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August 2, 2013

Via Electronic Filing

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

EX PARTE LETTER

RE: Special Access Rates for Price Cap Local Exchange Carriers, WC Docket No. 05-25, RM-10593

Dear Secretary Dortch:

On July 31, 2013, Sir Mike Rake, Chairman, BT plc, sent the attached communication to Chairwoman Clyburn. Please contact the undersigned if you have any questions.

Sincerely,

A handwritten signature in black ink that reads 'SChacko'. The signature is written in a cursive, slightly slanted style.

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

cc: Rebekah Goodheart

From: Rake,M,Michael,CGEA R
Sent: Wednesday, July 31, 2013 12:56 PM
To: Mignon.clyburn@fcc.gov <Mignon.clyburn@fcc.gov>
Cc: Stone,LW,Larry,CRT R; Rake,M,Michael,CGEA R
Subject: Special Access

Dear Acting Chairwoman Clyburn:

You may recall we met earlier this year in Washington; I enjoyed our conversation. BT has also had a good dialogue with former Chairman Genachowski regarding the FCC's on-going special access proceeding. The BT team has also spoken with other parts of the FCC, including your office, regarding the matter.

As you know, BT supports efforts by the Commission to take action on special access reform and to conclude its review of the special access market as expeditiously as possible. As a global company operating in 170 countries around the world, BT has witnessed first-hand the positive impact that addressing access bottlenecks can have on broadband deployment, innovation, jobs, and growth. The ability to obtain special access at a reasonable price is key to such advancements in the U.S. For years now, studies have demonstrated that the existing business access market failure harms the U.S. economy; we have also found that the market failure distorts competition in the global and transatlantic multinational telecoms market.

BT was therefore very pleased to see the FCC's December 2012 order calling for a mandatory data request on special access. This action represents a much-needed step in assessing competition in the business broadband market and making progress towards setting new rules to reinstate competition and vibrancy in this space.

We are aware that the OMB Paperwork Reduction Act process is underway but, given that the mandatory data request was announced some seven months ago, we would hope to see progress very soon on this matter. It was our hope, and that of many other organisations, that a mandatory data request would have emerged by now as this is essential to maintain momentum towards reform.

BT very much appreciates the Commission's focus on this issue, and for working to collect the necessary data in the proceeding.

Best wishes.

Mike