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*Squire, Sanders & Dempsey*

*U. S. Offices:*  
*Cleveland, Ohio*  
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*International Offices:*  
*Brussels, Belgium*  
*Budapest, Hungary*  
*London, England*  
*Prague, Czech Republic*

*Counsellors at Law*  
*1201 Pennsylvania Avenue, N.W.*  
*P. O. Box 407*  
*Washington, D. C. 20044-0407*

*Telephone: (202) 626-6600*  
*Call Squire DB*  
*Telecopier: (202) 626-6780*

July 12, 1996

*Direct Dial Number*

(202) 626-6634

William F. Caton  
Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

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JUL 12 1996

Federal Communications Commission  
Office of Secretary

Re: Ex Parte Presentation -- CC Docket No. 96-98

Dear Mr. Caton:

On Thursday, July 11, 1996, representatives of the Information Technology Association of America ("ITAA") made an ex parte presentation to James L. Casserly, Senior Legal Advisor to Commissioner Susan Ness. Representing ITAA were William Warner of ISSC, John B. Lynn of EDS and the undersigned of this Firm. The views expressed on behalf of ITAA are reflected in the enclosed materials.

Please let us know if you have any questions.

Sincerely,

  
Joseph P. Markoski

/jef  
Enclosure

cc: James L. Casserly

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**IMPLEMENTATION OF THE LOCAL COMPETITION  
PROVISIONS IN THE TELECOMMUNICATIONS ACT OF 1996 --  
CC DOCKET NO. 96-98**

Federal Communications Commission  
Office of Secretary

*Ex Parte* Presentation by the  
Information Technology Association of America

**ITAA MEMBERS' INTEREST IN CC DOCKET NO. 96-98**

- Major consumers of local exchange and interexchange services
- Major providers of enhanced services

**CONSUMERS WILL BENEFIT FROM INTERCONNECTION RULES THAT:**

- Prescribe uniform national policies
- Mandate cost-based pricing
- Require maximum unbundling without use restrictions

**THE DECISIONS REACHED IN THIS PROCEEDING WILL IMPACT THE FUTURE OF  
THE INTERNET, OTHER ON-LINE INFORMATION SERVICES AND ACCESS CHARGE  
REFORM**

- Use of the Internet and other on-line information services is growing
- Feature Groups are the problem, not the solution

**THE COMMISSION SHOULD REQUIRE OR, AT A MINIMUM, NOT FORECLOSE THE  
UNBUNDLING OF THE LOCAL LOOP AND OTHER LOCAL EXCHANGE NETWORK  
ELEMENTS**

- Enhanced service providers and other users should be able to select the network services that best meet their technical and economic needs



- **Local loops should be unbundled in a way that enables data and other traffic to be routed before it reaches the central office switch. Such unbundling would:**
  - ◆ **Allow interconnection at a number of established network points inside and outside the central office**
  - ◆ **Moot unsupported claims about the impact of the Internet and other on-line information services on LEC switches**
  - ◆ **Make more efficient use of LEC plant**
  - ◆ **Permit flat-rate pricing**
  - ◆ **Lower costs to consumers and service providers**
  - ◆ **Create new service opportunities for LECs, CLECs and IXC**
  - ◆ **Improve access to the NII**
- **Other network elements should be unbundled so as to permit the offering of services tailored to the needs of enhanced service providers and other users with data communications needs**

Loop Elements  
Illustrative Example  
Using Technical Standard  
Interfaces for Interconnection  
Issue 1

