

May 7, 2015

**VIA ECFS**

***NOTICE OF 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-to-IP Transition, GN Docket No. 12-353***

Dear Ms. Dortch:

On May 5, 2015, on behalf of Granite Telecommunications, LLC, I spoke by telephone with Matt DelNero of the Wireline Competition Bureau regarding the above-referenced proceeding. During the call, I explained that the Commission should adopt the proposal in the above-referenced proceeding to require incumbent LECs that seek to discontinue “a legacy service that is used as a wholesale input by competitive carriers to commit to providing competitive carriers equivalent access [to IP-based services] on equivalent rates, terms, and conditions.”<sup>1</sup> In so doing, the Commission should clarify that a “legacy service that is used as a wholesale input” means any service purchased by a competitor at wholesale and used by the competitor to serve its own customers, including but not limited to, commercial UNE-P replacement arrangements, retail services sold at wholesale to a reseller, and special access services.

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: Matt DelNero

---

<sup>1</sup> See *Ensuring Customer Premises Equipment Backup Power for Continuity of Communications*, Notice of Proposed Rulemaking and Declaratory Ruling, 29 FCC Rcd 14968, ¶ 110 (rel. Nov. 25, 2014)