



November 13, 2017

Ex Parte

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

Re: *Accelerating Wireline Broadband Deployment by Removing Barriers to
Infrastructure Investment* (WC Docket No. 17-84)

Dear Ms. Dortch:

USTelecom files this letter to supplement the ex parte letter filed November 9, 2017,¹ which inadvertently omitted a material portion of the presentation made on November 8, 2017, by Diane Holland (USTelecom), Jeb Benedict (CenturyLink), Fred Moacdieh (Verizon), and Ola Oyefusi (AT&T) to Lisa Hone, Daniel Kahn, Michele Berlove, Terri Natoli, Zachary Ross, and John Visclosky of the Wireline Competition Bureau in the above-referenced proceeding.²

We explained that contrary to ADT's allegation,³ there is no merit to the idea that ILECs will use advance notice to unfairly advantage their own affiliated service providers. First, we noted that at the end of 2016, ILECs provided switched voice lines only to an estimated 16% of all households, about half the residential voice lines provided by competitors.⁴ So as the FCC's draft order properly concludes, because "intermodal competition is more prevalent than ever," even if there were concern about early disclosure, it "is no longer as persuasive as it once was."⁵ Further, ADT offers no evidence that ILECs can or would cause anticompetitive harm to ADT

¹ Letter from Diane Holland, USTelecom to Marlene H. Dortch, Secretary, FCC, WC Docket No. 17-84 (Nov. 9, 2017). See 47 C.F.R. §§1.1203(c), 1.1206(b)(2)(iv) (permitting the filing, within two business days, of a written ex parte presentation summarizing an oral ex parte presentation made on the day before the Sunshine period begins).

² *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, WC Docket No. 17-84, FCC-CIRC1711-04 (rel. Oct. 26, 2017) (*Wireline Broadband Agenda Draft*).

³ Letter from Michael H. Pryor, Brownstein, Hyatt, Farber, Schreck, LLP, Counsel for ADT Corporation to Marlene H. Dortch, Secretary, FCC, WC Docket No. 17-84 (Nov. 7, 2017).

⁴ See USTelecom Broadband Industry Statistics, available at <http://www.ustelecom.org/broadband-industry/broadband-industry-stats/residential-competition>.

⁵ See *Wireline Broadband Agenda Draft*, ¶ 27.

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and similar competitors. In fact, it is illogical to think that ILECs could exert targeted anticompetitive behavior against ADT or any competing alarm monitoring service provider, when ILECs are not necessarily aware of whether their retail customers subscribe to such third party services.

Please do not hesitate to contact the undersigned if you have questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Holland", with a stylized flourish at the end.

Diane Holland
Vice President, Law & Policy

cc: Lisa Hone
Daniel Kahn
Michele Berlove
Terri Natoli
Zachary Ross
John Visclosky