
**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Promotion of Competitive Networks)	WT Docket No. 99-217
In Local Telecommunications Markets)	
)	
Implementation of the Local)	
Competition Provisions in the)	CC Docket No. 96-98
Telecommunications Act of 1996)	

REPLY COMMENTS OF SBC COMMUNICATIONS INC.

SBC COMMUNICATIONS INC.

ALFRED G. RICHTER JR.
ROGER K. TOPPINS
MARK ROYER

One Bell Plaza, Room 3024
Dallas, Texas 75202
214-464-2217

Its Attorneys

September 27, 1999

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SUMMARY

CLECs already have access to and have successfully penetrated multiple-tenant environments (MTEs). Regulatory intervention into this area is neither advisable nor required at this time. Serious concerns exist over the legality of the proposals in the NPRM/TFNPRM. Although both CLECs and ILECs should have an opportunity to negotiate “access” to MTEs, Section 224 of the Communications Act provides no basis for the Commission mandating access and a right to use facilities located at and inside MTEs. Nor does Section 251 provide such a basis because the legal standards for unbundling these facilities have not been met.

Exclusive “marketing” arrangements between service providers and the owners/managers of MTEs should not be modified or prohibited.

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REPLY COMMENTS OF SBC COMMUNICATIONS INC.

SBC Communications Inc. (SBC) submits these reply comments in response to the Commission's *Notice of Proposed Rulemaking* (NPRM) in WT Docket 99-217 and *Third Further Notice of Proposed Rulemaking* (TFNPRM) in CC Docket No. 96-98 relating to competitive access to Multiple Tenant Environments (MTEs).

I. Competitive Local Exchange Carriers Already Have Access To And Have Successfully Penetrated MTEs.

In its initial comments, SBC referenced a number of options available to Competitive Local Exchange Carriers (CLECs) for accessing MTEs. (SBC, p. 2). USTA and Shared Communications Services as well as others also reference the availability of such options. (USTA, p. 4; SCS, p. 17).¹

Not only do these options exist, they have been successfully implemented. As pointed out in the Joint Comments of Cornerstone Properties *et al.*:

Since the 1996 Act, TSP [telephone service provider] presence in multi-tenant buildings has exploded. For example, at the end of 1996, WinStar had access to less than 800 buildings. As of June 30, 1999, it had access rights to over 5,500 buildings, and expects to be in over

¹ See also First Regional Telecom, p. 7 [Competing providers who are not able to locate their equipment in MTE buildings can still reach customers by collocating at the ILEC central office and using a combination of unbundled loop UNE and intra-building inside wiring]; MCI WorldCom, p. 20; RCN, p. 10; and Teligent, p. 5.

8,000 buildings by the end of 1999. The second quarter of 1999 was the fifth consecutive quarter in which WinStar gained access rights to more than 500 buildings. (p. 6).

If, as some commenters claim, incumbent local exchange carriers (ILECs) had or have a monopoly over MTE access, obviously such competitive entry could not have occurred.² Also, in the case of the newer and more attractive properties (*e.g.*, shopping malls and residential subdivisions), SBC's experience is that it is often the ILECs, not the CLECs, who are excluded from those properties based upon the property owner's agreement or agreements with other service providers. (SBC, p. 6, & n. 11).

Given the serious legal concerns raised by many of the proposals herein and the unrefuted fact that access has already occurred without them, it is questionable whether regulatory intervention into this area is advisable or required at this time.³ The Comments of Shared Communications express this sentiment very well:

Building owners are free to choose from a variety of models available in the market for satisfying the inside wiring requirements of their buildings. This variety of arrangements appears to be working successfully to satisfy market demands, and there is no need for the Commission to intrude into this area. (p. 17).⁴

² Alpha, p. 2; ALTS, p. 22. Ironically, notwithstanding its tremendous success in negotiating access to thousands of MTEs, WinStar erroneously claims that "the ILECs have *de facto* exclusive contracts in virtually all MTEs nationwide...." (WinStar, p. 25). Similarly, AT&T, which has denied competitors access to its cable television network facilities, claims that building owners should have no rights to restrict access to their buildings, unless they are contracting with non-dominant telecommunications carriers or with multichannel video programming distributors. (AT&T, pp. 4, 25, 27, & 29). That is to say, AT&T wants nondiscriminatory access to the property of others for itself and its affiliates, but does not want to give others the same access to buildings served by AT&T and its affiliates. Moreover, the idea that incumbents enjoy great advantages in MTEs is rebutted by the fact that only about 5% of the office buildings or MTUs [multi-tenant units] are wired for high-speed access. Further, in many cases, redundant circuits are or will be necessary because otherwise "everyone would be climbing all over" the old riser cabling. *Telephony*, "Multitenant units mean opportunity." (July 26, 1999).

³ Real Access Alliance, pp. 34-37 ["...the Commission has no power to direct a building owner to do anything...."]; *See also* comments of U.S. RealTel, p. 7; Optel, p. 10-12; & THHC, pp. 2-3.

⁴ *Accord*: ARC, p. 3 [ARC's experience is that landlords are generally receptive to new providers of high-quality broadband services]; ICTA, p. 6 [ICTA and its members

Should the Commission conclude otherwise – namely, that regulatory intervention is lawful, advisable, and required – then SBC agrees with the CTIA that all providers should be given comparable treatment and relief. (CTIA, p. 5). As stated in SBC’s initial comments, SBC supports both ILECs and CLECs being given the opportunity to negotiate access to MTEs. (SBC, pp. 5-6).

II. The Commission Does Not Have Authority Under The Act To Mandate Access To And Use Of Facilities Located At And Inside MTE Structures.

Several of the commenters suggest that the Commission has authority in the Act to mandate access to facilities located at and inside MTEs. (AT&T, p. 15, citing Section 224(f); CPI, pp. 2-3; General Communications, p. 2; MCI, p. 10; McLeod, p. 5; Optel, p. 10, citing Section 251; and Metricom, p. 9, citing Sections 4(i) and 303(r)). AT&T contends, for example, that the Commission has authority under Section 224 of the Act to mandate access to “any pole, duct, conduit, or right-of-way,” including those at and within MTEs. (AT&T, p. 15).

SBC agrees with the Independent Cable & Telecommunications Association (ICTA) that those urging Section 224 as the basis for such authority are confusing MTE-access issues with pole-attachment issues. (ICTA, p. 2). Section 224 by its very title, “Regulation of Pole Attachments,” was never meant to apply to anything but “pole attachments,” *i.e.*, outside distribution plant. (ICTA, p. 2; IP&L, pp. 15-16; United Telecom et al., pp. 14-15; KCP&L, p. 3). Section 251(b)(4) explicitly recognizes this fact by referring back to Section 224 and tying the duty of telecommunications carriers under Section 251 to the Section 224 [pole attachment] obligations, including the pole attachment “rates, terms, and conditions.”⁵

have found that companies offering superior services at competitive prices are welcomed on MDU properties].

⁵ See *Conference Committee Joint Explanatory Statement, House Amendment. Section ...* “sets out the duty to afford access to the poles, ducts, conduits, and rights-of-way of the incumbent carrier, as provided under the pole attachment provisions of the Communications Act.”

