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November 12, 2014

Via ECFS

EX PARTE

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

Re: Technology Transitions, GN Docket No. 13-5; AT&T Petition to Launch A Proceeding Concerning the TDM-IP Transition, GN Docket No. 12-353;

Dear Ms. Dortch:

On November 7, 2014, Michael Galvin and Bobbi-Sue Doyle-Hazard of Granite Telecommunications, LLC (“Granite”), Kevin Joseph of The Joseph Group, LLC, and the undersigned met with Priscilla Argeris, Advisor to Commissioner Rosenworcel. The Granite representatives recapitulated points made by Granite in prior filings with respect to these dockets.¹ The Granite representatives expressed support for the proposed NPRM

¹ Granite Telecommunications, LLC Ex Parte Letter from Eric J. Branfman to Marlene Dortch, Secretary, GN Docket Nos. 13-5 and 12-353, (filed Nov. 6, 2014); Granite Telecommunications, LLC Ex Parte Letter from Bobbi-Sue Doyle-Hazard to Marlene Dortch, Secretary, GN Docket Nos. 13-5 and 12-353, (filed Oct. 30, 2014); Granite Telecommunications, LLC Ex Parte Letter from Michael B. Galvin to Marlene Dortch, Secretary, GN Docket Nos. 13-5 and 12-353, (filed May 23, 2014); Support of Granite Telecommunications, LLC For Challenge of Public Knowledge and the National Consumer Law Center to AT&T’s Confidentiality Designation, GN Docket Nos. 13-5 and 12-353, (filed April 17, 2014); Reply Comments of Granite Telecommunications, LLC, GN Docket Nos. 13-5 and 12-353, (filed April 10, 2014); Comments of Granite Telecommunications, LLC, GN Docket Nos. 13-5 and 12-353, (filed March 31, 2014); Granite Telecommunications, LLC Ex Parte Letter from Bobbi-Sue Doyle-Hazard to Marlene Dortch, Secretary, GN Docket Nos. 13-5 (filed March 18, 2014); Granite Telecommunications, LLC Ex Parte Letter from Eric J. Branfman to Marlene Dortch, Secretary, GN Docket Nos. 13-5 and 12-353, (filed Jan. 22, 2014); Granite Telecommunications, LLC Ex Parte Letters from Eric J. Branfman to Marlene Dortch, Secretary, GN Docket Nos. 13-5 and 12-353, (filed Jan. 17, 2014); Granite Telecommunications, LLC Ex Parte Letter from Eric J. Branfman to Marlene Dortch, Secretary, GN Docket Nos. 13-5 and 12-353, (filed Nov. 18, 2013); Reply Comments of Granite Telecommunications, LLC, GN Docket No. 13-5 (filed Aug. 7, 2013); Comments of Granite Telecommunications, LLC, GN Docket No. 13-5 (filed July 8, 2013); Granite Telecommunications, LLC et al Ex Parte Letter to Marlene Dortch, Secretary, GN Docket Nos. 13-5, 12-353 and 09-51, WC Docket Nos. 13-3, 11-188, 10-188, 09-223, 09-222 and 05-25; RM-11358 and RM-10593 (filed June 17, 2013); Granite Telecommunications, LLC Ex Parte Letter from Eric J. Branfman to Marlene Dortch, Secretary, GN Docket Nos. 13-5 and

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in these dockets, pointing out that, as reflected in an earlier Granite *ex parte*, national, multi-location customers such as Sears Holding Co. and Simon Property Group need to have certainty that their carrier can continue to provide service over an extended period of time at competitive rates, regardless of transition in technology. The Granite representatives stated that functionally equivalent services regardless of technology should be available at the same rates with all of the features and functionalities now available.

Sincerely,



Eric J. Branfman

Cc: Priscilla Argeris

12-353, (filed May 10, 2013); Reply Comments of Granite Telecommunications, LLC, GN Docket No. 12-353, (filed Feb. 25, 2013); Comments of Granite Telecommunications, LLC, GN Docket No. 12-353, (filed Jan. 28, 2013); Granite Telecommunications, LLC Ex Parte Letter from Joshua M. Bobeck to Marlene Dortch, Secretary, GN Docket Nos. 13-5 and 12-353, (filed Jan. 25, 2013).