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Glenn Brown
Executive Director-
Public Policy

September 11, 1997

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ex Parte

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

RE: CC Dockets 96-45 and 97-160

Dear Mr. Caton:

On September 10, 1997, representatives of the Benchmark Cost Proxy Model (BCPM) and the Hatfield model met with the Joint Board Staff and interested members of the public to continue our discussion of cost proxy models. A copy of the list of attendees of this meeting is attached.

Mr. Keller asked if there were any questions regarding the guidelines which the Staff had provided for the model sponsors regarding the documentation of the models. Generally this guidance consisted of flexibility to modify model inputs, and openness and verifiability of the model, its inputs and source code. Representatives of the BCPM team raised the following questions:

- Mr. Page asked if the sponsors had to choose between using public data at a high level of aggregation, or proprietary data which might allow for a more accurate estimation of costs, how should they evaluate this choice. Mr. Keller replied that sponsors should try to minimize their reliance on non-public data.
- Mr. Page asked if it was OK to use statewide average data for customer usage. Msrs. Keller and Loube replied that this would be OK, and in some situations nationwide average data might be OK.
- Mr. Stegeman asked how the sponsors should treat computations which were pre-processed and input to the models. Mr. Keller stated that the source code of the computations done outside of the models should be made available. Mr. Stegeman agreed that the BCPM sponsors would provide such source code.

Mr. Brown next used an aerial photograph of the Niwot, Colorado wire center to demonstrate how aerial maps could be used to verify that a model reasonably identified customer locations. Mr. Stegeman stated that neither the BCPM nor the Hatfield model in their prior versions built plant out to all areas of the wire center which contained people. He stated that aerial photographs could be used as a tool to validate that all populated areas of a wire center are served by the models.

Mr. Clarke of AT&T asked if the BCPM pre-processor could process Hatfield customer and SAI data through the BCPM's "intelligent" feeder routine that bends the main feeder towards

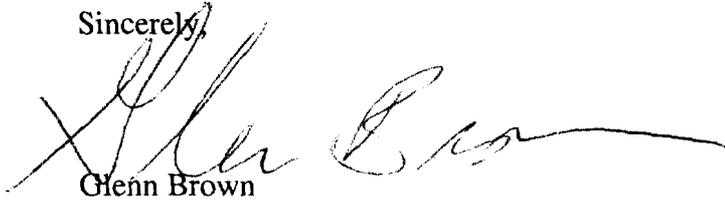
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the population points in the quadrant. Mr. Stegeman of the BCPM team stated that he thought, with some caveats, it could be done. He clarified by stating that the BCPM logic is built around the "dynamic" grid and he was not sure that the SAI sites could be a substitute. With the Hatfield SAIs, he was not sure where the DLCs were located nor did he know if the polygon shape of the clusters would impact the feeder algorithms. While it may be possible to do this, it would take significant time and resources which are not currently available.

Since this meeting concluded in the afternoon, this letter is being filed the following business day. In accordance with Commission Rule 1.1206(a)(1), the original and three copies of this summary of the presentation is being filed with your office. Acknowledgment and date or receipt are requested. A copy of this submission is provided for this purpose. Please contact me if you have questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Glenn Brown", written in black ink.

Glenn Brown

Attachment

cc: Mr. Charles Keller

**Ex-Parte Meeting September 10, 1997
Attendees**

IN PERSON:

Natalie Wales, FCC
Rich Clarke, ATT
Mike Lieberman, ATT
Ed Barber, Bell Atlantic
Dave Dowds, FL PSC
Rowland Curry, TX PUC
Glenn Brown, USWest
Neill Whitehead, Australian Comms. Auth.
Warren Hannah, Sprint
Whit Jordan, BellSouth
Brad Wimmer, FCC
Chris Frentrup, MCI
Bob Roche, CTIA
Wade Herriman, FCC
Bill Sharkey, FCC
Gary Allan, RUS
John Harlig, RUS
Ed Cameron, RUS
Pam Fusting, NTCA
Bryan Clopton, FCC
Bob Loube, FCC
Chuck Keller, FCC
Mark Askins, Sprint
Dave Porter, WorldCom

BY PHONE:

Mark Kennet, FCC
Ann Dean, MD PSC
Sandra Makeef, IA UB
Brian Roberts, CA PUC
Kevin Schwenzfier, NY DPS
Peter Cassidy, NorTel
Kevin Landis, Chris Antis, PNR
Chris Babb, NECA
Glen Sims, SBC
Tad Burnet, Joe Ebs, GTE
Peter Copeland, Jerry Perry U S WEST
Dan Fancher, BellSouth
Brian Staihr, Talmidge Cox, Sprint
Jim Stegeman, INDETEC
Audrey Curitss, INDETEC
Joe Page, INDETEC