



March 8, 2019

**Ex Parte**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St. SW  
Washington, DC 20445

Re: *Connect America Fund, Developing a Unified Intercarrier Compensation Regime*, WC  
Docket No. 10-90 & CC Docket No. 01-92

Dear Ms. Dortch:

On March 7, 2019, Joe Cavender and Tim Boucher of CenturyLink, and Kristine Devine and I, counsel on behalf of CenturyLink, spoke on the phone with Aaron Garza, Deputy Chief, Pricing Policy Division, and Rhonda Lien, Attorney, Pricing Policy Division, of the Wireline Competition Bureau. In the meeting, we walked through the points contained on p. 3 and 4 of CenturyLink's ex parte letter of March 4, 2019, as well as the discussion and diagrams on p. 3-6 of CenturyLink's ex parte letter of December 6, 2018, and incorporated those ex partes herein. We explained that Verizon's and AT&T's proposed distinctions are unworkable for many forms of modern network traffic, and require fine distinctions that Verizon and AT&T (and any other carrier) cannot implement. Thus, the interpretation that Verizon suggests is both unworkable and yields arbitrary results. It is fundamentally inconsistent with the Commission's objectives in the Transformation Order's VoIP provisions, which was to establish a uniform regime for VoIP access charges that would reduce unproductive litigation and disputes.

Sincerely,

John T. Nakahata  
Counsel to CenturyLink

cc: Rhonda Lien  
Aaron Garza