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Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Room TWB-204
Washington, DC 20554

Re: Notice of Ex Parte Communication

Review of the Section 251 Unbundling Obligations of Incumbent Local
Exchange Carriers, CC Docket No. 01-338

Implementation of the Local Competition Provisions of the Telecommunications
Act of 1996, CC Docket No. 96-98

Deployment of Wireline Services Offering Advanced Telecommunications
Capability, CC Docket No. 98-147

Dear Ms. Dortch:

Yesterday, Dick Juhnke and I met on behalf of Sprint Corporation with Chris Libertelli, Senior Legal Advisor to Chairman Powell.

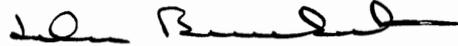
Sprint pointed out that RBOCs arguing for geographically disaggregated application of the impairment test have been unable to provide any workable means of doing so. Sprint also explained that ILEC loop and transport remain bottlenecks and that competitive alternatives for high-capacity loops and interoffice transport are extremely limited. With respect to unbundled local switching, Sprint commented that it does not object to drawing a distinction between the medium/large business and residential/small business markets.

For the residential/small business market, Sprint noted its preference for facilities-based competition and its view that UNE-P should not be regarded as a permanent fixture on the local competition landscape. However, Sprint explained that CLECs need time to grow customer bases, develop and fund transition options, and ensure adequate improvements in ILEC hot cut provisioning. Sprint suggested three years would be reasonable for this purpose, and that this would benefit the entire industry by providing needed regulatory certainty. In all events, Sprint emphasized that it would be unlawful and anticompetitive to attempt to freeze UNE-P competition where it stands today. Rather, new carriers should be permitted to enter the market and existing CLECs to add new customers during the transition period.

Sprint also explained that, particularly since wireless carriers are seen as intermodal local competitors to wireline, they should be allowed to utilize UNE transport between their switches and cell sites.

Pursuant to the requirements of Section 1.1206 of the Commission's rules, we are filing electronic copies of this notice for addition to these dockets.

Sincerely,

A handwritten signature in black ink, appearing to read "John E. Benedict". The signature is fluid and cursive, with a long horizontal stroke at the end.

John E. Benedict

cc: Christopher Libertelli