Subloop Elements  
Distribution  
Concentrator/Multiplexer  
and Feeder

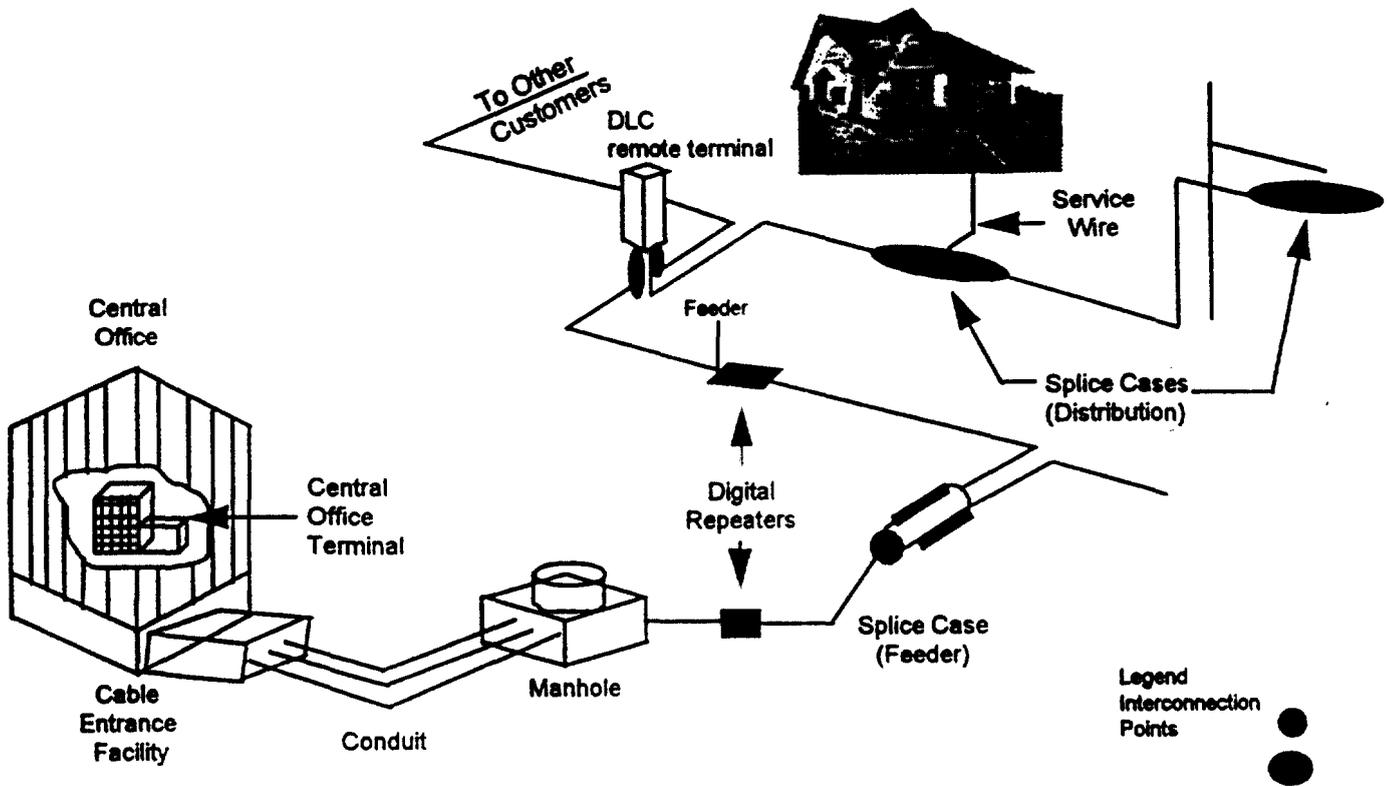


Figure 1 Central Office to the Home

Network Elements Connected via Industry Technical Standards:

- ANSI T1.403 - 1989 American Standard for Telecommunications- Carrier to Customer Installation, DS1 Metallic Interface Specification

