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AT&T

Suite 1000
1120 20th Street, N.W.
Washington, DC 20036
202 457-3810

July 15, 1999

RECEIVED

JUL 15 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

RE: Ex Parte Presentation
CC Docket No. 96-45 – Universal Service/Proxy Cost Models
CC Docket No. 97-160 – Forward-Looking Cost Mechanism

Dear Ms. Salas:

Attached are copies of the Protective Order declarations that have been executed by AT&T and MCI WorldCom in the above-captioned dockets. Also attached are copies of the correspondence that AT&T and MCI WorldCom have sent to various Local Exchange Carriers seeking to review the proprietary data that they may have filed in these dockets.

To date, we have been able to view data filed by Bell Atlantic, BellSouth, Ameritech, GTE, SBC, Sprint and Aliant. SBC has not yet allowed us to inspect its vendor contracts. U S West has refused to allow inspection of its data other than at its Colorado headquarters.

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

Sincerely,

Richard N. Clarke

Richard N. Clarke

Attachments

cc: Craig Brown
Katie King
Bob Loube
Sheryl Todd

Recycled Paper

Attachment A:

DECLARATION

In the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160).
I, Richard N. Clarke, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.
(signed) _____
(printed name) Richard N. Clarke
(representing) AT&T Corp.
(title) Division Manager
(employer) AT&T Corp.
(address) 295 North Maple Ave., Basking Ridge, NJ 07920
(phone) 908-221-8685
(date) June 10, 1999

Attachment A:

DECLARATION

In the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160).
I, Michael R. Lieberman, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.
(signed) _____
(printed name) Michael R. Lieberman
(representing) AT&T Corp.
(title) District Manager
(employer) AT&T Corp.
(address) 295 N. Maple Ave, Basking Ridge, NJ
(phone) 908-221-5467
(date) 6/17/99

Attachment A:

DECLARATION

In the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160).

I, Catherine Petzinger, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

(signed) Cath Petz
(printed name) Catherine Petzinger Catharine Petzinger.
(representing) AT&T
(title) District Mgr
(employer) AT&T
(address) 295 N. Maple Ave Basking Ridge, NJ
(phone) 908-221-5943
(date) 6/17/99

Attachment A:

DECLARATION

In the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160).
I, Chris Frentrup, hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

(signed) Chris Frentrup
(printed name) Chris Frentrup
(representing) MCI WorldCom
(title) Senior Economist
(employer) MCI WorldCom
(address) 1801 Pennsylvania Ave, NW
Washington, DC 20006
(phone) 202 887-2731
(date) June 10, 1999

Attachment A:

DECLARATION

In the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs (CC Docket Nos. 96-45, 97-160).
I, John C. Donovan ,hereby declare under penalty of perjury that I have read the Protective Order that has been entered by the Common Carrier Bureau in this proceeding, and that I agree to be bound by its terms pertaining to the treatment of Confidential Information submitted by parties to this proceeding. I understand that the Confidential Information shall not be disclosed to anyone except in accordance with the terms of the Protective Order and shall be used only for purposes of the proceedings in this matter. I acknowledge that a violation of the Protective Order is a violation of an order of the Common Carrier Bureau. I acknowledge that this Protective Order is also a binding agreement with the Submitting Party.

(signed) _____
(printed name) John C. Donovan
(representing) AT&T and MCI WorldCom
(title) President
(employer) Telecom Visions, Inc.
(address) 11 Osborne Rd, Garden City, NY 11530
(phone) 516-739-3565
(date) June 10, 1999

AT&T
Room 5462B3

295 North Maple Avenue
Basking Ridge, NJ 07920

May 12, 1999

Mr. Pete Sywenki
Director, Federal Regulatory Affairs
Sprint
1850 M Street, NW - Suite 1100
Washington, DC 20036

Re: Proprietary Data submitted to the FCC in:
CC Docket No. 96-45 – Universal Service/Proxy Cost Models
CC Docket No. 97-160 – Forward-Looking Cost Mechanism

Dear Mr. Sywenki:

Based on ex parte and other filings that you have made with the Federal Communications Commission in the above-captioned dockets, AT&T and MCI WorldCom understand that Sprint has provided the Commission with certain data that it believes are proprietary. These data pertain to the costs that Sprint incurs for the purchase, installation and operation of equipment used in its local exchange networks – or other costs including overheads. This may include information about the purchase and installation cost of end office or tandem switches, digital loop carrier systems, transmission systems, and/or the cost of outside plant elements such as cable and its placement, connectors, protectors, splicing, etc. Further information may have been provided on the quantities required of these pieces of a local network (e.g., loop and drop lengths, structure type and sharing percentages, etc.) Attached to the last page of this letter is a brief description of some, but quite possibly not all, of the proprietary data that you may have provided to the Commission.

