



October 22, 2004

Writer's Direct Dial: 703.755.6730  
Facsimile Number: 703.755.6740  
Sheba.Chacko@bt.com

Via Hand Delivery

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

Re: *Ex Parte Presentation, AT&T Corp. Petition for Rulemaking To Reform Regulation Of Incumbent Local Exchange Carrier Rates For Interstate Special Access Services*, RM No. 10593

Dear Ms. Dortch:

On October 18, 2004, Sheba Chacko of BT Americas Inc. met with Scott Bergmann from Commissioner's Adelstein and Matthew Brill from Commission Abernathy to discuss the above-referenced petition, including materials already part of the record in this proceeding.

During these meetings BTA urged the Commission to take immediate action to reform incumbent local exchange carriers' (LECs') rates for interstate special access services. BTA noted that prices for such services have not declined, as the Commission expected when it adopted the *Pricing Flexibility Order*, 14 FCC Rcd 14221 (1999). Instead, prices generally have remained at excessive levels and competition has not disciplined incumbent LECs' pricing practices. BTA also explained that the incumbent LECs' special access rates are significantly higher than the rates that British Telecom (BT) charges to provide comparable services in the United Kingdom. Further, in contrast to the trend of incumbent LEC special access prices, BT's rates in the United Kingdom are declining. BTA also discussed the negative impact the incumbent LECs' pricing practices have on competitive carriers and on business customers that depend on interstate special access services.

Marlene H. Dortch, Esq.  
October 22, 2004  
Page 2

In accordance with the Commission's rules, copies of this letter and the attached documents are being provided to you for inclusion in the public record of this proceeding.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "A. Sheba Chacko". The signature is written in a cursive, flowing style.

A. Sheba Chacko

Attachments

cc: Scott Bergmann  
Matthew Brill