

October 31, 2012

VIA 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 19, 2012, Doug Denney and Steve Fisher of Integra Telecom, Inc. (“Integra”) as well as the undersigned discussed the mandatory data request in the above-referenced proceeding with Betsy McIntyre, Jamie Susskind, Jack Erb, Ken Lynch, Bill Layton, and Eric Ralph of the Wireline Competition Bureau. During the discussion, Mr. Fisher explained that it is likely feasible for Integra to provide to the Commission information regarding (1) the location and characteristics of Integra’s fiber local transmission facilities as of 2010 and 2012, and (2) bills that Integra issued for dedicated transmission services each month in 2010. In addition, Mr. Fisher explained that there are significant differences between rates that incumbent LECs and non-incumbent LECs charge for wholesale transmission services: (1) incumbent LEC rates are generally much higher than non-incumbent LEC rates, (2) incumbent LEC rate structures are generally complex, and often include different prices for different geographic locations, whereas non-incumbent LECs’ rates are generally simple and uniform across all locations for which service is offered, and (3) incumbent LECs generally impose volume commitments on purchasers, whereas non-incumbent LECs generally do not do so.

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 Integra Telecom, Inc.

cc: Betsy McIntyre
Jamie Susskind
Jack Erb
Ken Lynch
Bill Layton
Eric Ralph