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July 30, 2015

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Petitions for Rulemaking and Clarification Regarding the Commission's Rules Applicable to Retirement of Copper Loops and Copper Subloops, RM-11358; Technology Transitions Policy Task Force, GN Docket No. 13-5; Comment Sought on the Technological Transition of the Nations Communications Infrastructure, GN Docket No. 12-353; Special Access for Price Cap Local Exchange Carriers; WC Docket No. 05-25, RM-10593*
Notice of Ex Parte Meeting

Dear Ms. Dortch:

On July 29, 2015, Nancy Lubamersky, Vice President Public Policy of U.S. TelePacific Corp. d/b/a TelePacific Communications (“TelePacific”) (by phone), and the undersigned met with Nicholas Degani, Legal Advisor to Commissioner Ajit Pai, and Trey O’Callaghan, Intern.

TelePacific expressed its support for the Technology Transitions Order and discussed the points outlined in the attached Last Mile Access handout, which was provided to the meeting participants. TelePacific also explained that it is not economical to build fiber to many of its small and medium sized business, school, health care, and community anchor institution customers, 89% of whom are not currently connected to fiber based on TelePacific’s April 2015 survey of 19 vendors. A monthly recurring rate for a 50 Mbps broadband service cannot justify a fiber build that costs tens of thousands of dollars, even for distances as short as 60 feet. Based on recent sample quotes, the permitting costs alone in California can approach nearly \$20,000 for a 500 foot build. Moreover, even if it were economical to build a fiber lateral to reach a customer, some “dig once” ordinances impose a 23-month moratorium on future digs after construction on a particular street/intersection. In order to preserve broadband for these customers, let alone competitive broadband options, it is critical that incumbent LECs maintain the copper network where it has not been retired and work in good faith with competitive carriers

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to offer reasonably comparable alternatives to wholesale last mile access services during the IP transition.

Please contact the undersigned if you have any questions.

Respectfully submitted,

/s/ Tamar E. Finn

Tamar E. Finn
*Counsel for U.S. TelePacific, Corp. d/b/a TelePacific
Communications*

Attachment

cc: Via E-Mail
Nicholas Degani
Trey O'Callaghan