



September 23, 2015

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Ex Parte

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

Re: Technology Transitions, GN Docket No. 13-5; Policies and Rules Governing Retirement of Copper Loops by Incumbent Local Exchange Carriers, RM-11358

Dear Ms. Dortch:

In recent weeks, through letters to state regulators and a public-relations campaign, the Communications Workers of America (“CWA”) has taken out of context a statement Verizon made in a July letter to the Commission to create a false impression of Verizon’s efforts to provide high quality services to customers that Verizon continues to serve by copper facilities. As a result, we write to clarify the record.

As we explained in that letter, Verizon takes reasonable steps to ensure its copper network remains healthy and, contrary to CWA’s suggestions, has not engaged in widespread “de facto” retirement of copper. As part of that discussion, we wrote that Verizon since 2008 has spent more than \$200 million on its copper network. CWA has seized on that comment, taken it out of context, and tried to use it to create the false impression that this was all of the money that Verizon has spent to keep copper in service. The “more than \$200 million” Verizon referred to, however, was not intended to and does not describe all of the various expenditures Verizon made on its copper network. Instead, that figure included only one category of capital investments, dedicated to copper infrastructure improvement and focused on proactive rehabilitation of copper facilities and related network support elements – *i.e.*, cable, air pressure, batteries, etc. That figure does not represent all of the capital Verizon has invested in its copper network, nor does it include the significant expenses incurred in connection with the copper network, including maintenance and repair costs. Instead, those dollars were uniquely relevant to the issues the Commission then was considering.

Sincerely,

A handwritten signature in black ink that reads "Maggie McCreedy". The signature is written in a cursive, flowing style.