

January 30, 2001

Ms. Elizabeth Yockus  
Federal Communications Commission  
Common Carrier Bureau  
445 12th Street, S.W., Room 5C143  
Washington, D.C. 20554

Re: Global Crossing Ltd. ("Global Crossing") and Citizens Communications Company ("Citizens"), DA 00-2366: Ex Parte Presentation

Dear Ms. Yockus:

This letter responds to your question regarding potential service area overlaps between the CLEC operations of Global Crossing which are subject to the transfer of control and Citizens' existing operations as well as any such similar overlap between their ILEC operations. There are no service area overlaps between Global Crossing's and Citizens' CLEC operations. The Global Crossing CLEC operations that will be transferred to Citizens are in Newburgh and Poughkeepsie, NY and Bloomington, MN. Citizens has no CLEC operations in these areas. There are also no overlaps between Global Crossing's and Citizens' ILEC operations.

You also asked that I identify the areas in which Citizens has CLEC and ILEC operations. Citizens has ILEC operations in: Nebraska; Minnesota; Montana; North Dakota; Idaho; Iowa; New York; Pennsylvania; Arizona; California; Illinois; Wisconsin; New Mexico; Nevada; Oregon; Tennessee; Utah; and West Virginia. Citizens is in the process of acquiring ILEC operations in Colorado, Wyoming, and Washington, but those transactions have not yet closed. Citizens has CLEC operations in: Washington; Oregon; California; Arizona; Utah; and Idaho.<sup>1</sup>

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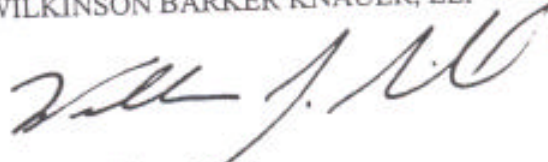
<sup>1</sup> Citizens provides competitive local exchange and other services in these states. Citizens also provides services other than competitive local exchange services in Nevada, Colorado, Texas, Illinois, Georgia, Ohio, Pennsylvania, New York, and the District of Columbia.

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Pursuant to Sections 1.1204(a)(10) and 1.1206(b) of the Commission's rules, an original and two copies of this letter and the enclosed document are being filed with the Secretary. Please call the undersigned if you have questions regarding this matter.

Sincerely,

WILKINSON BARKER KNAUER, LLP

A handwritten signature in black ink, appearing to read "William J. Sill", written in a cursive style.

By: William J. Sill  
Counsel to Global Crossing Ltd.