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ATTORNEYS AT LAW

June 11, 2002

**EX PARTE – Via Electronic Filing**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: CC Dockets No. 96-45, 98-171, 90-571, 92-237, 99-200,  
95-116, 98-170, and NSD File No. L-00-72

Dear Ms. Dortch:

On June 10, 2002, Colleen Boothby (on behalf of the Ad Hoc Telecommunications Users Committee), Brian Moir (on behalf of eTUG), Joel Lubin (of AT&T), Patrick Merrick (of AT&T), Ruth Milkman (on behalf of Worldcom), Staci Pies (of Level 3), Chris Wright and I (both on behalf of the Coalition for Sustainable Universal Service ("CoSUS")) met with Commissioner Kevin Martin, Dan Gonzalez, Senior Legal Adviser to Commissioner Martin, and separately with Matthew Brill, Legal Adviser to Commissioner Abernathy.

We discussed the CoSUS comments and reply comments filed in the above-referenced dockets in response to the Further Notice of Proposed Rulemaking, including the legal basis for the CoSUS proposal as set forth in those comments. We further stated that all evidence in the record showed that the assessment base was shrinking. We provided the attached charts. We further explained that the record reflects a growing recognition among a range of carriers including ILECs that, as Qwest put it, "short of the draconian measure of imposing a jurisdictional separations regime on all providers to identify interstate revenues, it is not possible to devise a competitively neutral revenue-based contribution methodology." Qwest Reply Comments at 9. We also reviewed the extent to which the SBC-BellSouth proposal would be inefficient and result in substantial, unnecessary transaction costs.

Ms. Magalie Roman Salas  
June 11, 2002  
Page 2 of 2

In accordance with FCC rules, a copy of this letter is being filed in each of the above-captioned dockets.

Sincerely,

*/s/*

John T. Nakahata  
*Counsel to the Coalition for Sustainable  
Universal Service*

JTN/krs