

ORIGINAL

EX PARTE OR LATE FILED

WALLMAN
STRATEGIC CONSULTING, LLC

1300 Connecticut Ave, N.W.,
Suite 1000
Washington, D.C. 20036
www.wallman.com

voice 202.347.4964
fax 202.347.4961

RECEIVED

SEP 24 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

September 24, 2001

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

Re: Ex Parte Submission, CC Docket Nos. 96-45 and 00-256

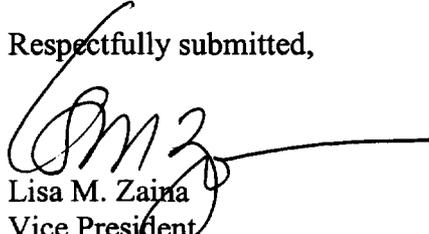
Dear Ms. Salas:

On September 21, 2001, Steve Kraskin of Kraskin, Lessee, and Cosson and I met with Dorothy Attwood, Chief of the Common Carrier Bureau, Carol Matthey, Deputy Chief of CCB, Jane Jackson, Chief of CPD, Rich Lerner, Deputy Chief of CPD, Eric Einhorn, Acting Deputy Chief of APD, Jack Zinman, CCB Counsel, and Bill Scher of CPD. We represent a coalition of approximately 200 small and rural telephone companies throughout the United States, including the Nebraska Companies. We discussed with them the ramifications of adopting the impending order in the above-captioned proceeding. Based on discussions with the Bureau, and our understanding of the proposed order, the adoption of the order on the Multi-Association Group (MAG) plan is premature. There are too many unanswered questions regarding access reform, universal service and the cost structures of the small and rural companies. The current record is not adequate and many parts of it are stale. Adoption of this order will be deleterious to service provision in rural areas, and would be unsound public policy.

No. of Copies rec'd 071
List ABCDE

In accordance with the Commission's rules, I submit two copies for the record in each proceeding captioned above.

Respectfully submitted,



Lisa M. Zaina
Vice President

Copies:

Dorothy Attwood, Chief, CCB
Carol Matthey, Deputy Chief, CCB
Jane Jackson, Chief, CPD
Rich Lerner, Deputy Chief, CPD
Eric Einhorn, Acting Deputy Chief, APD
Jack Zinman, CCB
William Scher, CPD