

EX PARTE OR LATE FILED

ORIGINAL



Leonard J. Cali
Vice President & Director
Federal Regulatory Affairs
AT&T Federal Government Affairs

Suite 1000
1120 20th St. NW
Washington, DC 20036
202 457-2120
FAX 202 457-2545

July 29, 1999

RECEIVED

JUL 29 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

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, I spoke with Kyle D. Dixon, Legal Advisor to Commissioner Michael K. Powell, 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,

A handwritten signature in cursive script, appearing to read "L. J. Cali".

Attachment

cc: Kyle D. Dixon

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.