

**FCC Forum Addressing Combinations  
Of Unbundled Network Elements**

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**DEC - 4 1998**

**Panel One: The Importance of Combinations of Network Elements**  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Remarks of Keith Townsend  
on Behalf of USTA**

**June 4, 1998**

**CC Docket Nos. 96-98  
97-137, 97-208, 97-231**

- **The '96 Act provides for three means of competitive entry (1) the new entrant uses its own facilities-based network and interconnects with ILECs, (2) purchase of ILEC unbundled network elements ("UNEs"), and (3) resale of ILEC retail telecommunications services**
- **The '96 Act requires that new entrants have access to ILEC UNEs on a nondiscriminatory basis**
- **The '96 Act requires CLECs to combine UNEs into alternative facilities-based telecommunications networks and services**
- **The 8<sup>th</sup> Circuit Court of Appeals affirmed the competitive entry differences between Section 251(c)(3) access to UNEs and Section 251(c)(4) resale of ILEC retail telecommunications services**