



July 22, 2015

**Via ECFS**

Marlene Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: *Ex Parte* Filing of the Fiber to the Home Council Americas, Technology Transitions, GN Docket No. 13-5**

Dear Ms. Dortch:

In regard to the above-reference docket, on July 20, 2015, representatives of the Fiber to the Home Council Americas (“Council”) – Tim Regan, Senior Vice President for Global Government Affairs, Corning, and the undersigned, Heather Burnett Gold, President and CEO of the Council – met with Daniel Alvarez, Legal Advisor, Wireline, Public Safety, and Homeland Security, to Chairman Wheeler, and on July 21, 2015, Ms. Gold had a telephone call with Travis Litman, Legal Advisor to Commissioner Rosenworcel. In both discussions, Council representatives focused on the issue of retirement of copper infrastructure for retail customers. First, the Council called on the Commission to properly balance the needs of customers to receive sufficient notification with the interests of carriers – and all customers and the community – to move expeditiously to deploy far more capable and efficient fiber infrastructure. Today, carriers already notify customers when they are installing fiber because they need access to install optical network terminals at premises. Therefore, it would be appropriate and sufficient for the Commission to provide that any additional consumer notifications be made part of the current process. Second, once a carrier announces its intention to deploy fiber infrastructure in a specific area, it should not be found to be engaging in any *de facto* copper retirement in that area since the carrier has an incentive to install fiber promptly and any dispute about *de facto* retirements would only impose costs without any material benefit.

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This letter is being filed electronically pursuant to Section 1.1206 of the Commission's rules.

Sincerely,



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Fiber to the Home Council  
Americas  
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cc: Daniel Alvarez  
Travis Litman