Section 224 cannot be reasonably interpreted to require competitive access to “any or all poles, ducts, conduits, and rights-of-way,” including rooftops and in-building wiring located in utility-owned buildings or on privately-owned property such as MTEs. Were that the case, there would be no reason for Section 251(c)(6), allowing CLEC access to an ILEC’s premises for collocation, because arguably the CLECs would have already had such access rights under Section 224. Also, nothing in Section 224 or in Section 251 even remotely suggests that CLECs were being granted access and the right to use facilities located at and within an unaffiliated, third party property owner’s private premises. Nor, as alleged by Metricom (p. 9), can the Commission’s general rulemaking authority under Sections 4(i) and 303(r) be reasonably interpreted to grant the Commission that authority. Both of those provisions were law at the time the *Bell Atlantic* and *Loretto* cases were decided, and the Courts held in both those cases that the Commission did not have authority under the Communications Act to require or permit access to a utility’s (*Bell Atlantic*) or to a private party’s (*Loretto*) premises.⁶

Level 3 makes the novel and legally unsupported argument that the Commission can regulate the economic relationship of the building owners or managers because they have already consented to an “invasion” of their property by ILECs and, in many cases, by CLECs. (Level 3, p. 15). The implication is that, due to such acquiescence on the part of the property owner, there has been a waiver of the private property owner’s rights

⁶ *Loretto v. Teleprompter Manhattan CATV Corp.*, 458 U.S. 419 (1992); *Bell Atlantic Telephone Companies v. FCC*, 24 F.3d 1441 (D.C. Cir. 1994). While the holding in *Bell Atlantic* has been modified by the enactment of Section 251(c)(6) on collocation, the holding in *Loretto*, regarding access to private premises, has not been. And, as noted previously, Section 251(c)(6), enacted after the *Bell Atlantic* case, cannot be asserted as such authority because Section 251(c)(4) (not Section 251(c)(6)) is the applicable provision on CLEC access to utility “poles, ducts, conduits, and rights-of-way,” and it is limited to “pole attachments” or “outside” distribution plant. The comments of Optel appear to recognize this fact. [p. 10. The Commission need not extend its interpretation of Section 224. “Indeed if it were to do so, it would raise a host of legal, policy, and practical concerns]; *See also* Comments of ICTA, p. 5; Arista, p. 3; Cinergy, p. 4; and KCP&L, p.3.

in regard to others' use of facilities located at or inside that property owner's building or buildings. Taken literally, that argument would mean the Commission could regulate and infringe upon the real property rights of every residence or business owner in the United States simply because they subscribe to basic local exchange service. Nothing in the '96 Act gives or could give the Commission such sweeping rights. (Real Access Alliance, pp. 34-37).⁷

Other proponents of mandated CLEC access to and use of in-building utility or privately owned facilities claim that, while the result may be a regulatory taking, it is not an "unconstitutional one." (Teligent, p. 62; Alpha, pp. 8-9). Those commenters whose private property and related rights are affected strenuously disagree, and believe that the Commission's proposals involve unconstitutional and unlawful takings.⁸ The courts in *Loretto* and *Bell Atlantic* clearly found such actions to constitute unlawful takings.⁹

⁷ If such authority existed, SBC agrees with Optel (p. 12) that the authority would reside not in the Commission, but would be within the jurisdiction of the States, who in some cases already regulate building access. (SBC, pp. 3, 8; *See also* Comments of Minnesota Power, p. 2; California PUC, p. 3; City and County of San Francisco, p. 18). Moreover, it matters not whether such facilities are "owned or controlled" by utilities when they are located on the private property of others because utilities generally have no authority or legal ability to grant third parties access to or the right to use facilities on those properties without the property owner's consent. *See Nixon v. United States*, 978 F.2d 1269 (D.C. Cir. 1992); and *Restatement of the Law of Property*, . 493, Comment (d).

⁸ BellSouth, p. 13; United & Edison, pp. 14-15; THHC, p. 3; Real Access, pp. 34 & 37; US RealTel, p. 7. Harrison, p. 1; San Francisco, pp. 4 & 9; Entergy, pp. 2-6; Minnesota Power, p. 2.

⁹ *See also Gulf Power Company v. United States*, No 98-2403, *Slip Op.* (11th Cir. Sept. 9, 1999) which found mandatory access to utility poles, ducts, conduits, and rights-of-way under the Pole Attachment Act, as amended by the '96 Act, to be a "taking," (pp. 5-10). However, the Court in *Gulf Power* also held that the Act provided an adequate process for obtaining "just compensation" for the taking effected by the mandatory access provision. (pp. 10-21). The latter part of the Court's decision is inapplicable to the facts of this case because: (1) Section 224 and its compensation provisions relate to "pole attachments" and not to rooftops or wiring located at or inside buildings; (2) the Commission has not determined a rate for access to "poles, ducts, conduits, and rights-of-way" located at or inside buildings; and (3) Section 224 makes no provision for the payment of compensation to a "building owner" for forced access to that owner's premises.

Some commenters claim that ILECs have been allowed to access these properties at no cost. (Alpha, p. 2). ILECs, like CLECs, often have to install their own in-building wiring if they want to serve a customer in a particular premise that has been wired by others, and incur substantial costs in doing so. Though rare, ILECs have also had to incur expense to access certain properties through eminent domain. But, even if such costs were not incurred, there would still be an unconstitutional taking because privately-owned and unregulated facilities and premises are being forcibly ordered occupied by third parties without any provision for compensation to the building owner.¹⁰

III. MTE Structures And Facilities Have Not Been Shown To Be Lawfully Subject To Unbundling.

Optel and other commenters suggest that the Commission either avoid the Section 224 interpretation issues or that it mandate access to MTE in-building facilities and wiring by finding that rooftops and in-building riser cable are network elements subject to ILEC unbundling and CLEC access under the terms of Section 251(c)(3), “Unbundled Access.” (Optel, p. 10; Fixed Wireless, p. 16; Blue Star Communications, p. 6; Global Crossing, p. 7).

Incumbent ILEC facilities, whether owned or simply controlled by the ILEC, cannot be ordered unbundled unless shown to be “necessary” and that the failure of the ILEC to provide such access “would impair the ability of the telecommunications carrier seeking access to provide the services that it seeks to offer.” 47 U.S.C. Section 251(d)(2).

The conclusory allegations of some commenters and the record in this proceeding fail to support any finding that CLEC access to ILEC or privately owned in-building facilities and wiring (*e.g.*, riser cable and rooftops) is either necessary or required, or that

¹⁰ *Id.*, n. 8. Because this case involves more than forced access to utility property and more than what has been considered access to the network distribution plant of utilities, it goes beyond the issues considered in *Gulf Power*, and is more akin to the issue decided in the *Loretto* case.

that the lack thereof actually impairs the ability of any CLEC to offer its desired telecommunications services. To the contrary, the experience of Winstar – which currently serves close to 6,000 buildings without such unbundled access – plainly contradicts those claims. Moreover, as noted by USTA, no party has shown how in-building riser cable or rooftop access meet the necessary and impair standard. (USTA, p. 13) Not only is the record without sufficient proof on this issue, a decision to require unbundling of those facilities would conflict with the Commission’s prior rulings on inside wiring, its decision on rooftop access, and with its previous decision declining to order subloop unbundling. (SBC, pp. 4-5, & note, 7, 8, & 9; USTA, pp. 2-13; Ameritech, p. 5; GTE, pp. 18 & 21). At the very least, the Commission’s decision to depart from those rulings would have to be supported and its departure adequately explained.¹¹

Moreover, the Commission cannot do indirectly what it cannot do directly,¹² which is to invade an owner’s private property rights. Nor does Section 251 give the commission that authority as it only applies to carriers and says nothing about the Commission having any jurisdiction over building owners. Section 251 also does not expand the scope of access to “poles, ducts, conduit, and rights-of-way” to include facilities located at or inside buildings.¹³ In fact, at the time Congress enacted that provision, it must have known of the Commission’s inside wire decisions, which either deregulated wiring located within such buildings or left the matter of the regulation of such wiring to the states, and it made no attempt to change those decisions.¹⁴ That the

¹¹ *Telecommunications Research and Action Center v. FCC*, 801 F.2d 501 (D.C. Cir. 1986), cert denied 482 U.S. 919.

¹² *Oklahoma Tax Commission v. SAC and Fox Nation*, 508 U.S. 114 (1993).

¹³ *Gulf Power Company v. United States*, 998 F. Supp. 1386 (N.D. Fla. 1998); S. Rep. No. 580, 90th Cong. 1st Sess. 15, reprinted in U.S. Code Cong. & Ad. News 120, 123.

¹⁴ The inside wire decisions are cited in notes 8 & 9 of SBC’s initial comments. For why those decisions are presumed within the knowledge of Congress, see *Abramson v. Georgetown Consulting Group, Inc.*, 765 F. Supp. 255 (D.V.I. 1991), aff’d 952 F.2d 1391 (3rd Cir. 1991).

