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June 14, 2012

Ex Parte

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, WC Docket No. 05-25 and RM-10593

Dear Ms. Dortch:

Yesterday, Maggie McCready, Ed Shakin, and the undersigned of Verizon met with Priscilla Delgado Argeris and Paul Murray of Commissioner Rosenworcel's office to discuss special access. In the meeting, we discussed the draft order currently on circulation regarding the Commission's special access rules. We expressed Verizon's concern that any order addressing the current special access pricing flexibility framework could prejudice the outcome of the Commission's ongoing analysis of the marketplace before the Commission has collected the competitive data it needs to complete its review. The Commission has acknowledged that it does not have the necessary data to accurately assess the level of competition, and that it plans to seek additional data from the relevant parties. We explained that before collecting these additional data, the Commission should not take any action that could affect the substantive evaluation of the existing pricing flexibility framework. We also questioned the factual basis in the order for concluding that the existing framework is flawed, given that the Commission has yet to collect all the necessary data. We also handed out industry quotes illustrating the vigorousness of competition in the special access marketplace. *See Ex Parte Letter from Donna Epps, Verizon, to Marlene Dortch, FCC, WC Docket No. 05-25 & RM-10593, at Attachment 3 (May 2, 2012).*

Sincerely,

A handwritten signature in black ink that reads "Donna Epps".

cc: Priscilla Delgado Argeris
Paul Murray