



The Voice of America's Broadband Providers

January 9, 2018

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

Re: *Ex Parte* Communication: WC Docket No. 17-144

Dear Ms. Dortch:

On January 5, 2018, Genny Morelli and the undersigned of ITTA met with Jay Schwarz of the Office of Chairman Pai regarding the pending petition for rulemaking (Petition) in the above-captioned proceeding.¹ Bob DeBroux of TDS Telecommunications, Mike Skrivan of Consolidated Communications, and Lynn Follansbee of USTelecom also participated by phone.

In our meeting, we discussed a timeline for the proceeding, stressing the importance of the rules to be adopted in this proceeding becoming effective by the end of 2018, so as to avoid model-based rate-of-return carriers having to perform highly resource-intensive cost studies for 2019.² We also emphasized that the regulatory relief sought by the Petition will help to promote the transition to IP-based networks by providing carriers incentives to invest in IP-based, Ethernet services. Therefore, we reiterated that it is critical that the Commission in the near term release a Notice of Proposed Rulemaking seeking comment on the petition's proposals.

Please do not hesitate to contact the undersigned with any questions regarding this submission.

Respectfully submitted,

/s/

Michael J. Jacobs
Vice President, Regulatory Affairs

cc: Jay Schwarz

¹ *Wireline Competition Bureau Seeks Comment on Petition for Rulemaking Regarding Regulation of Business Data Services for Model-Based Rate-of-Return Carriers*, WC Docket No. 17-144, Public Notice, 32 FCC Rcd 4701 (WCB 2017).

² *See, e.g.*, Petition for Rulemaking, WC Docket No. 17-144, at 3 (filed May 25, 2017) (stating that the need to perform annual cost studies now applies only with respect to business data services, and the associated “undue costs impose lopsided burdens on rate-of-return carriers facing competitors that do not operate under such regulatory conditions”).