

October 17, 2018

***Ex Parte Notice***

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

**Re: *Regulation of Business Data Services for Rate-of-Return Local Exchange Carriers, Business Data Services in an Internet Protocol Environment, Special Access for Price Cap Local Exchange Carriers, WC Docket Nos. 17-144, 16-143, and 05-25***

Dear Ms. Dortch:

On October 16, 2018, Suzanne Yerdon, Jennifer Leonard, Ann Wahba and the undersigned on behalf of NECA spoke via conference call with Lisa Hone, Pam Arluk, David Zesiger, Doug Slotten, Justin Faulb, Belinda Nixon, Marvin Sacks, William Kehoe, and Dick Kwiatkowski of the Wireline Competition Bureau regarding the draft Report and Order in the above-referenced proceeding.<sup>1</sup>

NECA staff focused its discussion on administrative efforts that would be required by NECA to implement the proposed business data services offerings in the draft Report and Order. In particular, we discussed timing of cost studies, processes for setting initial BDS rates for current pool participants, and issues related to participation in NECA's Traffic Sensitive tariff.

Pursuant to section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS.

Sincerely,

/s/ Jeffrey E. Dupree

cc: Lisa Hone  
Pam Arluk  
David Zesiger  
Doug Slotten  
Justin Faulb  
Belinda Nixon  
Marvin Sacks  
William Kehoe  
Dick Kwiatkowski

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<sup>1</sup> *Regulation of Business Data Services for Rate-of-Return Local Exchange Carriers, Business Data Services in an Internet Protocol Environment, Special Access for Price Cap Local Exchange Carriers, Report and Order, Second Further Notice of Proposed Rulemaking, and Further Notice of Proposed Rulemaking, WC Docket Nos. 17-144, 16-143, and 05-25, FCC-CIRC1810-06 (Public Draft Oct. 2, 2018).*