

**LATHAM & WATKINS** LLP

February 12, 2003

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**VIA ELECTRONIC FILING**

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

Re: Ex Parte Submission in UNE Triennial Review;  
CC Docket Nos. 01-338, 96-98, and 98-147

Dear Ms. Dortch:

On behalf of the Independent Telephone & Telecommunications Alliance (ITTA), I sent the attached letter yesterday to Aaron Goldberger of the Commission's Wireline Competition Bureau, in response to his request for additional information from ITTA, pursuant to Section 1.1204(a)(10) of the Commission's rules. This filing is being made in accordance with Section 1.1204(a)(10)(iii). Please direct any questions concerning this matter to me.

Respectfully submitted,

/s/ Karen Brinkmann  
Karen Brinkmann

cc: Marsha MacBride  
Christopher Libertelli  
Matthew Brill  
Jordan Goldstein  
Daniel Gonzalez  
Lisa Zaina  
William Maher  
Aaron Goldberger

# LATHAM & WATKINS LLP

February 11, 2003

VIA EMAIL

Aaron Goldberger  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

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Re: UNE Triennial Review --  
CC Docket Nos. 01-338, 96-98, 98-147 --  
Ex Parte Presentation

Dear Aaron:

Pursuant to §1.1204(a)(10) of the Commission's Rules, the Independent Telephone and Telecommunications Alliance (ITTA) responds to your request for information in the above-reference proceeding.

You asked how many small, independent telephone companies are subject to the unbundling requirements of 251(c)(3) of the Communications Act and the FCC's rules. ITTA has gathered information from eight companies, a representative sample of small and midsize independent telephone companies (that is, companies not affiliated with a Bell operating company). This list is not exhaustive, but we believe it is illustrative.

Among those eight companies (listed below), there are approximately **6,118,000 lines in 15 states** (also listed below) for which the incumbent LECs are subject to unbundling obligations. Many of the lines included in this count are in rural areas.

The companies responding are: Alaska Communications Systems (including ACS of Alaska, ACS of Anchorage, ACS of Fairbanks, and ACS of the Northland); ALLTEL; Broadwing (Cincinnati Bell); CenturyTel; Citizens (including Frontier, a Citizens company); SureWest; TXU; and Valor.

The states where these companies are subject to the unbundling requirements of the Act include: Alabama, Alaska, Arkansas, California, Indiana, Kentucky, Missouri, Nebraska, New Mexico, New York, North Carolina, Ohio, Oklahoma, Texas and Wisconsin.

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A copy of this letter will be filed electronically in the above-captioned dockets as required by the Commission's rules. If you have any further questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Karen Brinkmann", with a long horizontal flourish extending to the right.

Karen Brinkmann  
of **LATHAM & WATKINS LLP**

*Counsel for* INDEPENDENT TELEPHONE &  
TELECOMMUNICATIONS ALLIANCE (ITTA)