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March 6, 2014

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**EX PARTE**

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

**Re: Section 63.71 Application of MCI Communications Services, Inc. d/b/a/ Verizon Business Services, WC Docket No. 13-247**

Dear Ms. Dortch:

On March 4, 2014, Maggie McCready, Curtis L. Groves, and I from Verizon met with William Dever, Gregory Kwan, and Rodney McDonald of the Wireline Competition Bureau to discuss MCI Communications Services, Inc. d/b/a Verizon Business Services's ("Verizon Business") pending application for permission to grandfather its provisioning of interstate private line DS0 service (64 kbps or less). The Commission should approve the September 3, 2013 application as amended by Verizon Business's January 10, 2014 letter amendment.

We discussed that as a result of the January 10, 2014 amendment, Verizon Business is not seeking permission to discontinue DS0 private line service at this time. Verizon Business seeks permission only to grandfather DS0 private line service, so that no new customers would be able to purchase this service from Verizon Business. For existing customers of this service, however, there would be no change as result of the application. Customers that have Verizon Business DS0 private line service when Verizon Business grandfathers it will continue to be able to move, add, or change their DS0 private line service in accordance with their terms and conditions. Moreover, in the case of this service, existing customers whose contracts expire or otherwise terminate will be able to purchase DS0 private line service through Verizon Business's service guide after the Commission approves the application. We also explained that Verizon Business has no current plans to discontinue this service. We said that if Verizon Business in the future decided to discontinue this service for the existing customers, Verizon Business would have to file and gain Commission approval of a new Section 214 discontinuance application.

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We explained that we have addressed the concerns that two customers – Pan Am Railways and National Fuel Gas Company – have raised regarding the application. We explained that as existing customers both Pan Am and National Fuel would be able to retain their DS0 private line service in accordance with their contractual terms and conditions. With respect to National Fuel's assertion that Verizon Business could exercise a contractual right to terminate its contract on sixty days' notice, we said that while we have no current plan to do that, as an existing customer with an expired contract, National Fuel would be able to purchase DS0 private line service in accordance with the terms and conditions in Verizon Business's service guide, consistent with the terms of the grandfathering approval that we seek in this application. We also explained that National Fuel in December 2013 placed orders to add DS0 private line circuits, and that National Fuel has acknowledged that it will be able to add circuits after the service is grandfathered. Regarding National Fuel's unsupported allegation that Verizon Business refused to accept DS0 private line orders, we explained that Verizon Business has accepted recent National Fuel orders for the service and will continue to do so in accordance with the terms of our contractual relationship and the grandfathering authority that we seek.

Granting Verizon Business's application to grandfather DS0 private line service is in the public interest. Existing customers can continue to purchase the service, but no new customers for this outdated legacy service will be accepted. The public convenience and necessity is not impaired by the application, and we have addressed the concerns that Pan Am and National Fuel raised.

The Commission should now grant the application.

Please call me at 202 515-2590 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Marlene", with a stylized flourish extending to the right.

cc: William Dever  
Gregory Kwan  
Rodney McDonald