Commission has now apparently ordered subloop unbundling in the UNE remand does not alter these facts.¹⁵

IV. Public Policy Considerations Also Do Not Support Unbundling Of Facilities At And Inside MTEs.

The very reason why the Commission deregulated in-building wiring was to stimulate competition in the provision of such wiring. As Shared Communications states, the strategy has been successful in providing building owners with a variety of inside wiring options. (p. 17).

In addition, the Commission has recognized “that, in the long term, the most substantial benefits to consumers will be achieved through facilities-based competition....” (NPRM, para. 4). Global Crossing’s comments agree that facilities-based competition will be “the key to full market competition.” (p. 4). Unbundling facilities at and inside MTEs is not consistent with that policy. As Teligent points out, the unbundling approach “is suboptimal because it perpetuates a LEC’s reliance on a portion of the ILEC network thereby eliminating a true facilities-based carrier’s ability to avoid any dependence on the ILEC.” (p. 53).

Unbundling at and inside MTEs also raises a number of serious technical, administrative, operational, and network reliability concerns, which have not gone away and which the Commission previously recognized. (GTE, p.8; USTA, pp. 14-15). In fact, some property owners and building managers have already experienced problems (Jefferson West, p. 1), and others are legitimately concerned about having control over who enters their buildings; lest they face liability for damage to the building, the leased

¹⁵ Although the full details of the *UNE Remand Order* are not yet known, it is difficult to conceptualize how in-building wiring and rooftop access can be considered deregulated for one purpose and suddenly become re-regulated for another. Equally difficult to imagine is how in States, like California, such a ruling can be enforced when in many cases the utility’s network ends at the minimum point of entry (MPOE) and does not extend to the facilities located inside the buildings served from that MPOE. (SBC, p. 3, n. 2).

premises, the facilities of other providers, and/or for personal injury to residents and visitors. (Jefferson Arms, pp. 1-2; Apex, pp. 4-5; Berkshire, p. 1; General Growth, p. 1).

V. Exclusive Marketing Arrangements With Property Owners Should Not Be Modified Or Prohibited.

Some of the commentors have suggested that exclusive arrangements with property owners should be prohibited. (Global Crossing, pp. 3-4; CuServ, p. 4; Wireless Communications, p. 29). AT&T suggests that exclusive contracts should be prohibited for ILECs. However, AT&T believes such exclusive arrangements should be permitted for non-dominant carriers and multichannel video programming distributors. (AT&T, pp. 25-27).

As stated in SBC's initial comments, SBC favors all carriers, both CLECs and ILECs, having the opportunity to negotiate access to MTEs. (SBC, pp. 5-6). SBC also believes that property owners should have the right to negotiate exclusive marketing, as opposed to exclusive access, arrangements with service providers.¹⁶ (SBC, p. 7). A number of owners and property managers state that exclusive marketing contracts generally work to the benefit of their customers and residents. (Acadiana, p. 2; Allen House, p. 2; Altman Group, p. 2; AMLI, p. 2).

Unlike exclusive access agreements, exclusive marketing arrangements do not deter competition. As stated by Optel in its comments:

MDU owners and CLECs sometimes enter into arrangements that involve an exclusive marketing arrangement. There is nothing anticompetitive about these arrangements and nothing calling for federal regulatory intervention. (p. 18).

¹⁶ A building or property owner can have an exclusive "marketing" arrangement with a service provider while allowing others to have "access" to the property. Only exclusive "access" arrangements should be disfavored. Also, as pointed out in SBC's initial comments, some states have laws prohibiting exclusive access arrangements to MTEs or laws that permit access to be gained by other means (*e.g.*, through eminent domain laws or other statutes). (SBC, pp. 3, 8, n. 15 and attachment).

What should be avoided at all costs are the type of one-sided prohibitions such as that suggested by AT&T, placing the prohibition only on ILECs. Those types of prohibitions do not serve the interest of competition; they are designed to protect competitors, like AT&T. Nothing in this record supports the imposition of such a one-sided, punitive prohibition which would deny the ILECs – and only the ILECs – the ability to compete for the business of MTEs. Indeed, for AT&T to suggest such a prohibition smacks of hypocrisy; coming as it does from a company which has been amassing a cable monopoly and ferociously attempting to restrict competitive access to its cable systems. The Commission should reject AT&T's proposal.

The Commission should also reject the proposal of Wireless Communications that it adopt a permanent ban on all future exclusive MTE contracts and adopt a “fresh look” period for all exclusive MTE contracts already in effect. (Wireless Communications, p. 19). Besides being illegal because it would interfere with existing contracts, that proposal is unnecessary. As the WinStar experience clearly shows, competitors are *not* being denied access to these properties. They are signing them up in droves. Their success is the result of competition based on price and on claims of superior service.¹⁷ It would serve no purpose, except to limit the discounts and variety of beneficial service options available to consumers in MTEs, to place a ban on all future exclusive marketing contracts with MTEs. Also, as BellSouth correctly observes, that would be an unlawful abrogation of existing contracts and a denigration of private property rights. (BellSouth, p. 13).

¹⁷ Teligent, pp. 5 & 18 [“Teligent’s network structure allows it to realize significant savings which are passed directly to the customer. Teligent can save customers up to 30% off their local telephone and Internet service and provide substantial savings for long distance service.” “...[A] carrier’s exclusive presence in an MTE should be the result of superior service to the consumers therein...”]

VI. Conclusion

CLECs already have access to and have successfully penetrated MTEs. Regulatory intervention into this area is neither advisable nor required at this time. Serious concerns exist over the legality of the proposals in the NPRM/TFNPRM. Although both CLECs and ILECs should have an opportunity to negotiate access to MTEs, Section 224 of the Communications Act provides no basis for the Commission mandating access and a right to use facilities located at and inside MTEs. Nor does Section 251 provide such a basis because the legal standards for unbundling those facilities have not been met.

Exclusive “marketing” arrangements between service providers and the owners/managers of MTEs should not be modified or prohibited.

Respectfully submitted,

SBC COMMUNICATIONS INC.

By: /s/ Mark Royer
Alfred G. Richter Jr.
Roger K. Toppins
Mark Royer
One Bell Plaza, Room 3024
Dallas, Texas 75202
214-464-2217

Attorneys for SBC Communications Inc.

September 27, 1999

CERTIFICATE OF SERVICE

On this 27th day of September, 1999, I, Mary Ann Morris, hereby certify that the Reply Comments of SBC Communications Inc. in CC Docket 96-98, WT Docket No. 99-217 have been served upon the parties listed in the Service List attached to the Reply Comments of SBC Communications Inc.

/s/ Mary Ann Morris

September 27, 1999

INTERNATIONAL TRANSCRIPTION SERVICE
1231 20TH ST NW
WASHINGTON DC 20036

MAGALIE ROMAN SALAS
OFFICE OF THE SECRETARY
FEDERAL COMMUNICATIONS COMMISSION
THE PORTALS
445 TWELFTH STREET SW
ROOM TW-A325
WASHINGTON DC 20554

LAWRENCE G MALONE
PUBLIC SERVICE COMMISSION
OF THE STATE OF NEW YORK
THREE EMPIRE STATE PLAZA
ALBANY NY 12223-1350

WALTER STEIMEL JR
HUNTON & WILLIAMS
COUNSEL FOR ELECTRIC UTILITIES COALITION
1900 K STREET NW
12th FLOOR
WASHINGTON DC 20006

ROBERT N KITTEL
DEPARTMENT OF THE ARMY
UNITED STATES ARMY LEGAL SERVICES AGENCY
901 NORTH STUART STREET
ARLINGTON VA 22203-1837

SHIRLEY S FUJIMOTO
CHRISTINE M GILL
THOMAS P STEINDLER
McDERMOTT, WILL & EMERY
COUNSEL FOR AMERICAN ELECTIC POWER
SERVICE CORPORATION, COMMONWEALTH
EDISON CO., DUKE ENERGY CORP &
SOUTHERN CO.
600 13TH STREET
WASHINGTON DC 20005

PETER ARTH JR
LIONEL B WILSON
JONADY HOM SUN
PUBLIC UTILITIES COMMISSION
STATE OF CALIFORNIA
505 VAN NESS AVE
SAN FRANCISCO CA 94102

