

Dear FCC Commissioners & Staff:

My name is Ari Ramezani and I am the CEO of DSLExtreme.com, in Los Angeles, California. We began business in 1999 and presently serve over 15,000 clients, most of whom live and work in California.

We offer many services that our local phone companies, SBC (Pacific bell) and Verizon, do not. Services like Static IP, and customer service that answers calls within a few rings as opposed to dozens of minutes.

Verizon is currently running a promotion that makes DSL service, a FREE DSL Modem (\$200.00 cost), \$60.00 in free setup fees (which we are obligated to pay), and an introductory rate which is \$5.00 per month less than our cost for 90 days available to the general public. THIS REPRESENTS AN INITIAL OFFER THAT IS \$275.00 LOWER THAN OUR COST. We are then left with a \$15.00 GROSS MONTHLY PROFIT.....an 18.3 month break-even on each individual order!

SBC (Pacific Bell) offers similar retail end-user promotions, and requires from ISPs the added costs for connecting to each individual central office. These added costs total some \$6,000.00 PER MONTH PER LATA.

The fact that these offers are made through each of the ILEC's subsidiaries is only thinly veiled attempt at disguise and competition. These subsidiaries benefit from getting 100% of the ILEC's business.

Keep in mind that the above calculation is based on GROSS profit and does not take into account any of the significant variable costs associated with running our network and providing client support.

We do not have the resources to fight the tariff that ILECS have filed that allows them to get away with charging ISPs a wholesale rate of \$35.00 per circuit for access to the network. I believe the true cost is probably a great deal less than that. However, I also do not believe that the answer to this problem is simply to allow The ILECS to stop selling access to the network at all, or to take away the requirements that are supposed to be preventing the ILECS from discriminating.

The answer is for the FCC to make a good faith effort to uncover the discrimination (whether it is in pricing or provisioning) and put an end to it. Until the FCC has demonstrated that it is willing to do this for ISPs, any talk about lifting the rules for monopolies is premature.

I hope that you will take my comments seriously.

Sincerely

Sincerely,

Ari Ramezani  
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