

February 18, 2000

Via Electronic Filing

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Ex Parte Presentation in CC Docket No. 96-98

Dear Ms. Salas:

Pursuant to Section 1.1206 of the Commission's rules, the Competitive Telecommunications Association ("CompTel") hereby gives notice that on February 17, 2000, its representatives met with Dorothy Attwood, Legal Advisor to Chairman Kennard. CompTel discussed the need for the Commission to allow all competitive carriers the ability to use any UNE or UNE combination to provide any service, including special access services. CompTel explained that if the FCC was concerned about the revenue losses to ILECs from the conversion of special access circuits to lower priced UNE combinations, the Commission should develop a transition process for the "conversion" of special access circuits to UNEs. The transition process, if necessary, should be of limited duration, focused on existing special access revenues, and not be based on the competitive carrier being required to explain to the ILEC how it intends to use the UNE.

CompTel engaged in an exploratory discussion with staff regarding how to implement the conversion process in a manner consistent with the statute and Commission policies. Representing CompTel were Carol Ann Bischoff, Executive Vice President and General Counsel, Steven Augustino of Kelley Drye & Warren, and the undersigned attorney.

Sincerely,

Jonathan D. Lee
Vice President,
Regulatory Affairs