

December 14, 2017

VIA ECFS

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

Re: *In re Connect America Fund, WC Docket No. 10-90; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92.*

Dear Ms. Dortch:

On December 12, 2017, Pat Witte, Senior Director, Circuit Operations and Robert Dianda, Principal Engineer, Voice Engineering, and the undersigned of Charter Communications, Inc. (“Charter”), and Beth Choroser, Vice President, Regulatory Affairs, Robert Munoz, Executive Director, Regulatory Affairs, of Comcast Corporation (“Comcast”), met with Lisa Hone, Pamela Arluk, Gil Strobel, Edward Krachmer, Douglas Slotten, Irina Asoskov, Al Lewis, Joseph Price, Lynne Engledow, Victoria Goldberg, John Hunter, William Andrie, and Greg Capobianco of the Wireline Competition Bureau.

Using the attached diagram, we explained that the way Charter and Comcast route toll-free calls is more efficient than TDM network architecture. Even so, to route 8YY calls, Charter and Comcast must incur a charge for querying the 8YY database. During the meeting, we also explained that there are differences between 8YY calls and other forms of access traffic. Specifically, we explained that 8YY subscribers, typically businesses, subscribe to 8YY services in order to make it easier for consumers to call their businesses, and that transitioning 8YY to bill-and-keep would invert the concept of a toll-free call and place the cost of originating such calls (including the 8YY database query charges) on the calling party’s customers.

Charter and Comcast also expressed support for rules designed to address 8YY arbitrage and indicated that we are willing to explore different options for addressing high database dip charges such as adopting a national cap or unified rate for database query charges.¹ Finally, we underscored that Charter and Comcast are not engaging in any actions to “arbitrage” 8YY traffic and explained why aggregation of 8YY traffic can increase network efficiency and is not necessarily “bad.”

Please contact me if you have any questions regarding these matters.

Sincerely,

/s/ Christianna Barnhart

Christianna Barnhart
Vice President, Regulatory Affairs
Charter Communications, Inc.

Attachment

cc: Gil Strobel
Pamela Arluk
Edward Krachmer
Douglas Slotten
Irina Asoskov
Al Lewis
Joseph Price
Lynne Engledow
Lisa Hone
Victoria Goldberg
Greg Capobianco
John Hunter
William Andrie

¹ See Letter from Michael R. Romano, Senior Vice President – Industry Affairs & Business Development, NTCA – The Rural Broadband Administration et al. to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 01-92 (Nov. 1, 2017).

Wireline Originating 8YY Call Routing and Compensation