Because AT&T and MCI WorldCom would like to be able to provide the Commission with an evaluation of the accuracy and relevance of these proprietary data for the purpose of establishing the forward-looking economic costs of local exchange networks, we request the opportunity to review these data pursuant to the Common Carrier Bureau's *Protective Order*.[1] In the event that these data were submitted to the Commission under protective restrictions different from those stated in the *Protective Order*, AT&T and MCI WorldCom request that the status of these data be changed so as

[1] This *Protective Order* was issued in CC Docket Nos. 96-45 and 97-160 on July 27, 1998 as DA 98-1490 (13 FCC Rcd. 13910 (1998)).

to be subject to inspection under the terms of the *Protective Order*. As informally agreed to among the parties, we request to inspect these data in Washington, D.C. – unless the volume or format of these data make that location impossible.

We would like to inspect these data as soon as possible, preferably during the week of May 17 to May 21. Could you please propose a date and time that would be convenient. Upon establishing this appointment, we will be happy to provide you with names of the AT&T and MCI WorldCom representatives who will inspect the data – and provide you with copies of the Declarations that each of these representatives has executed stating that they will abide by the terms of the *Protective Order*.

Thank you very much for your attention to this request. Please contact us if you have any questions. Richard Clarke may be reached at the above address, or by telephone at 908-221-8685, by fax at 908-221-4628, or email at rnclarke@att.com. Chris Frentrup may be reached at MCI WorldCom, 1801 Pennsylvania Avenue, NW, Washington, DC 20006, or by telephone at 202-887-2731, by fax at 202-887-3070, or email at Christopher.J.Frentrup@mci.com.

Sincerely,

Richard N. Clarke
AT&T

Chris Frentrup
MCI WorldCom

cc: Craig Brown, FCC

Partial List of Data Items

1. All information provided to the Commission pursuant to its July 9, 1997 Data Request *Order* in CC Docket No. 96-45 and its July 19, 1997 *Errata*.

2. All information provided to the Commission pursuant to its "Outside Plant Structure and Cable Costs" *Data Collection Request* that was issued on or about December 14, 1998.

3. Any other information provided to the Commission under proprietary cover in CC Docket Nos. 96-45 and 97-160 concerning the costs, input prices or equipment quantities associated with local telephone networks.

AT&T
Room 5462B3

295 North Maple Avenue
Basking Ridge, NJ 07920

May 12, 1999

Mr. Robert McKenna
Associate General Counsel
U S West
1801 California Street, Suite 5100
Denver, CO 80202

Re: Proprietary Data submitted to the FCC in:
CC Docket No. 96-45 – Universal Service/Proxy Cost Models
CC Docket No. 97-160 – Forward-Looking Cost Mechanism

Dear Mr. McKenna:

Based on ex parte and other filings that you have made with the Federal Communications Commission in the above-captioned dockets, AT&T and MCI WorldCom understand that U S West has provided the Commission with certain data that it believes are proprietary. These data pertain to the costs that U S West incurs for the purchase, installation and operation of equipment used in its local exchange networks – or other costs including overheads. This may include information about the purchase and installation cost of end office or tandem switches, digital loop carrier systems, transmission systems, and/or the cost of outside plant elements such as cable and its placement, connectors, protectors, splicing, etc. Further information may have been provided on the quantities required of these pieces of a local network (e.g., loop and drop lengths, structure type and sharing percentages, etc.) Attached to the last page of this letter is a brief description of some, but quite possibly not all, of the proprietary data that you may have provided to the Commission.

