



HARRIS, WILTSHIRE
& GRANNIS LLP

1919 M STREET NW
SUITE 800
WASHINGTON DC 20036

TEL +1 202 730 1300
FAX +1 202 730 1301
HWGLAW.COM

ATTORNEYS AT LAW

August 31, 2017

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: MD Docket No. 17-134, Notice of Ex Parte Presentation

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 1.1206(b)(1), we notify the Commission of an *ex parte* presentation in the above-referenced proceeding. On August 30, 2017, Nick Alexander of Level 3 Communications, LLC (“Level 3”) and Kent Bressie and Colleen Sechrest of Harris, Wiltshire & Grannis LLP, counsel for Level 3, met with Rachael Bender, Legal Advisor to Chairman Ajit Pai, to discuss Level 3’s position regarding the regulatory fee methodology for Commission should replace its capacity-based fee methodology for terrestrial.

During the meeting, Mr. Alexander reiterated Level 3’s positions stated in previously-filed comments and reply comments that the Commission should replace its capacity-based fee methodology for terrestrial International Bearer Circuits with a flat-fee methodology that would result in greater fairness, reduce strategic behavior by Commission payors, and eliminate economic distortions in cross-border capacity markets. Mr. Alexander urged the Commission to move forward expeditiously to adopt such a methodology.

Respectfully submitted,

Kent Bressie
Colleen Sechrest

Counsel for Level 3 Communications, LLC

cc: Rachael Bender