

January 29, 2013

VIA ECFS

NOTICE OF EX PARTE PRESENTATION

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: *AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition; Petition of the National Telecommunications Cooperative Association for a Rulemaking to Promote and Sustain the Ongoing TDM-to-IP Evolution, GN Dkt. No. 12-353; Special Access for Price Cap Local Exchange Carriers, WC Dkt No. 05-25*

Dear Ms. Dortch:

On January 25, 2013, Larissa Herda, Chairman, CEO, and President of tw telecom inc., met with FCC Chairman Julius Genachowski regarding the above-referenced proceedings. Ms. Herda urged Chairman Genachowski to move swiftly toward completion of comprehensive special access reform. In particular, (1) the Wireline Competition Bureau should issue the mandatory special access data request as quickly as possible; (2) the Commission should adopt interim rules to mitigate the harmful effects of incumbent LEC special access “discount” plans as soon as possible; and (3) the Commission should complete the entire special access rulemaking proceeding by the spring of 2014.

Ms. Herda also discussed the ongoing transition from TDM technology to packet-mode and IP technology with Chairman Genachowski. She explained that the best way to promote the deployment of new technologies is to encourage competition. To that end, the Commission should (1) prioritize updating its last-mile access policies above all other reforms proposed in connection with the transition; and (2) reject incumbent LECs’ arguments that changes in technology warrant elimination of policies that make competition possible.

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): Chairman Genachowski