

October 22, 2012

VIA COURIER AND ECFS

EX PARTE

Ms. 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; AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, WC Docket No. 05-25, RM-10593*

Dear Ms. Dortch:

On October 18, 2012, the undersigned discussed the mandatory data request in the above-referenced proceeding with Angie Kronenberg, legal advisor to Commissioner Mignon Clyburn. During the meeting, I stated that, as part of the mandatory data request, the FCC should (1) include a de minimis exemption for providers of special access services that own only a very small number of local transmission facilities; (2) focus on collecting information from providers of special access services regarding (i) the location of local transmission facilities that such providers own or control pursuant to long-term IRUs (e.g., 30 years or longer), and (ii) prices, terms and conditions of special access services offered by such providers; and (3) not collect materials from providers of special access services such as marketing materials, RFP responses, or other information that is of “secondary” relevance and utility in the market power analysis.

Please do not hesitate to contact me at (202) 303-1111 if you have any questions or concerns about this submission.

Respectfully submitted,

/s/ Thomas Jones

Counsel for tw telecom inc.

cc: Angie Kronenberg