



October 26, 2012

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Ex Parte

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 and RM-10593

Dear Ms. Dortch:

On October 25, 2012, Kathy Grillo, Ed Shakin and the undersigned, representing Verizon, met with Christine Kurth, Legal Advisor to Commissioner McDowell, to discuss the FCC's upcoming mandatory special access data request. We explained that the Commission should take a forward-looking approach to the data it collects to determine where the market is heading rather than focusing on backwards-looking data that reflect only what is happening today or has happened in the past.

During the conversation, we discussed the information the Commission should request and the questions that Verizon has recommended the Commission include in the data request, which we set forth in our July 31, October 2 and October 15 ex parte letters¹:

1. Identify by geographic area where you currently provide or are technically capable of providing retail or wholesale high-capacity services (such as DS1, DS3, Ethernet, and other high-capacity services).
2. Provide data or maps that show the geographic area where you or your affiliate offers or plans to offer retail or wholesale high-capacity services, whether wireline or wireless, within the next two years. Providers should note on the maps where they can offer service over existing facilities, on other leased facilities, or on facilities they plan to build.
3. Explain where you have submitted competitive bids to provide backhaul services to wireless providers or high-capacity services to other customers.

¹ Ex Parte Letter from Donna Epps, Verizon, to Marlene Dortch, FCC, WC Docket No 05-25 & RM-10593 (October 15, 2012). *See also* Ex Parte Letter from Maggie McCready, Verizon, to Marlene Dortch, FCC, WC Docket No 05-25 & RM-10593 (October 2, 2012); Ex Parte Letter from Donna Epps, Verizon, to Marlene Dortch, FCC, WC Docket No 05-25 & RM-10593 (July 31, 2012).

Marlene H. Dortch

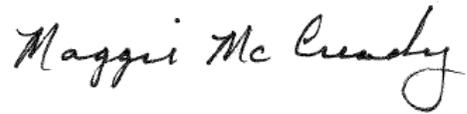
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Providers should also submit any business rules they rely upon to determine whether to submit a competitive bid.

We indicated that it is critical to gather all of the necessary information about present and future competition and to conduct a forward-looking market analysis before determining what regulatory changes are needed.

Sincerely,

A handwritten signature in cursive script that reads "Maggie McCreedy". The signature is written in black ink and is positioned below the word "Sincerely,".

cc: Christine Kurth