PATRICK DONOVAN
SWIDLER BERLIN SHEREFF FRIEDMAN, LLP
COUNSEL FOR CAPITAL TELECOMMUNICATIONS
INC
3000 K STREET NW
SUITE 300
WASHINGTON DC 20007-5116

RUSSELL M BLAU
KATHY L COOPER
SWIDLER BERLIN SHEREFF FRIEDMAN, LLP
COUNSEL FOR WINSTAR WIRELESS INC
3000 K STREET NW
SUITE 300
WASHINGTON DC 20007-5116

ELAINE REISS ESQ
DEPARTMENT OF INFORMATION TECHNOLOGY
AND TELECOMMUNICATIONS OF THE CITY
OF NEW YORK
11 METROTECH CENTER
BROOKLYN NY 11201

EDWARD W KIRSCH
SWIDLER BERLIN SHEREFF FRIEDMAN, LLP
COUNSEL FOR LIGHTSHIP TELECOM LLP
3000 K STREET NW
SUITE 300
WASHINGTON DC 20007-5116

NORMAN B SALES ESQ
CITY OF RICHMOND, VIRGINIA
OFFICE OF THE CITY ATTORNEY
SUITE 300
900 EAST BROAD STREET
RICHMOND VA 23219

MICHAEL D HESS ESQ
BRUCE REGAL ESQ
OFFICE OF THE CORPORATION COUNSEL OF
THE CITY OF NEW YORK
100 CHURCH STREET
NEW YORK NY 10007

FREDRIC V SHOEMAKER
COSHO, HUMPHREY, GREENER & WELSH, P.A.
CARNEGIE BUILDING
815 WEST WASHINGTON STREET
BOISE IDAHO 83702

EDWARD P DUNPHY ESQ
CORPORATION COUNSEL OF THE CITY OF
WHITE PLAINS
MUNICIPAL BUILDING
255 MAIN STREET
WHITE PLAINS NY 10601

WARD F HOPPE
HOPPE & HARNER
SUITE 303 CORNHUSKER BANK BUILDING
1101 CORNHUSKER HIGHWAY
LINCOLN NEBRASKA 68521

HOWARD C STROSS
STROSS LAW FIRM
33920 U S 19 NORTH SUITE 351
PALM HARBOR FL 34684-2650

JOHN T FLATTERY
THE WORTHING COMPANIES
800 MT VERNON HIGHWAY
SUITE 350
ATLANTA GA 30328

AUBREY L LAYNE JR
GREAT ATLANTIC
REAL ESTATE - PROPERTY MANAGEMENT
HARBOUR CENTRE
2 EATON STREET
SUITE 1100
HAMPTON VA 23669

ELAINE GARDNER
EPOCH MANAGEMENT INCORPORATED
200 SOUTH ORANGE AVENUE
SUITE 2800
ORLANDO FL 32801

BARBARA L YAMARICK CPM
BRANDYWINE REALITY TRUST
14 CAMPUS COULEVARD
SUITE 100
NEWTOWN SQUARE PA 19073-3280

CLAY W HAMLIN, III
CORPORATE OFFICE PROPERTIES TRUST
401 CITY AVENUE
SUITE 615
BALA CYNWYD PA 19004-1126

MARSHA E WILSON
LA CROSSE APARTMENT CARRIAGE HOMES
100 CROSSROADS BLVD
BOSSIER CITY LA 71111

ROBERT BRODY
THE BRODY COMPANIES
4190 TELEGRAPH ROAD
SUITE 1000
BLOOMFIELD HILLS MI 48302-2080

PAUL B WHITTY
GREENEBAUM DOLL & MCDONALD PLLC
3300 NATIONAL CITY TOWER
101 SOUTH FIFTH STREET
LOUISVILLE KENTUCKY 40202-3197

