

Maggie McCreedy
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March 14, 2013

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EX PARTE

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

Re: Comment Sought on the Technological Transition of the Nation's Communications Infrastructure, GN Docket No. 12-353; Technology Transitions Policy Task Force, GN Docket No. 13-5; Application Of Verizon New Jersey Inc. and Verizon New York Inc. to Discontinue Domestic Telecommunications Services, WC Docket No. 13-150

Dear Ms. Dortch:

On March 12, Kathleen M. Grillo, William H. Johnson, Katharine R. Saunders and I, all of Verizon, met with Jon Sallet, Stephanie Weiner, and Marcus Maher of the Office of General Counsel; and Tim Stelzig and Matt DelNero of the Wireline Competition Bureau to discuss the above captioned proceedings.

In particular, we discussed my letter of February 3, 2014, which responded to Public Knowledge's January 21, 2014 ex parte.¹ We noted that Public Knowledge's ex parte appears to demonstrate a misunderstanding of Verizon New Jersey's pending discontinuance application for the recovery efforts related to Sandy in parts of two central offices in the New Jersey Barrier Islands. Following the extensive storm damage in those areas, Verizon today serves fewer than 100 customers in these areas using Voice Link, a commercial mobile radio service (CMRS) that Verizon New Jersey ILEC purchases on a wholesale basis and resells to end-user residential customers. Voice Link is not an IP-based service subject to Title I. Therefore, Public Knowledge's arguments concerning the relevance of the D.C. Circuit's *Verizon v. FCC*² decision are misplaced. We also discussed the interstate wireline telecommunications services, including

¹ Letter from M. McCreedy, Verizon, to M. Dortch, FCC, GN Docket Nos. 12-353 & 13-5; WC Docket No. 13-150 (Feb. 3, 2014); Letter from H. Feld, Public Knowledge to M. Dortch, FCC, GN Docket Nos. 12-353 & 13-5; WC Docket No. 13-150 (filed Jan. 22, 2014).

² See *Verizon v. FCC*, 740 F.3d 623 (2014).

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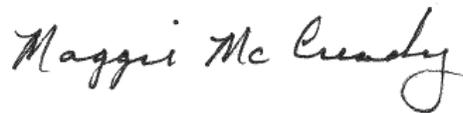
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“interstate interexchange and exchange access services,” at issue in Verizon New Jersey’s pending application.

We also discussed the scope and purpose of the discontinuance process under Section 214(a). As the statute makes clear and the legislative history and Commission and court precedent confirm, this provision addresses the discontinuance or impairment of interstate telecommunications services, and does not more generally address a provider’s choices concerning facilities or technology that do not effect such a discontinuance. We also discussed the different roles of the network change notification process and the discontinuance process under the Commission’s rules.

In accordance with Section 1.1206(b) of the Commission’s rules, this letter is being filed with your office. Please contact me if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Maggie McCreedy".

cc: Jon Sallet
Stephanie Wiener
Tim Stelzig
Matt DelNero
Marcus Maher