

Maggie McCreedy
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July 23, 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:

Curtis L. Groves, Kelton Shockey, Brigid Ueland, and I of Verizon met July 21 with Amy Bender, Legal Advisor to Commissioner O’Rielly, to discuss the above-captioned proceedings.

First, we urged the Commission not to adopt new requirements addressing so-called “*de facto* copper 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.

Second, we discussed copper-retirement notices. We explained that easy-to-understand communications for retail customers are essential. If the Commission changes its rules and requires ILECs to notify retail customers about copper retirements, it should allow providers flexibility to determine how best to communicate with their customers about how changes may affect them. At a minimum, any requirement to provide a “neutral statement” to retail customers should allow providers to inform customers of the available voice and broadband services that will be available to them as they move to new facilities. An approach that required multiple communications to customers to inform them about their options for voice and broadband would be wasteful and confusing.

Finally, we 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 special access services and must sunset by a date certain.

Sincerely,

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

cc: Amy Bender

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