



November 4, 2015

Ex Parte

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

Re: ***Special Access 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 Service (RM-10593)***

Dear Ms. Dortch:

On Tuesday, November 3, 2015, Jonathan Banks, Diane Griffin Holland, and Patrick Brogan of the United States Telecom Association (USTelecom); Gary Phillips, Keith Krom, Caroline Van Wie, and Frank Simone of AT&T; Curtis Groves and Frederick Moacdieh of Verizon; Melissa Newman, Carolyn Hammack, and Jeffrey Lanning of CenturyLink; AJ Burton of Frontier; Michael Bishop of Cincinnati Bell; and Christopher Sherk of Sidley Austin LLP spoke with Deena Shetler, Eric Ralph, Shane Taylor, William Layton, Joseph Price, Rachel Kazan, Jack Erb, and Tracy Walden of the Wireline Competition Bureau by telephone to discuss several issues that became evident only after experts retained by USTelecom's members gained access to and began to review the industry-wide business broadband data collected in the above-referenced proceedings.

We discussed concerns that certain essential data were not made available for review, and about the stability of the data collection in the Commission's secure data enclave managed by NORC, which is still being supplemented and otherwise revised. We also explained that the data enclave platform lacks certain software and tools that would allow important data analyses to be performed more completely and efficiently, and that requests to NORC that certain tools be added to the platform remain pending. We further explained that even with the recent extension

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of the comment and reply dates to January 6 and February 5, 2016, respectively, interested parties will not have sufficient time to review and analyze the data, and to prepare meaningful comments in this extraordinarily complex and important proceeding.

Sincerely,

A handwritten signature in black ink, appearing to read "DGH", with a long horizontal flourish extending to the right.

Diane Griffin Holland

Vice President, Law & Policy

cc: Deena Shetler
Eric Ralph
Shane Taylor
William Layton
Joseph Price
Rachel Kazan
Jack Erb
Tracy Walden