JEFFREY A HARRIS
POST PROPERTIES INC
ONE RIVERSIDE
4401 NORTHSIDE PARKWAY
SUITE 800
ATLANTA GA 30327-3057

JOSHUA GLAZOV
U S REALTEL INC
100 SOUTH WACKER DRIVE
SUITE #850
CHICAGO ILLINOIS 60606

GRETCHEN OVERDURFF, CMCA®, AMS, RCM
GREENBELT HOMES INC
HAMILTON PLACE
GREENBELT MD 20770

NANCY J GARNER
WOOLSON REAL ESTATE COMPANY INC
2715 HOUSTON HIGHWAY
VICTORIA TX 77901

JOHN J KEHRES
BLACK ROCK CABLE
2544 MT BAKER HWY
BELLINGHAM WA 98226

ROBERT S AISNER
AMLI RESIDENTIAL
16250 PARKWAY
SUITE 100
DALLAS TX 75248-2622

LISA A HUNTER
CLARK COUNTY HOME BUILDERS ASSOCIATION
5007 NE ST JOHNS ROAD
VANCOUVER WA 98661

J CHRISTIE DAVENPORT
CLARK WHITEHILL
4224 HOLLAND ROAD
SUITE 104
VIRGINIA BEACH VIRGINIA 23452

HELEN B ETKIN
ETKIN & CO
30600 TELEGRAPH ROAD
SUITE 1200
BINGHAM FARMS MI 48025-4531

GARY PARRETT
MCNEIL REAL ESTATE MANAGEMENT INC
13760 NOEL ROAD
SUITE 600, LB70
DALLAS TX 75240

TOM BRADEMAS JR
CENTER MANAGEMENT CORPORATION
425 N MICHIGAN
SUITE 500
P O BOX 4077
SOUTH BEND INDIANA 45634-4077

SHERRY DUNCAN
WINGATE FALLS
4801 BAKER GROVE ROAD
ACWORTH GA 30101

JOHN R PANKRATZ
RIVER PARK DEVELOPMENT CO
P O BOX 828
WAUKESHA WI 53187-0828

PHIL H CARLOCK
ECI MANAGEMENT CORPORATION
SUITE 100
2700 DELK ROAD
MAIETTA GEORGIA 30067

MICHAEL B SMITH
SIGNATURE MANAGEMENT CORPORATION
3850 HOLCOMB BRIDGE ROAD
SIOTE 215
NORCROSS GA 30092

DAVID M STRONG
WELLSFORD REAL PROPERTIES
1623 BLAKE STREET
SUITE 270
DENVER CO 80202

CARTER B EWING
KOLL DEVELOPMENT COMPANY
1200 17TH STREET
SUITE 550
DENVER CO 80202

TED FREYER
CRESCENT
4 HOUSTON CENTER
1200 MCKINNEY
SUITE 545
HOUSTON TX 77010

ROBERT J WAHLKE
TOWNE PROPERTIES ASSET MANAGEMENT
COMPANY
1055 ST PAUL PLACE
CINCINNATI OH 45202-1687

MARK W COPELAND
ALLIANCE RESIDENTIAL MANAGEMENT LLC
4300 ALPHA ROAD
SUITE 103
DALLAS TX 75244

STAN ALTMAN
THE ALTMAN GROUP OF COMPANIES
115 NEW STREET
P O BOX 6
GLENSIDE PA 19038

CINDY KEMPER
ALVARADO REALTY COMPANY
#10 TRAMWAY LOOP N E
ALBUQUERQUE NM 87122-20174

STANELY R FIMBERG
9777 WILSHIRE BOULEVARD
SUITE 820
BEVERLY HILLS CA 90212

RICHARD BIGHINATTI
BEACON RESIDENTIAL MANAGEMENT
6507 SUGAR MAPLE CRIVE
RICHMOND VA 23225-5718

THOMAS S BOZZUTO
THE BOZZUTO GROUP
6401 GOLDEN TRIANGEL DRIVE
SUITE 200
GREENBELT MD 20770-3203

BRENDA MELTON
BRANDON GLEN
1500 EAST VIEW ROAD
COVERS GA 30012

WILLIAM A BUTH
GREATER ST PAUL BOMA
W-2950 FIRST NATIONAL BANK BUILDING
332 MINNESOTA STREET
SAINT PAUL MN 55101-1379

PHILLIP A STEVENS
BURTONSVILLE OFFICE PARK LIMITED
PARTNERSHIP
3905 NATIONAL DRIVE
SUITE 250
BURTONSVILLE MD 20866

JOHN HOOD
CARBON DEVELOPMENT CORPORATION
16250 NORTH DALLAS PARKWAY
SUITE 111
DALLAS TX 75248

DEAN R DEVILLERS
CHARTER PROPERTIES INC
SUITE 300
1100 S TRYON ST
CHARLOTTE NC 28203

PATRICIA M BLASI
9955 N W 116TH WAY
SUITE 10
MIAMI FL 33178

MARK A DECKER
COLONIAL PROPERTIES TRUST
1130 ISLAND LAKE DRIVE
LAKE MARY FL 37746

ROBERT L TURPIN
DAYTON METROPOLITAN HOUSTIN AUTHORITY
400 WAYNE AVENUE
DAYTON OH 45410-1106

EUGENE J BURGER
EUGENE BURGER MANAGEMENT CORPORATION
481 VIA HIDALGO
GREENBRAE CA 94904

ELLIOT BERNOLD
EDGEWOOD MANAGEMENT CORPORATION
SILVER SPRING METRO PLAZA II
8403 COLESVILLE ROAD
SUITE 400
SILVER SPRING MD 20910

