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March 30, 2001

***EX PARTE FILING***

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: CC Docket No. 99-68, *Ex Parte* Inter-Carrier Compensation for Internet Service Provider Traffic**

Dear Ms. Salas:

On Thursday, March 29, 2001, Lee Schroeder, Vice President of Government and Regulatory Strategy, Cablevision Lightpath, Inc., and Chérie Kiser met with Linda Kinney, Associate General Counsel, Office of the General Counsel, and Tamara Preiss and Glenn Reynolds, Office of the Common Carrier Bureau, to discuss intercarrier compensation for ISP-bound traffic.

Lightpath emphasized the importance of ensuring that the Commission's decision incorporates sufficient guidelines to limit further litigation with respect to these issues under consideration. In particular, Lightpath recommended that no carrier should be permitted to deny payment of compensation owed pending review of a rebuttable presumption application by a carrier. The attached portion of the New York Public Service Commission decision was provided as an example of factors that should be demonstrated to meet a rebuttable presumption

Pursuant to Section 1.1206(a)(1) of the Commission's rules, an original and one copy of this letter are being submitted to the Office of the Secretary.

If you have any questions regarding this matter, please contact the undersigned.

Sincerely,

/s/ Cherie R. Kiser  
Chérie R. Kiser

cc: Linda Kinney  
Tamara Preiss  
Glenn Reynolds  
Lee Schroeder