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October 3, 2012

Via ECFS

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: American Cable Association (“ACA”), *Ex Parte* Meeting on Data Request:
Special Access Rates for Price Cap Local Exchange Carriers, WC Docket No. 05-25,
RM-10593**

Dear Ms. Dortch:

On October 1, 2012, Patrice Carroll, President and General Manager, Mike Edel, CTO, and Tiffany Conrey, Controller, for ImOn Communications, LLC (“ImOn”), Ross Lieberman, ACA, and the undersigned, Thomas Cohen of Kelley Drye & Warren LLP, had a telephone call with the following Wireline Competition Bureau staff: Nick Alexander, Betsy McIntyre, Jamie Susskind, William Layton, Eric Ralph, Ken Lynch, Jack Erb, and Jon Reel. The purpose of the call was to discuss the Commission’s collection of data to assess competitive conditions in the special access market.

Ms. Carroll began the call by providing background on ImOn, a cable television and competitive local exchange provider in Cedar Rapids/Marion, Iowa, which competes with incumbent local exchange and cable providers. ImOn serves approximately 16,000 residential customers with cable, broadband and voice services. It also provides service to about 500 business customers, of which approximately 60 have dedicated circuits (10 T-1’s and 50 MetroEthernet).

Ms. Carroll expressed general concern with having to comply with a new regulatory filing requirement. She noted that ImOn is a relatively new provider in the market and has only one person dealing with regulatory filings. She discussed the burden imposed by the recent need to convert customer information to comply with Connect Iowa broadband filing. Ms. Carroll asked that the

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Commission consider ImOn to be a small entity that does not need to file in response to the upcoming special access request. However, if ImOn must comply, she wanted the Commission to provide flexibility in the format for and timing of the response.

This letter is being filed electronically pursuant to section 1.1206 of the Commission's rules.

Sincerely,



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Counsel for the American Cable Association

cc: Nick Alexander
Betsy McIntyre
Jamie Susskind
William Layton
Eric Ralph
Ken Lynch
Jack Erb
Jon Reel