

[REDACTED]

ORIGINAL



W. Scott Randolph
Director - Regulatory Affairs

Verizon Communications
1300 I Street
Suite 500E
Washington, DC 20005

Phone: 202 515-2530
Fax: 202 336-7922
strandolph@verizon.com

RECEIVED

JUN 29 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

June 29, 2001

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

EX PARTE OR LATE FILED

**Ex Parte: Implementation of the Local Competition Provisions in the
Telecommunications Act of 1996 - CC Docket No. 96-98**

Dear Ms. Salas,

On June 29, 2001, Augie Trinchese, Larry Katz, and the undersigned met with Julie Veach, Jeremy Miller, and Tom Navin of the Common Carrier Bureau and Stacy Jordan and Greg Vadas of the Wireless Telecommunications Bureau. We discussed the use of special access services by wireless carriers and why such services were generally not entitled to convert to unbundled network elements under the Act. The attached materials were used in the discussions.

Pursuant to Section 1.1206(a)(1) of the Commission's rules, and original and one copy of this letter are being submitted to the Office of the Secretary. Please associate this notification with the record in the proceeding indicated above. If you have any questions regarding this matter, please call me at (202) 515-2530.

Sincerely,

W. Scott Randolph
Director - Regulatory Matters

cc: Julie Veach
Jeremy Miller
Tom Navin
Stacy Jordan
Greg Vadas

No. of Copies rec'd 04
List ABCDE

Use of Special Access Services by Wireless Carriers

Special access used by wireless carriers does not qualify as UNE combinations.

- Wireless carriers use special access to connect their switches to cell sites,
 - not end user customer premises.
- Use is not consistent with 51.319.

There is no basis to extend UNE treatment to these special access arrangements.

- No service/market-specific impairment analysis has been undertaken.
- Wireless carriers are not impaired in their provision of wireless service without access to UNEs/combinations.
- No market evidence exists to support an impairment finding.
- Reduced cost is not a basis for impairment.

Wireless carriers cannot meet the FCC's safe harbor rules.

Wireless

