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March 14, 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, D.C. 20554

Re: Telecommunications Services-Inside Wiring, Customer
Premises Equipment, CS Docket No. 95-184

Dear Mr. Caton:

We write to you in response to the FCC's Notice of Proposed Rulemaking released on January 26, 1996, regarding telephone and cable wiring inside buildings. We enclose four (4) copies of the letter, in addition to this original. We are concerned that any action taken by the FCC regarding access to private property by large numbers of communications may inadvertently and unnecessarily adversely affect the conduct of our business and needlessly raise additional legal issues. The Commission's public notice also raises a number of important issues that affect us. We urge the FCC to consider carefully any action it may take.

Brach, Eichler, Rosenberg, Silver, Bernstein, Hammer and Gladstone represents owners and managers of approximately 30,000 apartment units located in New Jersey, Pennsylvania, and Florida. The sizes of the complexes range from 50 unit complexes to 1500 unit complexes. A significant number of complexes are owned by small businesses as defined by the Small Business Administration. This is relevant as to the FCC's public claim that small businesses will not be affected by this rulemaking.

Issues Raised by the FCC's Notice

1. Access to Private Property. Apartment house owners are committed to making sure that efficient telephone and cable service is provided to our residents at a reasonable cost. Government intervention is neither necessary nor desirable to insure the availability of services and we believe that such intervention

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could have the unintended effect of interfering with our ability to effectively manage our properties, control the limited space available in most of our properties, and paramount, ensure the safety and security of our residents.

2. Demarcation Point. Depending on the type of property, the demarcation point should be outside the building or outside the structural premises of each resident.

3. Connections and Regulation of Wiring. There are already standards and building codes in place; the FCC does not need to impose new standards.

4. Customer Access to Wiring. This should be governed by state property law. We must retain the right to control activities on our property if need be.

Sincerely,

Benjamin O. Ringel