

8300 Greensboro Dr.
Suite 1200
McLean, VA 22102

(703) 584-8666
WWW.FCCLAW.COM

LNGS | LUKAS,
NACE,
GUTIERREZ
& SACHS, LLP

April 23, 2014

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, DC 20554

Re: Notice of *Ex Parte* in WC Docket No. 13-184
E-rate Modernization
Telepak Networks, Inc. d/b/a C Spire Fiber

Madam Secretary:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, we hereby provide notice of an oral ex parte presentation in connection with the Public Notice issued by the Wireline Competition Bureau ("WCB") in the above captioned proceeding.¹ On Monday, April 21, 2014, Ben Moncrief, Vice President of Government Relations for C Spire Fiber, and undersigned counsel, met with the following representatives from the Office of the Managing Director ("OMD"), Office of Strategic Planning & Policy Analysis ("OSP"), WCB, and WCB Telecommunications Access Policy Division ("TAPD"): Dana Shaffer, OMD; Gina Spade, OMD; Michael Steffen, OMD; Jonathon Chambers, Chief, OSP; Nick Alexander, Special Counsel, OSP; Trent Harkrader, Associate Bureau Chief, WCB; Patrick Halley, Acting Associate Bureau Chief, WCB; Lisa Hone, Deputy Division Chief, TAPD; Mark Walker, WCB; Kate Dumouchel, WCB; Melanie Tiano, WCB; David Strickland, WCB; James Bachtell, WCB; and Charles Eberle, WCB.

The purpose of the meeting was to discuss initial and reply comments filed by C Spire Fiber in response to the PN and our discussion was consistent with those comments.² In addition, we responded to questions regarding, among other things, the pricing model C Spire Fiber is utilizing for its managed LAN/Wi-Fi services product offering. We explained that

¹ *Wireline Competition Bureau Seeks Focused Comment on E-Rate Modernization*, Public Notice, WC Docket No. 13-184, DA 14-308 (Mar. 6, 2014) ("PN"); see *In the Matter of Modernizing the E-rate Program for Schools and Libraries*, WC Docket 13-184, Notice of Proposed Rulemaking, FCC 13-100.

² C Spire Fiber comments (filed Apr. 7, 2014); C Spire Fiber reply comments (filed Apr. 21, 2014).

Hon. Marlene H. Dortch

April 23, 2014

Page 2

current deployments are pilots³ and that C Spire is utilizing a per-student pricing model. We note for the record that C Spire is also considering pricing models that would be based on the number of Wireless Access Points (“WAPs”).

Sincerely,



Jeffrey A. Mitchell
Counsel for Telepak Networks, Inc.
d/b/a C Spire Fiber

³ See, e.g., Press Release, C Spire, Boonville School District Implements C Spire Fiber & WiFi (Apr. 22, 2014), <http://cspire.tumblr.com/post/83544160626/booneville-school-district-implements-c-spire-fiber> .