

November 15, 2001
Magalie Roman-Salas
Secretary
Federal Communications Commission
445 12 St., S.W.
Washington, D.C. 20554

Re: Ex Parte, Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, CC Docket No. 96-128.

Dear Ms Salas:

On November 15, 2001, Larry Fenster from WorldCom, Jeb Benedict from Sprint, Richard Rubin from AT&T, and Gina Keeney from Lawler, Metzger & Milkman, met with Sam Feder, Senior Legal Advisor to Commissioner Martin, to discuss issues associated with the implementation of the Second Order on Reconsideration in the above-captioned proceeding.

At the meeting, we discussed the technical infeasibility of determining whether calls routed to resellers who re-originate the calls are completed to the called party. We explained that a completion factor could be used as a proxy to determine compensable calls routed to switch-based resellers, and discussed three conditions that would smooth implementation of a call completion factor system. We also provided a copy of a letter explaining those three conditions, which is attached.

Sincerely,

Larry Fenster

Larry Fenster
202-736-6513