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*Re: In 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 20, 2018, Frank Simone, Keith Krom, and the undersigned of AT&T, Diane Holland of US Telecom, and Christopher Shenk of Sidley Austin LLP, met with Eric Ralph, Terri Natoli, Pam Megna, Madeleine Findley, Michele Berlove, Claudia Pabo, and Mason Shefa of the Wireline Competition Bureau to discuss the above-referenced petition.

- AT&T explained the difference between its digital and analog UNE loops. Digital loops have been groomed and are of sufficiently short length to enable reliable data services. Analog loops have not been conditioned, are too long, or are otherwise not deemed reliable for data services, and thus are generally used for voice services.
- AT&T explained that there are no significant differences in the capabilities of DS1 and DS3 facilities sold as UNE loops versus those sold as special access or under commercial contracts.
- AT&T explained that AT&T sells a negligible number of UNE subloops and no UNE Network Interface Devices (“NIDs”).
- AT&T explained that the data sample it provided for the economic study accounts for about one-third of all AT&T UNE volumes and is generally representative of AT&T’s overall UNE sales, except that the sample tended to over-represent DS0 UNE loop sales.
- AT&T explained that its CLEC affiliates purchase a very small number UNEs, and that the decision whether to purchase UNEs depends, in large part, on the relative overall economic costs of using UNEs compared to the commercial services offered by the Incumbent LEC, other CLECs, and cable companies.
- AT&T explained that its CLEC affiliates do not use UNEs for residential services.

Please contact the undersigned if you have any questions.

Respectfully submitted,  
/s/ Jacquelyne Flemming  
Jacquelyne Flemming

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