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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
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In the Matters of	)	
	)	
Deployment of Wireline Services Offering Advanced Telecommunications Capability	)	CC Docket No. 98-147
	)	
Implementation of the Local Competition Provisions of the Telecommunications Act of 1996	)	CC Docket No. 96-98
	)	
Applications for Consent to the Transfer of Control of Licenses and Section 214 Authorizations from Ameritech Corporation Transferor to SBC Communications Inc., Transferee	)	CC Docket No. 98-141
	)	
Common Carrier Bureau and Office of Engineering and Technology Announce Public Forum on Competitive Access to Next-Generation Remote Terminals	)	NSD-L-00-48 DA 00-891

**REPLY COMMENTS OF THE  
RURAL INDEPENDENT COMPETITIVE ALLIANCE**

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**REPLY COMMENTS OF THE  
RURAL INDEPENDENT COMPETITIVE ALLIANCE**

The Rural Independent Competitive Alliance ("RICA"), by counsel, hereby files these Reply Comments in response to the Petition for a Declaratory Ruling on Loop Provisioning of the Association for Local Telecommunications Services ("ALTS Petition").

Following adoption of the Telecommunications Act of 1996, many Rural Telephone Companies established competitive local exchange carrier ("CLEC") operations to bring improved service to the small rural towns and surrounding areas adjacent to their existing service territories.

Generally, these areas have received only minimal investment or attention from the large carriers serving them. These rural CLECs have offered facilities-based competition wherever possible. In recognition of common regulatory and legal issues facing them, many of these rural CLECs formed an alliance under the name Rural Independent Competitive Alliance. RICA supports ALTS in its attempts to encourage the Federal Communications Commission ("FCC" or "Commission") to make sure that CLECs are able to obtain timely, efficient and nondiscriminatory access to unbundled loops and other unbundled network elements ("UNEs").

RICA joins with ALTS and many of the Commenters in refuting the claims of the large incumbent local exchange carriers ("ILECs") that CLECs obtain loops in the same period of time that the ILECs deploy the same loops for themselves. *See* ALTS Petition at 8 "[i]n virtually no case do CLECs obtain loops in the same period of time that the ILEC can deploy the same loops for itself"); AT&T's Comments at 2 ("CLECs routinely encounter significant difficulties, frustrations and unnecessary delays in accessing the most essential of all unbundled network elements - the local loop"); DSLnet Communications at 4 (noting that absent a determination as to when UNEs must be provided, "CLECs will continue to be 'impaired' in their efforts to provide the service that they seek to offer if they are unable to procure loops in a timely and efficient manner"); Rhythms NetConnections' Comments at 2 ("ordering unbundled loops from the ILECs is often met with unnecessary delays and excessive costs"); McLeodUSA Telecommunications Services at 1-2 ("[i]t is essentially impossible for McLeodUSA to obtain, from any RBOC with which it deals, unbundled loops within a time frame that allows McLeodUSA to serve its customers with the same timelines with which the RBOC serves its own retail customers"); KMC Telecom/NewSouth Communications/ NEXTLINK Communications at 6 (noting that the current ILEC loop ordering

process continues to be "inefficient, discriminatory, and needlessly prolong[s] the provisioning interval for loops").

RICA members, likewise, have experienced delay and frustration in obtaining UNEs from the large ILECs and, in the more frequent cases where RICA members do not require UNEs, RICA members have experienced unnecessary delay in implementing interconnection agreements with the large ILECs. Thus, RICA urges the Commission to take whatever action is necessary to ensure that unbundled loops, UNEs and other facilities of the large ILECs are available to CLECs in a timely, efficient and nondiscriminatory manner.

Respectfully Submitted,

Rural Independent Competitive Alliance

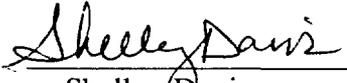


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## CERTIFICATE OF SERVICE

I, Shelley Davis, of Kraskin, Lesse & Cosson, LLP, 2120 L Street, NW, Suite 520, Washington, DC 20037, do hereby certify that a copy of the foregoing "Reply Comments of the Rural Independent Competitive Alliance" was served on this 10<sup>th</sup> day of July 2000, by first class, U.S. mail, postage prepaid to the following parties:

  
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