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*Via ECFS*

NOTICE OF EX PARTE

July 24, 2015

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

Re: *In the Matters of Technology Transitions*, GN Docket No. 13-5 and *Policies and Rules Governing Retirement of Copper Loops by Incumbent Local Exchange Carriers*, RM-11358

Dear Ms. Dortch:

On July 22, 2015, John Jones and Melissa Newman of CenturyLink met, in separate meetings, with Nick Degani of the office of Commissioner Ajit Pai, and with Amy Bender of the office of Commissioner Michael O’Rielly; and, on July 23, they met, in separate meetings, with Dan Alvarez of the office of Chairman Tom Wheeler and with Travis Litman of the office of Commissioner Jessica Rosenworcel. The above-captioned proceedings were discussed in all the meetings.

In each of these meetings, we discussed how CenturyLink is transitioning from legacy TDM-based products and services to innovative IP-based products. We recommended that the Commission consider guidelines that would give CLECs certainty regarding their access to ILEC last-mile facilities while providing a clear path for ILECs to sunset TDM services. A glide path provides certainty: for consumers by providing time to plan and adjust to new services; for CLECs with existing contracts; and for CenturyLink as it transitions its services from TDM to IP and its network from copper to fiber.

We also stated that reasonably comparable wholesale services should apply only to DS1s and DS3s, and not to commercial platform services. Platform customers can obtain Ethernet local access service to commercial locations from numerous alternative providers, including cable providers. They can also offer VoIP as an alternative to TDM voice service to commercial customers, which in fact it already does.

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Finally, we argued against a *de facto* copper retirement standard. CenturyLink spends billions of dollars to maintain its copper network such that a *de facto* copper retirement standard is not necessary to ensure the integrity of the copper network.

Sincerely,

/s/ Melissa Newman

Copy via email to:  
Dan Alvarez  
Amy Bender  
Nick Degani  
Travis Litman