



June 16, 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 12, 2015 Chip Pickering, Angie Kronenberg and the undersigned from COMPTTEL, and Thomas Jones of Willkie Farr and Gallagher on behalf of Granite and COMPTTEL met with Jon Sallet and Matt DelNero of the Commission with regard to the above-reference proceedings.

During the meeting we expressed strong support for the Commission's proposed actions in the *Technology Transitions NPRM* ("NPRM").¹ We emphasized that the application of the equivalent access requirement proposed in the *NPRM* should apply to wholesale voice services. We also explained that it would be inappropriate to sunset the equivalent access requirement as applied to wholesale voice services upon completion of the special access rulemaking, as wholesale voice is not a special access service. If the Commission determines that equivalent access for wholesale voice services should be "interim" in nature, the Commission should seek comment on the most appropriate sunset trigger in a Further Notice of Proposed Rulemaking.

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

Respectfully submitted,

/s/ Karen Reidy

cc: Jon Sallet
Matt DelNero

¹ Notice of Proposed Rulemaking and Declaratory Ruling, *Technology Transitions et al*, GN Docket No. 13-5, FCC 14-185 (2014) ("NPRM").