

November 5, 2015

**VIA ECFS**

***NOTICE OF EX PARTE***

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW, Room TW-A325  
Washington, DC 20554

**Re: *Petition of USTelecom for Forbearance Under 47 U.S.C. § 160(c), WC Docket No. 14-192; Petition for Declaratory Ruling of Granite Telecommunications, LLC, WC Docket No. 15-114***

Dear Ms. Dortch:

On behalf of Granite Telecommunications, LLC, I discussed the above-referenced proceedings with Madeleine Findley and Randy Clarke of the Wireline Competition Bureau on November 3, 2015. During the discussion, I stated that the Bell Operating Companies' ("BOCs") obligation to provide unbundled network elements ("UNEs") pursuant to Section 271(c)(2)(B) of the Communications Act ("Act") and to provide 64 Kbps UNE loops pursuant to Section 251(c)(3) of the Act and Section 51.319 of the Commission's rules serve as critically important regulatory backstops for competitive carriers seeking to enter into, renew or continue to receive services under wholesale voice agreements with BOCs. The Commission should therefore deny the above-referenced USTelecom petition for forbearance to the extent it seeks the elimination of these key requirements. In addition, I stated that the Commission should grant the above-referenced Granite petition for declaratory ruling at the same time it rules on the USTelecom petition for forbearance.

Please do not hesitate to contact me if you have any questions or concerns regarding this submission.

Respectfully submitted,

/s/ Thomas Jones  
*Counsel for Granite Telecommunications, LLC*

cc: Madeleine Findley  
Randy Clarke