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December 8, 2003

Via Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *Notice of Ex Parte Presentation:* CC Docket Nos. 01-92, 96-262; WC Docket No. 02-361.

Dear Ms. Dortch;

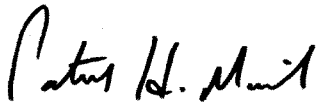
On Friday, December 5, 2003 Robert Quinn Jr. and I met with Jessica Rosenworcel, Legal Advisor to Commissioner Michael J. Copps to discuss the above mentioned petitions. AT&T urged the FCC to deny the US LEC petition as it seeks the ability to impose additional access charges on interexchange carriers, when in fact, the CLEC provides no access service or functionality. Where a CLEC simply inserts itself between the CMRS provider and the ILEC tandem, it provides no genuine access function and should not be permitted to charge the interexchange carrier access. In the situation where a CLEC actually replaces the ILEC in providing the tandem switching or other genuine access functions, the CLEC should only be permitted to charge the ILEC rate for the access functions that are actually being performed by the CLEC, not the full CLEC benchmark rate as requested by US LEC.

We also discussed generally the status of technology surrounding all communications over internet procol and reiterated the position that phone-to-phone IP telephony services must continue to be exempt from arcane, uneconomic and bloated switched access charges. AT&T reviewed the network evolution of services provided over IP and how the Commission's "wait and see" policy concerning IP telephony services has been an incentive to carriers to invest in advanced network architectures. The attached document was used as an outline of that discussion.

The positions expressed by AT&T were consistent with those expressed in their previous filings in the above referenced proceedings.

Consistent with the Commission rules, I am filing one electronic copy of this notice and request that you place it in the record of the proceedings.

