

October 18, 2017

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**By ECFS**

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

RE: Ex Parte Notification  
WC Docket No. 17-126  
ITC-T/C-20170511-00094, ITC-T/C-20170511-00095

Dear Ms. Dortch:

On October 16, 2017, Rebekah Goodheart of Jenner & Block, Christine Sanquist of Jenner & Block, and I, collectively counsel to the Wright Petitioners, met separately with Jay Schwartz, Legal Advisor for Chairman Pai, and Claude Aiken, Legal Advisor for Commissioner Clyburn, regarding the above-referenced transfer of control applications.

We raised the points previously summarized in the Wright Petitioner's *ex parte* letters of October 2, September 21, and August 23, which are incorporated by reference herein.<sup>1</sup> Additional discussions related to the Commission's past precedent of imposing forfeitures and compliance plans when the Commission found that the parties to a transaction lacked candor when meeting with Commission staff.<sup>2</sup>

Should there be any questions regarding this submission, please contact undersigned counsel.

Respectfully submitted,



Lee G. Petro

*Counsel for the Wright Petitioners*

<sup>1</sup> See Letter from Lee Petro, Counsel to the Wright Petitioners, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 17-126 (filed Oct. 2, 2017); See also Letter from Lee Petro, Counsel to the Wright Petitioners, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 17-126 (filed Sept. 21, 2017); See also Letter from Lee Petro, Counsel to the Wright Petitioners, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 17-126 (filed Aug. 23, 2017).

<sup>2</sup> See, e.g., *SBC Communications Inc.*, Consent Decree, 14 FCC Rcd 12,741 (1999).

Marlene H. Dortch, Secretary

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cc (by/email):

Chairman Ajit Pai

Commissioner Mignon Clyburn

Commissioner Michael O’Rielly

Commissioner Jessica Rosenworcel

Commissioner Brendan Carr

Nicholas Degani, Acting General Counsel

Kris Monteith, Chief, Wireline Competition Bureau

Tom Sullivan, Chief, International Bureau

Rosemary Harold, Chief, Enforcement Bureau

Jay Schwartz, Legal Advisor for Chairman Pai

Claude Aiken, Legal Advisor for Commissioner Clyburn

Jamie Susskind, Chief of Staff for Commissioner Carr

Amy Bender, Legal Advisor to Commissioner O’Rielly

Travis Litman, Chief of Staff for Commissioner Rosenworcel

Paul C. Besozzi, Counsel for Transferor and Licensees

William B. Wilhelm, Jr., Counsel for the Transferee