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April 24, 2000

EX PARTE – Via Hand Delivery

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
The Portals  
445 12th Street, SW  
Washington, DC 20554

RECEIVED  
APR 24 2000  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Coalition for Affordable Local and Long Distance Service Proposal –  
CC Dockets 96-262, 94-1, 96-45, 99-249

Dear Ms. Salas:

On Friday, April 21, 2000, I spoke with Aaron Goldschmidt of the Competitive Pricing Division of the Common Carrier Bureau. Mr. Goldschmidt called me with questions regarding the proposed "pooling" rules in proposed rules 61.48(m). I told Mr. Goldschmidt that we had simplified and clarified the test for pooling based upon disproportionate initial reductions in total access charges, and that these changes were necessary to ensure that the provisions operated as intended and without skewing that would have occurred if the calculation were based on lines. In addition, I explained that different companies get different levels of initial reductions based upon, among other factors, whether some of their filing entities reach the target rates, the relative proportion of common line to switched access revenues, and the relative proportion of local switching revenue to total access revenues when compared with the rest of the industry.

In accordance with FCC rules, I am filing copies of this letter in each of the above-captioned dockets.

Sincerely,



John T. Nakahata

Counsel to the Coalition for Affordable Local and  
Long Distance Service

JTN/krs

cc: Mr. Aaron Goldschmidt