November 4, 2015

Ex Parte

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

Re: Special Access for Price Cap Local Exchange Carriers (WC Docket No. 05-25);
AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local
Exchange Carrier Rates for Interstate Special Access Service (RM-10593)

Dear Ms. Dortch:

On Tuesday, November 3, 2015, Jonathan Banks, Diane Griffin Holland, and Patrick
Brogan of the United States Telecom Association (USTelecom); Gary Phillips, Keith Krom,
Caroline Van Wie, and Frank Simone of AT&T; Curtis Groves and Frederick Moacdieh of
Verizon; Melissa Newman, Carolyn Hammack, and Jeffrey Lanning of CenturyLink; AJ Burton
of Frontier; Michael Bishop of Cincinnati Bell; and Christopher Shenk of Sidley Austin LLP
spoke with Deena Shetler, Eric Ralph, Shane Taylor, William Layton, Joseph Price, Rachel
Kazan, Jack Erb, and Tracy Waldon of the Wireline Competition Bureau by telephone to discuss
several issues that became evident only after experts retained by USTelecom’s members gained
access to and began to review the industry-wide business broadband data collected in the above-
referenced proceedings.

We discussed concerns that certain essential data were not made available for review, and
about the stability of the data collection in the Commission’s secure data enclave managed by
NORC, which is still being supplemented and otherwise revised. We also explained that the data
enclave platform lacks certain software and tools that would allow important data analyses to be
performed more completely and efficiently, and that requests to NORC that certain tools be
added to the platform remain pending. We further explained that even with the recent extension
of the comment and reply dates to January 6 and February 5, 2016, respectively, interested parties will not have sufficient time to review and analyze the data, and to prepare meaningful comments in this extraordinarily complex and important proceeding.

Sincerely,

Diane Griffin Holland
Vice President, Law & Policy

cc: Deena Shetler
    Eric Ralph
    Shane Taylor
    William Layton
    Joseph Price
    Rachel Kazan
    Jack Erb
    Tracy Waldon