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FILED ELECTRONICALLY

June 30, 2015

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

**Re: Request for Review by IVANS, Inc. of Decision by the Universal Service
Administrator and Petition for Declaratory Ruling, WC Docket No. 06-122**

Dear Ms. Dortch:

On Friday, June 26, 2015, Alfred Mamlet and Christopher Bjornson of Steptoe & Johnson LLP, counsel for the shareholders of IVANS, Inc. ("IVANS") and ABILITY Network, Inc. ("ABILITY") talked with Chin Yoo of the Wireline Competition Bureau's Telecommunications Access Policy Division by telephone to discuss IVANS' above-referenced request for review.

During the meeting, we discussed AT&T Services, Inc.'s ("AT&T's") recent filing.¹ AT&T was IVANS' wholesale provider during the years in question for the review. AT&T's filing demonstrates that AT&T reported assessable revenues and made contributions on the revenues it received from IVANS. Thus, any additional assessment on these revenues would result in an impermissible double collection. Given the confirmatory nature of AT&T's filing, the previous submissions by IVANS and ABILITY in this proceeding, and the payments IVANS and ABILITY have made on invoices from the Universal Service Administration Company, ("USAC"), there is clear and convincing evidence that all of IVANS' USF contribution obligations have been met. Therefore, based on the evidence submitted, USAC should accept the filings made by IVANS and close this matter.

This summary of the *ex parte* presentation is being submitted pursuant to Section 1.1206(b) of the Commission's rules. The letter is being filed electronically through the Commission's Electronic Comments Filing System. An electronic copy is being sent to Ms. Yoo. Please address any questions to the undersigned.

¹ See Letter from Cathy Carpino, AT&T Services, Inc., to Marlene Dortch, WC Docket No. 06-122 (May 1, 2015).

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Sincerely,

/s/

Alfred M. Mamlet
Christopher Bjornson
Counsel to IVANS, Inc. and ABILITY Network, Inc.

cc: Chin Yoo, Telecommunications Access Policy Division