



July 5, 2016

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

Re: *Special Access Rates for Price Cap Local Exchange Carriers*, WC Docket No. 05-25;
*AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange
Carrier Rates for Interstate Special Access Services*, RM-10593; *Business Data Services
in an Internet Protocol Environment*, WC Docket No. 16-143

Dear Ms. Dortch:

In accordance with the *Modified Protective Order*, *Second Protective Order*, and *Data Collection Protective Order* for the above-referenced proceedings, Windstream Services, LLC (“Windstream”) herein submits a redacted version of the attached letter in the above-referenced proceedings.

Windstream has designated for highly confidential and confidential treatment the marked portions of the attached documents pursuant to the *Modified Protective Order*,¹ *Second Protective Order*,² and *Data Collection Protective Order*³ in WC Docket No. 05-25 and RM-10593.

Pursuant to the protective orders and additional instructions from Commission staff, Windstream is filing a redacted version of the document electronically via ECFS, one copy of the Highly Confidential version with the Secretary, and sending two copies of the Highly Confidential version to Christopher Koves, Pricing Policy Division, Wireline Competition Bureau.

¹ *Special Access for Price Cap Local Exchange Carriers*, Modified Protective Order, DA 10-2075, 25 FCC Rcd. 15,168 (Wireline Comp. Bur. 2010).

² *Special Access for Price Cap Local Exchange Carriers*, Second Protective Order, DA 10-2419, 25 FCC Rcd. 17,725 (Wireline Comp. Bur. 2010).

³ *Special Access for Price Cap Local Exchange Carriers*, Order and Data Collection Protective Order, DA 14-1424, 30 FCC Rcd. 11,657 (Wireline Comp. Bur. 2015).

REDACTED - FOR PUBLIC INSPECTION

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Please contact me if you have any questions or require any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "John T. Nakahata".

John T. Nakahata
Counsel to Windstream

Attachment

cc: Christopher Koves



Ex Parte Notice

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

Re: *Special Access Rates for Price Cap Local Exchange Carriers*, WC Docket No. 05-25; *AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, RM-10593; *Business Data Services in an Internet Protocol Environment*, WC Docket No. 16-143

Dear Ms. Dortch:

On June 30, 2016, Eric Einhorn, Senior Vice President of Government Affairs; Jennie Chandra, Vice President - Public Policy and Strategy of Windstream Services, LLC (“Windstream”); and I met with Jonathan Sallet, General Counsel; Matthew DelNero, Chief, Wireline Competitive Bureau; and William Dever of the Office of the General Counsel.

Windstream’s substantial experience as both an ILEC and a CLEC offers a window into financial operations of these two business models. Overall margins are significantly higher for ILEC operations, as compared with CLEC enterprise operations. *****BEGIN HIGHLY CONFIDENTIAL*****

CONFIDENTIAL*** [REDACTED] *****END HIGHLY CONFIDENTIAL*****. We provided attendees Windstream’s supplemental quarterly financial statement (incorporated by reference herein).¹

We also discussed the fact that Windstream has few wholesale last-mile supplier alternatives available to the ILEC in most of the areas where Windstream purchases last-mile access to connect its fiber network to individual customer locations. *****BEGIN HIGHLY CONFIDENTIAL***** [REDACTED]

¹ See Windstream Holdings, Inc., *Unaudited Pro Forma Consolidated Results (Non-GAAP) (A) Quarterly Supplemental Information* (2016), http://investor.windstream.com/common/download/download.cfm?companyid=ABEA-43PVYW&fileid=890088&filekey=95529EF6-5146-4802-A3A7-2FB1FD48A5C7&filename=WIN_Investor_Supplement.pdf.

Marlene H. Dortch

July 5, 2016

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END HIGHLY CONFIDENTIAL

Please let me know if you have further questions.

Sincerely,



John T. Nakahata
Counsel to Windstream

cc: Jonathan Sallet
Matthew DelNero
William Dever