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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY



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January 4, 2001

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S. W. - Room TWB-204
Washington, D. C. 20554

EX PARTE OR LATE FILED

Re: Ex parte, CC Docket No. 98-147, Deployment Of Wireline Services Offerings Advanced Telecommunications Capability; CC Docket No. 96-98, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996

Dear Ms. Salas:

On Thursday, January 4, 2001, Richard Rubin, C. Michael Pfau and the undersigned, all of AT&T, and James Cassery of Mintz Levin met with Jordan Goldstein, Legal Advisor to Commissioner Susan Ness. The purpose of the meeting was to discuss the obligation of incumbent LECs to provide nondiscriminatory access to the unbundled network element platform for use by CLECs in providing both voice and data services over a single loop. The topics discussed at the meeting are outlined in the attached presentation.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in black ink, appearing to read "F. Simone".

ATTACHMENT

cc: J. Goldstein

CLEC Needs

- A Commission ruling that:
 - Precludes ILECs from claiming that the *Line Sharing Order* limits CLEC requests for line splitting
 - Holds that splitters are “attached electronics” of the loop UNE, not a separate UNE
 - Requires ILECs to support loop-port combinations for voice services, regardless of who owns or inserts the splitter
 - Mandates prompt implementation of nondiscriminatory OSS necessary to support collocation-based UNE-P+DSL
 - Permits states to order ILECs to provide splitters

CLEC Needs

- Commission recognition that CLECs' OSS needs to support UNE-P+DSL line splitting are virtually identical to that provided for line sharing and a requirement that both line splitting options be operationally ready by 6/01, unless a state has already ordered an earlier date, *e.g.*, NY
- Commission affirmation that ILECs must support the voice portion of the line splitting configuration in a manner consistent with its support for UNE-P in a voice-only configuration

CLEC Needs

- Clear Commission expectations regarding UNE-P+DSL implementation regardless of who owns or deploys the splitter:
 - Mandatory re-use of existing loops (if DSL qualified)
 - Demonstrated proficiency in performing hot cuts for collocation-based service
 - Minimum disruption of preexisting UNE-P OSS processes
 - Parity OSS support for line splitting compared to UNE-P (for voice) or line sharing (for DSL)
 - No tolerance for delays past 6/01, because
 - CLECs have been seeking ILEC support for nearly a year
 - Support processes are closely analogous to line sharing
 - ILECs continue to sign customers to term contracts