monitoring services provided by Honeywell International Inc. ("Honeywell"). Claim No. 7 is asserted in the Chapter 11 case of RCN Corporation (Case No. 04-13638 (RDD)). The documentation attached to the proof of claim with respect to Claim No. 7 indicates that Honeywell provided security services at four different locations in Forest Hills, New York and New York, New York. RCN Corporation does not lease or own any property in New York. Additionally, the Books and Records indicate that several of the invoices annexed to the proof of claim were paid by RCN Telecom Services, Inc., a non-Debtor subsidiary of RCN Corporation. Moreover, Claim No. 7 is not reflected in the Books and Records and is not supported by sufficient evidence of the date of incurrence of such claim and/or the existence or nature of such claim. For these reasons, I believe that Claim No. 7 should be disallowed and expunged.

Federal Express Corporation ("Claim No. 14"). Claim No. 14 is a general unsecured claim in the amount of \$1,434.63 on account of prepetition services rendered. Claim No. 14 is asserted in the Chapter 11 case of RCN Corporation (Case No. 04-13638 (RDD)). Claim No. 14 is not reflected in the Books and Records and is not supported by sufficient evidence of the date of incurrence of such claim, the existence or nature of such claim, or the Debtors or non-Debtors to which services were rendered. For these reasons, I believe that Claim No. 14 should be disallowed and expunged.

Level 3 Communications, LLC ("Claim No. 394"). Claim No. 394 is a general unsecured claim in the amount of \$44,752.98 on account of pre-petition services. Claim No. 394 is asserted in the Chapter 11 case of RCN Corporation (Case No. 04-13638 (RDD)). The services, however, were rendered to RCN Telecom Services, Inc., a non-Debtor, and the Books and Records indicate that the invoices

attached to the proof of claim were paid in full by RCN Telecom Services, Inc., on or about July 9, 2004. Moreover, Claim No. 394 is not supported by sufficient evidence of the date of incurrence of such claim and/or the existence or nature of such claim. For these reasons, I believe that Claim No. 394 should be disallowed and expunged.

6. I believe that each of the Disputed Claims is appropriately the subject of an objection by the Debtors and that the Debtors should be granted the relief requested in the Fifth Omnibus Objection with respect to the Disputed Claims.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 21st day of October 2004.

/s/ Anthony M. Horvat
ANTHONY M. HORVAT