July 10, 2015

VIA ECFS

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

Re: Technology Transitions, GN Docket No. 13-5; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition, GN Docket No. 12-353

Dear Ms. Dortch:

On behalf of Granite Telecommunications, LLC ("Granite"), I discussed the above-referenced proceedings with Daniel Kahn and Matt DelNero of the Wireline Competition Bureau on July 8, 2015 and again with Matt DelNero on July 9, 2015. During the discussions, I reiterated the points regarding the duration of the equivalent access requirement as applied to wholesale voice services described in Granite’s ex parte letter dated June 12, 2015 in the above-referenced proceedings.1 In addition, during my discussion with Mr. DelNero on July 9, 2015, I stated that, regardless of the manner in which the Commission chooses to ensure that wholesale customers and competition are not harmed by incumbent LEC discontinuance of legacy wholesale services, the primary focus should be to prevent incumbent LECs from setting the price of IP wholesale services above the prices incumbent LEC charge for equivalent legacy wholesale services.

Please do not hesitate to contact me if you have any questions or concerns regarding this submission.

Respectfully submitted,

/s/ Thomas Jones
Counsel for Granite Telecommunications, LLC

cc: Matt DelNero
Dan Kahn

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