



VIA ECFS

June 27, 2007

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

**RE: Petitions of the Verizon Telephone Companies for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Boston, New York, Philadelphia, Pittsburgh, Providence, and Virginia Beach Metropolitan Statistical Areas, WC Docket No.06-172; Petitions of Qwest Corp. for Forbearance Pursuant to Section 160(c) in the Denver, Minneapolis-St. Paul, Phoenix, and Seattle Metropolitan Statistical Areas, WC Docket No. 07-97; Petitions for Rulemaking and Clarification Regarding the Commission's Rules Applicable to Incumbent LEC Retirement of Copper Loops and Copper Subloops, RM-11358**

Dear Secretary Dortch:

On June 26, 2007, Jim Kirkland, Chris McKee and Angela Simpson of Covad Communications met with Marcus Maher, Associate Bureau Chief of the Wireline Competition Bureau. Covad emphasized the procedural, legal, and substantive problems associated with requests for forbearance from basic network unbundling obligations consistent with its positions already on the record before the Commission. We also reviewed the pending petitions for the Commission to review current copper retirement practices as a means to promote broadband deployment, competition, and innovation.

In accordance with the Commission's rules, this letter is being filed electronically for inclusion in the public record of the above-referenced dockets. Please do not hesitate to contact me at (202) 220-0409 or [Angela.Simpson@covad.com](mailto:Angela.Simpson@covad.com) if you have any questions regarding this filing.

Sincerely,

Angela Simpson  
Director  
Government Affairs