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FILED ELECTRONICALLY

November 6, 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 Wednesday, November 4, 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 the evidence that all of IVANS' USF contribution obligations have been met. We indicated how IVANS filed its Form 499s using a very conservative methodology that resulted in overreporting assessable revenues. We noted that even if USAC were permitted to go back beyond the five years for which IVANS filed 499s, the assessable revenues would be virtually *de minimis* and far exceeded by the overpayments IVANS made as a result of its conservative revenue reporting. And we explained how AT&T Services, Inc. reported as assessable revenues and made contributions on the revenues it received from IVANS, making any additional assessment on those revenues an impermissible double collection.

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.

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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