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November 3, 2014

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

Re: Special Access, WC Docket No. 05-25

Dear Ms. Dortch:

On October 30, 2014, Jennifer McKee and I, on behalf of the National Cable & Telecommunications Association (NCTA), met with Deena Shetler, William Layton, Pam Arluk, and Christopher Koves of the Wireline Competition Bureau, Holly Saurer of the Media Bureau, and Doug Klein of the Office of General Counsel to discuss the Commission's pending data collection in the above-referenced proceeding. NCTA raised concerns about the potential customer privacy implications of the data collection pursuant to Sections 222 and 631 of the Communications Act, as well as the Electronic Communications Privacy Act. In particular, we explained that those statutory provisions generally prohibit cable operators from disclosing their customers' personally-identifiable information and billing records, and that it would be helpful for the Commission to issue guidance explaining how companies can comply with the special access data collection without violating these privacy obligations.

Respectfully submitted,

/s/ **Steven F. Morris**

Steven F. Morris

cc: D. Shetler
W. Layton
C. Koves
P. Arluk
H. Saurer
D. Klein