

September 28, 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 26, 2016, Martha Pultar, Telecommunications Director, International Brotherhood of Electrical Workers (IBEW), Robert Prunn, International Representative, IBEW, and Kathleen Abernathy, Executive Vice President, External Affairs, Frontier Communications, met with Claude Aiken, Wireline Advisor to Commissioner Clyburn.

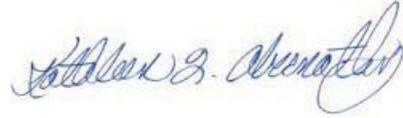
The representatives of IBEW and Frontier discussed the significant repercussions that new price regulation would have on good, middle-class jobs and broadband investment. Tens of thousands of IBEW members install, maintain, and support the business data services (BDS) provided by incumbent local exchange carriers (ILECs) like Frontier. IBEW and Frontier explained that if the FCC imposes BDS price cuts – at a time when there has never been more competition in the BDS market – it would undermine investment, hurt competition, and ultimately put thousands of union jobs at risk.

It was pointed out that Frontier, CenturyLink, AT&T, and other ILECs employ unionized workers with collectively-bargained wages, benefits, and working conditions. Meanwhile, competitive local exchange carriers, wireless companies (with the notable exception of AT&T), and cable companies generally block organized labor and do not provide the same level of pay, benefits, or working conditions. Considering that BDS agreements are most often agreements between large, well-capitalized companies, the Commission should not penalize companies that use organized labor by artificially favoring those that do not.

With the extensive evidence of vigorous competition in the BDS market, IBEW and Frontier strongly urged that the Commission avoid draconian price cuts that would unnecessarily threaten union jobs. Just last week, Communications Workers of America sent the Commission a letter explaining that potential job losses are not idle thinking, citing CenturyLink's announcement that it is laying off up to 3,500 employees – as much as 8 percent of its work force – in response to a decline in its legacy

revenues.¹ The Commission must not put additional union jobs at risk.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kathleen Q. Abernathy".

Kathleen Q. Abernathy
Executive Vice President, External Affairs
Frontier Communications

¹ See *Ex Parte* Letter from Christopher M. Shelton, President, Communications Workers of America, to Chairman Tom Wheeler, FCC, Docket Nos. 16-143, 15-247, 05-25 & RM-10593 (Sept. 20, 2016).