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**INDEPENDENT CABLE &  
TELECOMMUNICATIONS ASSOCIATION**

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December 17, 1999

Ms. Magalie R. Salas  
Secretary  
Federal Communications Commission  
The Portals  
445 Twelfth Street, SW  
Washington, DC 20554

Dear Madam Secretary:

Enclosed is a letter dated December 17, 1999 to Ms. Deborah Lathen regarding MDU Inside Wiring Rules and other topics included in Docket Number CS 95-184. The letter has two attachments.

Sincerely yours,

A handwritten signature in black ink that reads "William J. Burhop". The signature is written in a cursive style with a large, prominent initial "W".

William J. Burhop  
Executive Director

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December 17, 1999

Deborah A. Lathen, Esq.  
Bureau Chief  
Federal Communications Commission  
Cable Services Bureau  
The Portals  
445 12th Street, SW  
Washington, DC 20554

Dear Ms Lathen:

On November 16, representatives of the ICTA Board of Directors met with numerous members of your staff regarding MDU Inside Wiring Rules, contract provisions and mandatory access. It was a very useful meeting. We hope to meet with you before this rulemaking process is completed.

This letter provides information requested at that meeting and attached are two sets of documents. First, a contract utilized by a Private Cable Operator (PCO) and MDUs. Second, examples of perpetual – life of franchise provisions utilized by the franchised cable companies to prevent PCOs from competing in MDUs.

In the meeting, the MDU/REIT representatives were asked how long a Fresh Look window should be available to MDUs/REITs. Having surveyed the 12 MDUs/REITs on the ICTA BOD, representing over 750,000 units nationwide, they all think that a minimum of 18 months will be needed by the larger and more sophisticated owners. They also believe a longer period, probably as much as 36 months, will be needed by smaller housing companies.

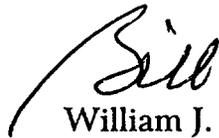
This window duration is needed to learn of any new FCC rules, to understand their implications, to negotiate with providers and to sign agreements. None of us want delay or to build in procrastination. Yet, as we have learned with the MDU Inside Wiring Rules, it takes more time than many hoped for the marketplace to

Deborah A. Larthen, Esq.  
December 17, 1999  
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absorb and implement new rules. In this case, too little time could diminish positive impact, and a longer duration has little downside risk.

If we can supply any additional information, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill", written in a cursive style.

William J. Burhop  
Executive Director

Enclosures

cc: Royce Dickens  
Carl Kandutsch