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October 30, 2002

EX PARTE

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Room TW-A325
445 12th Street, S.W.
Washington, D.C. 20554

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

Dear Ms. Dortch:

On October 29, 2002, Kevin Joseph of Allegiance Telecom and I met with Chris Libertelli, Legal Advisor to Chairman Michael Powell. During the meeting, we reiterated the arguments made by Allegiance in its comments and reply comments in the above-referenced Triennial Review dockets. In addition, we made the following two points. First, we argued that the FCC should rule in the Triennial Review proceeding that Verizon's "no facilities" policy is an unlawful practice under section 251 of the Communications Act. Second, we reiterated that, in assessing whether requesting carriers are impaired in the absence of unbundled interoffice transport, the Commission must adopt a route-by-route definition of the relevant geographic market.

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: Chris Libertelli