



Jeffrey R. Strenkowski  
Vice President, Deputy General Counsel  
of Governmental Affairs

August 2, 2018

**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)  
              WC Docket No. 18-141**

On July 31, 2018, Robert Leithman, Kelly McGriff and the undersigned (collectively, the “Uniti Fiber representatives”), met with Commissioner Michael O’Rielly and his Legal Advisor, Erin McGrath, to discuss USTelecom’s petition in the above-referenced docket.

The Uniti Fiber representatives described the company’s background as a facilities-based competitive network provider. We also discussed our use of various forms of unbundled network elements (UNEs), and how UNEs enable the company to expand its service offerings and network to new customers. The Uniti Fiber representatives explained that the company relies especially heavily on dry copper loops, as well as dark fiber interoffice transport to allow us to interconnect distant central offices (and the local customers served through those central offices) to our network.

We also noted that in many cases the company may not be able to overbuild or replace the dark fiber routes it purchases, as many are in locations and over geographic obstacles that would be impossible for us to deploy over. We also explained that we often utilize UNEs to enter new markets on a fair and competitive basis, and then work diligently to deploy our own facilities in those locations which brings long-term, facilities-based competition to local consumers. In locations where we have done this, we have seen significant price reductions and service improvements from the ILECs, all to the benefit of the local consumers.

The loss (or increase in price) of these inputs will have a significant impact on our ability to deploy competitive services in new markets, as well as to maintain services in some of our existing markets, all to the detriment of consumers.

Sincerely,



Jeffrey R. Strenkowski  
Vice President, Deputy General Counsel of Governmental Affairs  
Uniti Fiber

Cc: Commissioner Michael O'Rielly  
Erin McGrath