



March 21, 2016

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

Re: *Petition of USTelecom for Declaratory Ruling That Incumbent Local Exchange Carriers Are Non-Dominant in the Provision of Switched Access Services, (WC Docket No. 13-3)*

Dear Ms. Dortch:

On Thursday, March 17, 2016, Jacquelyne Flemming and Keith Krom (AT&T), Timothy Boucher, by telephone (CenturyLink), AJ Burton (Frontier), Curtis Groves (Verizon), and Jonathan Banks and I (USTelecom) met with Carol Matthey (Front Office), Daniel Kahn, Peter Saharko, Brian Hurley, and John Castle (Competition Policy Division), and Pamela Arluk and Douglas Slotten (Pricing Policy Division) of the FCC's Wireline Competition Bureau to discuss USTelecom's petition seeking relief for ILECs from dominant carrier regulation in the above-referenced proceeding.

We explained that ILECs are no longer dominant in the provision of switched access voice services based on their lack of market power, as evidenced by their collective share of 18 percent of the market. We then described the specific relief being sought as falling into three general categories: reduction of certain notice and cost support obligations associated with tariff filings; reduction of the effective date waiting period for applications to discontinue, reduce, or impair services; and streamlined procedures for additional types of transfers of control. We also described specific areas of relief that *are not* being sought, including relief from: obligations related to the provision of dedicated services (such as special access) or any service other than switched access telephone service; public policy obligations applicable to all carriers such as 911, customer privacy, and disabilities access; remaining ILEC obligations under sections 251 and 271; wholesale or other carrier-to-carrier service obligations; certain price cap obligations such as caps on the SLC and other charges; and any other obligations that are part of the transition described in the Commission's *USF/ICC Transformation* proceeding. We further agreed to supplement the record by identifying the specific rules we believe would be impacted by a grant of the petition.

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Please do not hesitate to contact the undersigned if you have questions or concerns.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Diane Griffin Holland', with a long horizontal flourish extending to the right.

Diane Griffin Holland
Vice President, Law & Policy

cc: Carol Matthey
Pamela Arluk
John Castle
Brian Hurley
Daniel Kahn
Peter Saharko
Douglas Slotten