



January 31, 2014

The Honorable Fred Upton
Chairman, House Energy and Commerce Committee
2125 Rayburn Building
Washington, D.C. 20515

The Honorable Greg Walden
Chairman, Subcommittee on Communications and Technology
2125 Rayburn Building
Washington, D.C. 20515

RE: #CommActUpdate

Dear Chairmen Upton and Walden:

The Independent Telephone and Telecommunications Alliance (ITTA), the voice of mid-size carriers, welcomes the opportunity to provide feedback and participate in the House Energy and Commerce Committee's efforts to update the Communications Act.

The members of ITTA¹ are mid-size communications companies that provide a broad range of high quality wireline and wireless voice, broadband, Internet, and video services to consumers in 44 states.

ITTA submits this letter in response to your request for comment on your January 8, 2014 white paper on "Modernizing the Communications Act." As a general matter, ITTA believes that the principle of regulatory parity must be a cornerstone of any congressional efforts to update our nation's communications laws to reflect today's marketplace.

The incumbent telecommunications carrier members of ITTA have been leading the broadband revolution in the markets they serve. However, despite advances in technology and increased competition, ITTA member companies remain burdened with an outdated federal

¹ The members of ITTA include: CenturyLink, Cincinnati Bell, Compurium Communications, Consolidated Communications, FairPoint Communications, Frontier Communications, Hargray Communications, Enventis Communications, and TDS Telecom.

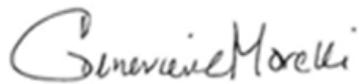
regulatory regime that puts them on an uneven playing field with the many competitors who have and continue to enter the marketplace.

Notwithstanding the dramatic changes that have radically altered the competitive landscape since the Communications Act was last updated in 1996, ITTA members must continue to adhere to a set of costly, arcane, and anticompetitive regulations that were created in a bygone era in which they were monopoly providers of voice service. Today, incumbent telephone companies are hardly the “dominant” providers of voice or any other communications service. It makes no sense that they continue to be saddled with a regulatory regime that their direct competitors do not have to abide by.

ITTA believes that Congress and the Federal Communications Commission (FCC), as well as state regulators, should focus on deregulating incumbent providers so that parity among competing providers of the same services is achieved.

ITTA appreciates the opportunity to weigh in on the Communications Act update and looks forward to commenting on more specific items, including the need for Congress to update our outdated video laws, as this process moves forward.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Morelli". The signature is written in black ink and is positioned above the typed name "President".

President