



April 21, 2016

**Ex Parte**

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

***Re: Special Access for Price Cap Local Exchange Carriers, WC Docket No. 05-25, RM-10593; Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans, WC Docket No. 15-247***

Dear Ms. Dortch:

On April 19, 2016, Charles McKee and Chris Frentrup of Sprint Corporation (“Sprint”) and Paul Margie and I of Harris, Wiltshire & Grannis LLP met with Jonathan Sallet, General Counsel; Stephanie Weiner, Legal Advisor to Chairman Wheeler; Bill Dever, Office of the General Counsel; and Deena Shetler and Eric Ralph, Wireline Competition Bureau. On April 20, 2016, the same group met via phone with Rebekah Goodheart, Legal Advisor to Commissioner Clyburn. On April 21, 2016, the same group also met with Travis Litman, Legal Advisor to Commissioner Rosenworcel.

At each of these meetings, we emphasized the importance of services above 50 Mbps to wireless backhaul and urged the Commission to ensure that wireless carriers have access to higher bandwidth services at competitive pricing. We discussed that Sprint’s market experience and the data presented in the record demonstrate that the market for such services remains non-competitive. For example, we noted the data show that there is only one provider of any type selling 50 to 200 Mbps special access services in 88.7 percent of all census blocks where special access is sold and there are two providers of 50 to 200 Mbps services in 8.6 percent of all such census blocks. This means that there are three providers—the minimum number of providers necessary to discipline prices—in less than 3 percent of these census blocks. Additionally, in Sprint’s experience, prices remain supracompetitive for services above 50 Mbps, even where there is a duopoly.

Pursuant to the Commission’s rules, I have filed a copy of this letter for inclusion in the public record of the above-referenced proceedings. Please contact the undersigned with any questions.

Sincerely,

Jennifer Bagg  
Counsel to Sprint Corporation

cc: meeting participants