

December 19, 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 December 17, 2014, Cisco WebEx LLC (“WebEx”), represented by Jeffrey Campbell of Cisco and Scott Blake Harris and the undersigned of this firm, met with Daniel Alvarez, Legal Advisor to Chairman Wheeler, to discuss the above-captioned request for review.

In that meeting, 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 doing so is necessary to resolve the historic question of WebEx’s liability during 2009 audit year, as well as to provide certainty in post-audit years. WebEx accordingly urged the Commission to swiftly resolve the WebEx request for review.

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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 long horizontal stroke.

Brita D. Strandberg
Counsel to Cisco WebEx LLC

cc: Daniel Alvarez