



BY ECFS

EX PARTE

February 12, 2016

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

Re: *Technology Transitions, GN Docket No. 13-5; Special Access for Price Cap Local Exchange Carriers, WC Docket No. 05-25; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, RM-10593*

Dear Ms. Dortch:

On Wednesday, February 10, 2016, Samuel Kline, Senior Vice President, Strategic Relations, and the undersigned, both representing Granite Telecommunications, LLC (“Granite”), met with Jonathan Sallet, General Counsel, Daniel Kahn, Acting Chief, Competition Policy Division of the Wireline Competition Bureau, and William Dever, Attorney, Office of General Counsel. In this meeting, we reiterated our concern about linking the reasonably comparable wholesale access requirement for wholesale platform services established in the *Technology Transitions Order*¹ to outcomes in the *Special Access* proceedings.² We reiterated the importance of the reasonably comparable access requirement to competitive local exchange carriers’ ability to provide competitive alternatives to incumbent local exchange carriers for voice services at the vast majority of businesses locations currently serviced by competitive local exchange carriers, and the many benefits this type of competitive offerings provide to the multisite businesses that receive those services and to their customers.

Very truly yours,

/s/

Michael B. Galvin
General Counsel
Granite Telecommunications

¹ *In the Matter of Technology Transitions; Policies and Rules Governing Retirement of Copper Loops by Incumbent Local Exchange Carriers; Special Access for Price Cap Local Exchange Carriers; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, GN Docket No. 13-5; RM-11358; WC Docket No. 05-25; RM-10593, Report and Order, Order on Reconsideration and Further Notice of Proposed Rulemaking, FCC 15-97 (rel. Aug. 7, 2015).

² *See id.* ¶ 132.

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cc: Jonathan Sallet
Daniel Kahn
William Dever
Thomas Jones
Eric Branfman
Paula Foley