

Maggie McCready
Vice President
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July 20, 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:

Kathleen Grillo, Will Johnson, and I of Verizon met July 17 with Daniel Alvarez, Legal Advisor to Chairman Wheeler, and Matthew DelNero, Chief of the Wireline Competition Bureau. In the meeting 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,¹ we explained *de facto* copper retirement is a myth and defining copper retirement to include *de facto* retirement could result in unmanageable loop-by-loop retirement requirements and complicate a provider’s ability to move customers to fiber when that is the best and most efficient way to resolve troubles they are experiencing with copper facilities.

Sincerely,

A handwritten signature in black ink that reads "Maggi Mc Cready".

cc: Daniel Alvarez
Matthew DelNero

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