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March 29, 2018

**Ex Parte**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Request of Verizon Pennsylvania LLC for Waiver of Section 51.332 of the Commission's Rules, Docket No. 18-13**

Dear Ms. Dortch:

On March 27, 2018, I spoke by telephone to Rodney McDonald from the Wireline Competition Bureau regarding the January 12, 2018, Request of Verizon Pennsylvania LLC for waiver of Section 51.332 of the Commission's copper retirement notice rules ("Request") referenced in the above-captioned proceeding.<sup>1</sup>

As explained in the Request, the Southeastern Pennsylvania Transportation Authority (SEPTA) and the Pennsylvania Department of Transportation ("PennDOT") planned to replace two bridges in the City of Philadelphia on April 1, 2018: (1) the Allens Lane Bridge in Verizon's Chestnut Hill, PA wire center and (2) the Woodland Avenue Bridge in our Saratoga, PA, wire center. SEPTA's and PennDOT's bridge replacement work will sever some of Verizon's copper facilities in these areas. Rather than reinstall the severed copper facilities after the bridges are replaced, Verizon plans to serve customers in the affected areas exclusively over its fiber network infrastructure. Because the municipal authorities gave Verizon less than 180 days notice of the bridge replacement dates, we asked the Commission to waive Section 51.332's 180 days public notice requirement.

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<sup>1</sup> 47 C.F.R. § 51.332.

During the telephone call, I informed Mr. McDonald that the municipal authorities recently informed Verizon that construction on the bridges has been delayed. The bridge replacement will now occur on May 1, 2018, for the Woodland Avenue Bridge and on July 1, 2018, for the Allens Lane Bridge. Despite this delay by the municipalities, their planned construction dates for the two bridges still fall within the 180 day notice period, and thus we continue to seek an expedited waiver.

In the meantime, we continue to work with customers and with interconnecting entities in the affected areas to minimize the impact of the migrations and copper retirement. In preparation, Verizon has already built out its fiber facilities to virtually all customer locations in the affected area and has begun encouraging customers to migrate. By doing so, customers may be moved to the fiber network before their service is disrupted by the municipal bridge construction. Customers may thus avoid service outages from the construction project and be able to schedule their migration to fiber facilities at a convenient time. Migrating customers will continue to have the option of subscribing to the same plain old telephone service over our fiber network as was available over copper facilities. Customers may also continue to receive Internet service, or may elect to receive Fios voice, video, or other bundled services.

Granting Verizon's Request would allow Verizon to retire our copper facilities in the affected areas in a timely and efficient manner and extend the benefits that our fiber network offers to the impacted customers.

Sincerely,

A handwritten signature in black ink, appearing to be "Rodney McDonald", written in a cursive style.

cc: Rodney McDonald