



Telephone Association of New England
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October 3, 2001

Kathleen Q. Abernathy, Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

EX PARTE PRESENTATION
MAG Proceeding Docket Nos. 00-256, 96-45, 98-77, 98-166

Dear Commissioner Abernathy:

On behalf of the Telephone Association of New England (TANE), I am writing about the Multi-Association Group (MAG) Plan for access charge reform. I understand that the MAG Plan may be placed on the Agenda for the October 11, 2001 Commission meeting. TANE respectfully requests the FCC to adopt the MAG Plan as a whole, rather than adopting only selected portions of the Plan.

TANE is comprised of 40 telephone companies that serve rural areas in the six states of New England: Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island and Vermont.

As you are aware, the MAG Plan reflects many meetings among telephone companies and their associations over many, many months. Although companies may have disagreed with individual portions of the MAG Plan, consensus was reached to submit the Plan as a whole. Thus, it is imperative that the Plan be retained as a whole.

TANE is concerned that the FCC may instead adopt only portions of the Plan and include changes that have been discussed in recent ex parte meetings. TANE opposes the adoption of a few selected portions of the Plan, because it would reduce the incentives for small telephone companies to continue to provide high quality service to rural America and to deploy advanced services. TANE is also concerned about any recently negotiated changes that have not been subject to evaluation by the industry as a whole.

If the FCC were to decide to not adopt the MAG Plan in its entirety, TANE would support the alternative proposed by MAG – that is, for the FCC to adopt a further notice of proposed rulemaking to give parties the opportunity to reach a consensus on issues that arose since the MAG Plan was submitted a year ago.

This letter is being filed electronically in each of the captioned dockets.

Sincerely,

/s/
Dana Twombly
Executive Vice President