July 6, 2016

Ex Parte

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: *Petition of USTelecom for Declaratory Ruling That Incumbent Local Exchange Carriers Are Non-Dominant in the Provision of Switched Access Services* (WC Docket No. 13-3); *Technology Transitions* (GN Docket No. 13-5); *AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition* (GN Docket No. 12-353)

Dear Ms. Dortch:

On Tuesday, July 5, 2016, Walter McCormick and I met with Commissioner O'Rielly and Amy Bender concerning USTelecom's petition for a declaratory ruling that incumbent local exchange carriers are non-dominant and about advancing the technology transition through streamlining processes to retire legacy services.

We discussed that the declines in legacy voice subscribership fully justified non-dominant treatment of those services. In addition, we discussed the importance of having a streamlined process available for retiring legacy services in favor of new, more robust fiber and IP-based networks and services.

Please do not hesitate to contact the undersigned if you have questions or concerns.

Sincerely,

Jonathan Banks
Senior Vice President, Law & Policy