



November 13, 2017

**Ex Parte**

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

Re: *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment Report and Order, Declaratory Ruling, and Further Notice of Proposed Rulemaking – WC Docket No. 17-84*

Dear Ms. Dortch:

On Wednesday, November 8, 2017, Jonathan Spalter and I met with Commissioner O’Rielly and his legal advisor Amy Bender. We discussed the importance of this item to modernizing our broadband networks and further closing the digital divide. By removing unnecessary regulatory burdens to retiring outmoded copper networks, and streamlining other processes, the item will incent investment in upgraded broadband facilities and make possible further extensions of modern broadband networks to communities that currently lack access to those networks and the essential services that they deliver. We noted that a recent study prepared for Corning found that, conservatively, “copper retirement can result in savings of \$45-50 per home passed per year.”<sup>1</sup> At the end of year 2016, only about 16 percent of households subscribed to traditional POTS phone service provided over copper networks.<sup>2</sup> This puts the cost of maintaining the copper network for POTS service at over \$300 per household taking the service, with that number climbing rapidly as households continue to move away from traditional voice service.

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<sup>1</sup> Singer, Naef and King, *Assessing the Impact of Removing Regulatory Barriers on Next Generation Wireless and Wireline Broadband Infrastructure Investment*, at p. 31 attached to Comments of Corning, Inc., *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, WC Dkt. 17-84 (June 15, 2017).

<sup>2</sup> See USTelecom data on residential voice service subscribership available at: <https://www.ustelecom.org/sites/default/files/files/documents/USTelecom%20Historical%20Residential%20Voice%20Data.pdf> and <https://www.ustelecom.org/broadband-industry/broadband-industry-stats/residential-competition>

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Please do not hesitate to contact me if you have any questions or need additional information.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Jonathan Banks".

Jonathan Banks  
Senior Vice President  
Law & Policy

cc: Amy Bender