

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

WASHINGTON HARBOUR, SUITE 400

3050 K STREET, NW

WASHINGTON, D.C. 20007-5108

(202) 342-8400

FACSIMILE

(202) 342-8451

www.kelleydrye.com

NEW YORK, NY

LOS ANGELES, CA

CHICAGO, IL

STAMFORD, CT

PARSIPPANY, NJ

BRUSSELS, BELGIUM

AFFILIATE OFFICES

MUMBAI, INDIA

DIRECT LINE: (202) 342-8518

EMAIL: tcohen@kelleydrye.com

July 24, 2015

Via ECFS

Marlene H. 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-referenced docket, on July 23, 2015, Heather Burnett Gold, President and CEO of the Fiber to the Home Council Americas (“Council”) and the undersigned, Thomas Cohen, Kelley Drye & Warren LLP and outside counsel to the Council met with Amy Bender, Legal Advisor, Wireline, to Commissioner O’Rielly, and Mr. Cohen met with Nicholas Degani, Legal Advisor, Wireline, to Commissioner Pai and Trey O’Callaghan, an intern in Commissioner Pai’s office. 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 to residential customer premises in a specific area, it should not be found to be engaging in any *de facto* copper retirement in that area for those locations 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.

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

KELLEY DRYE & WARREN LLP

Marlene H. Dortch
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Sincerely,

A handwritten signature in blue ink that reads "Thomas Cohen".

Thomas Cohen
Kelley Drye & Warren, LLP
3050 K Street N.W.
Washington, DC 20007
202-342-8518
tcohen@kelleydrye.com
Counsel for the Fiber to the Home Council
Americas

cc: Amy Bender
Nicholas Degani