Because AT&T and MCI WorldCom would like to be able to provide the Commission with an evaluation of the accuracy and relevance of these proprietary data for the purpose of establishing the forward-looking economic costs of local exchange networks, we request the opportunity to review these data pursuant to the Common Carrier Bureau's *Protective Order*.[2] In the event that these data were submitted to the Commission under protective restrictions different from those stated in the *Protective Order*, AT&T and MCI WorldCom request that the status of these data be changed so as

[2] This *Protective Order* was issued in CC Docket Nos. 96-45 and 97-160 on July 27, 1998 as DA 98-1490 (13 FCC Rcd. 13910 (1998)).

to be subject to inspection under the terms of the *Protective Order*. As informally agreed to among the parties, we request to inspect these data in Washington, D.C. – unless the volume or format of these data make that location impossible.

We would like to inspect these data as soon as possible, preferably during the week of May 17 to May 21. Could you please propose a date and time that would be convenient. Upon establishing this appointment, we will be happy to provide you with names of the AT&T and MCI WorldCom representatives who will inspect the data – and provide you with copies of the Declarations that each of these representatives has executed stating that they will abide by the terms of the *Protective Order*.

Thank you very much for your attention to this request. Please contact us if you have any questions. Richard Clarke may be reached at the above address, or by telephone at 908-221-8685, by fax at 908-221-4628, or email at rnclarke@att.com. Chris Frentrup may be reached at MCI WorldCom, 1801 Pennsylvania Avenue, NW, Washington, DC 20006, or by telephone at 202-887-2731, by fax at 202-887-3070, or email at Christopher.J.Frentrup@mci.com.

Sincerely,

Richard N. Clarke
AT&T

Chris Frentrup
MCI WorldCom

cc: Craig Brown, FCC

Partial List of Data Items

1. All information provided to the Commission pursuant to its July 9, 1997 Data Request *Order* in CC Docket No. 96-45 and its July 19, 1997 *Errata*.

2. All information provided to the Commission pursuant to its "Outside Plant Structure and Cable Costs" *Data Collection Request* that was issued on or about December 14, 1998.

3. Any other information provided to the Commission under proprietary cover in CC Docket Nos. 96-45 and 97-160 concerning the costs, input prices or equipment quantities associated with local telephone networks.

AT&T
Room 5462B3

295 North Maple Avenue
Basking Ridge, NJ 07920

May 12, 1999

Mr. W. Scott Randolph
Director - Regulatory Matters
GTE
1850 M Street, NW - Suite 1200
Washington, DC 20036

Re: Proprietary Data submitted to the FCC in:
CC Docket No. 96-45 – Universal Service/Proxy Cost Models
CC Docket No. 97-160 – Forward-Looking Cost Mechanism

Dear Mr. Randolph:

Based on ex parte and other filings that you have made with the Federal Communications Commission in the above-captioned dockets, AT&T and MCI WorldCom understand that GTE has provided the Commission with certain data that it believes are proprietary. These data pertain to the costs that GTE incurs for the purchase, installation and operation of equipment used in its local exchange networks – or other costs including overheads. This may include information about the purchase and installation cost of end office or tandem switches, digital loop carrier systems, transmission systems, and/or the cost of outside plant elements such as cable and its placement, connectors, protectors, splicing, etc. Further information may have been provided on the quantities required of these pieces of a local network (e.g., loop and drop lengths, structure type and sharing percentages, etc.) Attached to the last page of this letter is a brief description of some, but quite possibly not all, of the proprietary data that you may have provided to the Commission.

Because AT&T and MCI WorldCom would like to be able to provide the Commission with an evaluation of the accuracy and relevance of these proprietary data for the purpose of establishing the forward-looking economic costs of local exchange networks, we request the opportunity to review these data pursuant to the Common Carrier Bureau's *Protective Order*.[3] In the event that these data were submitted to the Commission under protective restrictions different from those stated in the *Protective Order*, AT&T and MCI WorldCom request that the status of these data be changed so as

[3] This *Protective Order* was issued in CC Docket Nos. 96-45 and 97-160 on July 27, 1998 as DA 98-1490 (13 FCC Rcd. 13910 (1998)).

to be subject to inspection under the terms of the *Protective Order*. As informally agreed to among the parties, we request to inspect these data in Washington, D.C. – unless the volume or format of these data make that location impossible.

We would like to inspect these data as soon as possible, preferably during the week of May 17 to May 21. Could you please propose a date and time that would be convenient. Upon establishing this appointment, we will be happy to provide you with names of the AT&T and MCI WorldCom representatives who will inspect the data – and provide you with copies of the Declarations that each of these representatives has executed stating that they will abide by the terms of the *Protective Order*.

