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**Ex Parte**

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

**Re: Technology Transitions (GN Docket No. 13-5); Policies and Rules Governing Retirement of Copper Loops by Incumbent Local Exchange Carriers (RM-11358); Special Access for Price Cap Local Exchange Carriers (WC Docket No. 05-25); AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services (RM-10593)**

Dear Ms. Dortch:

Today Tachana Joseph and I, of Verizon, met with Travis Litman, Legal Advisor to Commissioner Rosenworcel to discuss the above captioned proceedings.

In the meeting, we urged the Commission that any additional criteria it considers in the context of discontinuances related to technology transitions should be limited to the proposed streamlined process for discontinuing voice services. Providers should continue to have the option of using the existing process in all circumstances. And we urged the Commission to adopt metrics for assessing the availability and reliability of wireless voice substitutes that are geographically broad enough to be feasible. We explained that providers ought to be able to rely on either performance testing done in the ordinary course or widely accepted wireless service metrics such as ineffective or dropped call attempts.

Finally, to promote the efficient and timely resolution of all discontinuance applications, we encouraged the Commission to adopt a 15-day deadline for releasing public notices under both the existing and the proposed streamlined processes.

Sincerely,

cc: Travis Litman