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Net2000 Communications

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Magalie R. Salas, Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Implementation of the Local Competition Provisions of the
Telecommunications Act of 1996, CC Docket No. 96-98**

Written *Ex Parte* Presentation by Net2000 Communications, Inc.

Dear Ms. Salas:

Net2000 Communications, Inc. ("Net2000") supports the *ex parte* letter filed on February 28, 2000 by Bell Atlantic, BellSouth, Focal Communications, GTE, Intermedia Communications, SBC Communications, Time Warner Telecom, U.S. West, and Winstar Communications ("*ILEC-CLEC ex parte*") in the above-referenced proceeding. The *ILEC-CLEC ex parte* proposed three circumstances under which carriers may purchase loop/transport combinations as unbundled network elements ("UNEs") referred to as the Enhanced Extended Links or "EELs".

The *ILEC-CLEC ex parte* presents a fair compromise on rules and policies that should govern the provision of EELs. The availability of EELs is critical to the development of competition in the local exchange market. The *ILEC-CLEC ex parte* will resolve the special access arbitrage issue, while allowing competitive local exchange carriers to reach end-users cost-effectively using existing UNE combinations. Many existing special access circuits that carry a significant amount of local exchange traffic currently do not terminate in collocation arrangements. It is important that the Commission eliminate the collocation requirement for these circuits, as proposed in Option 3 of the *ILEC-CLEC ex parte*, so that they can be converted to EELs. Net2000 urges the Commission to accept the *ILEC-CLEC ex parte* proposal.

Sincerely,



Anthony Hansel
Counsel
Net2000 Communications, Inc.

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