



Writer's Direct Dial: 703.755.6730
Facsimile Number: 703.755.6740
Sheba.Chacko@bt.com

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Via Electronic Filing
Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

EX PARTE LETTER RE: WC Docket No. 16-70

Dear Secretary Dortch:

On October 25, 2016 representatives of BT Americas Inc. (BT) met with Johanna Taylor, legal advisor to Commissioner Rosenworcel. Sheba Chacko, Head of Americas Regulation, BT, and Thomas Whitehead, Director, US Government Affairs, BT participated in person in this meeting while Bridget Connolly, Senior Commercial Counsel, BT participated via phone.

BT asked that the Commission require Verizon to maintain for a period of five years XO's Ethernet over Copper (EoC) platform at existing rates, terms, conditions and coverage or offer an equivalent service at equivalent rates, terms, conditions and coverage before retiring an XO EoC service.

Failure to maintain XO's EoC platform for a reasonable length of time would cause BT's customers and other consumers of EoC services rate shock and turmoil. XO offers a valuable and innovative Ethernet BDS service in the 10 and sub-10 Mbps BDS market that a surprising number of BT's customers have ordered even though BT provisioned this as a form of access to BT's global managed services about only four years ago. If XO's EoC services are withdrawn summarily, consumers would experience sticker shock. XO has the lowest average Ethernet prices for the coverage provided in this low bandwidth Ethernet services market. While other providers may offer wider coverage, their average prices are higher. Alternatively, if the odd provider has lower average Ethernet rates in this product market, it has limited coverage.

Another reason for requiring that XO's EoC platform be maintained for five years is to avoid a forced and sudden migration to alternate services that could cause consumers disarray and turmoil. Migrations for large enterprise customers can take upwards of sixty days per circuit because migration entails planning, ordering, installation of parallel circuits, testing, and cutover, and much of this activity has to take place during off peak hours. If, however, XO's EoC platform is maintained for a period of five years, BT expects that customers' bandwidth needs

naturally would shift upwards during this time period and they would have smoothly migrated during this time period from XO's EoC services to higher bandwidth services without experiencing panic or major disruptions.

If you have any questions regarding any matters discussed herein please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'SChacko', with a stylized, cursive script.

Sheba Chacko
Head, Americas Regulation and Global Telecoms Policy, BT

cc: Johanna Taylor