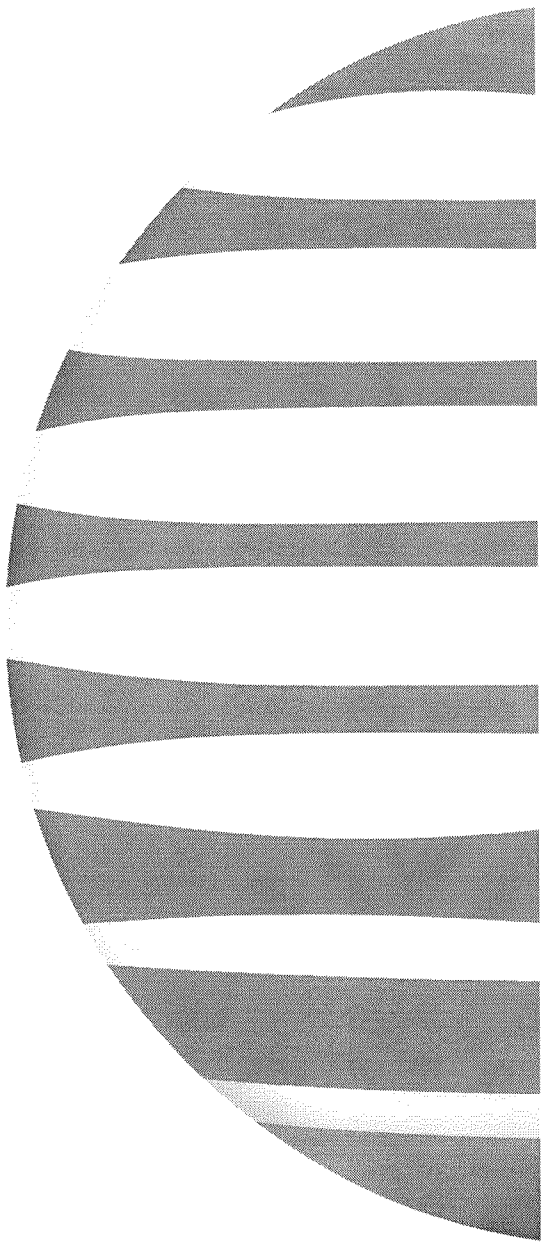
Sincerely,



Attachment

CC: Jessica Rosenworcel

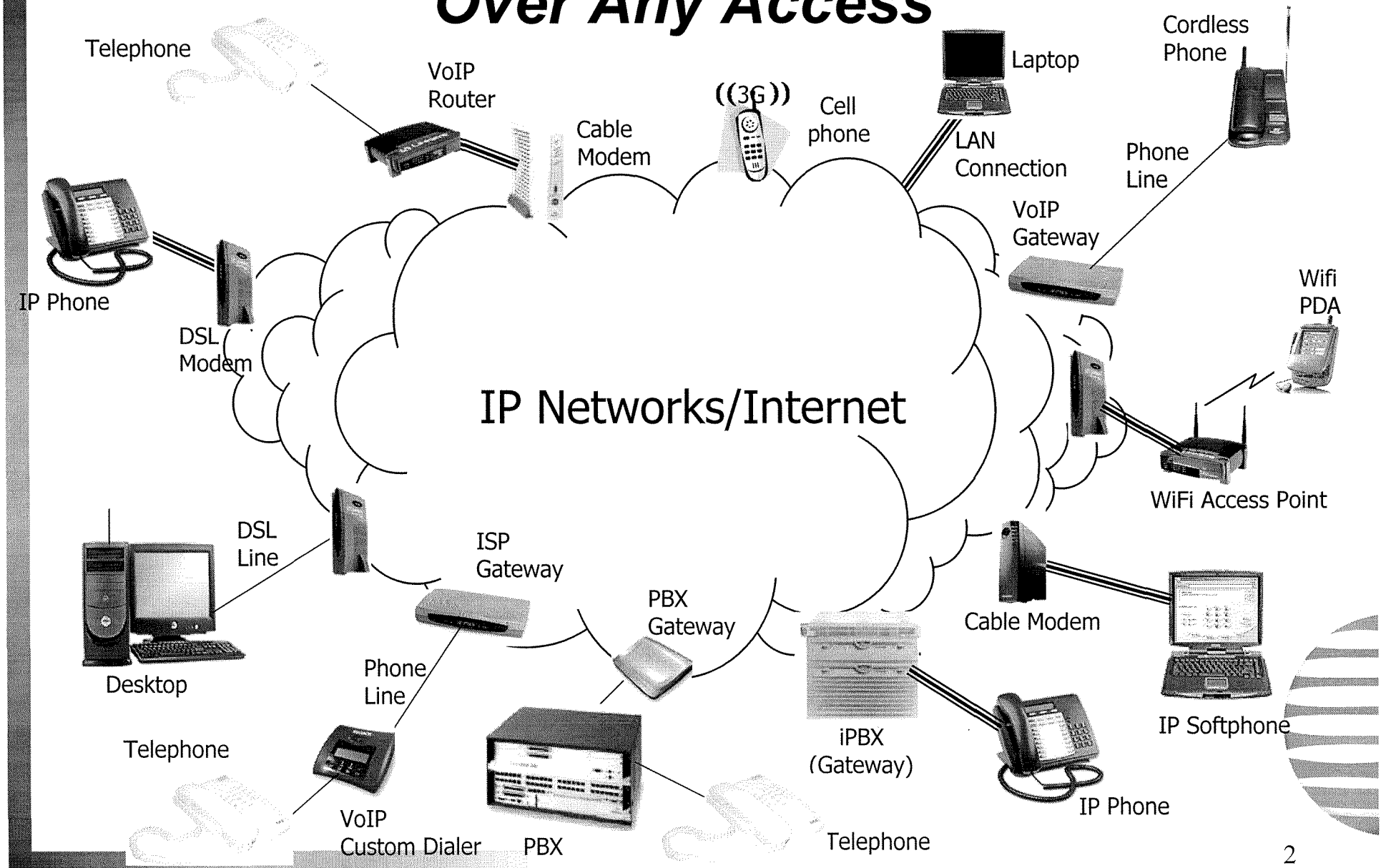
Services over IP Network Evolution



Hossein Eslambolchi

AT&T CTO & CIO and
President - AT&T Labs

Power of IP: Any Device to Any Device Over Any Access



Some Industry Trends

- **Data / voice distinction is blurring**
  - The Internet is increasingly being used for voice and data, including AT&T's phone-to-phone IP telephony
