

Karen Brinkmann  
Direct Dial: 202-637-2262  
karen.brinkmann@lw.com

555 Eleventh Street, N.W., Suite 1000  
Washington, D.C. 20004-1304  
Tel: (202) 637-2200 Fax: (202) 637-2201  
www.lw.com

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February 5, 2004

### **By Electronic Filing**

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

Re: WC Dockets 03-211, 03-45, and 02-361; Notice of *Ex Parte* Presentation

Dear Ms. Dortch:

On Tuesday, February 3, 2004, Stewart Ewing and John Jones of CenturyTel, Inc. and I met with Commissioner Adelstein and Lisa Zaina concerning the above-captioned dockets. On Wednesday, February 4, 2004, Glen Post, Stewart Ewing and John Jones of CenturyTel and I met with Chairman Powell and Christopher Libertelli, and with Jessica Rosenworcel, concerning the same proceedings. In these meetings, CenturyTel summarized the arguments made in its Comments in Docket 03-211 filed October 27, 2003, and urged the Commission to quickly and clearly respond to AT&T's petition in docket 02-361, and confirm that all interexchange telecommunications service providers that use the exchange access services of local exchange carriers remain subject to access charges unless and until the law is changed. CenturyTel supports the initiation of a comprehensive rulemaking to consider the appropriate classification and regulation of all services provided over packet-switched technologies, such as Internet Protocol, but does not believe VOIP is a unique service. The attached materials were distributed at these meetings. Please direct any questions concerning this matter to me.

Very truly yours,



Karen Brinkmann

Enclosure

cc: Honorable Michael K. Powell  
Honorable Jonathan S. Adelstein  
Christopher Libertelli  
Jessica Rosenworcel  
Lisa Zaina

Glen Post, Chairman & CEO  
Stewart Ewing, CFO  
John Jones, Vice President, Federal Regulatory  
CenturyTel, Inc.

**Presentation to the Federal Communications Commission  
on Voice Over Internet Protocol (VoIP) and Similar Technologies**

**February 3-4, 2004**

- I. **INTRODUCTION:** CenturyTel supports a clear FCC statement on the AT&T VoIP petition in the short term, and a thorough airing of the remaining issues surrounding VoIP in the rulemaking process for the long term
- II. **VoIP implications for a mid-size carrier and its customers are far-reaching:**
  - a. Inter-carrier compensation
  - b. Universal service
  - c. Definition of broadband
  - d. Competition
  - e. Public safety, network reliability and disaster recovery
  - f. Conclusion: New VoIP offerings are accelerating the need for clear rules, proper sequencing of rulings, and stabilization of the regulatory landscape
- III. **Technology does not define the service for regulatory purposes:** There are many different services that use “Internet protocol” and other packet-switching technologies, but the technology alone does not define how the service is classified under the Communications Act
- IV. **Limited regulation, but how to get there?** The FCC first should rule on how these services are classified under existing law; then it may seek comment on whether the law should change prospectively; the FCC also should resolve pending rulemakings on the proper treatment of Broadband services offered by companies such as CenturyTel
- V. **AT&T’s petition should be denied:** Current access charge rules are clear and should be enforced – AT&T’s service is *not* Internet-based
- VI. **FCC policies should further broadband deployment in all markets:** CenturyTel supports making Broadband a supported USF core service
- X. **The FCC’s action – and inaction – has a direct impact on the financial markets, public perceptions**

# End to End Internet Value Chain

