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VIA ECFS

NOTICE OF EX PARTE

July 12, 2018

Marlene H. 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

Dear Ms. Dortch:

On July 10, 2018, the undersigned and Diane Holland, Vice President of Law and Policy of USTelecom, met with Michele Berlove, Madeleine Findley, Daniel Kahn and Terri Natoli of the Wireline Competition Bureau (“WCB”) to discuss questions from staff relating to the above-referenced proceeding. Adam Zonneville, Windstream’s Vice President of Access Pricing and Product, and Pam Megna and Eric Ralph, from the WCB, joined via teleconference.

During the meeting, Windstream outlined its use, with respect to its CLEC business, of analog DS0, digital DS0, DS1 and DS3 unbundled network elements (“UNEs”) and discussed the following issues:

- Windstream explained that, in general, analog DS0s are used to provide voice services and other services that require resiliency from power outages, such as alarm, elevator and 911 services. Windstream clarified that it does not typically use analog DS0s to provide data services, but that it has an embedded base of customers using analog DS0s for data via dial-up modems. Windstream further noted that it does not foresee a shift among users of analog DS0s away from services dependent on them.
- Windstream explained that digital DS0s are used to support a range of DSL and ethernet over copper (“EoC”) services. Windstream noted that for new service orders and upgrades it mostly provides EoC and that, to deliver those services, it typically uses five to seven bonded DS0s depending on the distance to the customer’s premises.
- Windstream noted that DS1s and DS3s are used as an access medium for a range of private networking, integrated voice/data and transport services.

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- Windstream discussed the various factors, including price, availability and the characteristics of the service requested by the customer, that play a role in determining which service to purchase (such as UNEs, special access or commercially available alternatives) to fulfill any specific order. Windstream also discussed the availability of “best efforts” and dedicated broadband services for use in enterprise wide area network solutions.
- Windstream explained that, in its view, the period referenced in its ex parte with USTelecom represented a sufficient amount of time to effect the transition to other services, including next generation networking services.¹

Windstream also offered to follow up regarding further questions.

Please contact me if you need additional information.

Sincerely,

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

Thomas W. Whitehead

cc: Michele Berlove
Madeleine Findley
Daniel Kahn
Pam Megna
Terri Natoli
Eric Ralph

¹ See USTelecom Ex Parte, WC Docket No. 18-141 (filed June 21, 2018).