  - Many corporate packet networks run VoIP and TDM combinations
  - LD and Local providers run VoIP for an increasing portion of total traffic
  - Cable operators are offering VoIP and cable telephony services
- **Voice is becoming an application over IP networks**
  - The industry architecture for VoIP is to treat the voice packets and the signaling as applications on an IP network
  - Innovative IP-based applications (call routing, integrated messaging, …) are written for the IP network
  - Phone numbers are going to be location independent
  - Phone calls are going to be distance independent
- **Device functionality is converging**
  - Emergence of devices such as cell phones that are PDAs, SIP telephones that are also Java computing devices, WiFi handsets that are SIP endpoints
  - Protocol conversion is happening directly in many CPE devices, not just "computers"

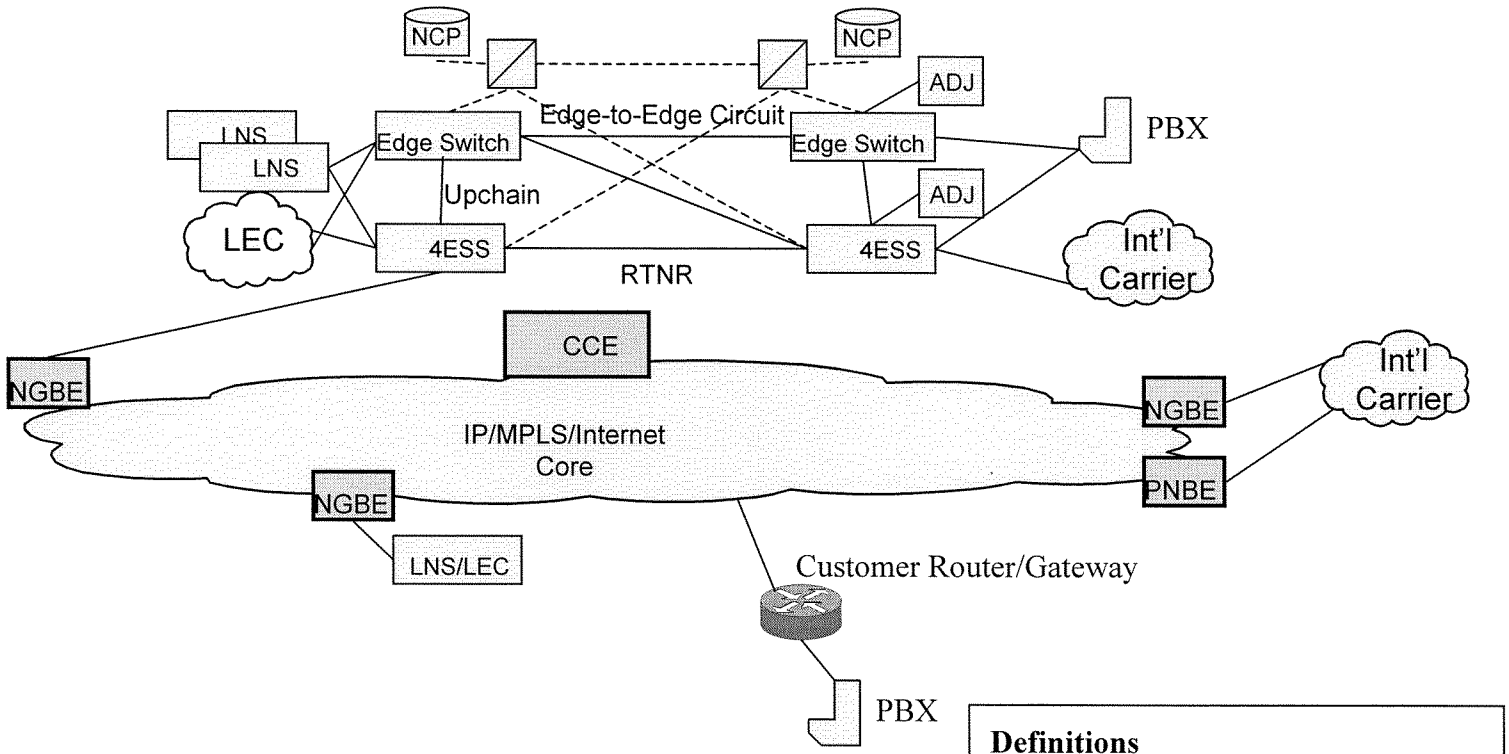
It is quickly becoming difficult to discern what a "phone call" is in the traditional sense

