



Melissa E. Newman
Vice President – Federal Regulatory Affairs
1099 New York Avenue NW
Suite 250
Washington, DC 20001
202.429.3120

EX PARTE

October 19, 2012

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

RE: *In the Matter of Special Access Rates for Price Cap Local Exchange Carriers –*
WC Docket No. 05-25

On October 18, 2012, Melissa Newman, Craig Brown, Glenda Weibel and Carolyn Hammack, all of CenturyLink, spoke by telephone with Elizabeth McIntyre, Jack Erb, Matthew Porter, Jamie Susskind and Luis Reyes about the above-captioned docket.

Specifically, CenturyLink discussed the need to consider potential competition and properly-defined IRUs in its evaluation of special access markets. CenturyLink also explained that the way in which it establishes the rates, terms and conditions for its special access services depends on many variables, most principally customer and competitive demands.

In addition, CenturyLink urged the Commission to require the same level and granularity of information from all providers of special access service in order to get an accurate picture of the marketplace. Finally, CenturyLink stressed the importance of giving companies sufficient time to respond to the data request.

Sincerely,

/s/ Melissa Newman

Copy via email to:
Elizabeth McIntyre
Jack Erb
Matthew Porter
Jamie Susskind
Luis Reyes