

SBC Communications Inc.
1401 I Street, N.W.
Suite 1100
Washington, DC 20005

EX PARTE OR LATE FILED



April 17, 1997

EX PARTE

William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W. , Room 222
Washington, D.C. 20554

RECEIVED

APR 17 1997

Federal Communications Commission
Office of Secretary

Dear Mr. Caton:

Re: Telecommunications Services Inside Wiring; CS Docket No. 95-184, Cable Home Wiring, MM Docket No. 92-260

Yesterday, Kathy Rehmer, Director Regulatory Planning, SBC Communications, Inc. , Mark Armstrong, Vice President, Regulatory, Southwestern Bell Video Services, Sarah Thomas, Senior Counsel, Pacific Telesis Legal Group, Lea Jones, Regulatory Director, Pacific Telesis Shared Services, Kevin Carbone, Director, Strategic Markets, Pacific Bell Video Services, discussed over the telephone, and I discussed in person, with John Logan, Deputy Chief, Cable Services Bureau, JoAnn Lucanik, Chief, Rick Chessen, Deputy Chief, and Larry Walke, of the Policy and Rules Division, Cable Services Bureau, the issues summarized in the attachment. We are submitting two copies of this notice in accordance with Section 1.206(a)(1) of the Commission's rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions.

Sincerely yours,

Gina Harrison
Director
Federal Regulatory Relations
Pacific Telesis Group
(A Subsidiary of SBC Communications, Inc.)

cc: R. Chessen
J. Logan
J. Lucanik
L. Walke

Attachment

No. of Copies rec'd
List ABCDE

0+1

Cable Inside Wire Docket
CC Docket No. 95-184

SBC/Pacific Telesis Main Points:

Cable Inside Wire demarcation point (demarc) for multiple dwelling units (MDUs) needs to be changed to the point where the common feeder wire meets line dedicated to the unit.

- A. Commission has authority to change the demarc:
- 1) 47 U.S.C. 543 (a)(2) - Preference for Competition
 - 2) 47 U.S.C. Section 548 - Development of Competition and Diversity in Video Programming Distribution
 - 3) Section 207 of the 1996 Telecommunications Act. Proper implementation of over-the-air reception device rules requires that the demarc be changed.

Perpetual exclusive contracts should not be permitted. Limited-time exclusive contracts should only be permitted for newly wired buildings:

- A. Only permitted for new installations where a video provider has newly installed at least 75% of the inside wiring in an MDU.
- B. Exclusive contracts should be limited to not more than 7 years. This provides an opportunity for the provider to recover the costs of a new system.
- 1) The 7 year period would be from the point in time that the new wiring is installed.

Example:

If wiring put in December, 1995, the exclusive could remain in place until December, 2002.

The changing of demarcation and limiting the use of exclusive contracts are inextricably tied together.

A decision should be issued soon. Parties should not be permitted to delay a decision in this proceeding.