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September 24, 1999

VIA HAND DELIVERY

Magalie R. Salas, Esq.
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 200554

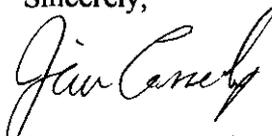
Re: Ex Parte Report: Implementation of the Cable Television Consumer Protections and Competition Act of 1992, Review of the Commission's Cable Attribution Rules, CS Docket No. 98-82; Implementation of Section 11(c) of the Cable Television Consumer Protection and Competition Act of 1992, Horizontal Ownership Limits, MM Docket No. 92-264

Dear Ms. Salas:

On September 23, 1999, on behalf of AT&T Corp., I met with Commissioner Susan Ness and her Legal Advisor, David Goodfriend, to discuss the above-captioned proceedings. I emphasized the point, made in AT&T's earlier filings in these proceedings, that the Commission, in formulating horizontal ownership and attribution rules for cable, should not foreclose transactions that have the potential to promote widespread, residential, telephone competition. I noted that video programming concerns are already addressed through a variety of rules (must-carry, program carriage, channel occupancy rules, etc.) and that insulating or behavioral safeguards can be devised that would attenuate any justification for low numerical quotas on horizontal ownership or for attributing ownership based on non-controlling investments.

Please contact me if you have any questions.

Sincerely,


James L. Casserly

cc: Commissioner Susan Ness
David Goodfriend, Esq.

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