



VIA ECFS

June 25, 2015

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; *Petition of Granite Telecommunications, LLC for Declaratory Ruling*, WC Docket No. 15-114

Dear Ms. Dortch:

On June 23, 2015, Robert T. Hale, Jr., Chief Executive Officer of Granite Telecommunications, LLC (“Granite”), Samuel J. Kline, Senior Vice President, Strategic Relations of Granite, Kevin Joseph of Joseph & Associates and on Granite’s behalf and I met with Chairman Wheeler and Daniel Alvarez, Legal Advisor to the Chairman.

Granite urged the Commission to enact the rules proposed in the Technology Transition NPRM, deny the Petition of US Telecom for forbearance from Section 271 obligations and grant Granite’s Petition for Declaratory Ruling to confirm existing obligations to commingle network elements under existing rules. Taking those steps are crucial to preserving the level of competition that exists today for Granite’s customers, which consist of multisite business, non-profits and other governmental entities that most often operate nationally or regionally at large numbers of sites, but with limited needs for telecommunications products at each site.

Granite cited and made reference to some of the more than one hundred and eighty letters from existing Granite customers who lack viable alternatives to the incumbent LECs’ physical network infrastructure at many of the locations where they conduct business. In the letters, the customers voiced their desire to maintain competitive options for telecommunications products or services, regardless of underlying technology transitions, including competition provided through wholesale commercial agreements of the type offered by Granite and others.¹

¹ See Granite filings dated June 23, 2015 in Dockets Nos. 12-353, 13-5, 14-192 and 15-114 (copies of 187 letters from 183 current Granite customers).

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Please contact me if you have questions regarding this filing.

Very truly yours,

/s/ Michael B. Galvin

Michael B. Galvin
General Counsel

cc: Thomas Wheeler
Daniel Alvarez
Thomas Jones
Eric Branfman
Samuel J. Kline
Paula Foley