



July 30, 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 30, 2015 Angie Kronenberg and the undersigned from COMPTTEL met with Travis Litman of Commissioner Rosenworcel'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. 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 are important in ensuring that competitors are able to continue to offer the innovative and affordable service consumers demand.

Additionally, 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.

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

Respectfully submitted,

/s/ Karen Reidy

cc: Travis Litman