



May 1, 2013

Ex Parte

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

Re: USTelecom Petition for Forbearance From Certain Legacy
Telecommunications Regulations, WC Docket 12-61

Dear Ms. Dortch:

On April 29, 2013, in connection with the above-referenced proceeding, Walter B. McCormick, Jr., Jonathan Banks, and the undersigned representing USTelecom met with Zac Katz and Michael Steffen from the Office of Chairman Genachowski, along with Julie Veach, Chief of the Wireline Competition Bureau.

During this meeting, the parties discussed USTelecom's request for forbearance from outdated legacy regulations. We focused particularly on Part 32 as applied to price cap carriers, the Commission's Continuing Property Record ("CPR") rules as applied to all incumbent local exchange carriers ("ILECs"), and the structural separation requirements under 47 C.F.R. § 64.1903 as applied to the remaining independent ILECs subject to these requirements. We also noted that the Commission recommended elimination of the CPR rules as far back as 2001.

Specifically, USTelecom discussed how, because the Part 32 Uniform System of Accounts were put in place for ratemaking purposes under cost-based regulation, Part 32 cost data do not serve any regulatory purpose under price cap regulation. Additionally, we discussed how the structural separation requirements were created to protect competition in the interstate, inter-exchange market and how changes in the market for long distance service have eliminated any of the concerns they were intended to address. We also noted that no substantive opposition to the requested relief has been raised by any parties in this proceeding.

Pursuant to Commission rules, this ex parte is being filed in the docket identified above.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Glenn Reynolds".

Glenn Reynolds
Vice President, Policy

c: Zac Katz
Michael Steffen
Julie Veach