

November 17, 2014

Errata

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

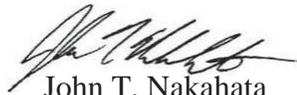
Re: GN Docket No. 13-5, *Technology Transitions*; GN Docket No. 12-353, *AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*; WC Docket No. 05-25, *In the Matter of Special Access Rates for Price Cap Local Exchange Carriers*; RM-10593, *AT&T Corp. Petition for Rulemaking to Reform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

Dear Ms. Dortch:

On November 17, 2014, an ex parte letter was filed by Windstream Corporation in the above matter. It inadvertently failed to include as an attachment a previous ex parte referenced in the letter. The only change is to include the referenced attachment in its redacted form. The corrected version is attached and replaces, in its entirety, the version that was filed previously.

Please contact me if you have any questions.

Sincerely,



John T. Nakahata

Counsel to Windstream Communications, Inc.

cc: Daniel Alvarez
Amy Bender
Nicholas Degani
Joel Thayer
Rebekah Goodheart
Christine Sanquist

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VIA ECFS

EX PARTE

November 17, 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 13, 2014, Eric Einhorn and Jennie Chandra from Windstream Corporation and John Nakahata of Harris, Wiltshire & Grannis LLP, counsel to Windstream, met separately with Daniel Alvarez, Amy Bender, Nicholas Degani and Joel Thayer, and Rebekah Goodheart and Christine Sanquist, of the staffs of Chairman Wheeler and Commissioners O’Rielly, Pai, and Clyburn, respectively, regarding the Notice of Proposed Rulemaking announced for potential consideration at the Commission’s meeting on November 21, 2014. The discussions were consistent with Windstream’s previous advocacy in the above-referenced proceedings,¹ including the attached September 26, 2014 *ex parte* letter, which was given to participants in the meetings. We emphasized that it is important that the Commission move forward to establish the basic ground rules for the transition from TDM to IP networks with respect to wholesale services, because CLECs are already selling the services that they will deliver in three to five years under long-term contracts. The basic principle should be “do no harm,” *i.e.*, that an incumbent LEC’s transition to IP networks should not in and of itself reduce the availability of, or cause significant

¹ See, e.g., Letter from Jennie B. Chandra, Windstream, to Marlene H. Dortch, Secretary, FCC, GN Docket Nos. 13-5, 12-353, WC Docket No. 05-25, RM-10593 (filed Sept. 26, 2014); Letter from Malena F. Barzilai, Windstream, to Marlene H. Dortch, Secretary, FCC, GN Docket Nos. 13-5, 12-353, WC Docket No. 05-25, RM-10593 (filed Aug. 22, 2014); Letter from Eric N. Einhorn, Windstream, to Jonathan Sallet and Julie Veach, FCC, GN Docket Nos. 13-5 and 12-353 (filed Apr. 28, 2014).

increases in the price for, underlying wholesale inputs, whether special access services, UNEs provided pursuant to Section 251 or other wholesale services. We noted that 47 C.F.R. 51.319(a)(4) and (5) define the loops to be unbundled according to digital throughput capacity—specifically loops of “a total digital signal speed of 1.544 megabytes per second” and “a total digital signal speed of 44.736 megabytes per second,” with no distinction between TDM and IP format. To have an orderly transition process, we added that it is important for the Commission to define the standards in advance of receiving actual applications for discontinuance, rather than adjudicating them on an ad hoc basis.

Please contact me if you have any questions.

Sincerely yours,

/s/ Malena F. Barzilai

Malena F. Barzilai

Attachment

cc: Daniel Alvarez
Amy Bender
Nicholas Degani
Joel Thayer
Rebekah Goodheart
Christine Sanquist