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AUG 31 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

August 31, 2001

Timothy Peterson
Common Carrier Bureau
Accounting Safeguards Division
Federal Communications Commission
445 12th Street, SW
Room No. 6-C466
Washington, DC 20554

Re: Ex Parte, CC Docket No. 00-199

Dear Mr. Peterson:

In calculating pole (and conduit) rents under the FCC formula, one usually obtains the relevant (telephone) data from ARMIS 43-02 and 43-08. There is a preference for calculating rates for one state based on data specific to that state. Some LECs do not file ARMIS 43-02 with the FCC at the disaggregated state level. In such cases, one would normally seek to obtain state level ARMIS data from State PSC records, but not every State PSC collects such a report. If appropriate ARMIS data is not available from PSC records, the ARMIS 43-03 and 43-08 filed at the FCC contains state-level data from which one may calculate pole and conduit rents.

In using ARMIS 43-02 and 43-03 maintenance expense data, the 6411 account is supposed to be utilized net of pole rents previously reported in the matrix of 6411. Future ARMIS reporting obligations should provide sufficient detail so that this calculation may continue to be made.

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Tim Peterson
August 31, 2001
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An original and two copies of this notice are being filed in the Office of the Secretary for inclusion in the files of the above-referenced proceeding.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'P' followed by a horizontal line that ends in a small upward tick.

Paul Glist
for the
National Cable & Telecommunications Association

cc. Ms. Magalie Roman Salas, Secretary