

Bell Atlantic
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Washington, DC 20005

Kenneth Rust
Director, Federal Regulatory Affairs

ORIGINAL



July 9, 1999

Ex Parte

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

RECEIVED
JUL 9 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket Nos. 94-1, 96-262, and RM 9210

Dear Ms. Salas:

Today, Susanne Guyer and I, representing Bell Atlantic, met with William Bailey, Legal Assistant to Commissioner Furchtgott-Roth, regarding the items captioned above. The attached material formed the basis of discussion at the meeting.

Any questions on this filing should be directed to me at the address shown above.

Sincerely,

Attachment

cc: Mr. W. Bailey (letter only)

No. of Copies rec'd 075
List A B C D E

Petition for Forbearance and Pricing Flexibility



July 8, 1999

The ALTS' "Study" Is Meaningless

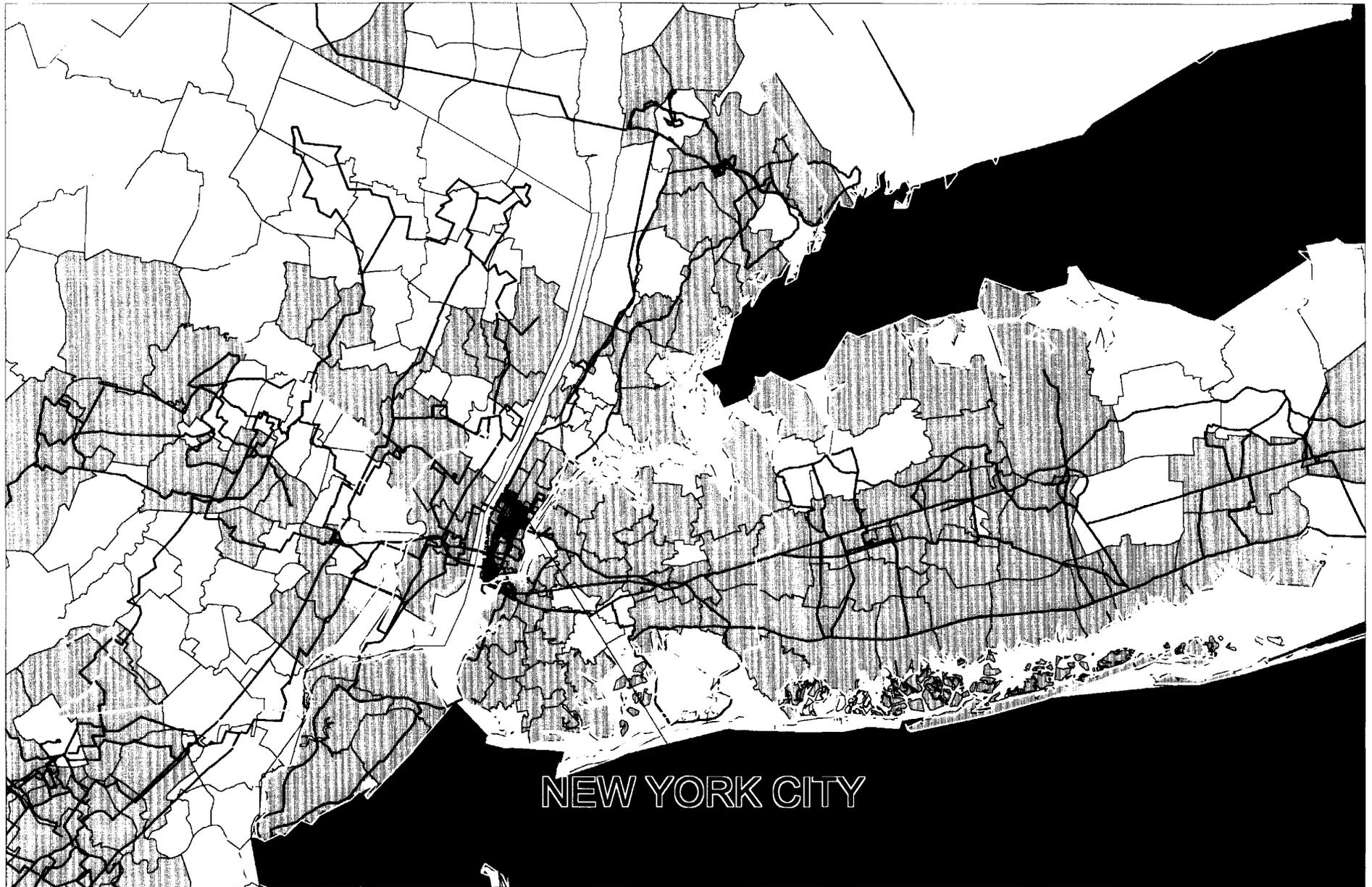
- It consists of nothing but a patchwork of hypothetical "what ifs" with no factual data to support absurd conclusions and recommendations.
- Unrealistic Criteria For Relief
 - » Collocation in all ILEC wire centers
 - » Route by route analysis of interoffice transport
 - » 20% of the ILEC business loops resold or provided as UNEs

