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May 15, 2007

**VIA ELECTRONIC FILING**

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

Re: RM-11358: Petitions for Rulemaking and Clarification  
Regarding the Commission's Rules Applicable to  
Incumbent LEC Retirement of Copper Loops and Copper  
Subloops; *Ex Parte Notification*

Dear Ms. Dortch:

XO Communications ("XO"), respectfully submits this Notice of *Ex Parte* Presentation in the above-referenced proceeding. On May 14, 2007, Heather Gold and Lisa Youngers of XO met with Scott Deutchman, Legal Advisor to Commissioner Copps, to discuss the Petition for Rulemaking filed by XO, Covad, NuVox, and Eschelon. Consistent with its comments and reply comments in the above-referenced docket, during the meeting, XO representatives discussed the possibilities of copper technology in offering broadband access and the need for the Commission to launch a NPRM in order to examine the copper loop retirement process.

In accordance with the Commission's rules, this letter is being filed electronically for inclusion in the public record of the above-referenced proceeding. Please feel free to contact the undersigned counsel, at (703) 547-2258, if you have any questions.

Respectfully submitted,

/s/

Lisa R. Youngers

XO Communications  
Director, Federal Regulatory Affairs

cc: Scott Deutchman