

JONES DAY

51 LOUISIANA AVENUE, N.W. • WASHINGTON, D.C. 20001.2113
TELEPHONE: +1.202.879.3939 • FACSIMILE: +1.202.626.1700

DIRECT NUMBER: (202) 879-5439
MHAZZARD@JONESDAY.COM

September 7, 2018

VIA ECFS

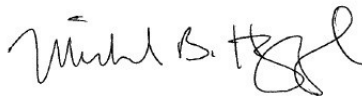
Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notification of *Ex Parte*, WC Docket No. 18-155

Dear Ms. Dortch:

On September 6, 2018, Andrew Nickerson, CEO of Wide Voice LLC, and I conducted an *ex parte* meeting in the above-referenced proceeding. The following members of the Wireline Competition Bureau's Pricing Policy Division attended the meeting: Pamela Arluk, Gregory Capobianco, Lynne Engledow, Victoria Goldberg, Lisa Hone, John Hunter, Ed Krachmer, Al Lewis, Richard Kwiatkowski, Doug Slotter, and Shane Taylor. During the meeting, I distributed the attached presentation, which served as the basis of discussion.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael B. Hazzard", with a stylized flourish at the end.

Michael B. Hazzard

Counsel to Wide Voice LLC



WIDE VOICE

EX PARTE, WC DOCKET NO. 18-155

SEPTEMBER 6, 2018

+ Who is WideVoice

- Small nationwide CLEC focused on bridging software applications requiring connectivity to the PSTN
- Believe we will be one of the last CLEC's to build a legacy nationwide network and we will use this network to hose the next generation of IPES carriers
- We are here to share our view of the industry from our vantage point



The Industry From Our Vantage Point

- + Communication services are rapidly becoming application based; services are being limited by PSTN tech & reg rules
- + Current rules have not kept up with the pace of technology, leading to disputes and uncertainty
 - Baseless tariff and billing disputes
 - Time and litigation expense to resolve
 - Goal posts keep moving



Our View Of Draft Rules

- + Providers will adjust practices to mitigate adverse impact of any new rules
 - For example, emergence of non-rev share arrangements
- + Likely Fallout
 - Rules impact carriers routing decisions; traffic shift away from commercial VoIP paths to legacy TDM
 - On-going disputes and self help rather than compliance



Leveling The Playing Field

- + Limit any new rules to providers behind CEA tandems, as this is actual arbitrage
- + Ensure clarity across the matrix of multiple carrier types and corporate structures (e.g., affiliates are affiliates for all providers)
- + In the alternative, they should look at a broader rule making process to move to reciprocal bill and keep over time



