

Admitted:
California
District of Columbia
New York
Oregon

**Law Offices
of
PETER A. CASCIATO
A Professional Corporation**
8 California Street, Suite 701, San Francisco, CA 94111

Telephone: (415) 291-8661
Facsimile: (415) 291-8661
Voice Mail: (415) 291-8843
E-mail: pacasciato@covad.net

By Electronic Filing

March 25, 2004

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

Re: Ex Parte Presentation, CC Consolidated Docket
Nos. 99-273, 92-105 & & 92-237

Dear Dortch:

This is to advise the Commission that the undersigned, on behalf of Metro One Telecommunications, Inc. ("MTI") met with William Dever and Rodney McDonald of the Commission's Wireline Competition Bureau Policy Division on March 24, 2004. At that meeting, the undersigned addressed some of the points raised by BellSouth in its February 13, 2004 letter concerning bulk resale/multiple use. In that regard, Metro One noted that the Commission has not imposed restrictions on telecommunications service resale generally and that since the passage of the 1996 Act the Commission has indicated that it disfavors restrictions on resale as anticompetitive.

Further, Metro One noted that the ILEC SLI information that is sold to carriers and agents of carriers may come in unusable form or a form that requires considerable "scrubbing" so that the resale of that information provided by a carrier or agent of a carrier adds value to the information sold because it may be put in useable form by the resale carrier. Metro One also noted that it is its experience that the ILECs not only get their own listing information for free but also get CLC listings for free so that pricing concerns only revolve around the proper forward looking costing method for the resale of that information by the ILECs to other carriers and not whether ILEC supracompetitive profits from pricing these services due to their monopoly position controlling the underlying data is somehow eroded by resale.

Finally, since the ILEC's such as BellSouth do not provide non-published SLI to purchasers, any such misuse can only be attributed to the source of such data.

Very truly yours,

Peter A. Casciato
Attorney for Metro One Telecommunications, Inc.

cc: William Deever, Esq.
Rodney McDonald, Esq.