



January 13, 1999

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Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M St., NW  
Washington, DC 20554

Re: Deployment of Wireline Services offering Advanced Telecommunications  
Capability; CC Docket Nos. 98-147, 98-11, 98-26, 98-32, 98-15, 98-78, and 98-91.

Dear Ms. Salas:

On January 12, 1999, John Windhausen, Jr., Emily Williams and I met on behalf of ALTS with Commissioner Susan Ness and Linda Kinney concerning the Commission's above-reference rulemaking. We discussed the need of the facilities-based CLECs for strong Commission rules on collocation and subloop unbundling. In addition, we addressed the need for strong separation requirements should the Commission decide to allow incumbent local exchange carriers to provide advanced data services through a separate subsidiary. Finally, we discussed our strong legal and policy opposition to any interLATA relief for the provision of advanced telecommunications services absent fulfillment of the Section 271 requirements.

Sincerely,

  
Cronan O'Connell

CC: Commissioner Susan Ness  
Linda Kinney