

Ian Dillner
Vice President
Federal Regulatory Affairs



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1300 I Street, NW, Suite 400 West
Washington, DC 20005

Phone 202.515.2458
ian.dillner@verizon.com

Ex Parte

VIA ECFS

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

Re: International Settlements Policy Reform, IB Docket No. 11-80

Dear Ms. Dortch:

On September 3, 2015, Jacquelynn Ruff, Anastacio Ramos, and Ian Dillner spoke by telephone with Denise Coca, David Krech, and Kimberly Cook of the International Bureau's Policy Division. Consistent with our comments in this proceeding, we discussed the application of benchmarks to indirect routing arrangements to address anti-competitive conduct.¹

This letter is being filed pursuant to Section 1.1206 of the Commission's rules. Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Ian Dillner".

¹ See Verizon Comments at 5-14 (Aug. 18, 2011).