

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, I met with Rebekah Goodheart, Legal Advisor to Commissioner Mignon Clyburn. During the meeting, I stated that, if an incumbent LEC offers a legacy TDM-based service as a wholesale input, such as AT&T's Local Wholesale Complete offering, the incumbent LEC must not be permitted to discontinue offering such input unless and until it makes available an equivalent IP- and packet-based wholesale input on equivalent rates, terms, and conditions to those applicable to the TDM-based offering 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 Granite Telecommunications, LLC

cc: Rebekah Goodheart