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February 27, 2013

Via Electronic Filing
Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

EX PARTE LETTER

RE: WC Docket No. 05-25; GN Dkt. 12-353

Dear Secretary Dortch:

On February 25, 2012, BT met with Alex Hoehn-Saric, Policy Advisor, and Priscilla Argeris, Legal Advisor, to Commissioner Rosenworcel. Representing BT were Sir Mike Rake, Chairman, Larry Stone, President Group Public and Government Affairs, Sheba Chacko, Senior Counsel and Head, North American Regulation and Global Telecoms Policy, and Jennifer Taylor Hodges, VP, US Government Affairs.

During this meeting, BT reiterated its concerns about the special access market and the unequal playing field that exists in terms of the availability of regulated, bottleneck enterprise access services in the U.S. versus the U.K. While U.S. incumbents can obtain effectively regulated wholesale access services in the U.K. wherever BT has dominance, U.K. providers cannot obtain equivalent treatment in the U.S. This has given rise to trade and competitiveness concerns. BT also expressed its concerns about AT&T's petition to commence a rulemaking regarding the transition of its network from TDM to IP. BT urged the Commission not to commence a rulemaking until the Commission has completed the special access rulemaking because the findings in the special access proceeding would inform the Commission's policy decisions regarding a transition to an all-IP ecosystem.

If you have any questions regarding any matters discussed herein please contact the undersigned.

Sincerely,

A handwritten signature in black ink that reads "SChacko". The signature is written in a cursive style with a prominent initial "S" and a stylized "C".

Sheba Chacko
Head, North American Regulation and Global Telecoms
Policy, BT

cc: Alex Hoehn-Saric
Priscilla Argeris