

August 18, 2014

VIA ECFS

EX PARTE

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: *WC Docket No. 05-25; GN Docket No. 13-5*

Dear Ms. Dortch:

On August 14, 2014, on behalf of Cbeyond, Inc., Integra Telecom, Inc., Level 3 Communications, LLC, and tw telecom inc., I discussed the status of the FCC's review of incumbent LEC special access services with Pam Arluk of the Wireline Competition Bureau. During the discussion, I asserted that the large volume commitments that incumbent LECs require their customers to make in order to obtain special access circuit portability and price discounts are slowing competitive wholesale carriers' deployment of new fiber loops and business customers' adoption of packet-based services. I further argued that the Commission should address this problem as soon as possible by, among other things, limiting the total volume commitment that a special access buyer must make in order to obtain a benefit, such as circuit portability or a discount.

Please do not hesitate to contact me if you have any questions or concerns regarding this submission.

Respectfully submitted,

/s/ Thomas Jones
*Counsel for Cbeyond, Integra, Level 3,
and tw telecom*

cc: Pam Arluk