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August 7, 2003

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 01-321; WC Docket No. 02-112; and
CC Docket No. 00-175

Dear Ms. Dortch:

This is to inform you that on August 7, 2003, Pat Finlen and I, representing BellSouth, met with Scott Bergmann, Legal Advisor to Commissioner Adelstein and subsequently with Matthew Brill, Senior Legal Advisor to Commissioner Abernathy. The purpose of our meetings was to discuss BellSouth's positions on the issues raised in the Commission's Special Access Performance Metrics Proceeding, as previously expressed in the comments and reply comments filed by BellSouth in this proceeding. The attached document summarizes the points made during the meetings.

In accordance with Section 1.1206, I am filing this notice electronically and request that you please place it in the record of the proceedings identified above. Thank you.

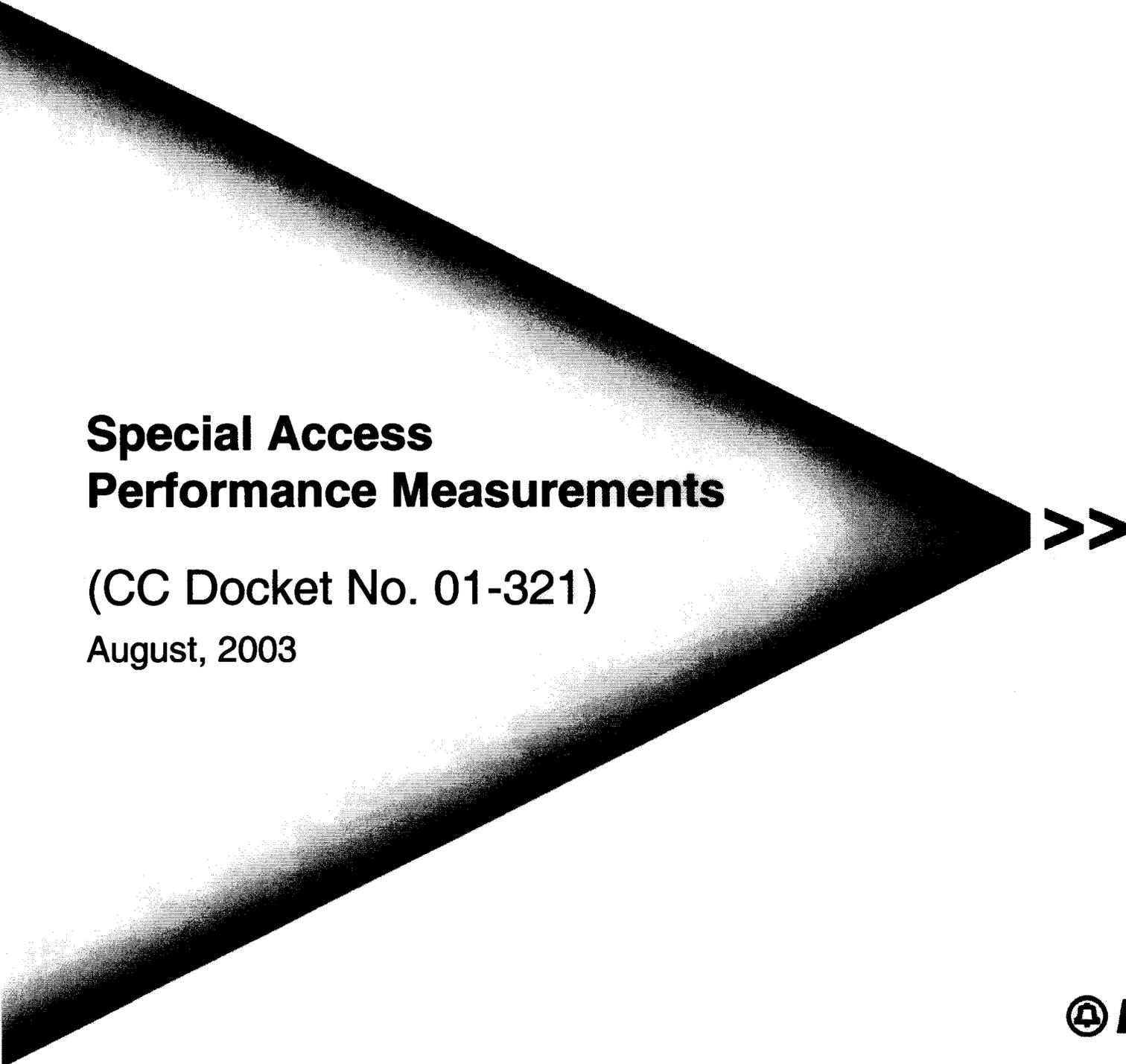
Sincerely,



Kathleen B. Levitz

Attachment

cc: Scott Bergmann
Matthew Brill



**Special Access
Performance Measurements**

(CC Docket No. 01-321)

August, 2003



Special Access Performance Measurements are Unnecessary

Key Summary Points

- The special access market is competitive
- Interstate special access tariffs provide service performance guarantees
- ILEC special access performance is excellent and has improved year over year in the absence of mandated performance measurements
- Negotiation is the preferred approach to address the diverse needs of the special access marketplace
- The performance measurements and standards proposed by JCIG are unrealistic and unachievable
- Adoption of JCIG performance measurements and standards would competitively disadvantage ILECs