



November 2, 2017

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

**Re: *Ex Parte* Communication: WC Docket No. 17-144**

Dear Ms. Dortch:

On October 31, 2017, Mike Skrivan of Consolidated Communications, Lynn Follansbee of USTelecom, Ken Pfister of Great Plains Communications (by phone), Bob DeBroux of TDS Telecom (by phone), and Genny Morelli and the undersigned of ITTA met with Kris Monteith, Lisa Hone, Pam Arluk, Justin Faulb, David Zesiger (by phone), and Shane Taylor of the Wireline Competition Bureau regarding the pending petition for rulemaking in the above-captioned proceeding.<sup>1</sup>

In our meeting, we discussed applicability of the business data services competitive market test to model-based rate-of-return carriers, the sophistication of business data services customers, and the prospects for providing model-based rate-of-return carriers some interim relief from performing resource-intensive cost studies pending the effectiveness of an order in this proceeding. We also reiterated that we are eager for the Commission in the near term to release a Notice of Proposed Rulemaking seeking comment on the petition's proposals.

Please do not hesitate to contact the undersigned with any questions regarding this submission.

Respectfully submitted,

/s/

Michael J. Jacobs  
Vice President, Regulatory Affairs

cc: Kris Monteith      David Zesiger  
    Lisa Hone          Justin Faulb  
    Pam Arluk          Shane Taylor

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<sup>1</sup> *Wireline Competition Bureau Seeks Comment on Petition for Rulemaking Regarding Regulation of Business Data Services for Model-Based Rate-of-Return Carriers*, WC Docket No. 17-144, Public Notice, 32 FCC Rcd 4701 (WCB 2017).