

It is my opinion that Copper-Loops (OSP-CL) intended to be retired due to an fiber overbuild by the incumbent should be allowed and not be encumbered by those CLECs currently utilizing the OSP-CL and sub-loops in the distribution plant. Rather those same CLECs should be offered the opportunity to either purchase those systems and/or networks, at close to or near salvage value, as stated in the ILECs continuing property record (CPR). If this or a similar alternative is not enacted, and the ILEC community is mandated to maintain and continue its ownership of the OSP-CL, there remains the expense of maintenance an aging asset, the cost of administration, and the expenses associated with replacing, rehabilitating and in the case of public requirements (Roadway, or right of way modification)the cost of relocation of facilities no longer aligned with the PSTN's primary function.

At some time, there should be an exit strategy enacted by the FCC and constructed by the CLECs, to build, maintain their own networks closer aligning themselves with thier service obligations and no longer rely on the ILEC community to suffer a mandated network subsidy.