



BY ECFS

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

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

Dear Ms. Dortch:

On Monday, September 16, 2019 I spoke with Nicholas Degani, Senior Counsel to Chairman Pai, regarding the Circulation Item in the above-referenced proceeding. During the teleconference I emphasized that the 6:1 ratio for Prong 1 treatment would create an uneven playing field, benefiting local exchange carriers utilizing long mileage routes, even though excessive mileage is the primary source of access arbitrage.

Consistent with Wide Voice longstanding advocacy in this proceeding, I recommended a focus on mileage, and in particular a mileage-based trigger. As an alternative the Commission could utilize the framework contained in the Circulation Item to apply the Prong 1 economic reversal only to the mileage charges (and not switching charges) between the tandem switch and LEC end office. These mileage charges are the primary driver of access rate disparities, and should be the target of any Commission rule.

In addition, I discussed Wide Voice's separate *ex parte* letters of August 26, 2019 and September 16, 2019, which I indicated I would transmit to Mr. Degani and Ms. Patel.

Respectfully submitted,

Andrew Nickerson

cc: Nicholas Degani (by email)
Nirali Patel (by email)