AT&T's Approach to VoIP

- **Voice over IP – The early days**
  - Learnings to improve reliability, operations and scalability
  - Network efficiency and availability of cost-based termination
  - Integrated access types
- **Voice over IP – Today's build-out**
  - Infrastructure capital savings
  - Executing the build-out with equipment and systems on par with carrier-quality
  - Reach to native IP endpoints (cable, DSL, private line, VPN, IP-PBXs)
- **Services over IP – The Target: seeds planted for the industry's future**
  - Value-added services based on direct IP connections to the network
  - A software-based platform for innovative third-party applications, devices and access types

AT&T is on a migration path to provide value-added services on a reduced cost infrastructure

VoIP – The Early Days

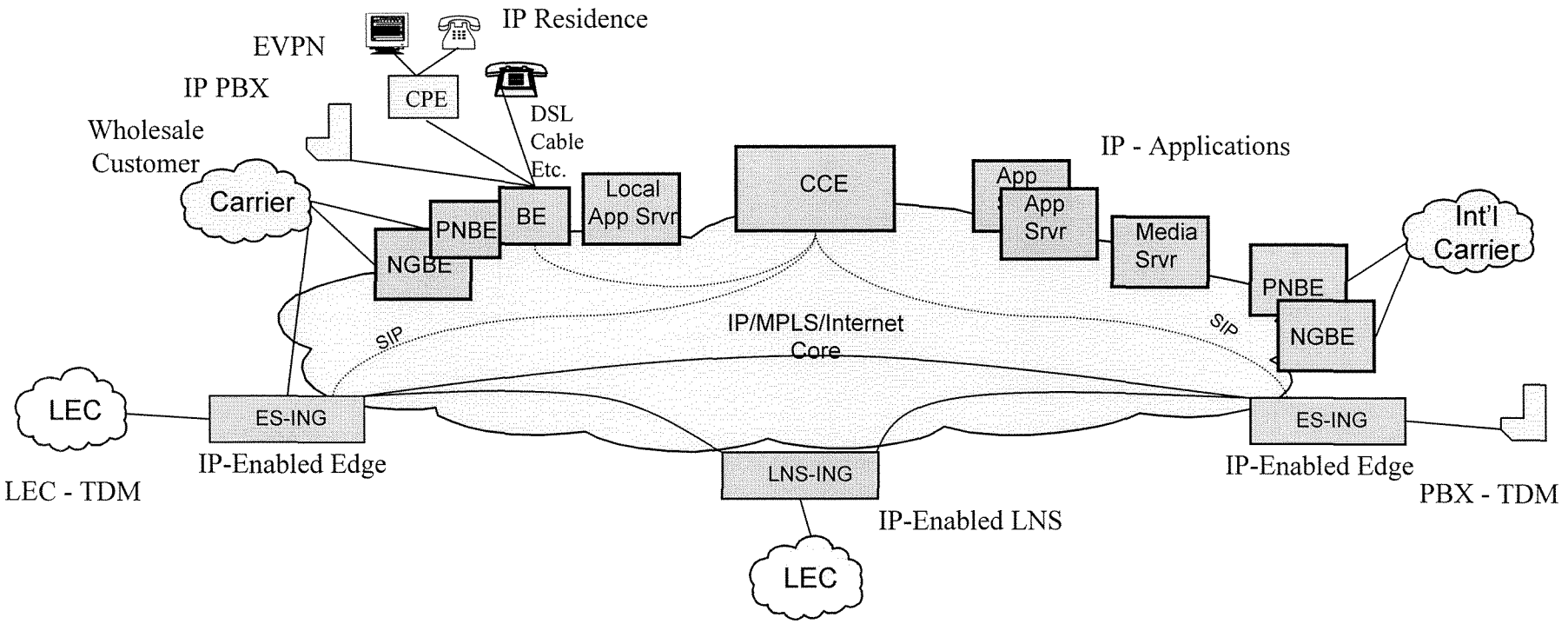


Advanced Voice Features Across TDM VoIP transport with hop-on/hop-off

Definitions

- BE – Border Element
- CCE – Call Control Element
- ING – Integrated Network Gateway
- NGBE – Network Gateway Border Element
- PNBE – Peer Network Border Element

VoIP – Today's Build-out



Interconnect local, toll & international switches with IP
Replace Adjuncts with Media Servers to reduce capex
Interconnect private VPNs with public VoIP services

- Definitions
- BE – Border Element
- CCE – Call Control Element
- ING – Integrated Network Gateway
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- PNBE – Peer Network Border Element

