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April 13, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**By Hand**Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals - TW-A325
445 Twelfth Street, S.W.
Washington, DC 20554Re: Ex Parte Bell Atlantic-GTE Merger CC Docket No. 98-184

Dear Ms. Salas:

Pursuant to Section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. Section 1.1206(b)(2), this will provide notice that on April 13, 2000 Louise Ng, Mary Cegelski, Christopher Holt, and Thomas O'Brien of CoreComm Limited ("CoreComm") and I spoke with Michael Jacobs and Jake Jennings, Policy and Program Planning Division, Common Carrier Bureau, by telephone concerning issues in the above captioned-proceeding. CoreComm personnel described some of the operational problems and additional expenses that CLECs might experience if GTE and Bell Atlantic operated their OSS using different business rules. CoreComm explained that the use of different business rules would increase the amount of training that its ordering and customer service personnel would require, would require CoreComm personnel to master two different handbooks instead of a single handbook, and would complicate the ordering, customer service, and other processes for CoreComm and other CLECs.

CoreComm advocated that as a condition of approval of this merger, GTE and Bell Atlantic should be required to integrate their systems by establishing a bridge between the Bell Atlantic systems and the proprietary GTE systems that are inconsistent with the industry standard systems used by Bell Atlantic and the other RBOCs. To do so, CoreComm advocated that the merged entity establish a dynamic change management process for the changes imposed by the merger conditions in which those changes are managed through a single national change management process in which the merged entity and CLECs collaborate. Such a change management process should establish a timeline for meeting merger requirements for software

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changes as well as FCC or state commission-mandated changes. CoreComm advocated that product offered by the merged entity be subject to the same ordering rules in the both the present Bell Atlantic and the present GTE regions. As an example, CoreComm cited frame due time for coordinated hot cuts, for which prior to their merger, Ameritech and SWBT had different rules. CoreComm's position was that these types of disparities between rules of the merging companies should be eliminated after the merger.

Two copies of this letter are enclosed.

Sincerely,



Eric J. Branfman
Counsel for CoreComm Ltd.

cc: Michael Jacobs
Jake Jennings
Christopher A. Holt
Thomas O'Brien
Mary Cegelski
Louise Ng

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