



April 21, 2016

**Ex Parte**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th 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 Wednesday, April 20, 2016, I met with Travis Litman, Senior Legal Advisor to Commissioner Jessica Rosenworcel, and on Thursday, April 21, 2016, I met with Nick Degani, Legal Advisor to Commissioner Ajit Pai, regarding the draft Business Data Services Further Notice of Proposed Rulemaking on circulation. In both meetings, we discussed the importance of ensuring that all providers – including competitors that currently rely heavily on others’ facilities to serve their business customers – have incentives to invest in broadband facilities. I also noted that we look forward to commenting on key aspects of the Further Notice, including how to structure the competitive test that will be used to determine where competition does and does not exist; the need to avoid re-regulating competitive Ethernet services; and the need to include in any new regulatory framework all broadband service offerings currently used by business customers, including cable offerings inaccurately referred to as “best efforts” services.

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 "DGH", written over a white background.

Diane Griffin Holland  
Vice President, Law & Policy

cc: Travis Litman  
Nick Degani