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December 5, 2011

*Via Electronic Filing*  
Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

RE: Special Access Voluntary Data Request, WC Docket No. 05-25, RM 10593

Dear Secretary Dortch:

BT Americas Inc. ("BTA") is writing in response to the Commission's request for voluntary submissions of data regarding special access pricing and competition issues. One or more of the supply agreements BTA has entered into contain non-disclosure obligations that may not be avoided unless BTA is under legal compulsion to provide the requested data. In addition, BTA and other BT affiliates operating in the USA ("BT") do not ordinarily purchase special access, as a service in itself, from suppliers. Rather, BT purchases services that connect customers to BT POPs in the USA. Special Access is an essential input or an alternative, in part or in whole, to the services that BT purchases and, therefore, special access pricing directly impacts the pricing BT receives from its suppliers.

If you have any questions regarding any matters discussed herein please contact the undersigned.

Sincerely,

A handwritten signature in black ink that reads "SChacko". The signature is written in a cursive, slightly slanted style.

Sheba Chacko  
Senior Counsel and Head, North American Regulation and  
Global Telecoms Policy, BT

cc: Andrew Mulitz