EX PARTE OR LATE FILED

ORIGINAL

HARRIS, WILTSHIRE & GRANNIS LLP

1200 EIGHTEENTH STREET, NW
WASHINGTON, DC 20036

TEL 202.730.1300 FAX 202.730.1301
WWW.HARRISWILTSHIRE.COM

ATTORNEYS AT LAW

May 22, 2000

RECEIVED
MAY 22 2000
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

EX PARTE – Via Hand Delivery

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

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

Dear Ms. Salas:

The attached letter was sent to Jack Zinman today.

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
Attachment

HARRIS,
WILTSHIRE &
GRANNIS LLP

1200 EIGHTEENTH STREET, NW
WASHINGTON, DC 20036

TEL 202.730.1300 FAX 202.730.1301
WWW.HARRISWILTSHIRE.COM

ATTORNEYS AT LAW

May 22, 2000

VIA HAND DELIVERY

Mr. Jack Zinman
Legal Counsel
Common Carrier Bureau
Federal Communications Commission
The Portals
445 12th Street, SW
Washington, DC 20554

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

Dear Jack:

I am writing you with respect to two technical clarifications needed to the Part 54 rules proposed to implement the CALLS proposal.

In response to an inquiry from CCB staff, the first modification is to § 54.403(b). The first sentence of that subsection should read, "For the qualifying low-income consumer, the federal lifeline support amount shall not exceed $3.50 plus the tariffed rate in effect for the primary residential end user common line charge of the incumbent LEC serving the area in which the consumer receives service."

The second modification is to the definition of "Average Price Cap CMT Revenue Per Line Per $\text{Month}_{\text{StudyArea}}$" in proposed rule § 54.800(a). The final clause of that definition should read "but excluding any other exogenous changes or any changes pursuant to §61A.45(i)(4) not yet effective." This will ensure that reductions to CMT revenue per line for companies with a $.0095 target rate do not affect universal service calculations until after the Commission has allowed those reductions to take effect.

Please call me if you have any questions.

Sincerely,

John T. Nakahata

Counsel to the Coalition for Affordable Local and Long Distance Service

JTN/krs