



The voice of mid-size communications companies

December 7, 2015

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

**Re: Ex Parte Communication: MD Docket No. 15-121**

Dear Ms. Dortch:

On December 3, 2015, Jeb Benedict, Joy McConnell-Couch (by phone), and Shelly Eggert (by phone) of CenturyLink, AJ Burton and Randy Brockmann (by phone) of Frontier, and Genny Morelli and the undersigned of ITTA met with Mika Savir in the Enforcement Bureau and Tom Buckley in the Office of Managing Director regarding the Commission's annual assessment and collection of regulatory fees.<sup>1</sup>

We discussed the disproportionate regulatory fee burden borne by wireline voice providers and their customers and the need for the Commission to adjust its regulatory fee structure to reflect that the work of the Wireline Competition Bureau is no longer focused exclusively on interstate telecommunications service providers ("ITSPs"). We expressed our continued support for the Commission to combine wireless voice providers into the ITSP regulatory fee category so that all voice providers pay regulatory fees on the same basis, and we advocated for a revenues-based approach for purposes of implementing the combined fee category. We also discussed other methodologies the Commission could utilize in calculating regulatory fees to reflect that the work of the Wireline Competition Bureau impacts multiple segments of the communications industry.

Please do not hesitate to contact the undersigned with any questions regarding this submission.

Respectfully submitted,

Micah M. Caldwell  
Vice President, Regulatory Affairs

cc: Mika Savir  
Tom Buckley

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<sup>1</sup> See *In the Matter of Assessment and Collection of Regulatory Fees for Fiscal Year 2015*, Report and Order and Further Notice of Proposed Rulemaking, MD Docket No. 15-121 (rel. Sept. 2, 2015) ("*FY 2015 NPRM*").