



Keith M. Krom
Assistant Vice President -
Senior Legal Counsel

AT&T Services, Inc.
1120 20th Street NW, Suite 1000
Washington, D.C. 20036

Phone: 202.463.4148
Fax: 202.463.8066
E-mail: kk1643@att.com

September 18, 2019

Ms. Marlene Dortch
Secretary
Federal Communications Commission
455 12th Street, SW
Washington, DC 20554

Re: *Updating the Intercarrier Compensation Regime to Eliminate Access Arbitrage*, WC
Docket No. 18-155

Dear Ms. Dortch:

On September 17, 2019, Michael Hunseder, Sidley Austin LLP (outside counsel) and Matthew Nodine, Phillip Bowie and the undersigned (of AT&T) met with Lisa Hone, Gil Strobel, Eric Burger, Susan Bahr, Shane Taylor, Octavian Carare, Erik Raven-Hausen, Lynne Engledow, Al Lewis (via telephone), and Eric Ralph (via telephone). During that meeting we expressed AT&T's general support for the draft Report and Order issued September 5, 2019. Specifically, AT&T stated that the Commission's rationale in adopting new rules requiring access-stimulating LECs to bear the costs for tandem switching and transport associated with the delivery of access-stimulating traffic to the LEC's end office and the Commission's adoption of the new 6:1 trigger are well-supported by the record. AT&T also discussed the draft's conclusions regarding the scope of certain CEAs mandatory carriage requirements for access-stimulating traffic.

Please direct any questions to the undersigned.

Sincerely,

/s/ Keith M. Krom
Keith M. Krom

cc: Lisa Hone
Gil Strobel
Eric Burger
Susan Bahr
Shane Taylor
Octavian Carare
Erik Raven-Hausen
Lynne Engledow
Al Lewis
Eric Ralph