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Ex Parte

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

Re: Technology Transitions, GN Docket No. 13-5; Policies and Rules Governing Retirement of Copper Loops by Incumbent Local Exchange Carriers, RM-11358

Dear Ms. Dortch:

We are responding to CWA's October 9, 2015 ex parte letter, the latest in CWA's misinformation campaign attempting to cast Verizon as failing to invest and maintain its networks.

CWA and others continue to misconstrue several of Verizon's statements on this topic. As we've explained, the figure that Verizon referred to in a July letter to the Commission reflected only a small subset of what we spend to maintain, repair, rehabilitate, restore, and supplement our copper plant. It did not reflect our total expenditures on our copper network, but rather captured only spending on one category of capital investments.

Verizon spends significant amounts to ensure our copper network remains healthy and provides the high quality of service customers demand. From 2008 through 2014, for example, Verizon spent more than \$12 billion on its copper network, including spending on maintenance and repair, restoral, and rehabilitation of copper throughout Verizon's wireline footprint. And Verizon's total spending on its wireline network during this time period – including on Verizon's advanced fiber-to-the-premises network that now passes more than 70 percent of the homes in Verizon's wireline footprint – amounted to a staggering \$50 billion.

The facts, including Verizon's expenditures on copper and our network performance, show we have not engaged in "de facto" retirement of copper. To the contrary, we are taking reasonable steps to ensure we maintain the quality of service we provide to all of our customers, including those served by copper.

Sincerely,