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May 10, 2013

VIA ECFS

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

Re: Notice of Ex Parte Presentation - AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition; Petition of the National Telecommunications Cooperative Association for a Rulemaking to Promote and Sustain the Ongoing TDM-to-IP Evolution, GN Docket No. 12-353; Technology Transitions Policy Task Force, GN Docket No. 13-5

Dear Ms. Dortch:

On May 8, 2013, the undersigned of Bingham McCutchen LLP, representing Granite Telecommunications LLC (“Granite”), Samuel J. Kline, Senior Vice President-Corporate Strategy of Granite, Michael B. Galvin, General Counsel of Granite, Bobbi-Sue Doyle-Hazard, Associate Corporate Counsel of Granite, and Kevin Joseph of The Joseph Group, met with Priscilla Argeris, Legal Advisor to Commissioner Rosenworcel regarding the above matters.

Granite began by discussing its unique position as a CLEC in serving national, multi-location businesses. Granite explained that it obtains these lines from the RBOCs primarily through multi-state “commercial” agreements and separate agreements to furnish DSL services. Granite explained that because it is a non-facilities-based competitor, it differentiates its service by offering highly responsive customer service, and by offering multi-location business the ability to obtain their communications needs throughout the country from a single supplier.

Granite urged that as it facilitates the transition to IP networks, the Commission should take steps to preserve competition, particularly in the business market, where wireless and other forms of communication are not an adequate substitute for the ILEC’s service. Granite noted that the RBOCs’ commercial agreements typically deny CLECs access to circuits provisioned over technology other than copper, and thus the type of competition provided by Granite would not be possible if copper were removed without any requirement that CLECs be given access to the replacement medium.

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Further, Granite expressed its concerns about AT&T's proposed trials. In particular, Granite observed that AT&T's proposed trials may interfere with the services Granite currently provides its customers in those locations. Granite also suggested that one of the upcoming panels to be held by the Technology Transitions Policy Task Force focus on how to preserve the benefits of competition in the business market during and after the transition. Granite also provided Ms. Argeris with a copy of the attached presentation

Respectfully submitted,

/s/ Eric J. Branfman

Eric J. Branfman

Counsel for Granite Telecommunications, LLC

cc: (via email): Priscilla Argeris

Attachment