

LAWLER, METZGER & MILKMAN, LLC

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**RECEIVED**

November 6, 2001

**NOV 6 2001**

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

BY HAND

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

Re: DA No. 00-1015, CC Docket 96-45  
*Oral Ex Parte Presentation*

On November 5, 2001, Kathy Wallman and Lisa Zaina of Wallman Strategic Consulting, LLC, Ruth Milkman of Lawler, Metzger & Milkman, LLC, and Anne Bingaman, Chief Executive Officer, Valor Telecommunications, LLC, met with Katherine Schroder, Sharon Webber, Eric Einhorn, and Greg Guice of the Accounting Policy Division, Common Carrier Bureau to discuss the above-captioned proceeding.

During the meeting, the company reiterated the views expressed in its comments and reply comments in this proceeding. In addition, we discussed the characteristics of Valor's markets, and provided copies of the enclosed chart. The company also explained why it should be classified as a rural carrier, as a matter of law, and described the public policy implications of granting Western Wireless' petition to reject Valor's self-certification in Texas and New Mexico, including the chilling effect on purchases of, and investment in, rural exchanges.

Enc. 10 copies rec'd 071  
ENCLOSURE

Magalie Roman Salas  
November 6, 2001  
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Pursuant to section 1.1206(b)(1) of the Commission's rules, 47 C.F.R. § 1.1206(b)(1), an original, one copy of this letter and enclosure are being provided to you for inclusion in the public record of the above-referenced proceeding.

Sincerely,

A handwritten signature in black ink that reads "Ruth Milkman/gms". The signature is written in a cursive style with a large initial "R" and "M".

Ruth Milkman

Enclosure

cc: Katherine Schroder (w/o enclosure)  
Sharon Webber (w/o enclosure)  
Eric Einhorn (w/o enclosure)  
Greg Guice (w/o enclosure)

## Teledensity Characteristics of Valor's Rural Markets

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Valor's Texas and New Mexico markets consist of a large number of small exchanges

- 134 of 244 exchanges have less than 1,000 access lines
- 94 of 244 exchanges have between 1,000 and 5,000 access lines
- 16 of 244 exchanges have more than 5,000 access lines

<b>Valor's Texas Markets</b>	
<b>Number of Exchanges:</b>	<b>197</b>
Exchange w/ fewer than 1,000 access lines:	112
Exchanges w/ between 1,000 and 5,000 access lines:	75
Exchanges w/ more than 5,000 access lines:	10
<b>Largest Market:</b>	<b>Texarkana, TX</b> <b>34,000</b>

<b>Valor's New Mexico Markets</b>	
<b>Number of Exchanges:</b>	<b>37</b>
Exchange w/ fewer than 1,000 access lines:	22
Exchanges w/ between 1,000 and 5,000 access lines:	9
Exchanges w/ more than 5,000 access lines:	6
<b>Largest Market:</b>	<b>Hobbs, NM</b> <b>30,000</b>

**Teledensity Chart Submitted to and Accepted by  
CALLS Coalition in April 2000**

TELEDENSITY COMPARISON: VALOR v. RBOCs v. CITIZENS					
	Line Density (lines/square Mile)	Access Lines/ Exchange	Number of lines	Number of Exchanges	Area (sq. miles)
<b>RBOCs</b>	287.5	10,853	175,959,000	16,420	580,864
<b>SPRINT<sup>1</sup></b>	56	-	-	-	-
<b>CITIZENS</b>	9.07	2,298	834,180	363	91,299
<b>VALOR</b>	10.94	1,999	519,176	260	47,448

1. As reported by John Nakahata 3/15/00.