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Thomas Jones

August 6, 2002

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Room TW-A325
445 Twelfth Street, S.W.
Washington, DC 20554

Re: CC Docket Nos. 96-98; 01-338; 98-147

Dear Ms. Dortch:

On August 5, 2002, Kevin Joseph, Mary Albert, and Doreen Best of Allegiance Telecom ("Allegiance") and I met with Brent Olson, Jeremy Miller, Tom Navin, Jon Reel, and Julie Veach of the Wireline Competition Bureau. During the meeting, Ms. Best provided an overview of the Allegiance business, in particular the growth of the broadband services that Allegiance provides via unbundled high-capacity loops to small and medium sized businesses. Ms. Best then explained that Verizon's policy (one not generally adopted by other ILECs) of rejecting a very high percentage of Allegiance's requests for high-capacity unbundled loops based on "no facilities" claims has made it increasingly difficult for Allegiance to deliver broadband services to businesses in the Verizon region. Ms. Best restated the statistics regarding rejection rates for high-capacity loops in the Verizon region provided on page 39 of the Corrected Version of the Allegiance Comments filed on July 22, 2002 in the above-referenced dockets. I explained that the Commission should rule that an ILEC's unbundling obligations include the duty to make the same changes necessary to provide unbundled high-capacity loops that it would make to equipment within the central office to provide special access service to its own customers. Ms. Albert explained that the Commission must also ensure that high-capacity loops continue to be subject to the unbundling obligation as a general matter. In addition, Ms. Albert explained that the Commission must clarify that the use restriction on enhanced extended loops does not apply to new loop-transport combinations, but rather only to those that have been converted from previously ordered special access circuits. Finally, Ms. Best described problems that Allegiance has experienced obtaining accurate electronic firm order confirmations from Verizon.

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Pursuant to Section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), a copy of this letter is being filed electronically for inclusion in the public record of each of the above-referenced proceedings.

Sincerely,

/s/

Thomas Jones

cc: Brent Olson
Jeremy Miller
Tom Navin
Jon Reel
Julie Veach