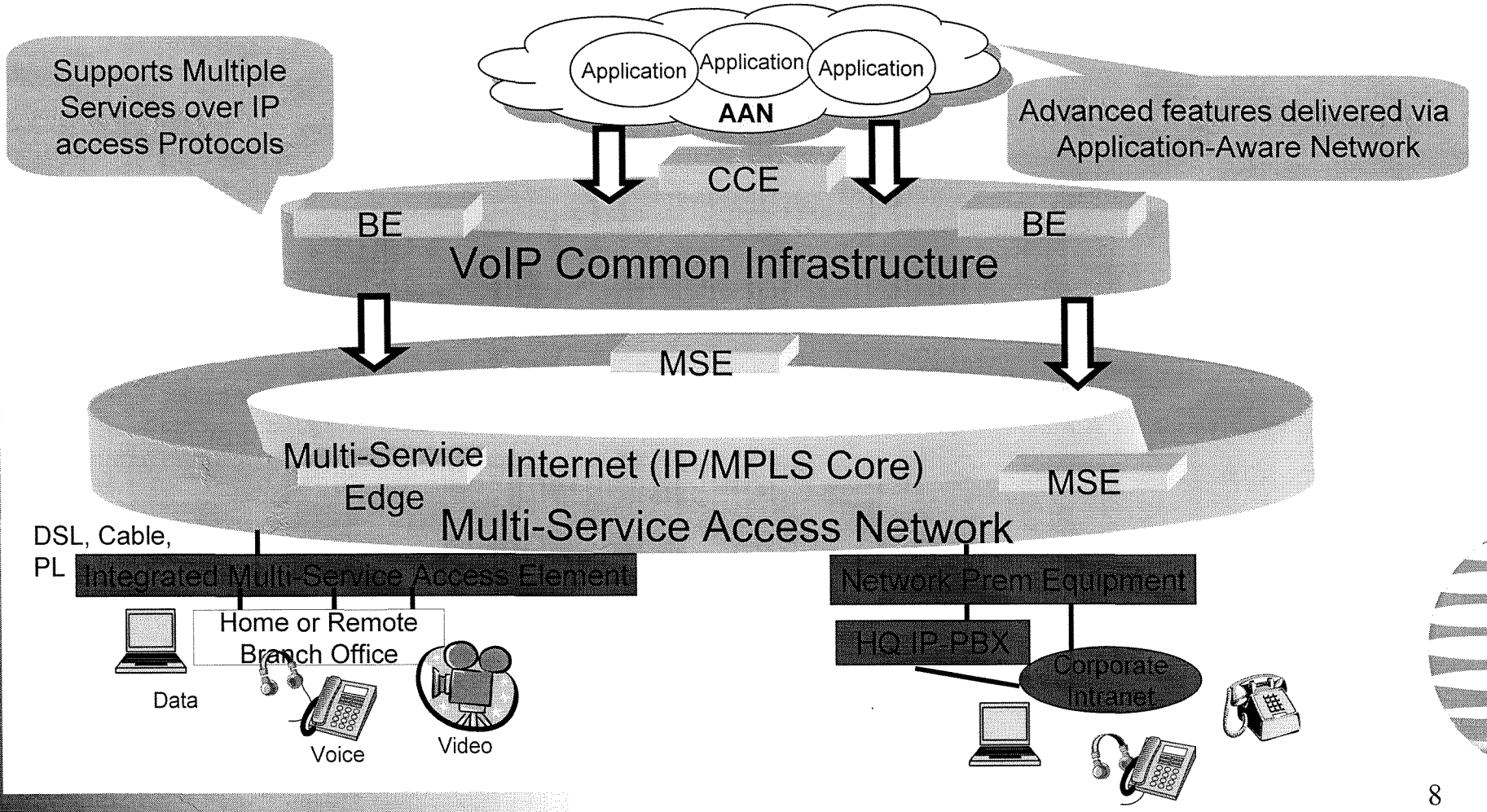
Voice Transformation to IP

- **The AT&T Voice Network – Big shoes to fill**
  - 350M calls/day
  - <100 Defects per Million
  - 10^{-5} blocking
  - 200 Toll switches; over 130 Local switches; 15 International gateways
- **Magnitude of Migration**
  - Approximately 525K T1s connected to the LD network
  - Even more complicated than the industry shift to all-fiber networks and the digital conversion (due to VoIP protocol explosion)
  - Huge investment in VoIP network, systems and migration tools
- **Industry perspective**
  - Little investment being made in circuit switching technology
  - Investment in VoIP technologies and real-time, IP-based applications
  - Intelligent endpoints (not just black telephones) are emerging

AT&T is undergoing a massive transformation to VoIP

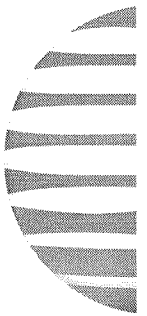
Services over IP – The Target

- **Secure, integrated voice/data/video access**
- **Extension of premise intelligence to reduce operations cycle time**
- **Innovative applications in the network based on standard protocols and service creation environment**
- **End-to-end resiliency to central office failure**



Take-Aways

- Data / voice distinction is already blurred and will become completely indistinguishable in the future.
- Voice is increasingly becoming an application over IP networks.
- Device functionality (computer/telephone) is converging.
- Because of the FCC's de-regulatory policies towards VoIP, capital was available to begin the enormous task of integrating VoIP technology into carrier networks.
- Today, innovation and investment in VoIP is on the rise as the industry moves to an integrated IP platform. AT&T, for example, is undergoing a massive transformation of the Voice Network to IP.
- The FCC should continue its deregulatory policies on VoIP to provide carriers the incentive to continue that evolution and to ensure continued investment growth throughout the industry



Top Ten Technology Trends

- IP Will Eat Everything!
- Broadband Will Be Common
- IP Will Ride Over Optics Directly
- Network Is Getting Smarter
- Data Will Move Into the Internet
- Home LANs Will Proliferate
- Security Is Critical
- Next-Gen Distributed Networking Is Growing
- Wireless Internet Will Be Big
- Application Development Will Be The Key