

June 24, 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; Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. § 160(c) from Enforcement of Obsolete Incumbent LEC Legacy Regulations that Inhibit Deployment of Next-Generation Networks, WC Docket No. 14-192; IP-Enabled Services, WC Docket No. 04-36***

Dear Ms. Dortch:

On June 22, 2015 and June 23, 2015, on behalf of Granite Telecommunications, LLC (“Granite”), I discussed the above-referenced proceedings with, respectively, Daniel Kahn and Matt DelNero, both of the Wireline Competition Bureau. During the discussions, I reiterated the points regarding the duration of the equivalent access requirement as applied to wholesale voice services described in Granite’s *ex parte* letter dated June 12, 2015 in the above-referenced proceedings.<sup>1</sup>

In my discussion with Mr. DelNero, I also stated that attempts to characterize the application of the equivalent access requirement to wholesale voice as somehow resurrecting the unbundled network element platform (“UNE-P”) have no basis in fact. Applying the equivalent access requirement to wholesale voice would simply ensure that incumbent LECs offer wholesale IP voice services on the same rates, terms, and conditions on which they currently offer TDM-based wholesale voice services. Nothing would be “resurrected” because nothing would change. I explained further that the existing wholesale prices for TDM-based services are the result of commercial negotiations conducted against a backdrop of a mixture of requirements under which BOCs must offer some network elements (e.g., circuit switching and shared transport) at just and reasonable (but not TELRIC-based) prices under Sections 201(b) and Section 271(c)(2)(B) and under which BOCs (as well as other incumbent LECs) must offer other network elements (e.g., copper loops) at TELRIC-based prices under Sections 251(c)(3) and

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<sup>1</sup> See Letter from Thomas Jones, Counsel for Granite Telecommunications, LLC, to Ms. Marlene H. Dortch, GN Docket Nos. 13-5, 12-353, WC Docket Nos. 14-192, 04-36 (June 12, 2015).

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252(d)(1). In contrast, under the UNE-P requirement, incumbent LECs were required to offer *all* network elements at TELRIC-based prices. I also emphasized that competition and business customers would be harmed if the equivalent access requirement were not applied to wholesale voice.

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  
Dan Kahn