

August 26, 2016

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

Re: *Special Access for Price Cap Local Exchange Carriers*, WC Docket No. 05-25, RM-10593

Dear Ms. Dortch:

I am filing the attached letters regarding Julie Veach's non-participation in the Special Access rulemaking since leaving the Federal Communications Commission in the above-mentioned docket to ensure that all potential parties to this proceeding have notice to the extent it may be required by Rule 1.11(d)(1) of the D.C. Rules of Professional Conduct.

Sincerely,



Patrick O'Donnell

Attachment

August 26, 2016

VIA ELECTRONIC AND FIRST-CLASS MAIL

Patrick J. Carney, Esq.
Office of General Counsel
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, WC Docket No. 05-25, RM-10593

Dear Mr. Carney:

I am writing you pursuant to the requirements of Rule 1.11(d)(1) of the D.C. Rules of Professional Conduct. As you know, I served in multiple positions at the Federal Communications Commission (“FCC”) from 2001 to 2015, including Wireline Competition Bureau Chief, Deputy General Counsel, and other positions within the Wireline Competition Bureau. I believe that I participated in the matter captioned above (“Special Access Rulemaking Matter”) both personally and substantially within the meaning of D.C. Rule 1.11(a). After leaving the Commission, I joined the law firm of Harris, Wiltshire & Grannis LLP. The firm represents a party in the Special Access Rulemaking Matter.

We understand that the FCC’s Office of General Counsel considers at least portions of the Special Access Rulemaking Matter to be a matter involving “a specific party or specific parties” for purposes of the federal ethics requirements of 18 U.S.C. § 207(a)(1). While the D.C. Rules of Professional Conduct are independent from the federal ethics requirements, out of an abundance of caution, my firm and I are treating the Special Access Rulemaking Matter as if it “involv[es] a specific party or parties” for purposes of Rule 1.11. Therefore, consistent with Rule 1.11, I attest that I have not participated in any manner in the Special Access Rulemaking Matter since joining the firm, and I will not participate in this matter in any manner in the future. Furthermore, I have not discussed and will not discuss the Special Access Rulemaking Matter with any firm partner, associate, or of counsel lawyer. I have not shared and will not share in any fees earned as a result of the Special Access Rulemaking Matter.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



Julie A. Veach

cc: Service List

August 26, 2016

VIA ELECTRONIC AND FIRST-CLASS MAIL

Patrick J. Carney, Esq.
Office of General Counsel
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, WC Docket No. 05-25, RM-10593

Dear Mr. Carney:

I am writing you pursuant to the requirements of Rule 1.11(d)(2) of the D.C. Rules of Professional Conduct. Julie Veach joined our firm in October 2015, after having served in multiple positions at the Federal Communications Commission (“FCC”) from 2001 to 2015, including Wireline Competition Bureau Chief, Deputy General Counsel, and other positions within the Wireline Competition Bureau. It is my understanding that during that period, Ms. Veach participated in the matter captioned above (“Special Access Rulemaking Matter”) both personally and substantially within the meaning of D.C. Rule 1.11(a). Our firm is currently representing a party in the Special Access Rulemaking Matter.

We understand that the FCC’s Office of General Counsel considers at least portions of the Special Access Rulemaking Matter to be a matter involving “a specific party or specific parties” for purposes of the federal ethics requirements of 18 U.S.C. § 207(a)(1). While the D.C. Rules of Professional Conduct are independent from the federal ethics requirements, out of an abundance of caution, Harris, Wiltshire & Grannis LLP is treating the Special Access Rulemaking Matter as if it “involv[es] a specific party or parties” for purposes of Rule 1.11. Therefore, consistent with Rule 1.11(d)(1) of the D.C. Rules of Professional Conduct, Ms. Veach has written to you attesting that she has not participated in any manner in the Special Access Rulemaking Matter since joining the firm and will not participate in any manner in the future. She has not discussed and will not discuss the substance of the Special Access Rulemaking Matter with any firm partner, associate, or of counsel lawyer, and has not shared and will not share in any fees earned from the Special Access Rulemaking Matter.

All attorneys at the firm are aware of the requirement that Ms. Veach be screened from participating in or discussing the Special Access Rulemaking Matter. To advise all firm personnel of this screening, we have provided firm-wide notice of the requirements under Rule 1.11 and of the steps taken to screen Ms. Veach. We have also prevented Ms. Veach from accessing the folders in our firm’s electronic file system set aside for the Special Access Rulemaking Matter.

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Letter to Patrick Carney
August 26, 2016

Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick O'Donnell", with a long horizontal flourish extending to the right.

Patrick O'Donnell
General Counsel

cc: Service List