

Stephen Sogin  
18835 Fitzpatrick Lane  
Occidental CA 95465

Sep 4th 2018

Via ECFS  
Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: In the Matter of Petition of USTelecom for Forbearance Pursuant to  
47 U.S.C. Section 160(c); WC Docket No. 18-141; Category 1**

Dear FCC,

I respectfully request that the FCC reject the United States Telecom Associations petition to end non-discriminatory rate-setting requirements per Section 251 of the Communications Act for unbundled broadband infrastructure. If their petition is granted, it will have a disastrous effect on the expansion of broadband in areas that the large carriers refuse to serve. It will also increase current subscriber costs in areas that receive broadband access through existing telecom infrastructure.

Race Communications of Millbrae, California, is just completing installing fiber cable in our previously unserved rural Occidental area in Sonoma County. Our community worked for over four years to find a provider like Race to agree to serve us. It has taken an additional two years and millions of dollars to install the system. Without having access to AT&T's existing middle-mile infrastructure at a non-discriminatory rate, this project could not have happened. None of the major carriers in our area (AT&T, Verizon, and Comcast) would provide us with broadband.

Common local exchange carriers like Race and Sonic use unbundled network elements (UNEs) to deploy to rural unserved areas like ours that have been turned down by these large incumbent carriers.

AT&T is particular bad actor and completely untrustworthy. As you can see from these WSJ articles, [https://www.wsj.com/articles/at-t-sprint-boost-customer-fees-1530276273?mod=hp\\_list\\_pos10m](https://www.wsj.com/articles/at-t-sprint-boost-customer-fees-1530276273?mod=hp_list_pos10m), not only does AT&T not care about their customers, they do not care about the fate of their retirees either. [https://www.wsj.com/articles/at-t-overpaid-some-pensioners-now-it-wants-the-money-back-1533306044?mod=hp\\_lead\\_pos5](https://www.wsj.com/articles/at-t-overpaid-some-pensioners-now-it-wants-the-money-back-1533306044?mod=hp_lead_pos5)

To deploy broadband to unserved and underserved rural areas like ours, its imperative that existing UNE regulations remain in force. Removing them will make serving any such area more expensive, or even prohibitively expensive, for smaller companies. The large incumbent carriers could charge whatever they wish for UNE access. They would be free to stifle competition by making a project economically unfeasible. This should not be permitted.

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