

July 29, 2015

VIA ECFS

EX PARTE NOTICE

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

Re: *Technology Transitions, GN Docket No. 13-5; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition, GN Docket No. 12-353; Policies and Rules Governing the Retirement of Copper Loops by Incumbent Local Exchange Carriers, RM-11358; Special Access Rates for Price Cap Local Exchange Carriers, WC Docket No. 05-25 and RM-10593*

Dear Ms. Dortch,

On July 27, 2015 Angie Kronenberg and the undersigned from COMPTTEL met with Amy Bender of Commissioner O’Rielly’s office. During the meeting we discussed the importance of the Commission providing guidance for determining if a replacement product satisfies the reasonably comparable standard. We explained that the Commission’s Order should provide the guidance and clarity of the meaning of such a standard for the benefit of both incumbents and competitors when an incumbent seeks discontinuance approval under Section 214, and we emphasized that the factors identified in the record by competitors will allow for both incumbents and competitors to better plan for the discontinuance process.

Additionally, we emphasized that it is important that these rules remain in place until the Commission completes a comprehensive market analysis for the relevant market and ensures that consumers—such as businesses of all sizes, health care facilities, education facilities, charities, etc. that have filed in this proceeding—do not lose their choice in service or service provider. It is also critical that the Commission complete its review of the special access market as quickly as possible. Indeed, yesterday, the Chairman indicated that he intends to complete the proceeding during his tenure.

Finally, we discussed the importance of the requirement of an incumbent providing a reasonably comparable service for the granting of the discontinuance of a wholesale voice service. Section 214 applies to common carriers and claims that Section 214 does not apply to these particular services do not have merit. As the customer letters and recent *ex parte* notice of Granite Telecommunications demonstrates, consumers would have a significant and negative impact if incumbents were allowed to discontinue the service without offering a reasonably comparable service. Indeed, we observed that the record demonstrates that it is not in the public interest, convenience, and necessity to discontinue those services without a reasonably comparable wholesale replacement product by the incumbent.

Please do not hesitate to contact me if you have any questions about this submission.

Respectfully submitted,

/s/ Karen Reidy

cc: Amy Bender