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October 23, 2012

Ex Parte

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

Re: Special Access for Price Cap Local Exchange Carriers, WC Docket No. 05-25 and RM-10593

Dear Ms. Dortch:

On October 19, 2012, Debbie Dexter, Donna Epps, Fred Moacdieh, Curtis Groves and the undersigned of Verizon spoke by phone with Nick Alexander, Elizabeth McIntyre, Eric Ralph, and Jamie Susskind of the Wireline Competition Bureau. Staff requested the call to discuss the upcoming mandatory data request. During the conversation we discussed infeasible rights of use ("IRUs"), pricing decisions, and unbundled network elements ("UNEs") to residential locations.

Regarding IRUs, Staff asked about which IRUs to include in the data request. We explained that the data request should require responses that include all facilities controlled through IRUs or similar leases that provide the lessee with unrestricted use of the facility, regardless of the term. All IRUs or leases that do not limit the services a lessee transmits over the facilities are relevant to the competitive analysis. Competitive providers' use of IRUs to provide high-capacity services is competitively significant, and excluding some based on term or terminology, as some have suggested, would lead to an underreporting of competitive facilities in the responses.

Regarding pricing decisions, Staff asked about Verizon's ability to provide information related to specific pricing decisions over a period of time, including factors that led Verizon to pursue or not pursue material price changes. We explained that Verizon looks at a variety of factors that can vary based on the circumstances. To the extent Staff is interested in this information, narrative answers through which companies explain their processes would be the appropriate approach instead of data-driven responses.

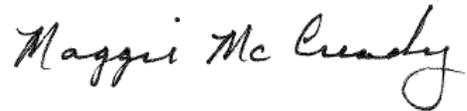
Marlene H. Dortch

October 23, 2012

Page 2

Regarding UNEs, Staff asked whether Verizon could identify “unconditioned loops” that CLECs use to serve residential facilities. We explained that when our customer leases a UNE from Verizon, we do not know how the customer deploys that UNE or how it is used. Our customer of record is the CLEC, and competitive providers can use UNEs for whatever allowable use they choose.

Sincerely,

A handwritten signature in cursive script that reads "Maggi McCreedy".

cc: Nick Alexander
Elizabeth McIntyre
Eric Ralph
Jamie Susskind