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AT&T

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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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JUL 29 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: Notice of Ex Parte Meeting: In the Matter of Access Charge Reform, CC Docket No. 99-262; MCI Telecommunications Corp. Emergency Petition for Prescription, CC Docket No. 97-250, and Consumer Federation of America Petition for Rulemaking, RM-9210.

Dear Ms. Salas:

Yesterday, Joel Lubin and I, both of AT&T, spoke with Lawrence E. Strickling, Chief of the Common Carrier Bureau, concerning the referenced proceedings. Specifically, the AT&T representatives described one of the potential alternatives to collocation as a measure of competition for special access channel terminations between local serving offices and customer premises. That alternative is set forth in the attachment to this letter. I am authorized to represent that MCI WorldCom concurs in the view that this measure affords a far more reliable way to assess the level competition for special access channel terminations.

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

Sincerely,

L J Cali

Attachment
cc: Lawrence E. Strickling

Recycled Paper

## 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.**