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Alan Buzacott
Executive Director
Federal Regulatory and Legal Affairs

November 27, 2019

Ex Parte

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

**Re: Connect America Fund, WC Docket No. 10-90
Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92**

Dear Ms. Dortch:

On November 25, 2019, Tamara Preiss and Alan Buzacott of Verizon met with Kris Monteith, Lisa Hone, Irina Asoskov, Gil Strobel, Aaron Garza and Rhonda Lien of the Wireline Competition Bureau to discuss the draft *Order on Remand and Declaratory Ruling* in the above-captioned proceedings.

Verizon supports the draft order's conclusion that the VoIP Symmetry Rule permits LECs to assess end office switched access charges only if the LEC or its VoIP partner provides a physical connection to the last-mile facilities used to serve an end user, and also supports the finding that this ruling should have retroactive effect. We agree that the draft order is consistent with the historical functional equivalence test and will advance the 2011 *Transformation Order's* goals of reducing market distortions, arbitrage, and compensation disputes.

During the meeting, we recommended that footnote 64 be modified to read as follows: "We reiterate that providers, including over-the-top VoIP-LEC partnerships, may assess access charges for the other access services they provide or the functional equivalent thereof, including such as dedicated transport access service or tandem-switched access service, only to the extent they provide those services or the functional equivalent thereof." The modified language would emphasize that LEC-VoIP partnerships may assess charges for non-end office access services only if they provide the functional equivalent of such services, and thus help avoid new arbitrage schemes based on non-end office access rate elements. As we noted in the meeting,

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the modified language is consistent with Chairman Pai's dissenting statement to the *2015 Declaratory Ruling*.¹

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's rules. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Buzacott". The signature is written in a cursive, slightly slanted style.

Alan Buzacott

cc: Kris Monteith
Lisa Hone
Irina Asoskov
Gil Strobel
Aaron Garza
Rhonda Lien

¹ *Connect America Fund*, Declaratory Ruling, 30 FCC Rcd 1587 (2015) ("*2015 Declaratory Ruling*"), Dissenting Statement of Commissioner Ajit Pai ("If such a partnership performs the functional equivalent of other intercarrier services, such as dedicated transport access service or tandem-switched access service, it may collect the corresponding access charges.").