



Jay Bennett
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February 15, 2013

Via Electronic Submission

Ex parte

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

Re: Modernizing the FCC Form 477 Data Program, WC Docket No. 11-10

Dear Ms. Dortch:

On February 13, 2013, Terri Hoskins, Victoria Carter Hall, Jeanine Poltronieri, Colleen Thompson and the undersigned of AT&T spoke by telephone with Lisa Gelb, Chelsea Fallon, Rodger Woock, Carol Simpson and Travis Litman of the Wireline Competition Bureau and Susan Singer, Nese Guendelsberger, Eliot Maenner, Mitali Shah, Melvin Del Rosario, Tom Peters and Michael Jansen of the Wireless Telecommunications Bureau regarding the above-listed proceeding. The discussion was an extension of a prior discussion of potential changes under consideration for the Form 477 data collection process and their impact on providers' burden in preparation of their submissions.¹ The discussion focused on the prospective reporting of wireless products and offerings under the Commission's Form 477 requirements.

As a threshold matter, AT&T's representatives indicated that reporting much of the information discussed below would impose new burdens on AT&T and the information is not gathered in the course of its normal business operations. Therefore the Commission must carefully weigh the perceived utility of the information against the burden imposed on service providers to collect and organize the information. Additionally, some of the data discussed may encompass Title I information services that, generally, are not subject to the Title II Form 477 data collection requirement.

In response to Staff's specific inquiries during the prior discussion, AT&T's representatives addressed the following five topics:

- The process AT&T Mobility uses to report wireless data speeds to state mapping entities in support of the NTIA broadband mapping program;

¹ See ex parte letter to Ms. Marlene H. Dortch from Jay Bennett, AT&T Assistant Vice President – Federal Regulatory, dated February 11, 2013.

- Whether AT&T Mobility has the capability to provide 477 wireless data formatted by county or other geographic area;
- Whether AT&T Mobility has the capability to provide the Commission aggregated data on the operating systems used by the wireless devices operating on its network;
- Whether AT&T Mobility has the capability to report wireless machine-to-machine connections on a nationwide basis; and
- Whether AT&T has the capability to report bundled service offerings that include wireless products combined with wireline video or data services.

Pursuant to Section 1.1206 of the Commission's rules, this ex parte notice is being filed electronically for inclusion in the record of the above-referenced proceeding. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Jay Bennett". The signature is written in a cursive style with a long horizontal stroke extending to the right from the end of the name.

cc: L. Gelb
T. Litman
C. Fallon
R. Woock
C. Simpson
S. Singer
N. Guendelsberger
E. Maenner
M. Shah
M. Del Rosario
T. Peters
M. Jansen