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VIA ECFS

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Ex Parte Communication:
WC Docket No. 10-90 (Connect America Fund);
WC Docket No. 18-155 (Updating the Inter-carrier Compensation Regime to Eliminate
Access Arbitrage);
WC Docket No. 18-156 (8YY Access Charge Reform)

Dear Ms. Dortch:

On August 12, 2019, the undersigned along with Nick Sgroi and Greg Rogers of Bandwidth Inc. ("Bandwidth") met with Arielle Roth, legal advisor to Commissioner O'Rielly, to discuss matters relating to inter-carrier compensation reform.

Bandwidth expressed its continuing support for reform of originating access charges for 8YY traffic. Bandwidth observed that the current inter-carrier compensation regime continues to include incentives for problematic behaviors such as access avoidance, asymmetries, and perverse incentives for incumbent LECs to delay the transition to IP technology so that they can continue collecting legacy access charges.

As a major provider of enterprise 8YY calling services, with an extensive nationwide facilities-based interexchange network, Bandwidth has experienced several problems created by the current inter-carrier compensation rules. These include use of the 0110 CIC by some entities to avoid paying originating access charges on interstate 8YY traffic; misuse of the industry's 8YY routing data and revenue sharing behaviors; demands by major wireless carriers affiliated with ILECs to route terminating traffic through ILEC tandems so that the ILEC can receive access charges for "transiting" that traffic, instead of using more efficient direct IP interconnection; and insistence on asymmetric traffic exchange payments based on certain carriers' interpretation of the so-called VoIP symmetry rules. Bandwidth expressed its continued support for CenturyLink's pending petition for declaratory ruling seeking clarification of the VoIP symmetry rules, but noted that the only long-term solution to all of these problems is to eliminate incentives to manipulate the access charge system by reforming originating 8YY access charges. Then, carriers will be able to

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exchange traffic in the most efficient manner and reduce costs to end users, without having to worry about how such arrangements will affect their access charge revenues.

Sincerely yours,

s/Russell M. Blau

Russell M. Blau

RMB