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July 29, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

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RE: Notice of Ex Parte Meeting: In the Matter of Access Charge ~~Records~~ ^{FEDERAL COMMUNICATIONS COMMISSION}
No. 99-262; MCI Telecommunications Corp. Emergency Petition for Prescription, ^{ATTN: SECRETARY}
CC Docket No. 97-250, and Consumer Federation of America Petition for
Rulemaking, RM-9210.

Dear Ms. Salas:

Yesterday, I spoke with Linda Kinney, Legal Advisor to Commissioner Susan Ness, concerning the referenced proceedings. We discussed AT&T's view that collocation is not a measure of competition for special access terminations, and that the Commission and the industry should instead identify flexibility "triggers" superior to collocation as well as the data sources needed to support those triggers. We otherwise reviewed AT&T's positions as reflected in AT&T's written submissions in this proceeding.

Two copies of this Notice are being submitted in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

Attachment

cc: Linda Kinney

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Alternative to Collocation Measure

- **One of the potential measures of competition for special access channel terminations between local serving offices (“LSOs”) and customer premises could be defined, for a given geography, based on the amount of revenue represented by alternative (non-ILEC) facilities versus the amount of revenue represented by ILEC facilities.**
- **The revenue measure would be based solely on facilities between LSOs and customer premises within the given geographic area (i.e., revenue represented by special access channel terminations).**
- **The revenue measure would include revenues generated in the provision of special access channel terminations as well as an appropriate revenue surrogate for self-provisioned channel terminations.**
- **The revenue measure would be stated, and regulatory flexibility where appropriate granted, separately for (i) T1 and below facilities, and (ii) those facilities greater than T1.**
- **Data used to support the revenue measure would be developed by and drawn from the industry as necessary, subject to appropriate certification or verification procedures, and submitted to the Commission or a neutral third party under appropriate confidentiality protections.**
- **This measure affords one example of a more reliable way to assess the level of facilities-based competition for special access channel terminations. Alternative measures might also exist.**
- **The Commission should consider this and other appropriate measures to assess competition for special access terminations, and the least intrusive means for reliably obtaining such information.**