

JENNER & BLOCK

May 21, 2010

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Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Samuel L. Feder
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Re: WC Docket No. 09-135
*Petition of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. § 160(c) in the
Phoenix, Arizona Metropolitan Statistical Area*

Dear Ms. Dortch:

On May 20th, 2010, Francie McComb and Brad Lerner of Cavalier Telephone, LLC (“Cavalier”), and I met with Zachary Katz of the Office of Strategic Planning & Policy Analysis about the above-referenced proceeding. In the meeting, we discussed the appropriate standard for assessing Qwest’s petition, and advocated for a market power analysis. We argued that, under such an analysis, Qwest has not met its burden to show that forbearance should be granted. In particular, we reiterated the arguments expressed in our comments that Qwest has not shown that wireless service belongs in the same market as Qwest’s wireline service. We explained that, with respect to broadband, there is no evidence of any significant wireless substitution. We further explained that, with respect to voice, Qwest has provided no analysis showing that wireless substitution is based on the relative pricing of wireless and wireline service, which is necessary to show that wireless service constrains wireline pricing. We argued that, for these reasons and the other reasons articulated in our comments, Qwest’s petition should be denied.

In accordance with §1.1206 of the Commission rules, one copy of this letter is being filed electronically via ECFS, and one delivered via email to Zachary Katz.

Sincerely,

/s/ Samuel L. Feder

Samuel L. Feder