



July 24, 2015

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

RE: Ex parte filing in: Technology Transitions, GN Docket No. 13-5; Ensuring Customer Premises Equipment Backup Power for Continuity of Communications, PS Docket No. 14-174.

Dear Ms. Dortch:

On July 22, Brian Ford of NTCA and the undersigned from GVNW Consulting, Inc. conducted an *ex parte* meeting with David Strickland and Evan Scott from Commissioner Clyburn's office.

The *ex parte* meeting covered the Commission's consideration of backup power requirements and the potential burdens this would create for small RLECs. In particular the discussion focused on the proposals made in the "FACT SHEET: Chairman Wheeler's Proposals to Protect Consumers & Promote Competition and Public Safety in the Technology Transitions" released on July 10, 2015. The rural representatives emphasized that rules should be clear that any requirements should be forward-looking and should not require providers to retrofit current installations. The rural representatives also noted that since small RLECs cannot drive the equipment market, it would be helpful for the Commission to urge CSRIC to recommend standards for customer premises backup power equipment.¹

¹ See, CSRIC IV Working Group 10B, CPE Powering – Best Practices; Final Report – CPE Powering, at 9-11 (September 2014) ("CSRIC CPE Powering Report") ("For the service provider, one of the greatest challenges is how to provide a reliable service given the wide range of technologies and the lack of any standards for DC power backup systems and interfaces.").

As required by the Commission's rules, this ex parte record is now filed in the above referenced docket. If there are any questions, please call me on 202-236-3947.

Respectfully submitted,

Via ECFS 7/24/15

David B. Cohen
Senior Policy Advisor

Cc: David Strickland, FCC
Evan Scott, FCC