

Lawrence R. Freedman

Partner

+1 202 939 7923

fax +1 866 955 9168

lfreedman@edwardswildman.com

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VIA ELECTRONIC FILING

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

Re: Notice of Ex Parte Meetings
GN Docket 12-353

Dear Ms. Dortch,

On July 31, 2014, Lawrence Freedman and Seth Davidson from the law firm of Edwards Wildman Palmer, LLP and representing WorldNet Telecommunications, Inc. ("WorldNet"), conducted a series of meetings with Priscilla Delgado Argeris, Legal Advisor to Commissioner Rosenworcel, Matthew DelNero, Deputy Chief of the Wireline Competition Bureau, Randy Clarke, Acting Chief of the Competition Policy Division, Jennifer Tatel, Association General Counsel, and Nicholas Degani, Legal Advisor to Commissioner Pai.

In these meetings, Mr. Freedman and Mr. Davidson explained that any TDM-to-IP transition must not only take into account the "IP transition," but also, the "CLEC transition, as well as competition issues generally and importantly. The unique competitive and economic circumstances presented in Puerto Rico, where WorldNet is a competitive provider, were identified. In particular, Mr. Freedman and Mr. Davidson expressed that the Commission should give careful consideration to various proposals that will preserve and protect the pro-competition goals of the 1996 Act, such as, first and foremost, preserving WorldNet's right of cost-based access to ILEC last mile facilities (a right established by Congress in 1996 and on which WorldNet has relied for the past sixteen years in establishing its network and network plans) Mr. Freedman and Mr. Davidson cautioned against the adoption of a "one size fits all" approach and urged careful consideration of the unique circumstances in Puerto Rico.

Respectfully submitted,



Lawrence R. Freedman
Counsel for WorldNet Telecommunications, Inc.

cc: Priscilla Delgado Argeris
Matthew DelNero
Randy Clarke
Jennifer Tatel
Nicholas Degani

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