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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98; Joint Petition of BellSouth, SBC, and Verizon, CC Docket No. 96-98

Dear Ms. Salas:

Today, Alan Buzacott and I of WorldCom met with Julie Veach and Jeremy Miller of the Common Carrier Bureau to discuss methodologies for assessing the extent of competitive carrier impairment for unbundled loops and transport circuits. A proper assessment would separately examine supply and demand characteristics for DS1s, DS3s, and optical level circuits. We recommended that the Bureau solicit certain specific categories of data from incumbent LECs and competitive LECs. Material attached to this letter summarizes the data that should be obtained.

Sincerely,

Cc: Michelle Carey
Jeremy Miller
Julie Veach

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CC Docket No. 96-98
Assessing Impairment for Loops & Transport Circuits

The record lacks data on significant issues:

- How concentrated is demand for different circuit-types?
- To what extent are competitive carriers able to self-provision various circuit-types or to procure them from other competitive carriers?

The Bureau should request specific data from incumbents and from competitive carriers to strengthen the record. Incumbents should be asked to provide:

- Data showing the total number of buildings from which they provide DS1s, DS3s, and optical level circuits, as well as the number of circuits associated with each building. U S West previously produced a spreadsheet summarizing these data for specific cities. The information will be helpful for understanding the concentration of demand for different circuit types.
- Data showing where individual CLECs are collocated. This information will be helpful for understanding the extent to which individual carriers are able to bypass ILEC interoffice facilities.

Competitive carriers should be asked to provide:

- Provisioning data that show, for the previous twelve months, total number of DS1s, DS3s, and optical level circuits self-provisioned, provisioned on the facilities of other competitive carriers, and provisioned by ILECs. This information will be helpful for understanding the extent to which CLECs have competitive alternatives for different circuit-types.
- Data showing the total number of on-net buildings and the number and types of circuits currently provided to those buildings. Since multiple CLECs often "light" the same buildings, these data will, in the aggregate, overstate the total number of CLEC on-net buildings. To address this, CLECs should be encouraged to separately indicate the number of buildings where they are the only competitive carrier. This information will provide the Bureau with additional details regarding the extent of competitive last-mile facilities.

Seattle Fiber Study
Cost Model - Competitive Access Providers
Developed by POWER Engineers, Inc. for US WEST Communications

DISTANCE BAND 1: 0 TO 1,000 FT FROM NEAREST CAP FIBER ROUTE								
LOCATIO ID	DS1	DS3	OC-3	OC-12	OC-48	PATH COST	EQPT COST	TOTAL COST
2827	2	0	0	0	0	11,573	5,468	17,041
2828	1	0	0	0	0	11,573	5,468	17,041
2829	1	0	0	0	0	11,573	5,468	17,041
2830	1	0	0	0	0	11,573	5,468	17,041
2831	2	0	0	0	0	11,573	5,468	17,041
2832	1	0	0	0	0	11,573	5,468	17,041
2833	1	0	0	0	0	11,573	5,468	17,041
2835	112	0	0	4	0	11,573	313,552	325,125
2836	9	1	0	0	0	11,573	46,734	58,307
2837	3	0	0	0	0	11,573	5,468	17,041
2838	3	0	0	0	0	11,573	5,468	17,041
2839	2	0	0	0	0	11,573	5,468	17,041
2840	1	0	0	0	0	11,573	5,468	17,041
2841	1	0	0	0	0	11,573	5,468	17,041
2842	1	0	0	0	0	11,573	5,468	17,041
2843	3	0	0	0	0	11,573	5,468	17,041
2844	1	0	0	0	0	11,573	5,468	17,041
2845	3	0	0	0	0	11,573	5,468	17,041
2846	1	0	0	0	0	11,573	5,468	17,041
2847	1	0	0	0	0	11,573	5,468	17,041
2848	1	0	0	0	0	11,573	5,468	17,041
2849	1	0	0	0	0	11,573	5,468	17,041
2851	2	0	0	0	0	11,573	5,468	17,041
2852	2	0	0	0	0	11,573	5,468	17,041
2853	2	0	0	0	0	11,573	5,468	17,041
2854	1	0	0	0	0	11,573	5,468	17,041
2855	1	0	0	0	0	11,573	5,468	17,041
2856	1	0	0	0	0	11,573	5,468	17,041
2860	1	0	0	0	0	11,573	5,468	17,041
2861	3	3	0	0	0	11,573	55,388	66,961
2862	1	0	0	0	0	11,573	5,468	17,041
2866	3	0	0	0	0	11,573	5,468	17,041
2867	3	0	0	0	0	11,573	5,468	17,041
2869	89	8	0	0	0	11,573	66,512	78,085
2870	8	0	0	0	0	11,573	16,136	27,709
2871	2	0	0	0	0	11,573	5,468	17,041
2872	1	0	0	0	0	11,573	5,468	17,041
2874	9	0	0	0	0	11,573	24,204	35,777
2882	3	0	0	0	0	11,573	5,468	17,041
2885	45	4	0	0	0	11,573	68,268	79,841
2886	1	0	0	0	0	11,573	5,468	17,041
2887	1	0	0	0	0	11,573	5,468	17,041
2889	1	0	0	0	0	11,573	5,468	17,041
2891	1	0	0	0	0	11,573	5,468	17,041
2893	1	0	0	0	0	11,573	5,468	17,041
2895	3	0	0	0	0	11,573	5,468	17,041
2896	1	0	0	0	0	11,573	5,468	17,041
2901	1	0	0	0	0	11,573	5,468	17,041