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ATTORNEYS AT LAW

October 12, 1999

EX PARTE

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
The Portals  
445 12th Street, SW  
Washington, DC 20554

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OCT 12 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Coalition for Affordable Local and Long Distance Service Proposal –  
CC Dockets 96-262, 94-1, 96-45, 99-249

Dear Ms. Salas:

On October 4, 1999, on behalf of the Coalition for Affordable Local and Long Distance Service, I met with the following members of the FCC staff regarding the CALLS integrated universal service and access charge proposal: Yog Varma, Deputy Chief, Common Carrier Bureau; Jane Jackson, Chief, Competitive Pricing Division, Common Carrier Bureau; Rich Lerner, Deputy Chief, Competitive Pricing Division, Common Carrier Bureau; Howard Shelanski, FCC Chief Economist; Neil Fried, Attorney, Competitive Pricing Division, Common Carrier Bureau; Aaron Goldschmidt, Attorney, Competitive Pricing Division, Common Carrier Bureau; Janice Jamison, Attorney, Competitive Pricing Division, Common Carrier Bureau.

The points I discussed are those contained in the Memorandum in Support of the Coalition for Affordable Local and Long Distance Service Proposal, filed August 20, 1999, in the above-captioned dockets. See Letter of John T. Nakahata to Magalie Roman Salas, Secretary, FCC, dated August 20, 1999, filed in CC Dockets 96-262, 94-1, 96-45, 99-249. In addition, I stated that the CALLS proposal covers a range of issues not currently addressed in FCC rules. FCC rules do not currently provide an integrated resolution of interstate access charge and universal service issues pending in these dockets. Furthermore, FCC proposals in these dockets to date do not contain an integrated solution covering the range of issues covered by the CALLS proposal. I also stated that the CALLS proposal promotes facilities-based competition, particularly for residential and rural markets. I noted that the FCC's recent local competition report found that local competition was primarily focused in urban business markets.

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I also made the point that the fact that the five year term of the CALLS proposal was consistent with concept that the CALLS proposal is a transition to competitive markets, rather than a permanent regulatory solution.

In accordance with FCC rules, I am filing two copies of this letter in each of the above-captioned dockets.

Sincerely,



John T. Nakahata

Counsel to the Coalition for Affordable  
Local and Long Distance Service

JTN/krs

cc: Yog Varma, Deputy Chief, Common Carrier Bureau  
Jane Jackson, Chief, Competitive Pricing Division, Common Carrier Bureau  
Rich Lerner, Deputy Chief, Competitive Pricing Division, Common  
Carrier Bureau  
Howard Shelanski, FCC Chief Economist  
Neil Fried, Attorney, Competitive Pricing Division, Common Carrier Bureau  
Aaron Goldschmidt, Attorney, Competitive Pricing Division, Common  
Carrier Bureau  
Janice Jamison, Attorney, Competitive Pricing Division, Common Carrier Bureau