

Malena F. Barzilai  
Senior Government Affairs Counsel  
Windstream Corporation  
1101 17<sup>th</sup> Street, N.W., Suite 802  
Washington, DC 20036

(202) 223-4276  
malena.barzilai@windstream.com



**VIA ECFS**

***EX PARTE***

November 4, 2014

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

Re: *GN Docket No. 13-5, Technology Transitions; GN Docket No. 12-353, AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition; WC Docket No. 05-25, In the Matter of Special Access Rates for Price Cap Local Exchange Carriers; RM-10593, AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*

Dear Ms. Dortch:

On November 4, 2014, Jennie Chandra from Windstream Corporation spoke by telephone with Pamela Arluk of the Wireline Competition Bureau about special construction charges. The discussion was consistent with earlier filings by Windstream and COMPTTEL.<sup>1</sup> In particular, Chandra noted that Windstream in some instances receives a single quotation for special construction that contains little or no detail, so it cannot sufficiently evaluate the reasonableness of the charges proposed. She urged the Commission to make clear that ILECs are required to identify special construction costs disaggregated by each cost component.<sup>2</sup>

---

<sup>1</sup> See, e.g., Letter from Eric N. Einhorn, Windstream, to Jonathan Sallet and Julie Veach, FCC, GN Docket Nos. 13-5 and 12-353 (April 28, 2014) (April 28 Ex Parte); Letter from Karen Reidy, COMPTTEL, to Marlene H. Dortch, Secretary, FCC, GN Docket Nos. 13-5 and 12-353 (October 24, 2014).

<sup>2</sup> See April 28 Ex Parte at 15. See also *Knology Inc. v. Georgia Power*, 18 FCC Rcd 24615, 24641-24642 (2003) (requiring detailed billing information for pole attachment make-ready charges).

Please contact me if you have any questions.

Sincerely yours,

/s/ Malena F. Barzilai

Malena F. Barzilai

cc: Pamela Arluk