



April 8, 2019

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

Re: *Ex Parte* Communication: WC Docket Nos. 17-144, 16-143, and 05-25

Dear Ms. Dortch:

On April 4, 2019, Genny Morelli and the undersigned of ITTA met with Lisa Hone, David Zesiger, Chris Koves, Greg Capobianco, and Belinda Nixon of the Wireline Competition Bureau, and Eric Ralph and Shane Taylor of the Office of Economics and Analytics, regarding the Further Notice of Proposed Rulemaking in the above-captioned dockets.¹ In the meeting, we discussed the extensive market data contained in the *Atlantic-ACM 2018-2023 Forecast*.² Specifically, we discussed whether the various depicted product lines, as well as revenue trends associated with them, might combine to provide evidence of competition to TDM transport in service areas of rate-of-return carriers that currently receive model-based or other forms of fixed high-cost universal service support.

Please do not hesitate to contact the undersigned with any questions regarding this submission.

Respectfully submitted,

/s/

Michael J. Jacobs
Vice President, Regulatory Affairs

cc: Eric Ralph, Lisa Hone, David Zesiger, Chris Koves, Greg Capobianco, Belinda Nixon, Shane Taylor

¹ *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, 33 FCC Rcd 10403 (2018).

² *Atlantic-ACM, U.S. Telecom Wireline and Wireless Sizing and Share Forecast: 2018-2023* (Oct. 2018) (*Atlantic-ACM 2018-2023 Forecast*); see Letter from Craig J. Brown, Assistant General Counsel, CenturyLink, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 17-144, 16-143, 05-25, Attach., *Atlantic-ACM 2018-2023 Forecast* (filed Mar. 1, 2019) (submitting *Atlantic-ACM 2018-2023 Forecast* subject to protective orders and supplemental request for confidentiality, and redacted in its entirety).