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July 21, 1998

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: CC Docket Nos. 98-11, 98-26/ Petitions For Relief From Barriers To Deployment of Advanced Telecommunications Services; CC Docket No. 98-32, Petition To Remove Barriers To Investment In Advanced Telecommunications Services; RM No. 9244, Petition of the Alliance for Public Technology Requesting Issuance of Notice of Inquiry and Notice of Proposed Rulemaking to Implement Section 706 of the 1996 Telecommunications Act; CC Docket No. 98-91, Petition for Relief from Regulation Pursuant to Section 706 of the Telecommunications Act of 1996 and 47 U.S.C. § 160 for ADSL Infrastructure and Service; CC Docket No. 98-78, Petition of the Association for Local Telecommunications Services for a Declaratory Ruling Establishing Conditions Necessary to Promote Deployment of Advanced Telecommunications Capability Under Section 706 of the Telecommunications Act of 1996

Dear Ms. Roman Salas:

Today, I spoke by telephone with Tom Power, Legal Advisor to Chairman Kennard. During our conversation, I reviewed AT&T's position in these proceedings as reflected in its filed comments. In particular, I reviewed AT&T's position on the suggestion that RBOCs be permitted to create completely separate subsidiaries for the provision of advanced telecommunications services. First, if such a suggestion were to be considered, it should be explored fully in a separate proceeding. And then, if this alternative is pursued, the Commission should only consider a totally divested entity that is not commonly owned with the RBOC; that must purchase access to Unbundled Network Elements and resale like any other CLEC; that can obtain no collocation that is not offered to other CLECs; that obtains the same pricing as other CLECs; that, in essence, comes to the market with no financial or market advantages related to any affiliation with its former RBOC parent.

Two copies of this Notice are being submitted on the following business day to the Secretary of the FCC in accordance with Section 1.1206(a)(2) of the Commission's rules.

Very truly yours,

Albert M. Lewis

cc: Mr. T. Power

