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ATTORNEYS AT LAW

September 26, 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 September 24, 2002, Colleen Boothby and Susan Gately (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), Rick Whitt (of WorldCom), Alan Buzacott (of WorldCom) and I (on behalf of the Coalition for Sustainable Universal Service (“CoSUS”)) met with Diane Law Hsu, Paul Garnett, Jim Lande, and Michael Goldstein, all of the Wireline Competition Bureau, to discuss the above-captioned proceeding.

We provided the staff with the attached written handout, which is an illustrative set of results under the CoSUS proposal, using projections of connection counts as specified. The numbers of residential switched access lines were taken from FCC Trends in Telecommunications and Local Competition reports, with the total residential lines subject to a 2% growth factor. While this treatment of growth may or may not precisely reflect the relative growth of ILEC lines as compared with CLEC lines, the estimates for total residential lines does conservatively follow the overall growth of all residential lines. Switched multiline business lines and ILEC centrex lines were also taken from FCC reports. The number of CLEC centrex lines was derived by applying the ILEC percentage of centrex lines to CLECs, although that may overstate the number of CLEC centrex lines. Non-paging wireless connections were taken from FCC reports as well, with growth from July 2001 to July 2003 projected at 19 million lines per year or approximately 15% per year.

The number of weighted private line connections was calculated using line counts from a Gartner Dataquest report (2002) entitled, “Fixed Public Network Services: Untied States 2000-2006.”

These numbers were then weighted in accordance with the CoSUS plan, with OC-n and Broadband T3 weighted each at 40 Tier I equivalents, Wideband T1 weighted each at 5 Tier I equivalents, and Narrowband weighted each at 1 Tier I equivalent. Broadband T3 was weighted at 40 rather than at 5 because the vast majority of services above E1 are DS-3 or higher, and very few are below DS-3. Similarly, Wideband T1 was weighted at 5 rather than 1 because the vast majority of these services are DS-1, with only a very few below. These facilities counts, when converted into voice-grade equivalents, also yielded a voice grade equivalent count for 2000 that was in the same range as FCC reports based on voice grade equivalents.

In the table entitled "Worksheet 1 – Calculation of SBC/BellSouth QSCs & Per QSC Assessment" in CoSuS' July 31, 2002 ex parte, these special access and private line facilities were not listed or weighted correctly. In addition, the July 31, 2002 ex parte omitted residential switched access lines served by rate of return carriers, and had older data on CLEC switched line counts. The numbers in this ex parte correct those inadvertent errors.

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  
Attachment