



Comcast Corporation
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Suite 700
Washington, DC 20001

March 21, 2019

VIA ELECTRONIC FILING

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

**Re: *Updating the Intercarrier Compensation Regime to Eliminate Access Arbitrage*,
WC Docket No. 18-155; *8YY Access Charge Reform*, WC Docket No. 18-156**

Dear Ms. Dortch:

On March 19, 2019, Beth Choroser and Robert Munoz of Comcast Corporation (“Comcast”), along with Emily Daniels of Lawler, Metzger, Keeney & Logan, LLC, outside counsel to Comcast, met with the following Commission staff from the Wireline Competition Bureau: Irina Asoskov, Susan Bahr, Allison Baker, Gregory Capobianco, Lynne Engledow, Albert Lewis, Erik Raven-Hansen, Gil Strobel, and David Zesiger. Also attending the meeting were Octavian Carare, Richard Kwiatkowski, and Shane Taylor from the Office of Economics and Analysis.

During the meeting, Comcast discussed the Commission’s pending proposals in the above-referenced dockets. In particular, with respect to access arbitrage, Comcast discussed the ongoing access stimulation schemes it encounters and urged the Commission to adopt its proposal to require “access-stimulating LECs to . . . bear the financial responsibility for the delivery of terminating traffic to their end office, or functional equivalent.”¹ With respect to 8YY traffic, Comcast’s advocacy was consistent with its prior comments, focusing on the need to gradually transition 8YY originating access charges to zero over a reasonable period and to establish a reasonable limitation on database dip charges.²

¹ *Updating the Intercarrier Compensation Regime to Eliminate Access Arbitrage*, Notice of Proposed Rulemaking, 33 FCC Rcd 5466, ¶ 9 (2018).

² *See* Comments of Comcast Corp., WC Docket No. 18-156 (Sept. 4, 2018).

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This filing is made in accordance with Section 1.1206(b)(2) of the Commission's rules.³
In the event that there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

/s/ Beth Choroser

Beth Choroser

Vice President

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cc: Meeting Attendees

³ 47 C.F.R. § 1.1206(b)(2).