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October 17, 2001

***EX PARTE***

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
Room TW-A325  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: CC Docket Nos. 96-98; 96-262

Dear Ms. Salas:

On October 16, 2001, Kelsi Reeves of Time Warner Telecom (TWTC), and I, on behalf of TWTC, discussed the need for mandated national business rules (defining how performance should be tracked and reported) and performance benchmarks (defining standard time intervals and other performance requirements) for interstate special access with Commissioner Kevin Martin and Sam Feder. We explained that TWTC purchases interstate special access where it cannot efficiently construct its own high-capacity loop facilities. TWTC has been increasingly concerned that ILEC service quality (both for provisioning as well as for repair and maintenance) has been deteriorating. Yet in the absence of uniform business rules and performance benchmarks, TWTC cannot monitor the ILECs' performance in general and, in particular, cannot detect discrimination. Thus, TWTC believes that it would be sound policy for the Commission to establish national business rules and performance benchmarks for interstate special access.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, 47 C.F.R. § 1.1206(b)(1), an original and one copy of this letter are being provided for inclusion in the public record of the above-referenced proceedings.

Sincerely,

/s/

Thomas Jones

Magalie Roman Salas  
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cc: Kevin Martin  
Sam Feder