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Via ECFS

April 15, 2016

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

Re: *Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans, WC Docket No. 15-247; Special Access for Price Cap Local Exchange Carriers; AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, WC Docket No. 05-25, RM-10593*

Dear Ms. Dortch:

On April 14, 2016, Kathleen Abernathy of Frontier Communications Corporation, and the undersigned of CenturyLink, Inc., participated in separate meetings with the following individuals to discuss the above-referenced matters:

- Rebekah Goodheart of Commissioner Clyburn's office
- Travis Litman of Commissioner Rosenworcel's office
- Nick Degani of Commissioner Pai's office
- Amy Bender of Commissioner O'Rielly's office

During the meetings, CenturyLink and Frontier emphasized the highly competitive nature of the marketplace for Ethernet offerings and the importance of refusing to reimpose regulation in this market segment. Beginning in 2006, the Commission has exempted virtually all of the price-cap ILECs from tariffing and dominant carrier regulation with respect to their Ethernet services. The result has been a massive expansion of fiber and other Ethernet-capable facilities, deployed not only by ILECs but also by CLECs and cable providers. Unsurprisingly, this deployment has spawned vigorous competition and produced dramatic price reductions, all *absent* rate regulation. For example, U.S. retail carrier Ethernet pricing fell by double-digit rates for all services across all speeds between 2010 and 2015. *See, e.g., Vertical Systems Group Pricing*

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Data by Service Segment 2011 – 2015. Even in the below-10 Mbps category ideally suited to substitute for legacy T1 facilities, average monthly pricing has decreased more than 20 percent for Ethernet private line and virtual private line services since 2011. *See id.* Under these circumstances, there is simply no basis for the reimposition of price regulation, which would distort competition and starve providers of all types of the capital necessary for promoting the migration to all-IP networks.

Please contact the undersigned with any questions.

Sincerely,

/s/ Melissa E. Newman

Copy to:

Rebekah Goodheart

Travis Litman

Nick Degani

Amy Bender