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December 13, 1999

VIA HAND DELIVERY

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

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FEDERAL COMMUNICATIONS COMMISSION
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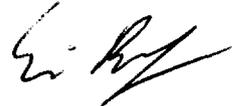
Re: Ex Parte
CC Docket No. 98-147

Dear Ms. Salas:

Pursuant to Section 1.1206(b)(1) and (2) of the Commission's rules, 47 C.F.R. Section 1.1206(b)(1) and (2), this letter will provide notice that on December 13, 1999 the undersigned and Christopher A. Holt, Assistant General Counsel, CoreComm Incorporated, met with the following persons concerning issues on reconsideration of the *Collocation Order*: Bill Kehoe of the Common Carrier Bureau and Raelynn Tibayan Remy and Darius Withers of the Enforcement Bureau.

We presented the views set forth in the attached document.

Sincerely,



Eric J. Branfman

Enclosure

cc w/enc.: Bill Kehoe
Darius Withers
Raelynn Tibayan Remy
Christopher A. Holt

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Ex Parte Presentation of CoreComm re Collocation - 12/10/99

- **Cageless Collocation Rack Depth (§ 43)**

The Collocation Order should be clarified to prohibit ILECs from imposing a single “standard” bay size that forces CLECs using industry standard equipment to make requests for “nonstandard” collocation that impose needless delay, business uncertainty, and expense

- **Cageless Collocation Spacing of Equipment (§ 42)**

The Collocation Order should be clarified to provide that although ILECs are permitted to enclose their equipment in a cage, they are prohibited from segregating their equipment by surrounding it with an additional “buffer zone,” absent a showing of security needs

- **Provisioning Pending Collocation Amendment (§ 53)**

The Collocation Order should be clarified to prohibit ILECs from denying processing and build-out during negotiation of collocation amendment or interconnection agreement, provided CLEC is willing to pay applicable application or construction charges

- **Available Space Reports (§ 58)**

The Collocation Order should be clarified to prohibit ILECs from imposing unreasonable intervals based upon number of applications submitted and to specify reasonable intervals

- **Provision of Floor Plans to CLEC (§§ 56-57)**

The Collocation Order should be clarified to give a CLEC the right to inspect floor plans that the ILEC turns over to the state commission, subject to appropriate nondisclosure protections

- **Collocation Equipment (§§ 28, 30)**

The Collocation Order should be clarified to prohibit ILECs from denying collocation of equipment “used or useful” for interconnection or access to UNEs simply because the equipment also contains standalone switching capability, and should not be permitted to impede efficient construction activities by, for example, limiting the placement of cross-connect panels or blocks installed

- **Pre-Turnover Walkthroughs (§ 49)**

The Collocation Order should be modified to make clear a CLEC must be given reasonable access to its designated collocation space during build-out

- **Eviction of CLEC from Collocation Space for ILEC Need (§ 585 of 1st R&O)**

The Collocation Order should be clarified to provide that once collocated, a CLEC should have right to remain, provided that it complies with its contractual obligations