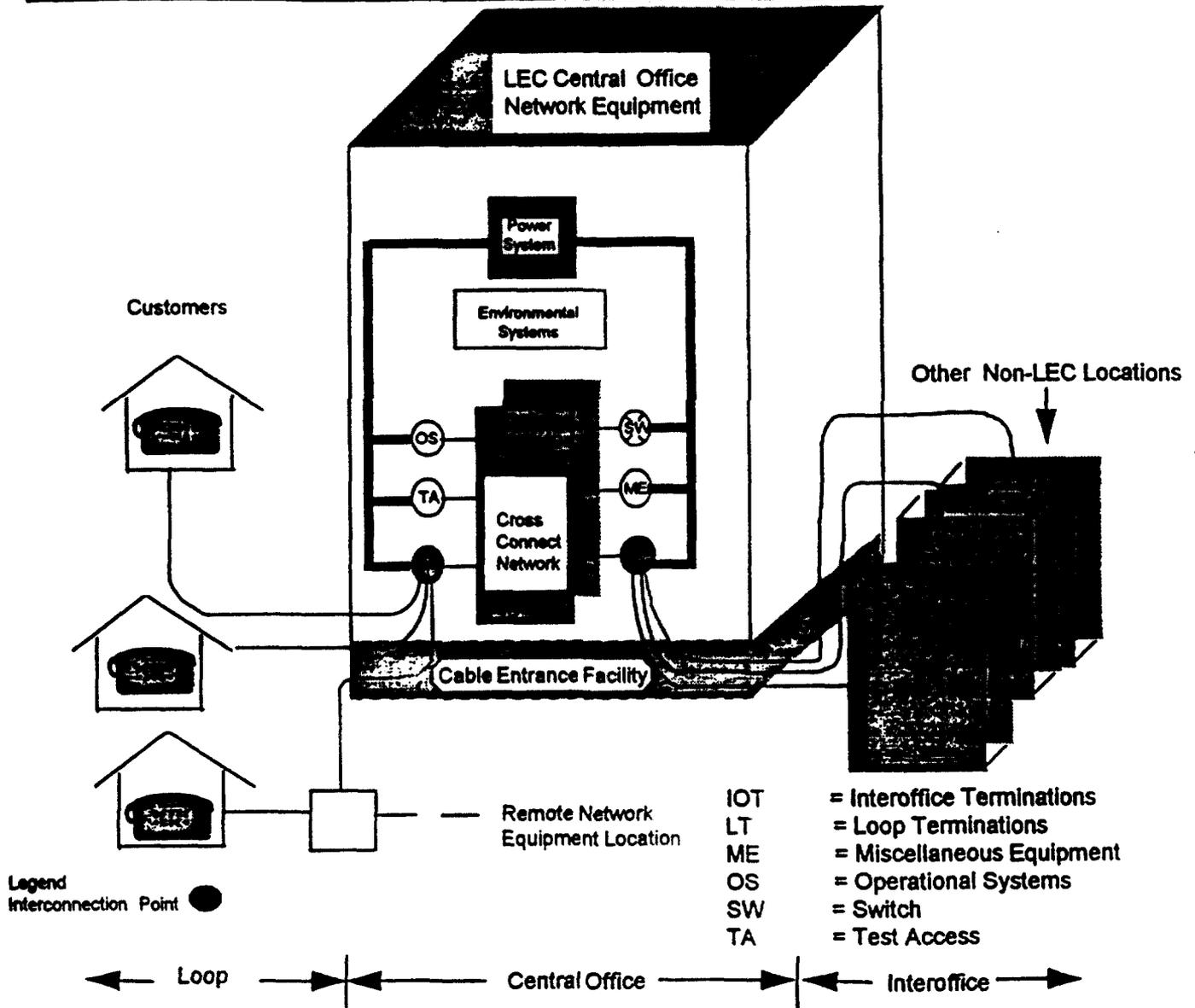


Figure 2 - End Office Switching

Network Elements Connected via Industry Technical Standards:

- ANSI T1.401.01-1994 Interface Between Carriers and Customer Installations - Analog Voice Grade Switched Access Lines Using Loop-Start and Ground-Start signaling with Line-Side Answer Supervision Feature.

# WIRE CENTER EVOLUTION

