

Eric J. Branfman
Direct Phone: +1.202.373.6553
Direct Fax: +1.202.373.6415
eric.branfman@bingham.com

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 Daniel Alvarez, Advisor to Chairman Wheeler. The Granite representatives summarized points made by Granite in prior filings with respect to these dockets.¹ The Granite representatives expressed support for the proposed NPRM in these

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 12-353, (filed May 10, 2013); Reply Comments of Granite Telecommunications, LLC, GN

Boston
Hartford
Hong Kong
London
Los Angeles
New York
Orange County
San Francisco
Santa Monica
Silicon Valley
Tokyo
Walnut Creek
Washington

Bingham McCutchen LLP
2020 K Street NW
Washington, DC
20006-1806

T 202.373.6000
F 202.373.6001
bingham.com

Ms. Marlene H. Dortch
November 12, 2014
Page 2

dockets, pointing out that it was important for CLECs that are purchasing service from ILECs to be able to continue to offer competitive alternatives to the ILEC regardless of technological transitions. To do so, CLECs need to be able to purchase services from the ILECs that are functionally equivalent to what they are purchasing today at equivalent rates, and including the same service functions, repair times, and installation times. The Granite representatives reiterated 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.

Sincerely,



Eric J. Branfman

Cc: Daniel Alvarez

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).