



June 29, 2015

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EX PARTE

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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 June 25, 2015 Will Johnson (via teleconference), Robert Morse, Kelton Shockey and I, all of Verizon, met with Daniel Alvarez, Legal Advisor to Chairman Wheeler, to discuss issues in the above proceedings.

We discussed Verizon's battery back-up (BBU) options for customers in connection with deployment of its fiber facilities, as described in more detail in our *ex parte* letter of May 22.¹ We also discussed the environmental benefits of copper retirement and the need to ensure the copper retirement rules result in a straightforward, certain, and quick process. We explained that Public Knowledge's concerns about so-called "de facto copper retirement" are wrong and misplaced.² Nor is it necessary for the Commission to establish new processes to govern carriers' practices after natural disasters. Section 63.63 of the Commission's Rules already establishes a process, as the Commission made clear after Hurricane Sandy.³

We also discussed the Commission's proposed rules for Section 214 discontinuance applications. The Section 214 application process should remain focused on the competitive alternatives available to retail end users. The FCC should not require that ILECs provide functionally equivalent service at equivalent prices when moving from legacy services to the next generation IP-based services, especially for DS0 services that are very costly to provision on new technologies.

Sincerely,

A handwritten signature in black ink that reads "Maggie McCready".

cc: Daniel Alvarez

¹ Letter from Nneka Chiazor, Verizon, to Marlene H. Dortch, Secretary, Federal Communications Commission, PS Docket No. 14-174 and GN Docket No. 13-5 (May 22, 2015).

² See Letter from Public Knowledge to Marlene H. Dortch, Federal Communications Commission, PS Docket No. 14-174 and GN Docket No. 13-5 (June 24, 2015).

³ See 47 C.F.R. § 63.63; *Section 63.71 Application of Verizon New Jersey Inc. and Verizon New York Inc. for Authority to Discontinue Domestic Telecommunications Services*, Order, 28 FCC Rcd 13826, ¶ 15 (WCB 2013).