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VIA ECFS

June 27, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th 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 Scott Bergmann, Commissioner Adelstein's Legal Advisor for Wireline Issues. 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 if you have any questions regarding this filing.

Sincerely,

Angela Simpson
Director
Government Affairs