

May 6, 2019

Ex Parte Notice VIA ECFS

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 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); Regulation of Business Data Services for Rate-of-Return Local Exchange Carriers (WC Docket No. 17-144); Regulation of Business Data Services in an Internet Protocol Environment (WC Docket No. 16-143); Special Access for Price Cap Local Exchange Carriers (WC Docket No. 05-25); AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services (RM-10593)*

Dear Ms. Dortch,

On May 2, 2019, Chip Pickering, CEO, and the undersigned from INCOMPAS, along with Roger Fleming, on behalf of Allstream, met with Commissioner O’Rielly and Arielle Roth with regard to the above-referenced proceedings.

In the meeting, using mapping illustrations from a previously filed ex parte,¹ we explained how the networks being built using unbundled network elements as a bridge to fiber support 5G, in addition to gigabit-speed broadband service to small businesses and residential users. We noted the economic study INCOMPAS submitted in the record showing carriers using unbundled network elements as a bridge to fiber are building more fiber in the areas they operate than either the incumbent or cable.²

We emphasized that the provisions of the Act at issue are finally working as intended—as a tool for market entry and the buildout of new networks. This comes at a critical time for the country as it is a race to 5G. The Commission should deny USTelecom’s petition.

¹ Letter from Julie A. Veach, Counsel to Sonic Telecom, LLC, to Marlene H. Dortch, Nov. 29, 2018 (Sonic Nov. Ex Parte), mapping illustrations pp. 2 and 6.

² See Declaration of William P. Zarakas, ¶ 5 Table 1, Attachment 2 to the Opposition of INCOMPAS, FISPA, Midwest Association of Competitive Communications, and the Northwest Telecommunications Association, WC Docket No. 18-141 (filed Aug. 6, 2018) (“Competitive Carriers Group Opposition”).

Respectfully submitted,

/s/ Karen Reidy

Karen Reidy
Vice President, Regulatory

cc: Commissioner O’Rielly
Arielle Roth