



1200 EIGHTEENTH STREET, NW
WASHINGTON, DC 20036

TEL 202.730.1300 FAX 202.730.1301
WWW.HARRISWILTSHIRE.COM

ATTORNEYS AT LAW

October 6, 2003

Ex Parte – Via Electronic Filing

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

Re: CC Docket No. 01-338 (Verizon 271 forbearance petition) and
CC Docket No. 96-149 (Verizon OI&M forbearance petition)
CC Docket No. 02-200 (Verizon 1+/payphone forbearance petition)

Dear Ms. Dortch:

On October 3, 2003, Kim Scardino of MCI, Richard Metzger of Lawler, Metzger & Milkman, representing MCI, Tom Koutsky of Z-Tel, and I met with Matt Brill, Commissioner Abernathy's Senior Legal Advisor, primarily to discuss Verizon's pending petition seeking forbearance from section 271. We pointed out that the Commission had rejected the basis for that forbearance petition in the recent *Triennial Review Order* by concluding that section 271 establishes independent access obligations on the BOCs. MCI and Z-Tel further urged the Commission to reject the Verizon petition for the reasons set forth in their prior written submissions in this proceeding.

We also discussed the two other pending Verizon forbearance petitions. We noted that Verizon had failed to show that it had satisfied the requirements of section 10(d) in its OI&M petition, and stated that Verizon ought not be allowed to attempt to cure that defect at this late date. We also argued that Verizon's proposed interpretation of section 10(d) was neither consistent with the statute nor sensible. We noted that the 1+/payphone petition was unopposed, and therefore provided an inappropriate record for deciding important issues.

Sincerely,

/s/

Christopher J. Wright
Counsel to Z-Tel Communications, Inc.