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October 25, 2012

**Ex Parte**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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 Tuesday, October 23, Curtis Groves and the undersigned of Verizon spoke by telephone with William Layton, Elizabeth McIntyre, Eric Ralph, and Jamie Susskind of the Wireline Competition Bureau regarding the upcoming mandatory data request. We discussed unbundled network elements (“UNEs”) that CLECs use to serve mass-market locations. As we explained in our October 23 ex parte letter, Verizon does not know how our CLEC customer deploys a UNE loop or how it is used once the customer leases the UNE from Verizon. Consistent with that, Verizon is unable to distinguish between UNEs that CLECs use to serve mass-market locations and those that they use to serve business locations. On the call, we also discussed the availability of historical 2010 data in Verizon’s billing systems.

Please call me at 202 515-2590 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to be "Frederick E. Moacdieh".

cc: William Layton  
Elizabeth McIntyre  
Eric Ralph  
Jamie Susskind