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September 24, 1997

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William F. Caton
Office of the Secretary
Federal Communications Commission
1919 M. St., NW, Room 222
Washington, D.C. 20554

RE: Hatfield Sponsors' Submission Pursuant to the Commission's Request
for Comments on Outside Plant Loop Design Proposed by the
Commission Staff for Their "HCPM"

CC Docket No. 96-45
CC Docket No. 97-160

Dear Mr. Caton,

On September 11, 1997, W. W. Sharkey, D. M. Kennet and C. A. Bush of the Commission staff, and Vaikunth Gupta of Panum Telecom, LLC presented several proposals for how loop outside plant (OSP) might be modeled. This letter responds to the Commission's request for comments on these proposals.

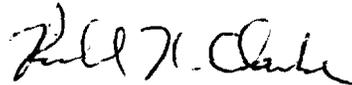
In general, the Hatfield Sponsors believe that the Commission's proposals are sound, and are quite consistent with the engineering of loop OSP in the Hatfield Model. In particular:

- 1) It is very appropriate to use copper-based T1 digital technologies to reach distant customers in sparsely populated areas.
- 2) While HDSL is a copper-based digital technology that could be used to serve distant, sparse customers, investigation by Hatfield has determined that its cost would exceed that of T1 technology, thus it is not to be preferred to T1.
- 3) It is inaccurate and excessive to assume that drop wires should reach to the center of estimated customer lots.
- 4) It is appropriate to assume some optimization in the routing of feeder cables to the population clusters that they serve.

In the Comments that AT&T Corp. and MCI Telecommunications Corporation are filing today on modeling issues related to OSP engineering in the cost models, each of these points is addressed at greater length.

An original and three copies of this letter are being submitted to the Secretary of the FCC. Seven copies are being submitted to Chuck Keller of the Universal Service Branch.

Sincerely,



Richard N. Clarke

cc: Chuck Keller (7 copies)
Sheryl Todd R. Loube N. Wales E. Hoffnar A. Bush
W. Sharkey B. Wimmer B. Clopton W. Herriman M. Kennet
State Staff Service List