



October 7, 1999

EX PARTE OR LATE FILED

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EX PARTE PRESENTATION

Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, S.W. Room TW-A325
Washington, DC 20554

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OCT 07 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: *Implementation of the Non-Accounting Safeguards of 272 of the Communications Act of 1934, as amended, CC Docket No. 96-149; Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Louisiana, CC Docket No. 98-121; Application by New York Telephone Company (d/b/a Bell Atlantic – New York), Bell Atlantic Communications, Inc. NYNEX Long Distance Company, and Bell Atlantic Global Networks, Inc., for Authorization To Provide In-Region, InterLATA Services in New York, CC Docket No. 99-295*

Dear Ms. Salas:

On October 6, Jim Thurwalker, Larry Stanfel, Lori Fink and the undersigned of SBC Communications Inc. met with Audrey Wright, John Stanley, Tony Dale and Jerome Stanshine of the FCC to discuss whether certain functions, network architecture planning and technology planning, constitute Operations, Installation and Maintenance (OI&M) of switching and transmission facilities. While the FCC's related Orders do not define specific OI&M functions, SBC expressed the view that network architecture planning and technology planning functions do not constitute OI&M.

If you have any questions regarding this information, please call me on 314-235-1107. In accordance with the Commission's rules governing ex parte communications, two copies are provided herewith.

Respectfully submitted,

Kathy Rehmer
by *MAB*
Kathy Rehmer
Executive Director-Regulatory Planning

No. of Copies rec'd 0+2
List ABCDE

CC: Audrey Wright
John Stanley
Tony Dale
Jerome Stanshine