

November 11, 2014

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 twelfth Street, S.W.  
Washington D.C. 20554

Re: *In the Matter of Protecting and Promoting the Open Internet,  
GN Docket No. 14-28; In re Matter of Framework for Broadband  
Internet Services; GN Docket No. 10-127*

Dear Ms. Dortch:

On November 6, 2014, Cogent Communications Group, Inc.'s ("Cogent") Chief Legal Officer, Robert N. Beury, Jr. and I met with Ambassador Philip Verveer.

During the meeting, and consistent with Cogent's prior submissions, we underscored that any effective new Open Internet regulatory regime must encompass the interconnection points at which the networks that comprise the Internet exchange traffic. Further, we emphasized that to achieve the goals the Commission repeatedly has articulated, any new rules—whether promulgated under Title I, Title II or a combination thereof—should be predicated on a "bill and keep" model and provide a prompt mechanism for remedying sustained states of congestion at interconnection points.

Please direct any questions regarding this matter to my attention.

Sincerely,



Robert M. Cooper

cc: Ambassador Philip Verveer