

Morgan Lewis

Russell M. Blau

Partner
+1.202.373.6035
russell.blau@morganlewis.com

August 15, 2019

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)

Dear Ms. Dortch:

On August 13, 2019, the undersigned along with Nick Sgroi and Greg Rogers of Bandwidth Inc. ("Bandwidth") met with Preston Wise, Special Counsel to the Chairman, to discuss matters relating to intercarrier compensation reform.

Bandwidth expressed its continued support for CenturyLink's pending petition for declaratory ruling seeking clarification of the VoIP symmetry rules. In addition, Bandwidth explained that some major carriers appear to misinterpret the Commission's rules as somehow broadly denying wholesale carriers reciprocal interconnection rights if they carry any "over-the-top" VoIP traffic. Bandwidth urged that any declaratory ruling concerning the VoIP symmetry rule should specify that the scope of the rule is limited specifically to the context of end-office switching charges for interstate access service, and expressly reject any broader interpretation or application.



Sincerely yours,

s/Russell M. Blau

Russell M. Blau

Morgan, Lewis & Bockius LLP

1111 Pennsylvania Avenue, NW
Washington, DC 20004
United States

 +1.202.739.3000
 +1.202.739.3001