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May 14, 2015

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EX PARTE

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Technology Transitions, GN Docket No. 13-5; Ensuring Customer Premises Equipment Backup Power for Continuity of Communications, PS Docket No. 14-174; Policies for Rules Governing the Retirement of Copper Loops by Incumbent Local Exchange Carriers, RM-11358; Special Access for Price Cap Local Exchange Carriers, WC Docket No. 05-25

Dear Ms. Dortch:

On Tuesday, May 12, Curtis Groves, Katharine Saunders, and I, all of Verizon, met with Matthew DelNero, Randy Clarke, Pamela Arluk, Daniel Kahn, Jean Ann Collins, Heather Hendrickson, Bakari Middleton, Michele Berlove and David Zesiger of the Wireline Competition Bureau, and Virginia Metallo of the Office of General Counsel to discuss the above-captioned proceedings.

We updated staff on Verizon's work in the last year to migrate six wire centers to all-fiber facilities under the existing rules. Those transitions went smoothly, with very few customer complaints. Retail and wholesale customers continued to receive the same or substantially the same services on comparable price, terms, and conditions, only served over the more reliable fiber facilities instead of over copper. These wire center migrations were not transitions from TDM to IP. Customers who wanted to keep their POTS service continued to receive it and at the same price, but over the new fiber facilities.

We notified our wholesale customers in accordance with the current requirements. The process worked well and showed no need for new wholesale notification requirements. Most wholesale customers migrated to like for like services on the new fiber facilities. For DS0 customers, we explained that while it is technically possible to provide customers with a comparable service over fiber, it is very expensive to do so. Here, where customers preferred to keep DS0 service (many did not), we transitioned these customers to a comparable service over fiber, but filed a Section 214 application with the Commission to grandfather those services, and discontinue the offering of these services to new customers in the six wire centers.

We noted that in these wire centers, we notified retail customers in several different ways, including first class letters, phone calls, automated messages, and other formats. These communications were effective. We explained that easy to understand customer communication

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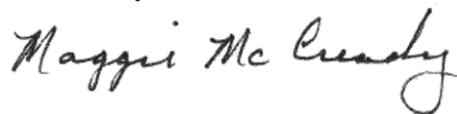
is essential because we need customers to take action and schedule the installation to complete the transition. In some cases, we found that multiple communications could be counterproductive or confusing to customers. In particular, we noted our concerns about proposals in the Commission's NPRM that would require either specific information or types of messaging in customer communications.¹ To adequately inform customers of their options in a network transition, providers need the flexibility to be able to inform customers about alternative services and the ability to guide the timing and method of communications as best fits the circumstances.

We discussed the battery back-up we provided to customers in this transition. We provided a D-cell battery back-up option to consumers and businesses with one to two voice lines. This state-of-the-art back-up battery provides customers with about 20 hours or more of back-up power for voice services, well beyond the NPRM's proposed 8-hour minimum. We also worked with customers who had multiple lines to identify an appropriate back-up solution for them, if they so desired one. We explained that because the industry uses a variety of network configurations to provide voice service over fiber or other types of networks, a standard battery back-up configuration is not appropriate.

We also discussed the environmental and public safety benefits of this type of network transition. Retiring the switch and copper facilities in these six wire centers reduced power consumption by approximately 1 million kilowatt hours – enough to power 100 homes for an entire year. Our use of the D-cell battery option in place of the 12-volt lead acid model eliminated 4.1 pounds of lead from the environment for every lead acid battery not deployed. Additionally, retiring copper and removing it from the network reduces opportunities for theft. Since 2009, Verizon has had more than 1700 incidents of copper theft in our ILEC network. These thefts interfere with customers' service and can create public safety issues. In contrast, fiber cables are not a target for thieves.

Please let me know if you need additional information,

Sincerely,



cc: Matthew DelNero
Pam Arluk
Randy Clarke
Daniel Kahn
Jean Ann Collins
Heather Hendrickson
Bakari Middleton
Michele Berlove
David Zesiger
Virginia Metallo

¹ See, e.g. Proposed Rule 51.322(c)(2)(iv) and 51.322(c)(4).