Thank you very much for your attention to this request. Please contact us if you have any questions. Richard Clarke may be reached at the above address, or by telephone at 908-221-8685, by fax at 908-221-4628, or email at rnclarke@att.com. Chris Frentrup may be reached at MCI WorldCom, 1801 Pennsylvania Avenue, NW, Washington, DC 20006, or by telephone at 202-887-2731, by fax at 202-887-3070, or email at Christopher.J.Frentrup@mci.com.

Sincerely,

Richard N. Clarke
AT&T

Chris Frentrup
MCI WorldCom

cc: Craig Brown, FCC

Partial List of Data Items

1. All information provided to the Commission pursuant to its July 9, 1997 Data Request *Order* in CC Docket No. 96-45 and its July 19, 1997 *Errata*.

2. All information provided to the Commission pursuant to its "Outside Plant Structure and Cable Costs" *Data Collection Request* that was issued on or about December 14, 1998.

3. Any other information provided to the Commission under proprietary cover in CC Docket Nos. 96-45 and 97-160 concerning the costs, input prices or equipment quantities associated with local telephone networks.

AT&T
Room 5462B3

295 North Maple Avenue
Basking Ridge, NJ 07920

May 12, 1999

Ms. Celia Nogales
Director - Federal Relations
Ameritech
1401 H Street, NW - Suite 1020
Washington, DC 20005

Re: Proprietary Data submitted to the FCC in:
CC Docket No. 96-45 – Universal Service/Proxy Cost Models
CC Docket No. 97-160 – Forward-Looking Cost Mechanism

Dear Ms. Nogales:

Based on ex parte and other filings that you have made with the Federal Communications Commission in the above-captioned dockets, AT&T and MCI WorldCom understand that Ameritech has provided the Commission with certain data that it believes are proprietary. These data pertain to the costs that Ameritech incurs for the purchase, installation and operation of equipment used in its local exchange networks – or other costs including overheads. This may include information about the purchase and installation cost of end office or tandem switches, digital loop carrier systems, transmission systems, and/or the cost of outside plant elements such as cable and its placement, connectors, protectors, splicing, etc. Further information may have been provided on the quantities required of these pieces of a local network (e.g., loop and drop lengths, structure type and sharing percentages, etc.) Attached to the last page of this letter is a brief description of some, but quite possibly not all, of the proprietary data that you may have provided to the Commission.

Because AT&T and MCI WorldCom would like to be able to provide the Commission with an evaluation of the accuracy and relevance of these proprietary data for the purpose of establishing the forward-looking economic costs of local exchange networks, we request the opportunity to review these data pursuant to the Common Carrier Bureau's *Protective Order*.[4] In the event that these data were submitted to the Commission under protective restrictions different from those stated in the *Protective Order*, AT&T and MCI WorldCom request that the status of these data be changed so as

[4] This *Protective Order* was issued in CC Docket Nos. 96-45 and 97-160 on July 27, 1998 as DA 98-1490 (13 FCC Rcd. 13910 (1998)).

to be subject to inspection under the terms of the *Protective Order*. As informally agreed to among the parties, we request to inspect these data in Washington, D.C. – unless the volume or format of these data make that location impossible.

We would like to inspect these data as soon as possible, preferably during the week of May 17 to May 21. Could you please propose a date and time that would be convenient. Upon establishing this appointment, we will be happy to provide you with names of the AT&T and MCI WorldCom representatives who will inspect the data – and provide you with copies of the Declarations that each of these representatives has executed stating that they will abide by the terms of the *Protective Order*.

Thank you very much for your attention to this request. Please contact us if you have any questions. Richard Clarke may be reached at the above address, or by telephone at 908-221-8685, by fax at 908-221-4628, or email at rnclarke@att.com. Chris Frentrup may be reached at MCI WorldCom, 1801 Pennsylvania Avenue, NW, Washington, DC 20006, or by telephone at 202-887-2731, by fax at 202-887-3070, or email at Christopher.J.Frentrup@mci.com.

Sincerely,

Richard N. Clarke
AT&T

Chris Frentrup
MCI WorldCom

cc: Craig Brown, FCC

Partial List of Data Items

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2. All information provided to the Commission pursuant to its "Outside Plant Structure and Cable Costs" *Data Collection Request* that was issued on or about December 14, 1998.

