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October 15, 2018

Via Electronic Submission

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, NW
Portals II, Room TW-A325
Washington, DC 20554

Re: In re Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. §160(c) to Accelerate Investment in Broadband and Next-Generation Networks (WC Docket No. 18-141).

On October 12, 2018, Keith Krom, and the undersigned of AT&T, participated in a conference call with Eric Ralph, Terri Natoli, Daniel Kahn, and Michele Berlove of the Wireline Competition Bureau to inform the Commission of AT&T's plans to begin discussions with wholesale customers on a proposed commercial product to replace DS0 unbundled loops, in the event the Commission grants the relief requested in the above-referenced petition. AT&T explained that its proposed commercial product will provide functionality comparable to the 2-wire and 4-wire DS0 level capable loops; offer simplified loop options and simplified regional pricing and allow customers to use the same ordering systems and processes they use to order unbundled loops today. AT&T expects that the general terms and conditions of the proposed commercial agreement will track, to the extent possible, AT&T's Local Wholesale Complete commercial agreements.

AT&T intends to start reaching out to wholesale customers as early as November to begin discussions.

Pursuant to section 1.1206 of the Commission's Rules, this letter is being filed electronically with the Commission.

Please contact the undersigned if you have any questions.

Sincerely,


Jacquelyne Flemming

CC: Terri Natoli (terri.natoli@fcc.gov)
Eric Ralph (eric.ralph@fcc.gov)
Daniel Kahn (daniel.kahn@fcc.gov)
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