



March 8, 2013

EX PARTE

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Petition of USTelecom for Forbearance, WC Docket No. 12-61

Dear Ms. Dortch:

This is to inform you that on March 5, 2013, Bennett Ross of Wiley Rein and the undersigned, representing USTelecom, held a conference call with the following staff of the Wireline Competition Bureau in connection with USTelecom's Forbearance Petition: Jenny Prime, Betsy McIntyre, Alex Johns and Marv Saks.

Bureau staff raised two questions during this meeting. First, staff asked whether USTelecom had any thoughts on the question of the Commission's authority to forbear from its rules concerning the extension of unsecured credit for communications services to candidates for federal office, as discussed in the recent order in this proceeding. We indicated we would look into the question.

Second, staff inquired as to whether the data gathered for purposes of complying with the cash working capital allowance requirement was included in any carrier reports filed with the Commission. We indicated that to the best of our knowledge, it was not. We further explained that there is significant ambiguity as to whether this requirement continues to apply to price cap carriers. Based upon the exclusions in the rules, it would appear not to apply. (*See*, 47 C.F.R. § 65.1). However, previous comments of the Bureau staff could be read to indicate that these rules have some continuing application. We urged the Commission either to clarify that the rules do not apply to price cap carriers or, in the alternative, grant the requested forbearance as this information serves no purpose under price cap regulation.

Pursuant to Commission rules, please include a copy of this notice in the above-identified proceeding.

Sincerely,

A handwritten signature in cursive script, appearing to read "Glenn Reynolds".

Glenn Reynolds
Vice President, Policy

c: Jenny Prime
Betsy McIntyre
Alex Johns
Marv Saks