

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the matter of)	
)	
Multi-Association Group (MAG) Plan)	
for Regulation of Interstate Services)	CC Docket No. 00-256
of Non-Price Cap Incumbent Local)	
Exchange Carriers and Interexchange)	
Carriers)	
)	
Federal-State Joint Board on Universal)	CC Docket No. 96-45
Service)	
)	
Access Charge Reform for Incumbent)	
Local Exchange Carriers Subject to)	CC Docket No. 98-77
Rate-of-Return Regulation)	
)	
Prescribing the Authorized Rate of)	
Return for Interstate Services of)	CC Docket No. 98-166
Local Exchange Carriers)	

MEMORANDUM OF ORAL EX PARTE PRESENTATION

On March 8, 2002, the following people met to discuss the data that will be submitted to USAC for its administration of Interstate Common Line Support (ICLS): Rodney Thiemann (via telephone), Great Plains Communications, Nebraska; Susan Bahr, Law Offices of Susan Bahr, PC; Ken Levy and Jim Frame, NECA; Katherine Schroder, Chief, William Scher and Ted Burmeister, Accounting Policy Division, Common Carrier Bureau, FCC; Jack Zinman, Deputy Division Chief, Raj Kannan and Jay Atkinson, Competitive Pricing Division, FCC; Irene Flannery, Karen Majcher and Linda Miller, USAC; and David Rolka, Rhoads & Sinon LLC.

The focus of the meeting was the data that USAC will need to

in order to administer ICLS. The topics discussed include: USAC's draft data collection forms for cost companies and average schedule companies; NECA's development of forecast data for common line pool participants; the data that local exchange carriers (LECs) submit to the FCC for tariff filings; the data to be supplied by the March 31, 2002 deadline in the Commission's ICLS rules; the use of subsequent true-ups; NECA's submission of data to USAC for local switching support as a model for NECA's submission of data to USAC for ICLS without forms being submitted by each LEC in the common line pool; and the need to minimize regulatory burdens. In particular, I proposed the following for the sake of meeting the March 31, 2002 deadline: (a) NECA could provide the common line data requested in Lines 62 to 72 of USAC's draft Schedule C (which includes the common line revenue requirement and subscriber line charge (SLC) revenues), for the LECs in the common line pool; and (b) the LECs that are not in the common line pool could submit that data in a letter to USAC or by using a form to be developed by USAC.

Pursuant to Section 1.1206(b)(2) of the Commission's Rules, this memorandum is being filed via ECFS in the captioned dockets. A copy of this memorandum is being sent via facsimile to: Rodney Thiemann, Great Plains Communications; Ken Levy and Jim Frame, NECA; Katherine Schroder, Chief, William Scher and Ted Burmeister, Accounting Policy Division, Common Carrier Bureau,

FCC; Jack Zinman, Deputy Division Chief, Raj Kannan and Jay Atkinson, Competitive Pricing Division, FCC; Irene Flannery, Karen Majcher and Linda Miller, USAC; and David Rolka, Rhoads & Sinon LLC.

Respectfully submitted,



Susan Bahr
Law Offices of Susan Bahr, PC
PO BOX 86089
Montgomery Village, MD 20886-6089
(301) 258-8947
sbahr@bahrlaw.com

March 11, 2002