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July 23, 2015

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 - 12th Street, S.W.
Washington, D.C. 20554

Ex Parte

Re: Notice of Ex Parte Presentation, GN Docket No. 13-5.

Dear Ms. Dortch:

The Utilities Telecom Council is providing the following ex parte notification in the above-referenced proceeding in accordance with Section 1.1206 of the Commission's Rules. On July 21, 2015, the undersigned representative and Eric Wagner from the Utilities Telecom Council ("UTC") along with Brad Nixon from the Edison Electric Institute ("EEI") and Russell Frisby from Stinson Leonard Street LLP (representing EEI) met with Carol Matthey, Daniel Kahn, Michelle Berlove, and Michael Ray from the FCC's Wireline Competition Bureau.

The purpose of the meeting was to discuss the utility industry's concerns regarding the Commission's IP-Transition proceeding. The representatives from EEI and UTC explained that utilities are being significantly impacted by the IP-transition, both in terms of the technology migration and the discontinuance of service that has followed as carriers migrate off their legacy networks.

The IP-transition can impact utility operational safety and reliability. If the new IP service does not meet utility functional requirements, it may prevent utilities from being able to monitor and control substations adequately. If the service is discontinued entirely, utilities may lack communications connectivity to critical infrastructure facilities. The consequences of inadequate or inoperable communications would create vulnerabilities that threaten safety and reliability.

The utility representatives urged the Commission to protect the interests of utilities, as well as consumers and competitive local exchange carriers. As a matter of process, utilities need sufficient notice in advance of when carriers anticipate the IP-transition to occur and when they will discontinue existing services. As a matter of technology, utilities need access to reasonable substitutes for the services that they currently receive from carriers.

The substance of the discussions was consistent with the comments of UTC and EEI on the record. Thank you for your help in this matter. If there are any questions concerning this matter, please let me know.

Respectfully,

A handwritten signature in black ink that reads "Brett Kilbourne". The signature is written in a cursive, flowing style.

Brett Kilbourne

Cc: FCC Participants