3. Any other information provided to the Commission under proprietary cover in CC Docket Nos. 96-45 and 97-160 concerning the costs, input prices or equipment quantities associated with local telephone networks.

AT&T
Room 5462B3

295 North Maple Avenue
Basking Ridge, NJ 07920

May 12, 1999

Ms. Hope Thurrott
Senior Counsel
SBC
One Bell Plaza, Room 3023
Dallas, TX 75202

Re: Proprietary Data submitted to the FCC in:
CC Docket No. 96-45 – Universal Service/Proxy Cost Models
CC Docket No. 97-160 – Forward-Looking Cost Mechanism

Dear Ms. Thurrott:

Based on ex parte and other filings that you have made with the Federal Communications Commission in the above-captioned dockets, AT&T and MCI WorldCom understand that SBC has provided the Commission with certain data that it believes are proprietary. These data pertain to the costs that SBC incurs for the purchase, installation and operation of equipment used in its local exchange networks – or other costs including overheads. This may include information about the purchase and installation cost of end office or tandem switches, digital loop carrier systems, transmission systems, and/or the cost of outside plant elements such as cable and its placement, connectors, protectors, splicing, etc. Further information may have been provided on the quantities required of these pieces of a local network (e.g., loop and drop lengths, structure type and sharing percentages, etc.) Attached to the last page of this letter is a brief description of some, but quite possibly not all, of the proprietary data that you may have provided to the Commission.

Because AT&T and MCI WorldCom would like to be able to provide the Commission with an evaluation of the accuracy and relevance of these proprietary data for the purpose of establishing the forward-looking economic costs of local exchange networks, we request the opportunity to review these data pursuant to the Common Carrier Bureau's *Protective Order*.[5] In the event that these data were submitted to the Commission under protective restrictions different from those stated in the *Protective Order*, AT&T and MCI WorldCom request that the status of these data be changed so as

[5] This *Protective Order* was issued in CC Docket Nos. 96-45 and 97-160 on July 27, 1998 as DA 98-1490 (13 FCC Rcd. 13910 (1998)).

to be subject to inspection under the terms of the *Protective Order*. As informally agreed to among the parties, we request to inspect these data in Washington, D.C. – unless the volume or format of these data make that location impossible.

We would like to inspect these data as soon as possible, preferably during the week of May 17 to May 21. Could you please propose a date and time that would be convenient. Upon establishing this appointment, we will be happy to provide you with names of the AT&T and MCI WorldCom representatives who will inspect the data – and provide you with copies of the Declarations that each of these representatives has executed stating that they will abide by the terms of the *Protective Order*.

Thank you very much for your attention to this request. Please contact us if you have any questions. Richard Clarke may be reached at the above address, or by telephone at 908-221-8685, by fax at 908-221-4628, or email at rnclarke@att.com. Chris Frentrup may be reached at MCI WorldCom, 1801 Pennsylvania Avenue, NW, Washington, DC 20006, or by telephone at 202-887-2731, by fax at 202-887-3070, or email at Christopher.J.Frentrup@mci.com.

Sincerely,

Richard N. Clarke
AT&T

Chris Frentrup
MCI WorldCom

cc: Craig Brown, FCC

Partial List of Data Items

1. All information provided to the Commission pursuant to its July 9, 1997 Data Request *Order* in CC Docket No. 96-45 and its July 19, 1997 *Errata*.

2. All information provided to the Commission pursuant to its "Outside Plant Structure and Cable Costs" *Data Collection Request* that was issued on or about December 14, 1998.

3. Any other information provided to the Commission under proprietary cover in CC Docket Nos. 96-45 and 97-160 concerning the costs, input prices or equipment quantities associated with local telephone networks.

