

February 9, 2012

**VIA ECFS**

***EX PARTE***

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW, Room TW-A325  
Washington, DC 20554

**Re: *Special Access Rates for Price Cap Local Exchange Carriers; AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, WC Docket No. 05-25, RM-10593***

Dear Ms. Dortch:

On February 7, 2012, Rochelle Jones, Senior Vice President, Regulatory, Tammy Chatfield, Regulatory Analyst, Sarah Poindexter, Carrier Relations Manager, and the undersigned, all of tw telecom inc. (“tw telecom”) had a telephone conversation with Andrew Mulitz and Elizabeth McIntyre of the Wireline Competition Bureau. On the call, we addressed questions regarding our responses to the voluntary Special Access Data Request.<sup>1</sup> We explained that our responses did not include CLEC revenue data for 2008 and 2009. We also indicated that tw telecom was unsure how to handle the incorporation of NRC waivers into its discount calculations.

Additionally, we informed the staff members that (1) certain data items requested in the data request instructions were not included in the provided template; and (2) the data request instructions asked whether a circuit was active while the corresponding portion of the provided template asked whether the circuit was fallow.

Please do not hesitate to contact me if you have any questions or concerns about this submission.

Respectfully submitted,

/s/ Don Shephard

Don Shephard  
Vice President, Federal Regulatory Affairs  
tw telecom inc.  
228 Blanchard Road  
Braintree, VT 05060

CC (via email): Andrew Mulitz  
Elizabeth McIntyre

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<sup>1</sup> *Competition Data Requested in Special Access NPRM*, Public Notice, DA 11-1576 (rel. Sept. 19, 2011) (“*Public Notice*”).