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Pricing Flexibility Principles

- Administratively simple process
- Decrease regulation as competition increases
 - » Allow deaveraged rates and targeted rate reductions
 - » Provide clear path for removal of all price regulation
- Criteria and Triggers must be
 - » Explicit
 - » Measurable
 - » Verifiable
- Comprehensive -- must address all markets
 - » Services
 - » Geographic areas

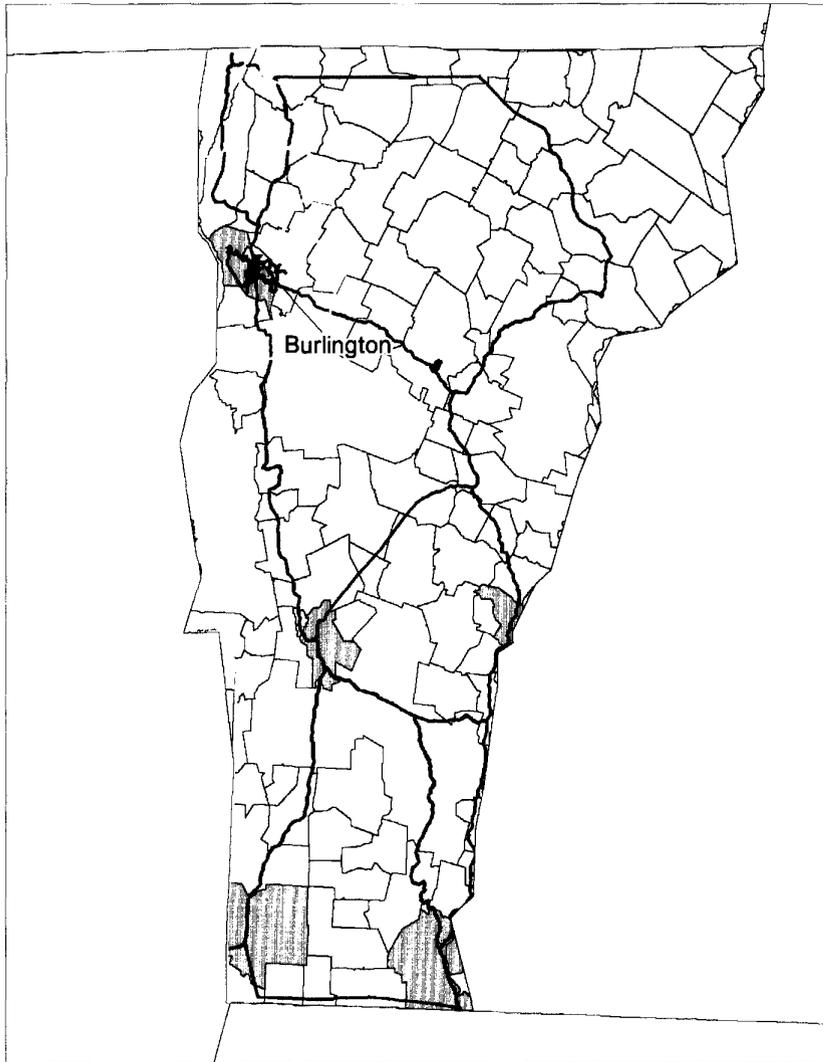
Status of Competition in Metropolitan New York



