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October 18, 2012

VIA ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

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

Dear Ms. Dortch:

On Oct. 17, 2012, Cody Harrison, Bright House Networks (BHN), and the undersigned met with the following members of the Wireline Competition Bureau regarding the above captioned matter: William Layton, Nicholas Alexander, Cathy Zima, Steven Rosenberg, Jamie Susskind, Travis Litman, Deena Shetler and Elizabeth McIntyre (via phone).

Mr. Harrison explained BHN's interest in helping to facilitate collection of relevant data to revise the test for pricing flexibility for price-capped regulated special access carriers. He emphasized that the data collection would involve among the most sensitive business records of the company. Further, any data collection effort or proposed rule based on the collection must insure that the confidentiality of the data is preserved.

Mr. Harrison indicated that commercial accounts are recorded based on the number of passings by BHN and the addresses where services are provided. Records are not kept based on longitude or latitude. Nor are customers and facilities tracked by wire centers or by MSAs.

BHN recognized that the FCC has a challenging data collection task but that unlike wire center collocation data, the data that may be requested here are not transparent to ILECs. While BHN stands ready to cooperate with the FCC's data request, we urged the FCC to carry out the data collection process in a manner that minimizes the burden on respondents.

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In conclusion, BHN urges the FCC to make data confidentiality the guiding principle in developing its requests for information in this proceeding and in any proposals that may arise from the data collection effort.

Sincerely,

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cc: Nicholas Alexander
William Layton
Travis Litman
Elizabeth McIntyre (via phone)
Steven Rosenberg
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