



September 19, 2018

Ex Parte

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: WC Docket No. 10-90 & CC Docket No. 01-92 – CenturyLink Petition for Forbearance

Dear Ms. Dortch:

On September 18, 2018, Michel Singer Nelson, representing O1 Communications ("O1"); David Aldworth, Melinda Ferguson, Alexander I. Schneider and Robert H. Jackson, representing Teliix, Inc. ("Teliix"), met with Lisa Hone, Pam Arluk, Rhonda Lien and, via telephone, Victoria Goldberg, with respect to O1's and Teliix's previously presented positions in the above-numbered proceedings. We also discussed the attached documents that were provided to the Commission attendees.

The Parties explained how they have invested in IP networks that provide additional and better quality services than TDM networks but must also invest in TDM capacity to interconnect with AT&T and Verizon. We stated that the Parties need to recoup their investments in advanced networks just as AT&T and Verizon were able to use access revenues for decades to pay for their TDM networks and associated operating costs.

We discussed the attached network charts and explained how over-the-top VoIP providers and their CLEC partners perform the very same functions as cable TV operators do for facilities-based VoIP services and as TDM voice providers do for traditional voice services. Additionally, the Parties showed that the provider of a broadband connection does not perform the functions necessary to offer voice services but merely transports packets.

We summarized key access charge litigation cases and self-help tactics by AT&T and Verizon whereby they refuse to pay tariff rates but do not challenge those rates before the FCC or in court.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this letter is being electronically submitted into the record of these proceedings and provided to the Commission participants. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Robert H. Jackson
Robert H. Jackson
Counsel for Teliix, Inc.

cc: Lisa Hone
Pam Arluk
Rhonda Lien
Victoria Goldberg