

Morgan, Lewis & Bockius LLP
2020 K Street NW
Washington, DC 20006-1806
Tel. +1.202.373.6000
Fax: +1.202.373.6001
www.morganlewis.com

Tamar E. Finn
Partner
+1.202.373.6117
tamar.finn@morganlewis.com

August 27, 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 August 25, 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 Daniel Kahn, Deputy Division Chief, Competition Policy Division and Michele Berlove of the Wireline Competition Bureau. TelePacific expressed its appreciation for the Technology Transitions Order. The participants discussed the requirement that all carriers consider carefully whether a planned copper retirement will result in a discontinuance, reduction or impairment of service requiring Section 214 approval and the meaningful evaluation framework that governs a carrier’s determination of whether a Section 214 application is required. Participants also discussed new rule 51.332(g) requiring incumbent LECs to work in good faith to provide information necessary to assist interconnecting carriers accommodate the ILEC’s planned retirements without disruption of service to end users. TelePacific provided the attached handout and explained that the information AT&T provided in its June 23, 2015 feeder retirement notice was detailed enough to enable TelePacific to determine whether any of its end users would be impacted by the planned retirement, an important first step in providing necessary information to interconnecting carriers. TelePacific looks forward to working with the Commission in the further notice to elaborate on the indicia that show good faith and ensuring that adequate substitute services are reasonably available for customers currently using 20 Mbps and above broadband services provided via Ethernet over Copper.

Marlene H. Dortch, Secretary
August 27, 2015
Page 2

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
Daniel Kahn
Michele Berlove



Date: **June 23, 2015**

Number: **CLECC15-013**

Effective Date: **IMMEDIATELY**

Category: **All**

Subject: **(BUSINESS PROCESSES) AT&T California is announcing that copper facilities originating from the Folsom Nimbus central office passing thru to Aerojet property feeding DA330240 and DA340501 will be cut over to available digital loop carrier and fiber hub pairs that do not pass thru Aerojet property. The affected copper cable count is 99,1-100 and 12,1-1200. Affected location is from MH15 to Aerojet property and ending at the thru to splice case before the SAI @ 12399 will be removed. - CA**

Related Letters: **NA**

Attachment: **NA**

States Impacted: **AT&T California**

Response Deadline: **NA**

Contact: **1ST Account Manager
Technical Issues: Richard R. Hatch**

**135 Huntsville Rd, 1st Floor
Eureka Springs, AR 72632
479-253-7675
rh4979@att.com**

Conference Call/Meeting: **NA**

SHORT TERM PUBLIC NOTICE of NETWORK CHANGE UNDER RULE 51.333(a)

**Network Disclosure
Number:**

ATT20150624S.1

Issue Date: 06/24/2015

Modification Date: **3rd Qtr 2015**

Carrier's Name:

AT&T California

Carrier's Address:

135 Huntsville Rd, Eureka Springs, AR 72632

Contact:

Your Account Manager or Service Representative

Technical Issues

Richard R Hatch
135 Huntsville Rd, 1st Floor
Eureka Springs, AR 72632
479-253-7675
rh4979@att.com

Public Notice: can be obtained on the Internet at:

<https://ebiznet.att.com/networkreg/>

Network Change:

AT&T California is announcing that copper facilities originating from the Folsom Nimbus central office passing thru to Aerojet property feeding DA330240 and DA340501 will be cut over to

AT&T reserves the right to make any modifications to the information set forth herein and/or to cancel the information set forth herein. In the event of any modifications to or cancellation of the information set forth herein, carriers will be notified via a subsequent Accessible Letter. AT&T shall incur no liability to any carrier if the information set forth herein is modified or cancelled by AT&T.

available digital loop carrier and fiber hub pairs that do not pass thru Aerojet property. The affected copper cable count is 99,1-100 and 12,1-1200. Affected location is from MH15 to Aerojet property and ending at the thru to splice case before the SAI @ 12399 will be removed.

DA	SAI Address	Pairs avail after cutover
330240	12399 White Rock Rd	100
340501	3417x Grant Line Rd	25

Description of Type of Changes Planned:

It is proposed to cut and replaced the existing copper facilities with fiber-fed DLC and Fiber Hub facilities at the following locations in the Folsom Nimbus wire center.

DA	SAI Address	Pairs avail after cutover
330240	12399 White Rock Rd	100
340501	3417x Grant Line Rd	25

Description of Reasonably Foreseeable Impact of the Planned Changes:

After this plan is implemented and work is complete, metallic facilities from the central office to the affected areas passing thru the Aerojet property will no longer be available. Unbundled loops that are defined as compatible with Digital Loop Carrier (DLC), e.g. those defined to transport POTS-grade service, will be transferred to the available and nearby DLC system. Competitive carriers employing unbundled loops that are defined to require metallic facilities for DSL circuits will be notified individually. **Currently there are no DSL circuits that will be impacted by this project.** This notification is intended to restrict the carrier from obtaining an unbundled loop that has been defined to transport POTS-grade service, but then the carrier utilizes the loop to provide DSL service. AT&T California will have no knowledge of the presence of DSL In such a case. If so AT&T California has no basis to notify the carrier and the ability of the competitive carrier to provide DSL services may be affected.

Location of Change:

CLLI Code/Statewide	City	State	Implementation Date
FLSMCA12	FOLSOM NIMBUS	CA	3 RD QTR 2015

AT&T reserves the right to make any modifications to the information set forth herein and/or to cancel the information set forth herein. In the event of any modifications to or cancellation of the information set forth herein, carriers will be notified via a subsequent Accessible Letter. AT&T shall incur no liability to any carrier if the information set forth herein is modified or cancelled by AT&T.