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DEC 15 2014

November 10, 2014

Federal Communications Commission
Office of the Secretary

VIA ECFS

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

Re: Notice of Ex Parte Presentation, WT Docket No. 01-316 and WC Docket No. 10-90

Dear Ms. Dortch:

On November 6, 2014, representatives of a broad coalition of local exchange carriers and, where applicable, their parent companies (collectively, the "LEC Coalition") met with the Commission staff copied below. These LEC Coalition representatives were: Tim Boucher of CenturyLink, Michael Saperstein of Frontier Communications, Terri Natoli of Time Warner Cable, Eric Einhorn of Windstream, Trip England of Brydon Swearingen & England, P.C. (as outside counsel to a large group of Missouri rural local exchange carriers), Yaron Dori of Covington & Burling LLP (as outside counsel to CenturyLink), and the undersigned (as outside counsel to Cox Communications, Frontier Communications, LICT Corp., Time Warner Cable, and Windstream).

We informed the staff of litigation initiated throughout the country by Sprint and Verizon, in which those entities (as interexchange carriers ("IXCs")) are seeking refunds of access charge payments made pursuant to many LECs' switched access tariffs. We also noted that one court adjudicating such claims, the U.S. District Court for the Northern District of Iowa, recently issued an order rejecting Sprint's characterization of the law and referring the dispute to the Commission for resolution under the primary jurisdiction doctrine. We discussed our understanding of the Commission's rules governing the exchange of "intraMTA" wireless traffic, including in particular the fact that the intraMTA rule that entitles wireless carriers to enter into reciprocal compensation arrangements with respect to the exchange of such LEC-CMRS traffic has no application to traffic exchanged between LECs and IXCs over switched access trunks. We noted the LEC Coalition's planned submission of a petition for declaratory ruling to clarify the appropriate application of Commission precedent to traffic exchanged between LECs and IXCs. That petition is being filed with the Commission today.

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Please contact the undersigned should you have any questions.

Respectfully submitted,

/s/ Matthew A. Brill
Matthew A. Brill
Jarrett S. Taubman

cc: Daniel Alvarez
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