

ORIGINAL

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November 2, 1999

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Ex Parte**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

**Re: Deployment of Wireline Services Offering Advanced Services Capability -  
CC Docket No. 98-147**

Dear Ms. Salas:

Yesterday, on behalf of Bell Atlantic, Donna Epps, Augie Trinchese, and I met with Rebecca Beynon of Commissioner Furchtgott-Roth's office to discuss the captioned proceeding. The attached material was used during the meeting.

Please enter this material into the record as appropriate. Should you have any questions please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. Mulieri".

Attachment

Cc: R. Beynon

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## Line Sharing

### **Competition Concerns**

- ❑ Line Sharing Would Actually Inhibit Competitive Alternatives To Consumers
- ❑ Line Sharing Is Advocated By Very Narrow Segment Of Industry, Data-Only CLECs, And Is Self-Serving
- ❑ Will Retard Network Modernization; Disincentivizes Broadband Technology Investment

### **Consumer Concerns**

- ❑ Limits Choice Of Provider
- ❑ Not Consumer Friendly From Service Provisioning, Maintenance And Trouble Resolution Perspective And May Affect Service Quality
- ❑ Will Make It Much More Difficult For Customer To Identify Provider

### **Policy Concerns**

- ❑ Line Sharing Is Inconsistent With Act's Unbundling Requirements And With Prior Commission Decisions, I.E., Local Competition Order, GTE, ADSL Tariff Order, And Recent "Broadband Today" Staff Report
- ❑ Doesn't Solve Any "Market Entry" Problem; DLECs Can Enter, And Currently Serve, The Data Market Via Purchase Of UNE Loops As Evidenced By Their Accelerating Deployment Of DSL Services
- ❑ Line Sharing Would Be A Permanent Requirement That Serves An "Interim Technology"
- ❑ Doesn't Foster Deployment Of DSL In Rural Areas Because Of Need To Load Cable For Voice Over 18,000 Ft

### **Operational Concerns**

- ❑ Line Sharing Is A New (As Of Yet Undefined) Offering That Cannot Be Accommodated Within Present OSS Architecture
- ❑ Two Different Services Over A Single Loop To Two Different Customers
- ❑ BA's Existing Service Offerings, Including ADSL Service, Are Not Line Sharing
- ❑ Service Development Processes Must Be Followed To Avoid Service Disruption And Ensure Efficient Provisioning. BA Estimates 9-12 Months Lead Time

### **Recommendation**

- ❑ Commission An Industry Forum To Evaluate Policy Ramifications As Well As Technical, Operational, And Service Quality Issues
- ❑ Develop Proposals For Service Definition, Deployment, And Customer Care Requirements