

September 30, 2014

VIA ECFS

EX PARTE

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: *In the Matter of Special Access Rates for Price Cap Local Exchange Carriers, WC Docket No. 05-25; AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, RM-10593*

Dear Ms. Dortch:

On September 26, 2014, I discussed the status of the above-referenced proceeding with Pam Arluk of the Wireline Competition Bureau. During the discussion, I stated that rules adopted to limit the harmful consequences of incumbent LEC lock-up arrangements should ensure that each unit of Ethernet special access purchased by a buyer reduces the volume of DSn special access units that the buyer must purchase under the lock-up plan applicable in the region where the Ethernet was purchased.

Please do not hesitate to contact me if you have any questions or concerns regarding this submission.

Respectfully submitted,

/s/ Thomas Jones

Counsel for BT Americas, Inc., Cbeyond Communications, LLC, Integra Telecom, Inc., Level 3 Communications, LLC, and tw telecom inc.

cc: Pam Arluk