

BellSouth D.C., Inc.
Legal Department
Suite 900
1133 21st Street, N.W.
Washington, D.C. 20036-3351

bennett.ross@bellsouth.com

Bennett L. Ross
General Counsel-D.C.

202 463 4113
Fax 202 463 4195

November 30, 2004

EX PARTE

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

Re: *Unbundled Access to Network Elements*, WC Docket No. 04-313;

Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, CC Docket No. 01-338;

Dear Ms. Dortch:

BellSouth Telecommunications, Inc. ("BellSouth") submits this ex parte letter to refute claims made by AT&T Corporation ("AT&T") concerning the calculation of fiber-based collocation arrangements in individual wire centers.¹

There is no merit to AT&T's claim that the information BellSouth has presented concerning the number of fiber-based collocations "is likely to create a misimpression as to the number of competitive carriers that are collocated in those offices." While AT&T is correct that "a *single* carrier may have *multiple* collocation arrangements (*i.e.*, cages) in an ILEC wire center," BellSouth's count of the fiber-based collocation arrangements in each of its central offices did not include multiple arrangements maintained by the same carrier. Thus, notwithstanding AT&T's claims to the contrary, the data presented by BellSouth in this proceeding reflect the number of fiber-based collocators in each central office, not the number of fiber-based collocation arrangements.²

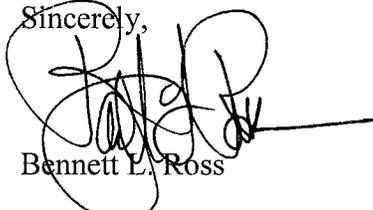
¹ See Ex Parte Letter from Joan Marsh, AT&T, to Marlene Dortch, Secretary, FCC (November 19, 2004).

² See, e.g., Direct and Rebuttal Affidavits of Shelley W. Padgett; Ex Parte Letter from Bennett L. Ross, Counsel for BellSouth, to Marlene Dortch, Secretary, FCC (November 22, 2004).

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Please include this letter in the record in the referenced proceedings.

Sincerely,



Bennett L. Ross

BLR:kjw

cc: Christopher Libertelli
Matthew Brill
Jessica Rosenworcel
Daniel Gonzalez
Scott Bergmann
Jeffrey Carlisle
Michelle Carey
Thomas Navin
Jeremy Miller
Ian Dillner

Russell Hanser
Marcus Maher
John Rogovin
John Stanley
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Jeffrey Dygert
Pamela Arluk
Robert Pepper
Rodger Woock
Robert Tanner

Tamara Preiss

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