

PUBLIC VERSION

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February 21, 2019

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

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***

Dear Ms. Dortch:

On February 19, 2019, Frank Simone, Jacquelyne Fleming, and Keith Krom from AT&T and the undersigned, along with Patrick Halley and Diane Holland of USTelecom, met with Pamela Arluk, Terri Natoli and Michele Berlove (in person) of the Wireline Competition Bureau and Pam Megna (via telephone) from the Office of Economics and Analytics regarding the above-referenced proceeding. In the meeting we discussed the claims of some carriers that they are using ILEC unbundled network elements (UNEs) to provide advanced telecommunications services to rural residential customers in rural areas where the ILECs cannot or will not provide similar service capabilities. As part of that discussion we discussed the attached maps which depict the number of fixed broadband providers operating in the wire centers where Sonic provides service. These fixed broadband providers include incumbent and competitive local exchange carriers (LECs), cable television system operators, terrestrial fixed wireless providers (including wireless ISPs, or WISPs) that provide service to end user premises, and satellite network operators. While the maps are based on the public December 2017 Form 477 Fixed Broadband Deployment data, since they depict the areas in California where Sonic is reportedly providing broadband service, as a precaution we have labeled the maps as “Highly Confidential” under the Protective Order in this proceeding.

We also updated the Commission on AT&T’s plans to offer a DS0 loop commercial offering, assuming the requested forbearance relief is granted. As we explained, AT&T still intends to make DS0 loops available pursuant to commercial agreements. AT&T intends to price the DS0 loops according to the same geographic wire center designations that currently exist – urban, suburban and rural. During the transition, AT&T intends to add a flat amount to any *new* DS0 loops ordered pursuant to the commercial agreement in urban and suburban wire centers.

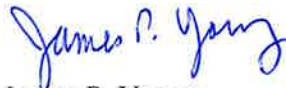
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However, the rates for *new* DS0 loops provisioned in rural wire centers will not change during the transition. AT&T does not intend to require any volume or term commitments.

Please do not hesitate to contact me with any questions.

Sincerely,



James P. Young  
Partner

Cc: Pamela Arluk  
Terri Natoli  
Michele Berlove  
Pam Megna

Highly Confidential Enclosure

**THE ATTACHMENT HAS BEEN  
REDACTED FOR PUBLIC INSPECTION**