

Maggie McCready
Vice President
Federal Regulatory Affairs



December 7, 2012

1300 I Street, NW, Suite 400 West
Washington, DC 20005

Phone 202 515-2543
Fax 202 336-7922
maggie.m.mccready@verizon.com

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Special Access Rates for Price Cap Local Exchange Carriers, WC Docket No. 05-25 and RM-10593

Dear Ms. Dortch:

On Monday, December 3, 2012, US Telecom filed an ex parte letter explaining that since at least 2006, hybrid fiber coaxial (“HFC”) lines “have been capable of delivering the equivalent of TDM-based dedicated connections.”¹ In that letter, US Telecom explained that cable companies like Charter Communications market Ethernet over coaxial facilities and advertise this capability on their websites.²

In response to US Telecom’s submission, Verizon is filing this letter to provide the Commission with additional information demonstrating that both Comcast and Time Warner Cable are delivering Ethernet services over coaxial cable. As Light Reading reported December 6th, “In several major markets, Comcast Corp’s business services unit has quietly rolled out Ethernet-over-coax (EoC) services that take advantage of the operator’s widely deployed DOCSIS 3.0 network.”³ The report goes on to say that Ethernet over coaxial cable “give[s] Comcast a better T1 replacement strategy,” and that “Comcast has already deployed its Docsis 3.0/Ethernet combo in its Northeast division (Philadelphia, Boston, Pittsburgh, and Western New England); Atlanta; Chicago; Denver; Portland, Ore.; Seattle; and its California systems.” Furthermore, Light Reading reported that “Time Warner Cable Inc., which is already delivering Ethernet services using Docsis 2.0, discussed plans to make the leap to Docsis 3.0 at last month’s Ethernet Expo in New York City.”

Sincerely,

A handwritten signature in cursive script that reads "Maggie McCready".

¹ Ex Parte Letter from Glenn T. Reynolds, US Telecom, to Marlene Dortch, FCC, WC Docket No 05-25 & RM-10593 (December 3, 2012) at 1.

² *Id.*

³ Jeff Baumgartner, Light Reading Cable, “Comcast Meshes Ethernet with Docsis 3.0,” (December 6, 2012), http://www.lightreading.com/document.asp?doc_id=227702&site=lr_cable&f_src=lightreading_section_393 (last visited December 6, 2012).