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November 29, 2004

By Electronic Filing

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

Re: Ex Parte Presentation in WC Docket 04-313 – Unbundled Network Elements

Dear Ms. Dortch:

Today David Zesiger of the Independent Telephone & Telecommunications Alliance (ITTA) and I met with Commissioners Abernathy and Martin, and their respective senior legal advisors Dan Gonzalez and Matthew Brill, to discuss the above-referenced proceeding. ITTA urged that the Commissioners incorporate into the new unbundling rules standards for “impairment” that reflect the size and nature of non-BOC (Bell Operating Company) markets. The enclosed materials summarize the substance of our discussion; a copy of those materials was left behind. In accordance with the Commission’s rules, this letter and the enclosures are being filed in the above-referenced docket. Please contact me if you have any questions.

Very truly yours,



Karen Brinkmann

Enclosure

cc: Commissioner Kathleen Q. Abernathy
Commissioner Kevin J. Martin
Matthew Brill, Senior Legal Advisor to Commissioner Abernathy
Daniel Gonzalez, Senior Legal Advisor to Commissioner Martin