

Maggie McCready  
Vice President  
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July 16, 2015

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**Ex Parte**

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 Retirement of Copper Loops by Incumbent Local Exchange Carriers, RM-11358**

Dear Ms. Dortch:

Will Johnson, Curtis L. Groves, Kelton Shockey, and I of Verizon met July 14 with Nick Degani, Legal Advisor to Commissioner Pai, and Christine Bealer and Trey O'Callaghan of Commissioner Pai's office. Later that day we also met with Travis Litman, Legal Advisor to Commissioner Rosenworcel. In both meetings we urged the Commission not to define copper retirement as including vague so-called "*de facto* retirements." Consistent with our July 13 *ex parte* letter,<sup>1</sup> we explained *de facto* copper retirement is a myth, the overall state of Verizon's copper network remains healthy, and we continue to take reasonable steps to maintain it. In both meetings we also explained to the extent the Commission adopts interim rules governing applications under section 214 to discontinue special-access services, those interim rules must be limited to DS1 and DS3 services and must sunset by a date certain.

Sincerely,

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

cc: Nick Degani  
Travis Litman  
Christine Bealer  
Trey O'Callaghan

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<sup>1</sup> Letter from Maggie Mc Cready, Verizon, to Marlene H. Dortch, FCC, *Technology Transitions*, FN Docket No. 13-5 *et al.* (June 13, 2015).