



April 13, 2017

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: *Business Data Services in an Internet Protocol Environment (WC Docket No. 16-143); Technology Transitions (GN Docket No. 13-5); Special Access Rates for Price Cap Local Exchange Carriers (WC Docket No. 05-25); AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services (RM-10593)*

Dear Ms. Dortch:

On April 11, 2017, Jonathan Spalter (by telephone), Jon Banks and I of USTelecom met with Commissioner Mignon Clyburn and her Wireline Legal Advisor Claude Aiken to discuss the draft Order in the above-referenced proceedings. USTelecom expressed support for the Commission's efforts to advance this long-pending proceeding by adopting reasonable measures to identify where BDS is not competitive and to ensure that pricing protections remain in such areas. We also explained that the Commission last granted special access pricing relief more than a decade ago, and thus the additional relief proposed here appropriately reflects the measured, incremental progress of competition in the BDS market over that time period. With regard to the need for additional transition periods for competitors that currently rely on regulated pricing, we noted that because additional pricing flexibility relief has been "frozen" (and thus anticipated) for over 5 years and existing contracts will not be interrupted, competitors likely will not be harmed by the lack of a formal, lengthy transition period.

Please do not hesitate to contact the undersigned if you have questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Diane Griffin Holland".

Diane Griffin Holland
Vice President, Law & Policy

c: Commissioner Mignon Clyburn
Claude Aiken