

October 9, 2014

Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, D.C. 20554

Re: *Cisco WebEx LLC Request for Review of a Decision of the Universal Service Administrator*, WCB Docket No. 06-122

Dear Ms. Dortch:

On October 7th, Cisco WebEx LLC (“WebEx”), represented by Jeffrey Campbell of Cisco and Scott Blake Harris and the undersigned of this firm, met with Priscilla Delgado Argeris, Legal Advisor to Commissioner Rosenworcel, and separately with Nicholas Degani, Legal Advisor to Commissioner Pai. On October 8th, on behalf of WebEx, Mr. Campbell, Mr. Harris and the undersigned met with Amy Bender, Legal Advisor to Commissioner O’Rielly and separately with Rebekah Goodheart, Legal Advisor to Commissioner Clyburn.

In those meetings, WebEx explained that it offers customers an information service that allows users to share information and collaborate on work product by seamlessly integrating voice, video and computing capabilities. In the audit context, USAC nevertheless incorrectly found that WebEx’s service is actually two separate services, one of which is a telecommunications service subject to Universal Service Fund contribution requirements. WebEx has sought review of USAC’s finding.

WebEx noted that review of USAC’s finding requires a straightforward application of the Commission’s existing precedents to the particular facts of WebEx’s service. WebEx noted that the Commission has explained the statutory distinction between telecommunications services and information services in numerous decisions, and observed that the Wireline Competition Bureau has the expertise necessary to apply this body of precedent to the facts presented by WebEx. Finally, WebEx explained that the Universal Service Fund would not be harmed by a determination that WebEx is an information service – as an information service provider, WebEx has and will continue to purchase telecommunications inputs and pay USF indirectly to its underlying suppliers.

Ms. Marlene H. Dortch

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If you have any questions, please do not hesitate to contact me at (202) 730-1346, or bstrandberg@hwglaw.com.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'BDS' followed by a stylized flourish.

Brita D. Strandberg

Counsel to Cisco WebEx LLC

cc: Priscilla Delgado Argeris
Amy Bender
Nicholas Degani
Rebekah Goodheart