



July 1, 2019

**Via ECFS**

Ms. Marlene H. Dortch  
Secretary, Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, D.C. 20554

Re: Partial Withdrawal of USTelecom Petition from WC Docket No. 18-141

Dear Ms. Dortch:

USTelecom maintains its request for forbearance from (1) unbundling obligations for DS1 and DS3 transport and analog voice-grade copper loops under Section 251(c)(3) of the Act and the Commission's rules, and associated Section 251 and Section 252 obligations under the Act and the Commission's rules; and (2) avoided cost resale obligations under Section 251(c)(4) of the Act and associated Section 251 and Section 252 obligations under the Act and the Commission's rules. These requests were made as part of USTelecom's Petition for Forbearance Pursuant to 47 U.S.C. §160(c) to Accelerate Investment in Broadband and Next-Generation Networks, WC Docket No. 18-141, filed on May 4, 2018 ("Petition").<sup>1</sup> Pursuant to Section 1.59 of the Commission's rules, USTelecom seeks to withdraw any and all other pending requests for forbearance identified in Appendix A of the Petition without prejudice as to further action.

USTelecom urges the Commission to initiate a rulemaking proceeding addressing elements of the Petition that are not granted as a result of this request or the Commission's prior decision granting USTelecom's partial withdrawal of its request for forbearance from dark fiber transport unbundling requirements.<sup>2</sup>

Please direct any questions to the undersigned.

Sincerely,

/s/ Patrick R. Halley  
Patrick R. Halley  
Senior Vice President, Policy & Advocacy

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<sup>1</sup> See Petition for Forbearance of USTelecom – The Broadband Association, WC Docket No. 18-141 (filed May 4, 2018) ("Petition").

<sup>2</sup> Order Approving Withdrawal of USTelecom Dark Fiber Unbundling Request, Order, DA 19-573 (WCB June 18, 2019).

cc: Nirali Patel  
Kris Anne Monteith  
Terri Natoli