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July 30, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
TW-A325
Washington, D.C. 20554

Re: Promotion of Competitive Networks in Local Telecommunications Markets, WT Docket No. 99-217, Implementation of the Local Competition Provisions in the Telecommunication Provisions in the Telecommunications Act of 1996 CC Docket No. 96-98.

Dear Ms. Salas:

We are writing in response to the FCC's Notice of Proposed Rulemaking released on July 7, 1999, regarding forced access to buildings. We enclose six (6) copies of this letter, in addition to this original.

We are concerned that any action by the FCC regarding access to property by large numbers of communications companies may inadvertently and unnecessarily adversely affect the conduct of our business and needlessly raise additional legal issues. The Commission's public notice also raises a number of other issues that concern us.

Brigantine Group, Inc. is in the commercial and residential real estate business. We are involved in the management consulting and/or ownership of over 4 million sq. ft of commercial, facility, condominium and residential property.

First and Foremost, we do not believe the FCC needs to act in this field because we are doing everything we can to work with our residents, tenants and clients demands for access to telecommunications. In addition, the FCC's request for comments raises the following issues of particular concern to us: the main issue is that the owners of property we represent have paid many dollars including millions of dollars for their investments and when they purchased this real estate they bought the rights to have the use of their real estate, now operators are coming forth wanting to install their product or services in our properties with no ownership and equity involved, and they want to get a benefit off our investment. We foresee this to offer many problems if this is allowed in that anyone can come on our properties and take the use of our assets and privileges associated with ownership, also our tenants can then have the perceived right to do the same, like for instance installing large dish antenna's destroying roofs, parking areas land and buildings surfaces, etc.. insurance problems can also take place like were items installed can fall or affect other people, were owners can be sued for items they were not involved in as well as their property and rights being harmed and or destroyed.

Thank you for the opportunity to talk to you about our position and if you have any questions please give us a call.

Yours truly,



Brigantine Group, Inc.
David W. Drosesch, CPM, RPA President