AT&T
Room 5462B3

295 North Maple Avenue
Basking Ridge, NJ 07920

May 12, 1999

Ms. Jill Hume
ATU Telecommunications
600 Telephone Avenue
Anchorage, AK 99503

Re: Proprietary Data submitted to the FCC in:
CC Docket No. 96-45 – Universal Service/Proxy Cost Models
CC Docket No. 97-160 – Forward-Looking Cost Mechanism

Dear Ms. Hume:

Based on ex parte and other filings that you have made with the Federal Communications Commission in the above-captioned dockets, AT&T and MCI WorldCom understand that ATU Telecommunications has provided the Commission with certain data that it believes are proprietary. These data pertain to the costs that ATU Telecommunications incurs for the purchase, installation and operation of equipment used in its local exchange networks – or other costs including overheads. This may include information about the purchase and installation cost of end office or tandem switches, digital loop carrier systems, transmission systems, and/or the cost of outside plant elements such as cable and its placement, connectors, protectors, splicing, etc. Further information may have been provided on the quantities required of these pieces of a local network (e.g., loop and drop lengths, structure type and sharing percentages, etc.) Attached to the last page of this letter is a brief description of some, but quite possibly not all, of the proprietary data that you may have provided to the Commission.

Because AT&T and MCI WorldCom would like to be able to provide the Commission with an evaluation of the accuracy and relevance of these proprietary data for the purpose of establishing the forward-looking economic costs of local exchange networks, we request the opportunity to review these data pursuant to the Common Carrier Bureau's *Protective Order*.[6] In the event that these data were submitted to the Commission under protective restrictions different from those stated in the *Protective Order*, AT&T and MCI WorldCom request that the status of these data be changed so as to be subject to inspection under the terms of the *Protective Order*. As informally agreed

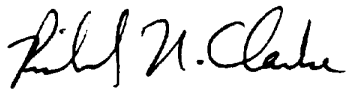
[6] This *Protective Order* was issued in CC Docket Nos. 96-45 and 97-160 on July 27, 1998 as DA 98-1490 (13 FCC Rcd. 13910 (1998)).

to among the parties, we request to inspect these data in Washington, D.C. – unless the volume or format of these data make that location impossible.

We would like to inspect these data as soon as possible, preferably during the week of May 17 to May 21. Could you please propose a date and time that would be convenient. Upon establishing this appointment, we will be happy to provide you with names of the AT&T and MCI WorldCom representatives who will inspect the data – and provide you with copies of the Declarations that each of these representatives has executed stating that they will abide by the terms of the *Protective Order*.

Thank you very much for your attention to this request. Please contact us if you have any questions. Richard Clarke may be reached at the above address, or by telephone at 908-221-8685, by fax at 908-221-4628, or email at rnclarke@att.com. Chris Frentrup may be reached at MCI WorldCom, 1801 Pennsylvania Avenue, NW, Washington, DC 20006, or by telephone at 202-887-2731, by fax at 202-887-3070, or email at Christopher.J.Frentrup@mci.com.

Sincerely,



Richard N. Clarke
AT&T

Chris Frentrup
MCI WorldCom

cc: Craig Brown, FCC

Partial List of Data Items

1. All information provided to the Commission pursuant to its July 9, 1997 Data Request *Order* in CC Docket No. 96-45 and its July 19, 1997 *Errata*.

2. All information provided to the Commission pursuant to its "Outside Plant Structure and Cable Costs" *Data Collection Request* that was issued on or about December 14, 1998.

3. Any other information provided to the Commission under proprietary cover in CC Docket Nos. 96-45 and 97-160 concerning the costs, input prices or equipment quantities associated with local telephone networks.

AT&T
Room 5462B3

295 North Maple Avenue
Basking Ridge, NJ 07920

May 12, 1999

Mr. Whit Jordan
Vice President - Federal Regulatory
BellSouth
1133 21st Street, NW - Suite 900
Washington, DC 20036

Re: Proprietary Data submitted to the FCC in:
CC Docket No. 96-45 – Universal Service/Proxy Cost Models
CC Docket No. 97-160 – Forward-Looking Cost Mechanism

Dear Mr. Jordan:

Based on ex parte and other filings that you have made with the Federal Communications Commission in the above-captioned dockets, AT&T and MCI WorldCom understand that BellSouth has provided the Commission with certain data that it believes are proprietary. These data pertain to the costs that BellSouth incurs for the purchase, installation and operation of equipment used in its local exchange networks – or other costs including overheads. This may include information about the purchase and installation cost of end office or tandem switches, digital loop carrier systems, transmission systems, and/or the cost of outside plant elements such as cable and its placement, connectors, protectors, splicing, etc. Further information may have been provided on the quantities required of these pieces of a local network (e.g., loop and drop lengths, structure type and sharing percentages, etc.) Attached to the last page of this letter is a brief description of some, but quite possibly not all, of the proprietary data that you may have provided to the Commission.

