



November 5, 2018

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

Re: *Ex Parte* Communication: WC Docket No. 11-10

Dear Ms. Dortch:

On November 1, 2018, Pat Rupich, Doug Martin, Tom Kelley, and Kathy Campbell of Cincinnati Bell, Ken Pfister and Chris Jones of Great Plains Communications, Michelle Owens of Blackfoot, Bob DeBroux of TDS Telecom, and Genny Morelli and the undersigned of ITTA met by conference call with Steve Rosenberg, Rodger Woock, John Emmett, Ying Ke, Ken Lynch, and Suzanne Mendez of the Wireline Competition Bureau regarding the *FNPRM* in the above-referenced proceeding.¹

During the call, ITTA members discussed general concerns with the costs and accuracy of a broadband deployment data collection based on road segments. ITTA members also discussed the merits of a data collection proposal involving an address-based database, suggesting such a proposal may be less burdensome but expressing concerns about the potential for public availability of competitively sensitive speed and service data. Furthermore, they addressed logistical issues concerning the formatting of the data that would populate such a database.

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: Steve Rosenberg, Rodger Woock, John Emmett, Ying Ke, Ken Lynch, Suzanne Mendez

¹ *Modernizing the FCC Form 477 Data Program*, Further Notice of Proposed Rulemaking, 32 FCC Rcd 6329 (2017) (*FNPRM*).