



Brian J. Benison
Associate Director –
Federal Regulatory

SBC Telecommunications, Inc.
1401 I Street, N.W., Suite 1100
Washington D.C 20005
Phone: (202) 326-8847
Fax: (202) 408-4801

January 28, 2003

VIA ELECTRONIC SUBMISSION

Ms. Marlene H. Dortch
Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Memorandum of Ex Parte Presentation**
CC Docket No. 01-338, Review of the Section 251 Unbundling
Obligations of Incumbent Local Exchange Carriers;
CC Docket No. 96-98, Implementation of the Local Competition
Provisions in the Telecommunications Act of 1996; and
CC Docket No. 98-147, Deployment of Wireline Services Offering
Advanced Telecommunications Capability

Dear Ms. Dortch:

On January 27th, James C. Smith, James K. Smith and Christopher Heimann representing SBC Telecommunications, Inc. (SBC) met with Commissioner Michael Copps and his senior legal advisor Jordan Goldstein. The attached presentation was used to discuss switching, broadband and transport issues. SBC's comments were consistent with its filed materials in the record of these proceedings.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter and attachment are being electronically filed. I ask that this letter be placed in the files for the proceedings identified above.

Please call me should you have any questions.

Sincerely,

/s/ Brian J. Benison

CC: Michael Copps
Jordan Goldstein



Triennial Review
Key Issues

January 27, 2003

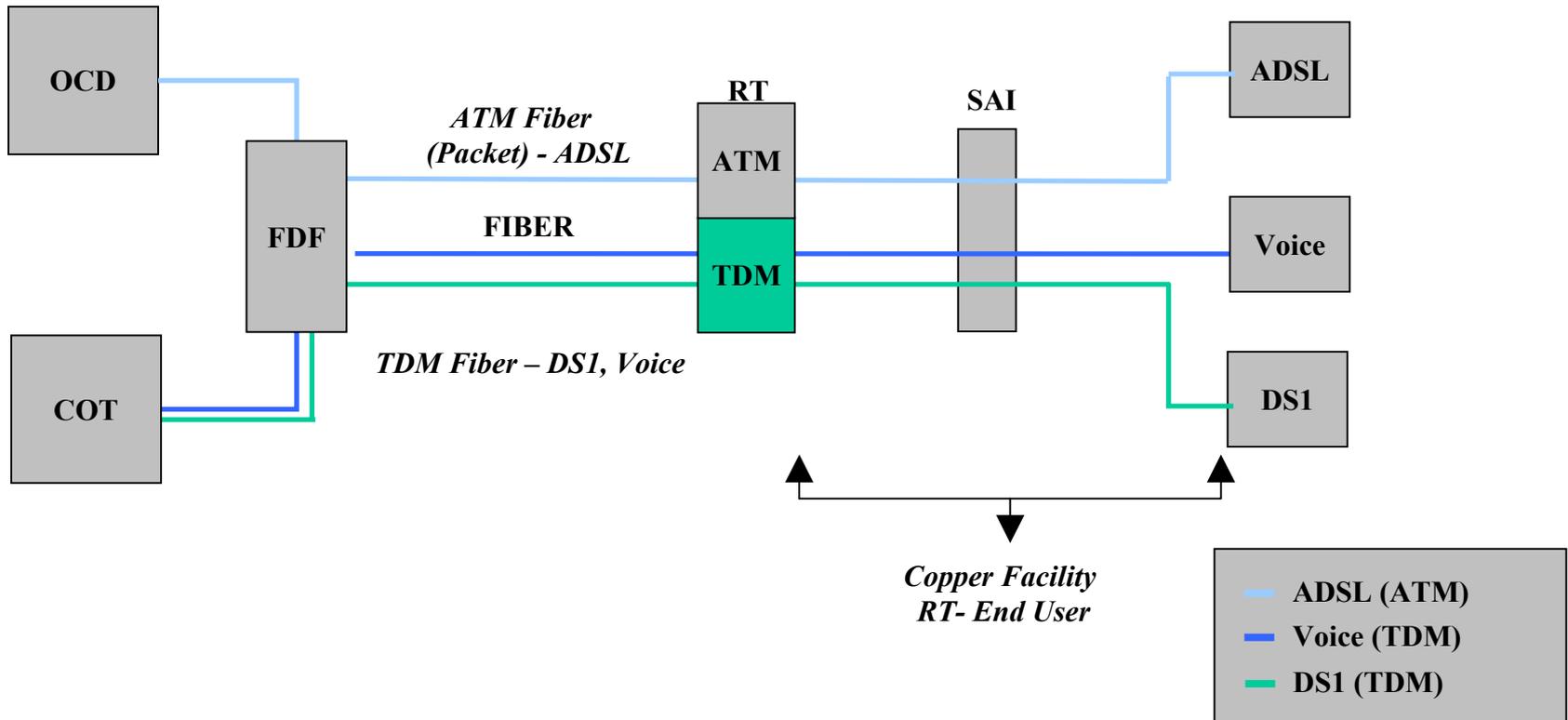
Local Switching/UNE-P



- Hot Cut Issues
 - Excellent Performance
 - Scalable
 - Affordable
- Economic Issues
 - CLECs can profitably serve residential customers in wire centers with 5,000 or more lines

Broadband

- CLECs would continue to obtain access to non-packet voice and data UNEs where impaired
 - Voice grade UNE Loops
 - Non-packet high capacity UNE Loops (DS1s)



- Contestability standard, based on alternative provider(s) in defined areas, determines impairment
- Contestability standard should be applicable to DS1s as well as DS3s

UNE EELs Restrictions



➤ Principles

- UNE EELs, where impaired, should be available to CLECs for the provisioning of local exchange traffic
- Long distance traffic should continue to be provisioned pursuant to ILEC Special Access wholesale offerings
- Wireless providers are not impaired and therefore are not entitled to UNE EELs