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Leonard J. Cali
Vice President
Federal Government Affairs

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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September 20, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

Re: Notice of Ex Parte Presentation: Policy and Rules Concerning the Interstate, Interexchange Marketplace, Implementation of Section 254(g) of the Communications Act of 1934, as amended, CC Docket No. 96-61; Request for Emergency Relief of the Minnesota CLEC Consortium and the Rural Independent Competitive Alliance, DA 00-1067; Mandatory Detariffing of CLEC Interstate Access Services, DA 00-1268; Access Charge Reform, et al., CC Docket Nos. 96-262 and 94-1 and CCB/CPD File Nos. 98-63, 00-20, and 00-21

Dear Ms. Salas:

Yesterday, Dan Meron, Bob Quinn, Mark Lemler, and I, all representing AT&T, discussed with Dorothy Attwood, Chief of the Common Carrier Bureau, and Jeff Dygert, Jane Jackson, Rich Lerner, Tamara Priess, and Jack Zinman, also of the Common Carrier Bureau, matters related to the referenced proceedings. In particular, we discussed AT&T's view that many CLECs charge exorbitantly high rates for their access services, and that interexchange carriers have no duty to purchase such services. We also discussed AT&T's concern that imposing such a duty on interexchange carriers would, among other harms and in addition to being inconsistent with law, require the Commission to regulate CLEC access rates, impose an unwarranted burden on Commission resources, distort competitive market entry, and force interexchange carriers to subsidize other carriers' predatory pricing schemes. We shared the attached document in discussing this matter.

In addition, we discussed AT&T's view that proper implementation of the Commission's detariffing requirements should not result in undue customer confusion or create unnecessary complexity or cost. We also urged that the detariffing schedule for domestic and international services be the same, and argued that international tariffs concerning integrated domestic and international offers may include a disclaimer explicitly limiting application of the tariff to international offerings until international detariffing is implemented.

Finally, we urged that the Commission adopt a moratorium on all petitions under the Commission's pricing flexibility order (Access Charge Reform, et al., Fifth Report and Order and FNPRM, 14 FCC Rcd. 14222 (1999)) pending judicial review of that order.

Our statements concerning all of these issues were consistent with our written submissions in the referenced proceedings.

In accordance with Section 1.1206 of the Commission's rules, I have submitted two copies of this Notice for each referenced proceeding.

Sincerely,

A handwritten signature in black ink, appearing to be "R. J. L. L. L.", written in a cursive style.

Att.

cc: D. Attwood
Jeff Dygert
Jane Jackson
Rich Lerner
Tamara Priess
Jack Zinman



"Your Local Telephone Company"

Dear Valued Cavalier Customer:

We have been notified by American Telephone & Telegraph (AT&T) that they will no longer be providing residential long distance service to Cavalier Telephone customers. As a result of this, your authorization is needed to switch your long distance carrier.

We are pleased to offer our customers the following special program to greatly lower your monthly telephone bill:

Price Comparison

	<u>Monthly Fee</u>	<u>State to State Price Per Minute*</u>	<u>In-State Price Per Minute*</u>
AT&T One Basic Rate	\$0.00	16.0¢	16.0¢
Cavalier Basic	\$0.00	9.0¢	9.0¢
AT&T One Rate Seven Cents	\$5.95	7.0¢	12.0¢
Cavalier Enhanced	\$5.00	7.0¢	7.0¢

By choosing Cavalier long distance, you will save on monthly long distance charges and have the savings shown to you on one easy to read telephone bill. Cavalier Telephone is always looking for ways to serve you, our valued customer, and we are always looking for new ways to earn your business.

For your convenience and to expedite your cost savings, simply return the enclosed, self-addressed, stamped postcard by September 15th. If you wish to switch to another long distance, contact our customer service department.

Sincerely,

Jeffrey C. Snyder
Vice President of Marketing

*AT&T bills in 1 minute increments, with a 1 minute minimum;
Cavalier Telephone bills in 6-second increments, with a 30-second minimum.