

November 17, 2014

VIA ECFS

EX PARTE

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
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, Nicholas Alexander of Level 3 Communications, LLC, Roger Fleming, representing Integra Telecom, Inc., Sheba Chacko of BT Americas, Inc., and I met with Priscilla Argeris, Legal Advisor to Commissioner Jessica Rosenworcel. Also on November 13, 2014, Mr. Fleming, Ms. Chacko, and I met with Rebekah Goodheart, Legal Advisor to Commissioner Mignon Clyburn. On November 14, 2014, Mr. Fleming and I met with Amy Bender, Legal Advisor to Commissioner Michael O’Rielly. Also on November 14, 2014, I met with Nicholas Degani, Legal Advisor to Commissioner Ajit Pai, and Joel Thayer, Law Clerk to Commissioner Ajit Pai.

During each of these meetings, I stated that the Commission must ensure that competition in the business broadband market and the thousands of business customers served by competitive carriers are not harmed as a result of the incumbent LECs’ transition from legacy TDM-based services to IP and packet-based services. Accordingly, I stated that, if an incumbent LEC offers a legacy TDM-based service as a wholesale input, the incumbent LEC must not be permitted to discontinue such offering unless and until it makes available equivalent IP and packet-based wholesale inputs on equivalent rates, terms, and conditions to those applicable to the TDM-based services to be discontinued.

Please do not hesitate to contact me if you have any questions or concerns regarding this submission.

Respectfully submitted,

/s/ Thomas Jones _____

Counsel for Birch Communications, Inc., BT Americas, Inc., LLC, Integra Telecom, Inc., and Level 3 Communications, LLC

cc: Priscilla Argeris
Amy Bender
Nick Degani
Rebekah Goodheart
Joel Thayer