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April 3, 2002

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 OFFICE OF THE SECRETARY

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William F. Caton, Acting Secretary
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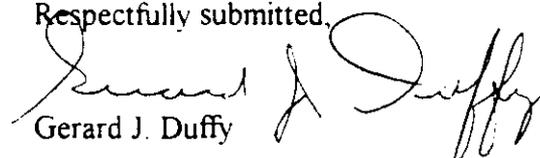
RE: CC Docket Nos. 00-256, 96-45/98-77 and 98-166

Dear Mr. Caton:

On April 2, 2002, Evelyn Jerden, Jack Rhyner and Gerry Duffy, on behalf of the Western Alliance, met with Dorothy Attwood, Jane Jackson, Katherine Schroeder, Christopher Libertelli, William Scher, Jessica Rosenworcel and Jack Zinman of the Wireline Competition Bureau to discuss issues regarding the portability of Interstate Common Line Support ("ICLS") raised by the Western Alliance's December 31, 2001 "Petition for Reconsideration" in the above-captioned dockets. The discussion focused upon the erroneous economic signals, artificial competition and financial windfalls that will result from the provision of portable ICLS support to wireless competitors on the basis of the per-line support received by incumbent local exchange carriers rather than the actual costs of the competitors themselves. The discussion also touched upon the larger issues of portable universal service support in general, as well as the sustainability of federal universal service support mechanisms and the benefits and difficulties of obtaining actual cost data from competitive carriers.

Pursuant to Section 1.1206(b) of the Commission's Rules, and original and eight copies of this submission are being filed for inclusion in the public record of the referenced proceedings.

Respectfully submitted,


 Gerard J. Duffy

cc: Dorothy Attwood