

November 2, 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, WC Dkt. No. 05-25;
AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local
Exchange Carrier Rates for Interstate Special Access Services, RM-10593***

Dear Ms. Dortch:

On November 1, 2012, Rochelle Jones, Senior Vice President – Regulatory of tw telecom inc. (“tw telecom”), transmitted the attached email to Eric Ralph of the Wireline Competition Bureau. Therein, Ms. Jones responded to a request from Mr. Ralph, relayed through Karen Reidy of COMPTTEL, for information regarding tw telecom’s use of unbundled network elements (“UNEs”) as inputs to the services that tw telecom provides to end users. Ms. Jones explained that tw telecom only serves business customers and therefore uses UNEs only as inputs to the services that it provides to those business customers.

In addition, Ms. Jones explained that tw telecom’s practice is to use UNEs as inputs to certain bundled services but not to use UNEs to provision standalone information services or special access services for toll traffic. For the purposes of the forthcoming mandatory data request, Ms. Jones explained that (1) tw telecom can associate a given UNE with the service to which that UNE is an input; and (2) it is doubtful that tw telecom purchases any UNEs that are used to provision standalone dedicated services.

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
Thomas Jones

Counsel for tw telecom inc.

cc (via email): Eric Ralph

From: Jones, Rochelle [<mailto:Rochelle.Jones@twtelecom.com>]
Sent: Thursday, November 01, 2012 9:19 AM
To: Eric.Ralph@fcc.gov
Cc: Jones, Thomas; Jones, Matthew
Subject: FW: FCC Data Request

Per the request below

tw telecom only serves business customers therefore 100% of our UNE use is for business

As a standard practice we use UNEs to provision bundled services that can include a dedicated service component

It is our practice **not** to use UNEs to provision stand-alone information services or special access for toll traffic.

The company can associate a UNE with the service that is being sold ...but it is doubtful that we have any UNEs that are used to provision stand-alone dedicated services

Please let me know if you would like to discuss this information

Rochelle D Jones
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-----Original Message-----

From: Karen Reidy [<mailto:KReidy@comptel.org>]
Sent: Wednesday, October 31, 2012 4:04 PM
To: Karen Reidy
Subject: FCC Data Request

Dear Members:

For those that make substantial use of UNEs in the business, the FCC is looking for feedback on the approximate percent of their UNE purchases that are used to serve businesses vs residences, the approximate

percent of their UNE purchases that are resold as dedicated services (as opposed to being resold as more value added services such as Internet access etc.), etc., and also to discuss how easy it would be for you to match UNE supplied locations with billed dedicated services.

If you can provide this information, please contact Eric Ralph, the Chief Economist of the Wireline Competition Bureau, directly at Eric.Ralph@fcc.gov to set up a time to discuss. Eric is working on the mandatory data request in the special access proceeding. Thanks.

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