HENRY HIRSCH
ECI MANAGEMENT CORPORATION
SUITE 100
2700 DELK ROAD
MARIETTA GA 30067

RUSSELL VANDENBURG
EPT MANAGEMENT COMPANY
6090 SURETY DRIVE
SUITE 102
EL PASO TX 79905

MARK L WESHINSKEY
FIRST CENTRUM LLC
21400 RIDGETOP CIRCLE
SUITE 250
STERLING VA 20166

GLEASON E AMBOY
FIRST HOUSING CORPORATION
4275 FIVE OAKS DRIVE
LANSING MI 48911

FRANK BASILE
GENE B GLICK COMPANY INC
P O BOX 40177
8330 WOODFIELD CROSSING BLVD
SUITE 200
INDIANAPOLIS IN 46240

STAN SADDORIS
GENERAL GROWTH PROPERTIES INC
400 SOUTH HIGHWAY 169
SUITE 800
MINNEAPOLIS MN 55426

COLIN E BARKER
THE GIPSON CO
7 PIEDMONT CTR
SUITE 150
ATLANTA GA 30305

MICHAEL STEINER
HENDERSEN – WEBB INC
1025 CRANBROOK ROAD
HUNT VALLEY MD 21030

LINDA D HORNE
HORNE COMPANIES INC
7301 WARFIELD ROAD
GAITHERSBURG MD 20879

JOHN F O'MEARA
INVERNESS PROPERTIES LLC
2 INVERNESS DRIVE EAST
SUITE 200
ENGLEWOOD CO 80112

JOHN PRICE
J P REALTY INC PRICE DEVELOPMENT COMPANY,
LIMITED PARTNERSHIP
35 CENTURY PARK-WAY
SALT LAKE CITY UT 84115

MICHAEL D ROCQUE
CAMCO INC
1201 NORTH CLARK STREET
SUITE 400
CHICAGO IL 60610-2270

DEBBIE DILLON
L & B REALTY ADVISORS INC
8750 NORTH CENTRAL EXPRESSWAY
SUITE 800
DALLAS TX 75231-6437

CRAIG LLOYD
LLOYD COMPANIES
3101 WEST 41ST STREET
SUITE 203
SIOUX FALLS SD 57105

EDWARD L DAVIDSON JR
MID-ATLANTIC REALTY COMPANY INC
248-C PRESIDENTIAL DRIVE
GREENVILLE DE 19807

MICHAEL C BOREE
NEW MILLENIUM ENTERPRISE INC
P O BOX 261002
HIGHLANDS RANCH CO 80163-1002

TAMMY ESPONGE
THE APARTMENT ASSOCIATION OF GREATER
NEW ORLEANS
3017 HARVARD AVENUE
SUITE 201
METAIRIE LA 70006

WENDY LEISU
THE OLNICK ORGANIZATION INC
110 EAST 59TH STREET
20TH FLOOR
NE W YORK NY 10022

T EDGIE RUSSEL III
PARTNERS MANAGEMENT COMPANY
105 W CHESAPEAKE AVENUE
SUITE 307
TOWSON MD 21204

HOWARD W EDISON
PARTNERSHIP CONCEPTS REALTY MANAGEMENT
INC
SUITE 26
201 EAST OGDEN AVENUE
HINSDALE IL 60521-3697

KERRIE FALCO
PLANTATION RIDGE
1022 LEVEL CREEK ROAD
SUGAR HILL GA 30518

EDWARD RIBBECK
PYRAMID DEVELOPMENTS LLC
3101 LAKE STREET
LAKE CHARLES LA 70601

STEVEN SPINOLA
THE REAL ESTATE BOARD OF NEW YORK INC
570 LEXINGTON AVENUE
NEW YORK NY 10022

INGRID L REGAL
REGAL CREST VILLAGE
13275 W BURLEIGH ROAD
BROOKFIELD WI 53005

DOUGLAS J GROPPENBACKER
RE/MAX COMMERCIAL INVESTMENT
7110 E MCDONALD DRIVE
SUITE A-1
SCOTTSDALE AZ 85283-5426

ROBERT GRINCHUK
THE SAN DIEGO COUNTY APARTMENT
ASSOCIATION
2727 CAMINO DEL RIO SOUTH
SUITE 327
SAN DIEGO CA 92180

MARK SILVERWOOD
SILVERWOOD ASSOCIATES INC
107 LOUDOUN STREET S E
LEESBURG VA 20175

WILLIAM H HALPRIN
S L NUSBAUM REALTY CO
1000 NATIONSBANK CENTER
ONE COMMERCIAL PLACE
NORFOLK VA 23510

JAMES L POCHLMAN
T & C MANAGEMENT SERVICES INC
579 D'ONOFRIO DRIVE
SUITE 10
MADISON WI 53719-2838

MIKE SMITH
THOMPSON THRIFT DEVELOPMENT
1100 SPRUCE ST
TERRE HAUTE IN 47807

THOMAS RAGAUSKIS
T J ADAM & COMPANY
480 EAGLE DRIVE
ELK GROVE VILLAGE IL 60007

DANIEL J LIPNICK
TRANSWORLD PROPERTIES INC
BANK ONE CENTER
910 TRAVIS STREET
SUITE 800
HOUSTON TX 77002

WAYNE A VANDENBURG
TVO REALTY PARTNERS
70 EAST LAKE STREET
SUITE 600
CHICAGO IL 60601

WILLING L BIDDLE
URSTADT BIDDLE PROPERTIES INC
321 RAILROAD AVENUE
GREENWICH CT 06830

KEVIN P KELLY
LEON N WEINER & ASSOCIATES INC
ONE FOX POINT CENTRE
4 DENNY ROAD
WILMINGTON DE 19809

DEBRA L BENEIT
WHITE BIRCH APARTMENTS
9239 NORTH 75TH STREET
MILWAUKEE WI 53223

PENNY NICHOLS
WINDSOR AT QUIET WATERS
11 NORTHWEST 45TH AVENUE
DEERFIELD BEACH FL 33442

RUSS ENDRES
WISCONSIN MANAGEMENT COMPANY INC
2040 SOUTH PARK STREET
MADISON WI 53713

BRENDA BROOKS
ALLEN HOUSE APARTMENTS
3601 ALLEN PARKWAY
HOUSTON TX 77019

BOB FRENCH
COLONIAL PROPERTIES TRUST
1665 WESLEYAN DRIVE # 1014
MACON GA 31210

PAUL J WALTER
HOUSING AUTHORITY - CITY OF ANTIGO
PARK VIEW MANOR
535 THIRD AVE
ANTIGO WI 54409-2262

TODD R FRED
TRUST PROPERTY MANAGEMENT
12000 FORD ROAD
SUITE 245
DALLAS TX 75234

DEBRA L BENOIT
RIDGEDALE APARTMENTS
7740 WEST GRANGE AVENUE
GREENDALE WI 53129

DONNA R BALDWIN
GARDEN COURT INC. DBA PINE CREST
APARTMENTS
3734 EAST LA SALLE STREET
COLORADO SPRINGS CO 80909

JENNIFER ROBERTSON
WINDSOR AT BUTTERNUT RIDGE
5800 GREAT NORTHERN BOULEVARD
NORTH OLMSTED OH 44070

TAMMY VAUGHAN
WINDSOR AT OLD BUCKINGHAM STATION
1301 BUCKINGHAM STATION DRIVE
MIDLOTHIAN VA 23113

SUE KERLEY
WINDSOR AT RIVER HEIGHTS
3702 RIVER HEIGHTS CROSSING
MARIETTA GA 30067

KELLY PERKINS
WINDSOR AT STERLING PLACE
5399 COACHMAN ROAD
COLUMBUS OH 43220

CONNIE SIMMONS
WINDSOR AT PINE RIDGE
7100 DUCKETTS LANE
ELKRIDGE MD 21075

MARY ELLEN KLAMM
WINDSOR VILLAGE AT HAUPPAUGE
1312 DEVONSHIRE ROAD
HAUPPAUGE
LONG ISLAND NY 11788-4599

HOWARD C STROSS
STROSS LAW FIRM
33920 U S 19 NORTH
SUITE 351
PALM HARBOR FL 34684-2650

JACK B HARRISON
ATTORNEY FOR CINCINNATI BELL TELEPHONE
CO
FROST AND JACOBS LLP
201 EAST FIFTH STREET
CINCINNATI OH 45202

SPECTRAPOINT WIRELESS LLC
SCOTT MARIN
1125 E COLLINS
RICHARDSON TEXAS 75081

PATRICK J BRADLEY
364 WEST LANE AVENUE
SUITE C
COLUMBUS OH 43201

ANTHONY J MORDOSKY
ACUTA INC
152 WEST ZANDALE DRIVE
SUITE 200
LEXINGTON KY 40503

BRIAN HAWKINS
1112 16TH STREET NW
SUITE 600
WASHINGTON DC 20036

LANDER MEDLIN
1643 PRINCE STREET
ALEXANDRIA VA 22314

HARRY L PLISKIN
IRELAND STEPLETON PRYOR AND PASCOE PC
COUNSEL FOR THE COMPETITION POLICY
INSTITUTE
1675 BROADWAY
SUITE 2600
DENVER CO 80202

RISER MANAGEMENT SYSTEMS
200 CHURCH STREET
P O BOX 1264
BURLINGTON VA 05401

ENSEMBLE COMMUNICATIONS INC
BILL S SIMPSON
6256 GREENWICH DRIVE
SUITE 400
SAN DIEGO CA 92122

RONALD BINZ
DEBRA BERLYN
COMPETITION POLICY INSTITUTE
1156 15TH STREET
SUITE 520
WASHINGTON DC 20005

MINNESOTA POWER INC
INGRID KANE JOHNSON
30 WEST SUPERIOR STREET
DULUTH MINNESOTA 55802

HIGHSPEED COM LLC
KRISTIAN E HEDINE
1520 KELLY PLACE
SUITE 202
WALLA WALLA WA 99362

RF DEVELOPMENT LLC
CHARLES E WALTERS
4940 HAMPDEN LANE
SUITE 212B
BETHESDA MARYLAND 20817

GREGORY W WHITEAKER
EDWARD D KANIA
BENNET AND BENNET PLLC
COUNSEL FOR CENTRAL TEXAS
COMMUNICATIONS INC.
1000 VERMONT AVENUE
10TH FLOOR
WASHINGTON DC 20005

ALBERTO LEVY
ECONOMIST
TEXAS OFFICE OF PUBLIC UTILITY COUNSEL
1701 N CONGRESS AVENUE
SUITE 9-180
AUSTIN TEXAS 78701

RICK GUZMAN
ASSISTANT PUBLIC COUNSEL
1701 N CONGRESS AVENUE
SUITE 9-180
AUSTIN TEXAS 78701

CATHLEEN A MASSEY
NEXTLINK COMMUNICATIONS INC
1730 RHODE ISLAND AVENUE NW
SUITE 1000
WASHINGTON DC 20036

HOWARD J SYMONS
UZOMA C ONYEIJE
MINTZ LEVIN COHN FEERRIS GLOVSKY
AND POPEO PC
701 PENNSYLVANIA AVENUE NW
SUITE 900
WASHINGTON DC 20004-2608

PHILP L VERVEER
GUNNAR D HALLEY
WILLKIE FARR & GALLAGHER
COUNSEL FOR TELIGENT INC, THE ASSOCIATION
FOR LOCAL TELECOMMUNICATIONS
SERVICES
THREE LAYFAYETTE CENTRE
1155 21ST STREET NW
WASHINGTON DC 20036-3384

ROBERT G BERGER
JOSEPH M SANDRI JR
RUSSELL C MERBETH
WINSTAR COMMUNICATIONS INC
1146 19TH STREET NW SUITE 200
WASHINGTON DC 20036

RODNEY D CLARK
LARA E HOWLEY
COMMUNITY ASSOCIATIONS INSTITUTE
1630 DUKE STREET
ALEXANDRIA VA 22314

SHIRLEY S FUJIMOTO
CHRISTINE M GILL
THOMAS P STEINDLER
MCDERMOTT WILL & EMERY
600 13TH STREET
WASHINGTON DC 20005-3096

TERRY LEWIS
1401 EYE STREET NW
SUITE 700
WASHINGTON DC 20005

DOUGLAS M KLEINE
NATIONAL ASSOCIATION OF HOUSING
COOPERATIVES
1401 NEW YORK AVENUE NW
WASHINGTON DC 20005

INDEPENDENT CABLE & TELECOMMUNICATIONS
ASSOCIATION
5335 WISCONSIN AVENUE NW
SUITE 800
WASHINGTON DC 20015

GOLDBERG GODLES WIENER & WRIGHT
OPTEL INC
1229 NINETEENTH STREET NW
WASHINGTON DC 20036

LOUISE H RENNE
MARA ROSALES
TRACI BONE
JAYNE LEE
CHRISTINE FERRARI
THE CITY AND COUNTY OF SAN FRANCISCO
CITY HALL ROOM 234
SAN FRANCISCO CA 94102

FLORIDA POWER & LIGHT COMPANY
JEAN G HOWARD
9250 WEST FLAGLER STREET
MIAMI FL 33174

MINNESOTA POWER INC
INGRID KANE JOHNSON
30 WEST SUPERIOR STREET
DULUTH MINNESOTA 55802

THE UNITED STATES TELEPHONE ASSOCIATION
LAWRENCE E. SARJEANT
LINDA KENT
KEITH TOWNSEND
JOHN HUNTER
JULIE E RONES
1401 H STREET NW
SUITE 600
WASHINGTON DC 20005

JAMES R HOBSON
DONELAN CLEARY WOOD & MASER PC
COUNSEL FOR ARDEN REALTY INC
1100 NEW YORK AVENUE NW #750
WASHINGTON DC 20005-3934

MICHAEL A RUMP
KANSAS CITY POWER & LIGHT COMPANY
1201 WALNUT
P O BOX 418679
KANSAS CITY MO 64141-9679

WILLIAM L FISHMAN
KATHLEEN L GREENAN
SWIDLER BERLIN SHEREFF FRIEDMAN LLP
COUNSEL FOR RCN CORPORATION
3000 K STREET NW
SUITE 300
WASHINGTON DC 20007-5116

LARRY FENSTER
MCI WORLDCOM INC
1801 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20006

PATRICIA PAOLETTA
WILLIAM P HUNT III
LEVEL 3 COMMUNICATIONS LLC
1025 ELDORADO DRIVE
BROOMFIELD CO 80021

JOHN F RAPOSA
GTE SERVICE CORPORATION
600 HIDDEN RIDGE
HQE03J27
IRVING TEXAS 75038

M ROBERT SUTHERLAND
THEODORE R KINGSLEY
BELLSOUTH CORPORATION
SUITE 1700
1155 PEACHTREE STREET NE
ATLANTA GA 30306-3610

ANDREW D LIPMAN
TAMAR E FINN
SWIDLER BERLIN SHEREFF FRIEDMAN LLP
COUNSEL FOR LEVEL 3 COMMUNICATIONS LLC
3000 K STREET NW
SUITE 300
WASHINGTON DC 20007

