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November 12, 2014

**VIA ECFS**

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

**Re: *National Broadband Plan, GN Docket No. 09-51; Petitions for Rulemaking and Clarification Regarding the Commission's Rules Applicable to Retirement of Copper Loops and Copper Subloops, RM-11358; Business Broadband Marketplace, WC Docket No. 10-188; Technology Transitions Policy Task Force, GN Docket No. 13-5; Comment Sought on the Technological Transition of the Nations Communications Infrastructure, GN Docket No. 12-353***

**Notice of Ex Parte Communications**

Dear Ms. Dortch:

On November 10, 2014, Nancy Lubamersky, Vice President Public Policy of U.S. TelePacific Corp. d/b/a TelePacific Communications (“TelePacific”) (by phone), and the undersigned met with Amy Bender, Legal Advisor to Commissioner Michael O’Rielly to discuss the Emerging Wireline Networks and Service Notice. TelePacific explained that:

- TelePacific, a facilities-based provider with an extensive network in California that includes more than 200 connections to commercial buildings, relies on last mile access to offer competitive broadband services to its SMB, school, health care, and community anchor institution customers.
- Properly maintained copper plant can be used to bridge the divide between today’s largely copper-based networks and the mainly-fiber networks of the future.
- When copper is not maintained, customers are losers.

The discussion was consistent with the points in the Last Mile Access handout provided to Ms. Bender. The participants also discussed examples of TelePacific customers who receive TelePacific’s voice and broadband communications services that

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Hartford  
Hong Kong  
London  
Los Angeles  
New York  
Orange County  
San Francisco  
Santa Monica  
Silicon Valley  
Tokyo  
Walnut Creek  
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rely on copper and/or DS1/DS3 special access services as last mile inputs. The customer information was also provided to Ms. Bender at the meeting.

Sincerely,

*/s/ electronically signed*

Tamar E. Finn

*Counsel for U.S. TelePacific, Corp. d/b/a  
TelePacific Communications*

Enclosure

cc: (via E-Mail)  
Amy Bender