



1200 G STREET, NW, SUITE 350 PH: 202.296.6650
WASHINGTON, DC 20005 FX: 202.296.7585

June 11, 2015

VIA ECFS

EX PARTE NOTICE

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

Re: *Technology Transitions, GN Docket No. 13-5; Policies and Rules Governing the Retirement of Copper Loops by Incumbent Local Exchange Carriers, RM-11358; PS Docket No. 14-174; Special Access Rates for Price Cap Local Exchange Carriers, WC Docket No. 05-25 and RM-10593*

Dear Ms. Dortch,

On June 11, 2015, the undersigned had a phone conversation with Daniel Kahn, of the Wireline Competition Bureau, with regard to the revised version of the six principles attached to the *ex parte* notice filed by COMPTTEL on June 8, 2015 in the above-referenced dockets. So as to provide further clarification on intent of the revision to the third principle, COMPTTEL proposes the following language:

3) Pricing for Basic Wholesale Voice and Data Services Shall Not Increase. The price (net of any and all discounts) of wholesale voice service purchased under a UNE-P replacement commercial agreement shall not be higher than the price of the existing TDM wholesale voice service it replaces, and the price (net of any and all discounts) for the lowest capacity level of special access service at or above the capacity of a DS1 shall not increase. For example, (1) the wholesale price for a single IP voice line shall not exceed the wholesale price for a single TDM voice line and (2) a 2 Mbps Ethernet price shall not exceed the DS1 price when 2 Mbps is the lowest Ethernet option available.

Please do not hesitate to contact us if you have any questions about this submission.

Respectfully submitted,

/s/ Karen Reidy

cc: Daniel Kahn