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October 2, 2014

VIA ELECTRONIC SUBMISSION

Notice of Ex Parte Presentation

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

Re: *Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund,* WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208

Dear Ms. Dortch:

On September 30, 2014, Bob Quinn and I (of AT&T), as well as David Lawson of Sidley, Austin LLP (counsel for AT&T) met Priscilla Delgado Argeris, Legal Advisor to Commissioner Rosenworcel. In the meeting, we addressed arguments in the record by, among others, Level 3, that the Commission's access charge rules permit CLECs to assess end office switching charges for their limited role in partnering with various "over-the-top" VoIP providers to route to the public Internet calls to the VoIP providers' end users.

In our discussion, we explained the limited role played by CLECs and VoIP providers in these calls that may traverse hundreds or even thousands of miles on the public Internet before reaching the called parties. We discussed Commission precedent in support of the proposition that neither these CLECs, the VoIP providers, nor any combination of them provide "local switching" under the Commission's rules. Finally we explained that if the Commission were to change course and allow assessment of local switching charges in these circumstances, it could do so only on a prospective basis. Our discussion centered on the points made in the attached document and the *ex parte* that was filed on February 21, 2014, which we provided to Ms. Argeris.

If you have any questions or need additional information, please do not hesitate to contact me. Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically with the Commission.

Sincerely,

Henry G. Hultquist

cc: Priscilla Delgado Argeris