

Donna Epps
Vice President
Federal Regulatory Affairs



1300 I Street, NW, Suite 400 West
Washington, DC 20005

Phone 202 515-2527
Fax 202 336-7922
donna.m.epps@verizon.com

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:

Today, Kathleen Grillo, Maggie McCready, Ed Shakin, and the undersigned of Verizon met with Nick Degani and Gene Fullano of Commissioner Pai'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 a copy of "Regulation in Financial Translation: The importance of current data in the FCC's special access proceeding" by Anna-Maria Kovacs, PhD.¹

Sincerely,

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

cc: Nick Degani
Gene Fullano

¹ See Anna-Maria Kovacs, *Regulation in financial translation: the importance of current data in the FCC's special access proceeding*, at 27, (June 4, 2012), available at http://www.gcbpp.org/files/EPV/FCC_Special_Access_Proceeding.pdf; see also Ex Parte Letter from Robert W. Quinn, AT&T, to Marlene H. Dortch, FCC, *Special Access Rates for Price Cap Local Exchange Carriers, WC Docket No. 05-25, et al.*, at Attachment 3 (June 7, 2012).