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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, RM-10593

Dear Ms. Dortch:

On January 11, 2013, I, along with Fred Moacdieh and Curtis L. Groves of Verizon, met with Deena Shetler, Eric Ralph, Billy Layton, Betsy McIntyre, Jamie Susskind, Ken Lynch, Pam Arluk, Jay Bennett, Vienna Jordan, and Jim Lichford of the Wireline Competition Bureau and Jack Erb of the Office of Strategic Planning and Policy Analysis to discuss the Mandatory Data Collection.

We discussed specific aspects of the Mandatory Data Collection in Appendix A of the *Report and Order and Further Notice of Proposed Rulemaking*.¹ We asked for clarification on the following definitions:

1. Clarify that the definition of “Connection” includes connections capable of providing a Dedicated Service and is not limited to paths on which there actually is a Dedicated Service being sold. We noted that the “Connection” definition includes the undefined term “End User’s Location” and requested the Bureau define that term to avoid confusion.
2. The definition of “Best Efforts Business Broadband Internet Access Service” should capture a capacity of DS1 in each direction.
3. Does the definition of “Packet-Based Dedicated Service (PBDS)” include frame relay and ATM services or only services *using* frame relay and ATM?

¹ See *Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, Report and Order and Further Notice of Proposed Rulemaking, WC 05-25, RM-10593, FCC 12-153 (Dec. 18, 2012) (“*Report and Order and Further Notice of Proposed Rulemaking*”).

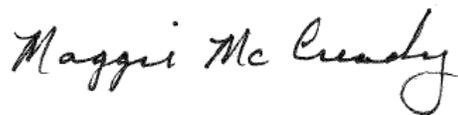
4. The definition of “Revenues” should be clarified to capture the bottom-of-the-bill amount billed to the customer.
5. The definition of “Dedicated Service” should not include interLATA Point-Of-Presence (POP)-to-POP services.

In addition we sought clarification on the following data request questions:

1. Clarify that where Section II.A.4 seeks data on “total sold bandwidth” that refers to the sum of the bandwidth in both directions.
2. Section II.A.5 should be clarified to exclude interLATA facilities between POPs.
3. Does the term “study area” in Section II.B.2 refer to an incumbent LEC’s footprint?
4. Clarify that Section II.B.4.e does not seek data on analog unbundled network elements below the capacity of DS1.
5. We discussed that the term “end of the circuit” in Section II.B.4.l refers to the end of the circuit at the serving wire center associated with the channel termination.
6. Clarify whether “adjustment” in Section II.B.5 includes bottom-of-the-bill credits and out of period corrections.
7. “Providing” Best Efforts Business Broadband Internet Access Services in Section II.C.2.c.ii should include services both sold and offered.

Finally, we discussed that Verizon’s ability to provide certain information related to government accounts may be limited by national security restrictions and other sensitivity concerns.

Sincerely,



cc: Deena Shetler
Eric Ralph
Billy Layton
Betsy McIntyre

Jamie Susskind
Ken Lynch
Pam Arluk
Jay Bennett

Vienna Jordan
Jim Lichford
Jack Erb