



Jay Bennett
Executive Director-
Federal Regulatory

SBC Telecommunications, Inc.
1401 I. Street, N.W.
Suite 1100
Washington, DC 20005

202.326.8889 Phone
202.408.4806 Fax

October 14, 2004

VIA ELECTRONIC SUBMISSION

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
TW-A325-Lobby
Washington, D.C. 20554

Dear Ms. Dortch:

RE: MEMORANDUM OF EX PARTE COMMUNICATION
CC Docket No. 01-338, Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers
CC Docket No. 04-313, Unbundled Access to Network Elements

On October 13, 2004, Parley Casto, Tom Hughes, Gary Phillips, Christopher Heimann, Colin Stretch and the undersigned met with FCC staff members Russ Hanser, Jeremy Miller, Ian Dillner, Marcus Maher, Gail Cohen, Christopher Killion, Cathy Zima, Erin Boone, Carol Simpson and Chris Cantor regarding final unbundling rules. SBC described the widespread deployment of competitive loop and transport facilities, the extensive use of ILEC special access services by CLECs to serve end-user customers and the variety of pricing options for those services.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being electronically filed. I ask that this letter be placed in the files for the proceedings identified above.

You may contact me at (202) 326-8889 should you have any questions.

Sincerely,

/s/Jarvis Bennett

CC: R. Hanser (*electronic copy*)
J. Miller (*electronic copy*)
I. Dillner (*electronic copy*)
M. Maher (*electronic copy*)
G. Cohen (*electronic copy*)
C. Killion (*electronic copy*)
C. Zima (*electronic copy*)
E. Boone (*electronic copy*)
C. Simpson (*electronic copy*)