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May 10, 2013

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20005

Re: *Special Access for Price Cap Local Exchange Carriers, WC Docket No. 05-25;*
AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent
Local Exchange Carrier Rates for Interstate Special Access Services, RM-10593

Dear Ms. Dortch:

On May 8, 2013, Michael Shortley III, Diane Peters, and I, on behalf of Level 3 Communications, LLC (Level 3), spoke by phone with Eric Ralph, Billy Layton, and Ken Lynch, of the Wireline Competition Bureau, and Jack Erb, of the Office of Strategic Planning and Policy Analysis, to discuss the Commission's mandatory data request relating to special access services.

In response to questions from Commission staff, Level 3 stated that, previously, when reporting data as part of the State Broadband Initiative that supports the National Broadband Map, Level 3 had reported its service availability on a building-by-building basis, reporting that its service was "available" at a particular building if Level 3 had an active customer at that location. Level 3 further stated that for future rounds of reporting, it intended to report on a census-block basis rather than building-by-building basis (for all census blocks less than 2 square miles), and to show service as available in the census block if any building within the census block was connected to the Level 3 network by a lateral connection.

Also in response to staff questions, Level 3 provided general information about its customer billing systems, explaining that as a result of acquisitions, it has several such systems, and stated that, as a general matter, it does submit network data to the CLONES database.

Please contact me if you have any questions.

Sincerely,

/s/ Joseph C. Cavender

cc: Jack Erb
Billy Layton
Ken Lynch
Eric Ralph