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October 2, 2018

**VIA ECFS**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: Notice of *Ex Parte***  
***In the Matter of Updating the Intercarrier Compensation Regime to***  
***Eliminate Access Arbitrage, WC Docket No. 18-155***

Dear Ms. Dortch:

On October 2, 2018, Ronald Laudner and Jeff Roiland, the CEOs of OmniTel Communications and BTC, Inc. d/b/a Western Iowa Networks, respectively (collectively the “CLECs”), and Gary Blosser, co-founder of the Amish and Mennonite Conference Line, met with Travis Litman, Chief of Staff and Senior Legal Advisor to Commissioner Rosenworcel, to discuss matters related to the above-referenced proceeding. Myself and my colleague, John Nelson, also attended as the CLECs’ counsel. The presentation attached as **Exhibit A** was used during the discussion.

During our meeting with Mr. Litman we briefly discussed the CLECs’ August 2018 meetings with Commission staff members and the CLECs’ initial concerns with the Commission’s Notice of Proposed Rulemaking (the “Access Stimulation NPRM”), including the unsupported allegations and factual omissions in the comments and reply comments submitted by the IXC and CEA providers and the Commission’s failure to support their proposed rules and assertions with the necessary data and evidence. We also focused on the developments in the Access Stimulation NPRM Docket that have occurred since the CLECs’ August 2018 meetings. Those developments include: (1) the findings and conclusions reached in the Expert Report of Dr. Daniel E. Ingberman; (2) the 750-plus comments filed by consumers thus far supporting access stimulation and free conferencing services; and (3) the benefits free conference calls provide to discreet minority groups like the Amish and Mennonite communities spread across the United States.

In summarizing the Expert Report of Dr. Daniel E. Ingberman (attached hereto as **Exhibit B**), I noted Dr. Ingberman’s important economic analysis regarding the access stimulation regime, including his conclusion that the current regime: (1) does not harm consumers; (2) is efficient; and (3) will not become more efficient by imposing new regulations or reallocating access stimulation traffic away from the access-stimulating CLECs. I also explained how these conclusions do not support the reforms proposed in the Access Stimulation NPRM and how such

reforms are unnecessary because of the cost savings long-distance carriers are experiencing via the Commission's continued investigation and lowering of Aureon's CEA rate and the agency's recent decision to investigate (and likely lower) South Dakota Network's CEA rate.

We then discussed a few of the 750-plus comments filed by consumers in the Docket thus far, which collectively show that free conference calls provide numerous benefits to citizens nationwide – particularly Veterans, minority communities, and those involved in twelve-step addiction support programs. Mr. Laudner reiterated this point, explaining how OmniTel Communications has developed Veteran support conference lines that allow Veterans to talk to each other, doctors, and mental health professionals about post-service-related issues and how free conference lines are also an important mode of communication during Iowa's presidential primary and during and after national emergencies, such as pandemics or terrorist attacks. Mr. Blosser provided Mr. Litman with an overview of how free conferencing services support minority groups like America's Amish and Mennonite populations, who use free conferencing services to not only relay daily news updates, healthcare services, natural disaster updates, and religious services, but also as a way to retain and pass on the Amish and Mennonite history and the Pennsylvania German language. In making these points, Mr. Blosser referenced sections of *German Language: Cradle of Our Heritage*, by Amos B. Hoover (attached hereto as **Exhibit C**), wherein the Amish and Mennonite Conference Line and the effect the service has on preserving the Amish and Mennonite history and language is discussed.

In concluding our meeting, I reiterated that the CLECs do not believe the Commission, IXC's, or CEA providers have provided enough data and evidence to support their assertions and proposals, and that access stimulation does in fact benefit, not harm, consumers. Mr. Litman encouraged the CLECs to continue to urge the Wireline Competition Bureau to act on the CLECs' proposed data requests and suggested that Wireline Competition Bureau does have, and could utilize, subpoena power to obtain information from the IXC's and CEA providers that seek to eliminate free conference calling services. A copy of the requests proposed by the CLECs is attached hereto as **Exhibit D**.

Pursuant to Section 1.1206 of the Commission's rules,<sup>1</sup> a copy of this letter is being filed via the Commission's electronic comment filing system ("ECFS"). If you have any questions, please do not hesitate to contact me.

Sincerely,



G. David Carter

cc: Travis Litman  
John C. Nelson, Jr., Esq.

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<sup>1</sup> 47 C.F.R. § 1.1206.