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February 6, 2003

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VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W. Room TWB-204
Washington, D.C. 20554

Re: UNE Triennial Review, CC Docket Nos. 01-338, 96-98, 98-146
Ex Parte

Dear Ms. Dortch:

On behalf of Broadview, Eschelon, SNiP LiNK and Xspedius, please find attached additional information for the Commission's consideration regarding access to loop/transport combinations referred to as Enhanced Extended Links ("EELs"). During this proceeding, various CLECs have argued that if the Commission is to limit the availability of EELs, such limitations should be narrow and account for a carrier's local exchange network architecture, rather than traffic measurements.¹ Certain ILECs have responded that such EEL limitations are inappropriate as a local exchange architecture could be easily created and sustained by a carrier that does not provide substantial local service.

In order to illustrate the measures a CLEC must take to establish local interconnection, we are submitting for the Commission's consideration sections from the CLEC Handbooks available on the SBC, Verizon, and Qwest web sites. These sections specifically outline the steps that need to be taken to establish an interconnection network in each LATA of the ILEC's territories, once the CLEC has selected a Point of Interconnection ("POI")/switch site. In addition, we direct the Commission to the information contained in a November 21, 2002 ex parte filed by Broadview, Eschelon and Talk America which further addresses the tasks needed to build a switch site, establish collocation cages, and establish interconnection.²

¹ See, e.g., NuVox, SNiP LiNK, Xspedius and KMC Telecom ex parte (Jan. 10, 2003).

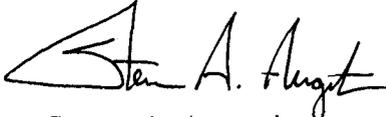
² See Broadview, Eschelon and Talk America ex parte (Nov. 21, 2002).

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Notably, fulfillment of these steps requires a serious initial and ongoing commitment to the provisioning of local service, including obtaining applicable industry codes, *i.e.*, ACNAs, OCNs, NXXs, and establishing networking for the origination and completion of local, long distance, 911, operator services, and directory assistance calls, etc. The interconnection process can take from several months to a year or more to complete in a LATA.

In accordance with the Commission's rules, this letter and attachments are being filed electronically for inclusion in the public record for each of the above-referenced proceedings.

Respectfully Submitted,



Steven A. Augustino

cc: (via email)

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Enclosures