



**Mike Saperstein**

Vice President, Federal Regulatory Affairs  
1800 M Street, NW, Suite 800N  
Washington, DC 20036  
(203) 614-4708  
michael.saperstein@ftr.com

September 26, 2016

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: *Business Data Services in an Internet Protocol Environment et al., WC  
Docket Nos. 16-143, 15-247, and 05-25 and RM-10593*

Dear Ms. Dortch:

On September 22, 2016, Kathleen Abernathy, Executive Vice President of External Affairs for Frontier Communications, spoke on the phone with Matt DelNero, Chief of the Wireline Competition Bureau, to discuss the proceeding referenced above. Frontier urged the Commission to fully consider the disparate impacts that would occur if the Commission instituted a uniform rate reduction for BDS services across providers with differing business models and revenue streams, particularly those ILECs that lack wireless or significant CLEC operations. Frontier described the economic impact that the BDS proposals could potentially have on the company, and ultimately may have on its customers and employees. The parties agreed that industry discussions on BDS proposals among stakeholders remain appropriate.

Sincerely,

\_\_\_\_\_/s/\_\_\_\_\_  
Mike Saperstein

cc: Matt DelNero