



April 18, 2012

Ms. Marlene H. Dortch  
Secretary  
Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: Notice of *Ex Parte* Contact in Special Access Rates for Price Cap Local Exchange Carriers, WC Docket No. 05-25, RM-10593.

Dear Ms. Dortch:

On April 16, 2012, the undersigned, on behalf of the Ad Hoc Telecommunications Users Committee ("Ad Hoc"), met with Elizabeth McIntyre, Nicholas Alexander, Deena Shetler, and Andrew Mulitz of the Wireline Competition Bureau.

During this meeting, we discussed the Commission's use of "rebuttable presumptions" in prior orders and decisions of the U.S. Court of Appeals for the District of Columbia Circuit upholding those orders. We discussed whether a presumption mechanism would be a defensible and practical option for setting special access rates at reasonable levels in geographic areas that are no longer subject to the constraints on excessive prices established by the Commission's price caps rules.

Pursuant to the Commission's rules, this letter is being filed in the above referenced docket. If you have any questions regarding this submission, please do not hesitate to contact me directly.

Sincerely,

Colleen Boothby  
Counsel, Ad Hoc Telecommunications Users  
Committee

Cc: Elizabeth McIntyre  
Nicholas Alexander  
Deena Shetler  
Andrew Mulitz