MARTIN L STERN
JOHN LONGSTRETH
LISA L FRIEDLANDER
PRESTON GATES ELLIS & & ROUVELAS MEEDS
LLP
1735 NEW YORK AVENUE NW
SUITE 500
WASHINGTON DCJ 20006

PAUL KOUROUPAS
GLOBAL CROSSING DEVELOPMENT CO
12 HEADQUARTERS PLAZA
4TH FLOOR NORTH TOWER
MORRISTOWN NJ 07960

KAREN NATIONS
METROMEDIA FIBER NETWORK SERVICES
ONE MEADOWLANDS PLAZA
EAST RUTHERFORD NJ 07073

TERRY LEWIS
COOPERATIVE HOUSING COALITION
1401 EYE STREET NW
SUITE 700
WASHINGTON DC 20005

FIXED WIRELESS COMMUNICATIONS COALITION
1300 NORTH 17TH STREET
11TH FLOOR
ARLINGTON VA 22209

KATHY L SHOBERT
GENERAL COMMUNICATION INC
1500 K STREET NW
SUITE 1100
WASHINGTON DC 20005

STEVEN G ROGERS
PARKWAY PROPERTIES
ONE JACKSON PLACE
188 EAST CAPITOL STREET
SUITE 1000
JACKSON MS 39201-2195

JOHN B GLICKSMAN
JANET S LIVENGOOD
ADELPHIA BUSINESS SOLUTIONS
500 THOMAS STREET
DD1 PLAZA II
SUITE 400
BRIDGEVILLE PA 15017

JOHN P MCCANN
JOHN S SCHNEIDER
UNITED DOMINION REALTY TRUST INC
10 SOUTH SIXTH STREET
RICHMOND VA 23219-3802

J WAYNE ANDERSON
MATTHEW R SUFFERN
J CHRISTOPHER NEEL
ENTERGY SERVICES INC
639 LOYOLA AVENUE
NEW ORLEANS LA 70113

GERALD A FRIEDERICHS
MICHAEL S PABIAN
COUNSEL FOR AMERITECH
39TH FLOOR
30 S WACKER DR
CHICAGO IL 60606

LAWRENCE W KATZ
BELL ATLANTIC
1320 NORTH COURTHOUSE ROAD
EIGHTH FLOOR
ARLINGTON VA 22201

HENRY M RIVERA
LARRY S SOLOMON
J THOMAS NOLAN
SHOOK HARDY & BACON LLP
COUNSEL FOR METRICOM INC
600 14TH STREET NW
WASHINGTON DC 20005-0004

JAMES R HOBSON
HEIDI C PEARLMAN
DONELAN CLEARLY WOOD & MASER PC
COUNSEL FOR APEX SITE MANAGEMENT INC
1100 NEW YORK AVENUE NW
SUITE 750
WASHINGTON DC 20005-3934

RICHARD B STERN
APEX SITE MANAGEMENT INC
555 NORTH LANE
SUITE 6138
CONSHOHOCKEN PA 19428

ROBERT J MILLER
GARDERE & WYNNE LLP
COUNSEL FOR DALLAS WIRELESS BROADBAND
LP dba COSERV BROADBAND
3000 THANKSGIVING TOWER
1601 ELM STREET
DALLAS TX 75201-4761

LAURENCE BROWN
EDISON ELECTRIC INSTITUTE
701 PENNSYLVANIA AVE NW
WASHINGTON DC 20004

JEFFREY L SHELDON
BRETT KILBOURNE
UNITED TELECOM COUNCIL
1140 CONNECTICUT AVENUE NW
SUITE 1140
WASHINGTON DC 20036

MICHAEL SPECHT
FIRST REGIONAL TELECOM LLC
962 WAYNE AVENUE
SUITE 701
SILVER SPRING MARYLAND 20910

GLENN B MANISHIN
LISA N ANDERSON
BLUMENFELD & COHEN – TECHNOLOGY LAY
GROUP
COUNSEL FOR FIRST REGIONAL TELECOM LLC
1625 MASSACHUSETTS AVE NW
SUITE 300
WASHINGTON DC 20036

PAUL A COLBERT
CINERGY CORP
139 EAST FOURTH STREET
P O BOX 960
CINCINNATI OH 45201

ROBERT E NEATE
PAINE HAMBLEN COFFIN BROOKE & MILLER
LLP
COUNSEL FOR AVISTA CORPORATION
717 W SPRAGUE AVE
SUITE 1200
SPOKANE WA 99201-3505

DAVID L LAWSON
DANIEL MERON
PAUL J ZIDLICKY
RUDOLPH M KAMMERER
SIDLEY & AUSTIN
COUNSEL FOR AT&T CORP
1722 I STREET NW
WASHINGTON DC 20006

MARK C ROSENBLUM
STEPHEN C GARAVITO
AT&T CORP
295 NORTH MAPLE AVENUE
ROOM 1130M1
BASKING RIDGE NJ 07920

NORTON CUTLER
BLUESTAR COMMUNICATIONS
401 CHURCH STREET
NASHVILLE TN 37219

ANDREW D LIPMAN
PATRICK DONOVAN
SWIDLER BERLIN SHEREFF FRIEDMAN LLP
COUNSEL FOR BLUESTAR COMMUNICATIONS LLP
3000 K STREET NW
SUITE 300
WASHINGTON DC 20007

CHARLES A ROHE
JOHN M BEAHN
SWIDLER BERLIN SHEREFF FRIEDMAN LLP
COUNSEL FOR CAIS INC
3000 K STREET NW
SUITE 300
WASHINGTON DC 20007

JOHN W CONNOR
C & G INVESTMENT ASSOCIATES
1690 BOB-O-LINK BEND
COLUMBUS OH 43229

MATTHEW C AMES
NICHOLAS MILLER
WILLIAM MALONE
MARCI L FRISCHKORN
MILLER & VAN EATON PLLC
COUNSEL FOR BUILDING OWNERS AND MANAGERS ASSOCIATION INTERNATIONAL, INSTITUTE OF
REAL ESTATE MANAGEMENT, INTERNATIONAL COUNCIL OF SHOPPING CENTERS,
MANUFACTURED HOUSING INSTITUTE, NATIONAL APARTMENT ASSOCIATION, NATIONAL
ASSOCIATION OF HOME BUILDERS, NATIONAL ASSOCIATION OF INDUSTRIAL AND OFFICE
PROPERTIES, NATIONAL ASSOCIATION OF REALTORS, NATIONAL ASSOCIATION OF REAL
ESTATE INVESTMENT TRUSTS, NATIONAL MULTI-HOUSING COUNCIL AND NATIONAL REALTY
COMMITTEE, AND THE NATIONAL ASSOCIATION OF COUNTIES, THE NATIONAL ASSOCIATION
OF TELECOMMUNICATIONS OFFICERS AND ADVISORS, AND MONTGOMERY COUNTY,
MARYLAND
1155 CONNECTICUT AVENUE SUITE 1000
WASHINGTON DC 20036-4306

DEBORAH C COSTLOW
TREG TEMONT
ARENT FOX KINTNER PLOTKIN & KAHN
COUNSEL FOR INDEPENDENT CABLE &
TELECOMMUNICATIONS ASSOCIATION
1050 CONNECTICUT AVENUE NW
WASHINGTON DC 20036

JONATHAN M ASKIN
ASSOCIATION FOR LOCAL
TELECOMMUNICATIONS SERVICES
SUITE 900
888 17TH STREET NW
WASHINGTON DC 20006

MARY MCDERMOTT
BRENT H WEINGARDT
PERSONAL COMMUNICATIONS INDUSTRY
ASSOCIATION
500 MONTGOMERTY STREET
SUITE 700
ALEXANDRIA VA 22314-1561

ANDREW KREIG
THE WIRELESS COMMUNICATIONS ASSOCIATION
INTERNATIONAL INC
1140 CONNECTICUT AVE NW
SUITE 810
WASHINGTON DC 20036-4001

