

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

November 17, 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 13, 2014, Michael Galvin and Bobbi-Sue Doyle-Hazard of Granite Telecommunications, LLC (“Granite”), Susan Butler of Capitol Resources, LLC, and the undersigned met in separate meetings with (1) Amy Bender, Advisor to Commissioner O’Rielly; (2) Nick Degani, Advisor to Commissioner Pai, and Joel Thayer; and (3) Matthew DelNero, Daniel Kahn, and Michele Berlove¹ of the Wireline Competition Bureau. In meeting (3), Thomas Jones of Willkie Farr & Gallagher also participated. The Granite representatives reiterated points made by Granite in prior filings with respect to these dockets.² The Granite representatives explained that Granite principally relies

Beijing
 Boston
 Frankfurt
 Hartford
 Hong Kong
 Lexington (GSC)
 London
 Los Angeles
 New York
 Orange County
 San Francisco
 Santa Monica
 Silicon Valley
 Tokyo
 Washington

¹ Ms. Berlove participated by telephone.

² Granite Telecommunications, LLC Ex Parte Letters from Eric J. Branfman to Marlene Dortch, Secretary, GN Docket Nos. 13-5 and 12-353, (filed Nov. 12, 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. 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-

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upon wholesale DS-0 services (UNE-P replacements), such as AT&T's LWC, to serve multi-location customers that have modest telecommunications needs at each location Granite pointed out that at many locations, these customers have few competitive alternatives to the ILEC and benefit from the presence of competitive alternatives, regardless of technology. Granite urged that the Commission require ILECs to offer functionally equivalent service on substantially similar terms after the IP transition.

Sincerely,

/s/

Eric J. Branfman

Cc: Amy Bender
Nick Degani
Matthew DelNero
Daniel Kahn
Michele Berlove

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 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).