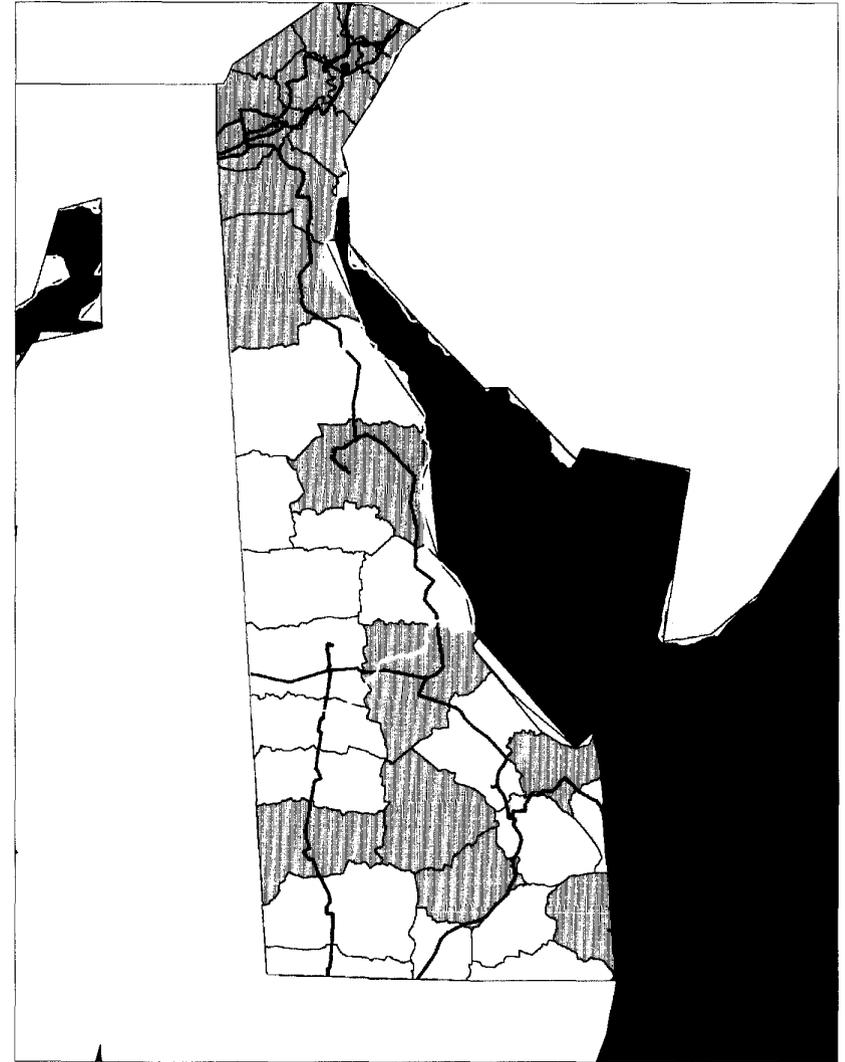
— Fiber MSA □ BA Wire Center ▨ Coll WC

1 inch = 7 miles

Competition in non-MSA Areas



Vermont
1 inch = 21 miles



Delaware
1 inch = 13 miles

— Fiber MSA □ BA Wire Center ▨ Coll WC

Other Concerns

- Respond to RFPs
 - » Customers with demand across MSA and non-MSA
- Facilities-based competition
- Criteria for non-MSA relief
- Lower Formula Adjustment

SUMMARY

- Meaningful relief must include *reasonable* opportunity to remove services from price caps
- Criteria for relief must be *realistically* attainable
- Provisions must also allow for relief for non-MSAs