LEON M KESTENBAUM
JAY KEITHLEY
NORINA T MOY
SPRINT CORPORATION
1850 M ST NW
SUITE 1100
WASHINGTON DC 20036

RICHARD MORRIS
CRAIG T SMITH
SPRINT CORPORATION
7301 COLLEGE BLVD
OVERLAND PARK KS 66210

MICHAEL R CARPER
ALLIED RISER COMMUNICATIONS CORPORATION
1700 PACIFIC AVENUE
SUITE 400
DALLAS TX 75201

DONALD N DAVID ESQ
FISCHBEIN BADILLO WAGNER HARDING
COUNSEL FOR SHARED COMMUNICATIONS
SERVICES INC
909 THIRD AVUE
NEW YORK NY 10022

ROBERT M BLICK
POLEN MORTGAGE REALTY CO
BOX 103
G-8308 OFFICE PARK DRIVE
GRAND BLANC MI 48439-0103

DANIEL VAN EPP
THE HOWARD HUGHES CORPORATION
1645 VILLAGE CENTER CIRCLE
SUITE 200
LAS VEGAS NV 89134

CINDY Z SCHONHAUT
JULIA WAYS DORF
LACHARLES KEESEE
ICG COMMUNICATIONS INC
161 INVERNESS DRIVE WEST
ENGLEWOOD CO 80112

RICHARD S LIPMAN
MCLEODUSA TECHNOLOGY PARK
6400 C STREET SW
CEDAR RAPIDS IA 52406-3177

ANDREA D WILLIAMS
MICHAEL F ALTSCHUL
RANDALL S COLEMAN
CELLULAR TELECOMMUNICATIONS INDUSTRY
ASSOCIATION
1250 CONNECTICUT AVENUE NW
SUITE 800
WASHINGTON DC 20036

CHARLES C HUNTER
CATHERINE M HANNAN
HUNTER COMMUNICATIONS LAW GROUP
TELECOMMUNICATIONS RESELLERS
ASSOCIATION
1620 I STREET NW
SUITE 701
WASHINGTON DC 20006

MICHAEL STEELE
SEAN BURNS
EQUITY OFFICE PROPERTIES TRUST
THE NORTH RIVERSIDE PLAZA
SUITE 2200
CHICAGO IL 60606

DAVID SWARTZ
ARDEN REALTY INC
11601 WILSHIRE BOULEVARD
4TH FLOOR
LOS ANGELES CA 90025

LARRY A PECK
COUNSEL FOR AMERITECH
ROOM 4H86
2000 WEST AMERITECH CENTER DRIVE
HOFFMAN ESTATES IL 60196-1025

DONNA WILLIAMS
HUNINGTON LAKES
7324 SKILLMAN
DALLAS TX 75231

SUSAN GENOVESE
WINDSOR HEIGHTS AT MARLBOROUGH
SUSAN GENOVESE
39-5 BRIARWOOD LANE
MALBOROUGH MA 01752

RONDA WENGER
WINDSOR AT ASBURY SQUARE
2000 ASBURY SQUARE
DUNWOODY GA 30346

CARL KIDD
PRESCOTT PLACE
2701 FRANKLIN DRIVE
MESQUITE TX 75150

KARA MORAN
WINDSOR MEADOWS AT MALBOROUGH
141A-8 BROADMEADOW ROAD
MALBOROUGH MA 01752

GREG CARLSON
FEDERATION OF NEW YORK HOUSING
COOPERATIVES
138-10 FRANKLIN AVENUE
SUITE 8K
FLUSHING NY 11374

JENNIFER BLACKSTONE
WINDSOR COURTS AT BEVERLY
201 BROUGHTON DRIVE
BEVERLY MA 01915

MARY HUNT
RITTENHOUSE SQUARE
201 SOUTH 18TH STREET
PHILADELPHIA PA 19103

FERD LIGHTNER
JEFFERSON WEST
810 WILDWOOD DR R-2
JEFFERSON CITY MO 65109

JENNY DONELLON
WINDSOR AT BRITTON WOODS
5489 CRESCENT RIDGE DRIVE
DUBLIN OH 43016

KAREN WILLIAMSON
THE BERKSHIRES OF ADDISON
14600 MARSH LANE
DALLAS TX 75234

RICHARD B SMAGALA
THE CHATEAU APARTMENTS CO
PHILADELPHIA PIKE & SHIPLEY ROAD
WILMINGTON DELAWARE 19809

SHIREE SPENCER
GOLF SIDE APARTMENTS
5613 COVENTRY PARK
HALTOM CITY TX 76117

SUSAN YOUNG
THE INDIGO ON FOREST
9669 FOREST LANE
DALLAS TX 75243

NANCY CAMPBELL
P O BOX 43
GREENDALE WI 53129

BEVERLY LANHAM
BERKSHIRE SPRINGS
5704 SPRING VALLEY ROAD
DALLAS TX 75240

GRACE SALAZAR
BENCHMARK APARTMENTS
3424 W COUNTRY CLUB DRIVE
IRVING TX 75038

PATRICIA K ORENDER
WINDSOR AT WOODGATE
5400 EAST 21ST STREET
WICHITA KS 67208

THEODORE M SELDIN
SELDIN COMPANY
MONTCLAIR PROFESSIONAL CENTER
13057 WEST CENTER RD
OMAHA NE 68144-3790

MATT SCARBOROUGH
WINDSOR AT ARBORS
5250 DUKE STREET
ALEXANDRIA VA 22304

DAVID C MACOAB
ARROWHEAD MANAGEMENT COMPANY
1320 D STREET
P O BOX 87
SALIDA CO 81201

LAURA ARNETT
WINDSOR AT CEDARBROOKE
8406 EAST HARRY
WICHITA KS 67207

PATRICK M KELLY CPM
FDC MANAGEMENT INC
2600 E NUTWOOD AVE
PENTHOUSE SUITE
FULLERTON CA 92831-3114

PAMELA ADAMS
HUNTER'S GLEN
6400 INDEPENDENCE PARKWAY
PLANO TX 75023

JERRY KELLEN
FLAGSTONE
2002 FLAGSTONE DRIVE
MADISON AL 35758

SONIA J PATANO
WINDSOR VILLAGE AT WALTHAM
976 LEXINGTON STREET
WALTHAM MA 02451

MARCIE WICALL
WINDSOR AT GOLDEN POND
3300 ALDEN POND LANE
EAGAN MN 55121

WILLIAM D GOHL
LIBERTY HEIGHTS AT NORTHGATE
12105 AMBASSADOR DRIVE
COLORADO SPRINGS CO 80921-3640

DAWN EASTMAN
WINDSOR AT BASLIGHT SQUARE
6516 N UNIVERSITY
PEORIA IL 61614

RALPH PAUL
COLONY NORTH
319 EAST LEA BOULEVARD
WILMINGTON DELAWARE 19802

KRISTINE M DINGLEY
WINDSOR RIDGE AT WESTBOROUGH
WINDSONR RIDGE DRIVE
WESTBOROUGH MA 01581

DEBRA L BENOIT
RIDGEDALE APARTMENTS
7740 WEST GRANGE AVENUE
GREENDALE WI 53129

CARLEEN HILMES
PLEASANT WOODS
9236 CHURCH ROAD
DALLAS TX 75231

LANA LANE
SWEETWATER RANCH
540 BUCKINGHAM ROAD
RICHARDSON TX 75081

KATHY FLETCHER
PROVIDENCE APARTMENT HOMES
11700 AUDELIA ROAD
DALLAS TX 75243

SHANNON SCHMITT
HUNTINGTON BROOK
12516 AUDELIA ROAD
DALLAS TX 75243

DENISE SILVA
WINDSOR AT BRENTWOOD
630 SMITHFIELD ROAD
NORTH PROVIDENCE RI 02904

MICHAEL S YONGE
CONCORD MANAGEMENT LTD
1551 SANDSPUR ROAD
MAITLAND FL 32751

MARY RUSH
KEY MANAGEMENT
125 NORTH MARKET
SUITE 1510
WICHITA KS 67202