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**VIA ECFS**

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

Re: *Business Data Services in an Internet Protocol Environment et al., WC  
Docket Nos. 16-143, 15-247, and 05-25 and RM-10593*

Dear Ms. Dortch:

On October 26, 2016, Kathleen Abernathy, Executive Vice President, External Affairs for Frontier Communications and I met with Paul de Sa, Chief of the Office of Strategic Planning and Policy Analysis, to discuss the proceeding referenced above.

Frontier explained the ways in which the draft BDS proposal would unduly affect mid-size ILECs, like Frontier, in ways that would be deeply harmful to investment in American broadband connectivity and jobs. Frontier also stated the importance of ensuring that the Commission carefully consider the current state of market competition in how it implements any reform to existing grants of Phase II pricing flexibility, noting the particularly competitive nature of the transport market. Frontier's discussion on the topic of Phase II pricing flexibility and transport was consistent with the recent AT&T filing on the same topic.<sup>1</sup>

Please contact me with any questions.

Sincerely,

Mike Saperstein

cc: Paul de Sa

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<sup>1</sup> See Letter from James P. Young, Counsel to AT&T Inc., to Marlene H. Dortch, Secretary, FCC, WC Dkt. Nos. 16-143, 15-247, 05-25, RM-10593 at 4-11 (Oct. 25, 2016).