Because AT&T and MCI WorldCom would like to be able to provide the Commission with an evaluation of the accuracy and relevance of these proprietary data for the purpose of establishing the forward-looking economic costs of local exchange networks, we request the opportunity to review these data pursuant to the Common Carrier Bureau's *Protective Order*.[7] In the event that these data were submitted to the Commission under protective restrictions different from those stated in the *Protective Order*, AT&T and MCI WorldCom request that the status of these data be changed so as

[7] This *Protective Order* was issued in CC Docket Nos. 96-45 and 97-160 on July 27, 1998 as DA 98-1490 (13 FCC Rcd. 13910 (1998)).

to be subject to inspection under the terms of the *Protective Order*. As informally agreed to among the parties, we request to inspect these data in Washington, D.C. – unless the volume or format of these data make that location impossible.

We would like to inspect these data as soon as possible, preferably during the week of May 17 to May 21. Could you please propose a date and time that would be convenient. Upon establishing this appointment, we will be happy to provide you with names of the AT&T and MCI WorldCom representatives who will inspect the data – and provide you with copies of the Declarations that each of these representatives has executed stating that they will abide by the terms of the *Protective Order*.

Thank you very much for your attention to this request. Please contact us if you have any questions. Richard Clarke may be reached at the above address, or by telephone at 908-221-8685, by fax at 908-221-4628, or email at rnclarke@att.com. Chris Frentrup may be reached at MCI WorldCom, 1801 Pennsylvania Avenue, NW, Washington, DC 20006, or by telephone at 202-887-2731, by fax at 202-887-3070, or email at Christopher.J.Frentrup@mci.com.

Sincerely,

Richard N. Clarke
AT&T

Chris Frentrup
MCI WorldCom

cc: Craig Brown, FCC

Partial List of Data Items

1. All information provided to the Commission pursuant to its July 9, 1997 Data Request *Order* in CC Docket No. 96-45 and its July 19, 1997 *Errata*.

2. All information provided to the Commission pursuant to its "Outside Plant Structure and Cable Costs" *Data Collection Request* that was issued on or about December 14, 1998.

3. Any other information provided to the Commission under proprietary cover in CC Docket Nos. 96-45 and 97-160 concerning the costs, input prices or equipment quantities associated with local telephone networks.

AT&T
Room 5462B3

295 North Maple Avenue
Basking Ridge, NJ 07920

May 12, 1999

Mr. Kenneth Rust
Director, Federal Regulatory Affairs
Bell Atlantic
1300 I Street, NW - Suite 400W
Washington, DC 20005

Re: Proprietary Data submitted to the FCC in:
CC Docket No. 96-45 – Universal Service/Proxy Cost Models
CC Docket No. 97-160 – Forward-Looking Cost Mechanism

Dear Mr. Rust:

Based on ex parte and other filings that you have made with the Federal Communications Commission in the above-captioned dockets, AT&T and MCI WorldCom understand that Bell Atlantic has provided the Commission with certain data that it believes are proprietary. These data pertain to the costs that Bell Atlantic incurs for the purchase, installation and operation of equipment used in its local exchange networks – or other costs including overheads. This may include information about the purchase and installation cost of end office or tandem switches, digital loop carrier systems, transmission systems, and/or the cost of outside plant elements such as cable and its placement, connectors, protectors, splicing, etc. Further information may have been provided on the quantities required of these pieces of a local network (e.g., loop and drop lengths, structure type and sharing percentages, etc.) Attached to the last page of this letter is a brief description of some, but quite possibly not all, of the proprietary data that you may have provided to the Commission.

Because AT&T and MCI WorldCom would like to be able to provide the Commission with an evaluation of the accuracy and relevance of these proprietary data for the purpose of establishing the forward-looking economic costs of local exchange networks, we request the opportunity to review these data pursuant to the Common Carrier Bureau's *Protective Order*.[8] In the event that these data were submitted to the Commission under protective restrictions different from those stated in the *Protective Order*, AT&T and MCI WorldCom request that the status of these data be changed so as

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to be subject to inspection under the terms of the *Protective Order*. As informally agreed to among the parties, we request to inspect these data in Washington, D.C. – unless the volume or format of these data make that location impossible.

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Sincerely,

Richard N. Clarke
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