

April 4, 2018

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

**Re: Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment, WT Docket No. 17-79; Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Deployment, WC Docket No. 17-84**

Dear Ms. Dortch:

On April 2, 2018, Will Johnson and I of Verizon met with Jay Schwarz, Wireline Advisor to Chairman Pai, and Alison Cheperdak, Law Clerk to Chairman Pai. Consistent with our filed comments and prior ex partes,<sup>1</sup> we urged the Commission to adopt rules allowing providers the option of using a robust one-touch make-ready process for pole attachments.

We also discussed further streamlining the Section 214(a) discontinuance process for legacy voice services, in line with our prior comments.<sup>2</sup> As we explained previously, the Commission should recognize that it lacks Section 214(a) authority to regulate a provider's discontinuance of a particular voice offering if the affected community's members have access to other voice options.<sup>3</sup> Alternatively, the Commission should forbear from enforcing Section 214(a) with respect to legacy voice services.<sup>4</sup> During the meeting, we reiterated that, at a minimum, the Commission should abandon the "adequate replacement" test for review of applications seeking to discontinue a legacy TDM-based voice service in a community as part of a technology transition and instead find that such a discontinuance application should be

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<sup>1</sup> See, e.g., June 15, 2017, Verizon NPRM Comments at 4-8; July 17, 2017, Verizon NPRM Reply Comments at 4-11; Aug. 25, 2017, Verizon Ex Parte Letter; Sept. 11, 2017, Verizon Ex Parte Letter; Jan. 19, 2018, Verizon Ex Parte Letter; Mar. 8, 2018, Verizon Ex Parte Letter. Unless otherwise noted, all citations to comments or ex partes are to WC Docket No. 17-84.

<sup>2</sup> See June 15, 2017, Verizon NPRM Comments at 28-39; July 17, 2017, Verizon NPRM Reply Comments at 25-28; Jan. 17, 2018, Verizon FNPRM Comments at 5-11; Feb. 16, 2018, Verizon FNPRM Reply Comments at 3-6.

<sup>3</sup> See June 15, 2017, Verizon NPRM Comments at 30-33; July 17, 2017, Verizon NPRM Reply Comments at 25-26; Jan. 17, 2018, Verizon FNPRM Comments at 5-8; Feb. 16, 2018, Verizon FNPRM Reply Comments at 3-4.

<sup>4</sup> See, e.g., Jan. 17, 2018, Verizon FNPRM Comments at 8-10; Feb. 16, 2018, Verizon FNPRM Reply Comments at 4-5.

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automatically granted if the provider certifies *either* (1) that it provides interconnected VoIP service throughout the affected service area, *or* (2) that at least one other alternative voice service is available in the affected service area.<sup>5</sup> Pursuant to the FCC's rules, no application would be required if there is not a community or part of a community affected.

Consistent with our filed comments and prior ex partes, we urge the Commission to act quickly to exercise its statutory authority to eliminate barriers to infrastructure deployment.

Sincerely,

A handwritten signature in black ink that reads "Roy Litland". The signature is written in a cursive, slightly slanted style.

Roy E. Litland

cc: Jay Schwarz  
Alison Cheperdak

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<sup>5</sup> See July 17, 2017, Verizon NPRM Reply Comments at 27-28; Jan. 17, 2018, Verizon FNPRM Comments at 10-11; Feb. 16, 2018, Verizon FNPRM Reply Comments at 5-6.