



October 19, 2007

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

Dear Ms. Dortch:

**RE: Ex Parte Notice. WC Docket No. 05-25 and RM-10593. In the Matter of Special Access Rates for Price Cap Local Exchange Carriers.**

On October 18, 2007, Larry Cohen, CWA President, spoke via telephone with Commissioner Michael J. Copps regarding the aforementioned proceeding. CWA-represented technicians and customer service personnel install, maintain, sell and service the special access lines provided by AT&T, Qwest, Embarq and other unionized telecommunications carriers!<sup>1</sup>

Mr. Cohen pointed out that the Government Accountability Office (GAO) has concluded that the Commission does not have sufficient data to determine the level of competition in the special access market. Mr. Cohen also noted that the companies that are seeking re-regulation of special access have made no commitments to flow the benefits of such reductions to consumers.

Mr. Cohen urged the Commission to conduct a thorough analysis of the marketplace for dedicated access services *before* taking any action to re-regulate what appears to be a highly competitive service. Any precipitous action would pose serious harm to good jobs in the industry and telephone companies' investments in high-speed Internet networks.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Debbie Goldman', is written in black ink.

Debbie Goldman  
Research Economist

cc: Commissioner Michael J. Copps  
Scott Deutchman

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<sup>1</sup> At Verizon, this work has traditionally been performed by union-represented employees. Verizon now contends that the company may permit employees of its Verizon Business affiliate to perform the work at wages and conditions which differ from those specified in the CWA-Verizon contract. This dispute is subject to the dispute resolution mechanism of the contract.