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


Dear Ms. Dortch:

On April 16, 2010, Howard Janzen, Chief Executive Officer of One Communications Corp. (“One Communications”), Russ Oliver, Chief Strategy Officer of One Communications, Greg Floerke, Chief Operating Officer of One Communications, as well as Julia Strow and the undersigned, held a conference call with Paul de Sa, Sharon Gillett, Don Stockdale, Nick Alexander, and Ian Dillner. During the call, the representatives of One Communications explained that the Company remains critically reliant on access to incumbent LEC last mile facilities in order to serve small and medium-sized businesses. One Communications also explained that, where such access is granted on reasonable terms and conditions, One Communications is able to provide “game changing” services and applications to businesses, such as Ethernet over first mile and OneSolutions Complete, a managed solution enabling business customers to consolidate their local, long distance and Internet access traffic on a single, high-speed connection. Indeed, OneSolutions Complete was named a 2009 Product of the Year by Internet Telephony magazine.

Unfortunately, as One Communications explained, the Company faces more and more obstacles to obtaining access to incumbent LEC loops. For example, One Communications has experienced numerous problems with obtaining access to unbundled network element loops from Verizon. This is because, as One Communications explained, (1) Verizon has proceeded with the retirement of copper feeder plant, foreclosing reliance on home run copper loops in some locations;¹

¹ See, e.g., Verizon Short Term Public Notice of Network Change under FCC Rule 51.333(a) for Replacing Copper Feeder Facilities with Fiber Optic Cable and Digital Loop Carrier Systems in Alexandria, Virginia (Nov. 16, 2009); Verizon Short Term Public Notice of Network Change under
(2) Verizon rejects UNE DS1 orders without providing competitors with sufficient information to determine the true cause of the order rejection; and (3) Verizon seems to increasingly neglect its copper plant, resulting in an increase in “chronic troubles” for unbundled loops. As these problems illustrate, it is critical to the promotion of broadband to businesses that the FCC require incumbent LECs to maintain their copper loop plant and to provide unbundled network elements loops on just, reasonable and nondiscriminatory terms and conditions. Moreover, as One Communications has previously explained, it is also critical that incumbent LECs be required to provide the packetized capabilities of their hybrid and fiber loop facilities on an unbundled basis under Section 251(c)(3). Access to such facilities will enable competitors to provide efficient broadband services tailored to the needs of small business customers utilizing capacities that are currently unavailable as unbundled network elements.

Respectfully submitted,

/s/ Thomas Jones
Thomas Jones

cc: Paul de Sa
Sharon Gillett
Don Stockdale
Nick Alexander
Ian Dillner

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FCC Rule 51.333(a) for Replacing Copper Feeder Facilities with Fiber Optic Cable and Digital Loop Carrier Systems in Pennsylvania (Sept. 21, 2009); Verizon Short Term Public Notice of Network Change under FCC Rule 51.333(a) for Replacing Copper Feeder Facilities with Fiber Optic Cable and Digital Loop Carrier Systems in West Virginia (Sept. 10, 2009).

2 See Comments of Integra Telecom, Inc. and One Communications Corp., WC Docket No. 09-223 (Jan. 22, 2010).