



Comcast Corporation
300 New Jersey Avenue, NW
Suite 700
Washington, DC 20001

April 15, 2016

VIA ELECTRONIC FILING

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

Re: *Special Access Rates for Price Cap Local Exchange Carriers, WC Docket No. 05-25*

Dear Ms. Dortch:

On April 13, 2016, Lynn Charytan, Mary McManus, Brian Rankin, Beth Choroser (by telephone), and the undersigned from Comcast, along with Matthew Brill of Latham & Watkins LLP, met with Jonathan Sallet and William Dever of the Office of General Counsel, and with Matthew DelNero, Eric Ralph, and Deena Shetler of the Wireline Competition Bureau, in connection with the above-referenced proceeding.

At the meeting, we discussed Chairman Wheeler's proposal for special access reform, as outlined in his blog post published on April 8, 2016,¹ and in his speech at the INCOMPAS Policy Summit on April 11, 2016.² In particular, we discussed the scope of any new regulatory framework for "business data services" under the Chairman's proposal. We also discussed the manner in which the proposed framework would assess the level of competition in markets for business data services, as well as the proposed consequences of a finding of "insufficient competition" in a particular geographic area.

¹ See Tom Wheeler, Chairman, FCC, "Out with the Old, In with the New," Apr. 8, 2016, available at <https://www.fcc.gov/news-events/blog/2016/04/08/out-old-new>.

² See Remarks of FCC Chairman Tom Wheeler, INCOMPAS Policy Summit, Apr. 11, 2016, available at http://transition.fcc.gov/Daily_Releases/Daily_Business/2016/db0411/DOC-338806A1.pdf.

Please contact the undersigned if you have any questions regarding these issues.

Respectfully submitted,

/s/ Kathryn A. Zachem

Senior Vice President
Regulatory and State Legislative Affairs
Comcast Corporation

cc: Jonathan Sallet
William Dever
Matthew DelNero
Eric Ralph
Deena Shetler