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November 20, 2012

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

Re: *Special Access Rates for Price Cap Local Exchange Carriers; WC Docket 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 20, 2012, Steve Pitterle, Manager – Carrier Relations, of TDS Metrocom, LLC (“TDS”), spoke by telephone with Eric Ralph of the FCC’s Wireline Competition Bureau. The purpose of the call was to respond to the Commission’s inquiry regarding incremental cost impacts to TDS to provide specific location/address information for each commercial customer receiving “Best Effort” broadband services from TDS using UNE DSL loops leased from the RBOCs as the underlying facility. Such data may be requested by the FCC as part of their forthcoming mandatory data request to carriers such as TDS.

Mr. Pitterle indicated that the cost for TDS to produce this additional data, on top of the very detailed information already being considered for the FCC’s data request, was not incrementally significant in relation to the overall cost of responding to the complete data request.

Mr. Pitterle questioned why obtaining geographic address/location information for small/medium commercial customers who use DSL service via UNE DSL loops provided by the RBOCs to TDS for Best Efforts broadband would be relevant in the context of the special access proceeding, which is focused on higher-capacity T-1 services.

Please contact the undersigned if you have any questions.

Respectively submitted,

/s/ Tamar E. Finn

cc: (via e-mail) Eric Ralph

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