Patrick H. Merrick, Esq.
Director – Regulatory Affairs
AT&T Federal Government Affairs

Suite 1000
1120 20th Street NW
Washington DC 20036
202 457 3815
FAX 202 457 3110

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Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W., Room TW-B204
Washington, DC 20554

Re: Notice of Ex Parte Presentation: In the matter of Verizon Telephone Companies Tariff FCC Nos. 1 and 11, Transmittal No. 232.

Dear Ms. Dortch:

Yesterday, Kathleen Farrell (via teleconference) and Richard Rubin (via teleconference) and I met with Deena Shetler, Judith Nitsche, Jay Atkinson, Margaret Dailey, Gene Gold, Jim Litchford and Vienna Jordan of the FCC's Pricing Policy Division of the Wireline Competition Bureau. We discussed Verizon's Transmittal No. 232 and areas of concern for AT&T within the transmittal. A brief summary of each concern is a follows:

Collocation: Verizon only offers PARTS to CLECs that are collocated in an end user's serving central office. This collocation requirement unreasonably limits CLECs to access in a collocation when there is no technical basis behind such limitation. This requirement will limit CLECs to only those offices with a large enough concentration of customers to support the cost of collocation.

Interface: The tariff limits the interface to DS3 or OC3. Again, this requirement unreasonably limits CLECs to only those areas where customer volumes can support a high capacity interface. Depending on how services are engineered, a DS3 connection can serve between 750 and 1500 loops. Especially given Verizon's current scattered deployment plans for PARTS, a DS1 form of interface shoud be available to enable a CLEC to serve smaller volumes of customers.

Voice Capabilities: Verizon's tariff terms and conditions would preclude the provision of derived voice services over the high frequency of the loop capability by providing only a UBR class of service. A VBR-RT class of service is preferred because it is the most "bandwidth-friendly," allowing the sharing of bandwidth among customers. In addition, Verizon's tariff limits a CLEC to only one PVC per line; two are needed to provide derived voice service.

Ambiguities: Verizon's tariff is unclear in many aspects In particular, it is unclear whether and how UNE-P carriers are allowed to purchase from the PARTS and how the rates for PARTS inbterrelate with rates for the unbundled elements.

Annual Commitments: Verizon requires at a minimum annual commitment for ATM ports and cross-connects. Month to month rates are not available. These terms also limit CLEC flexibility and load additional risk and costs onto their competitors.

Notice: Verizon must provide notice to CLECs about its PARTS deployment. CLECs need more information in order to make a investment decisions. Verizon should be required to provide notice to CLECs when RTs are being pre-positioned, not at the end of the process when line cards are being installed.

Consistent with the Commission rules, I am filing one electronic copy of this notice and request that you place it in the record of the proceedings.

Sincerely,

Attachments

cc: Deena Shetler
Judith Nitsche
Jay Atkinson
Margaret Dailey
Gene Gold
Jim Litchford
Vienna Jordan