

**BellSouth Corporation**  
Suite 900  
1133-21st Street, NW  
Washington, DC 20036-3351

glenn.reynolds@bellsouth.com

**Glenn T. Reynolds**  
Vice President -  
Federal Regulatory

202 463 4112  
Fax 202 463 4142

October 26, 2004

**Ex Parte**

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

**Re: IP-Enabled Services, WC Docket No. 04-36; Vonage Petition for Declaratory Ruling, WC Docket No. 03-211**

Dear Ms. Dortch:

The attached white paper provides an analysis of the Commission's jurisdiction over IP-enabled services, including in particular VoIP, and the Commission's authority to preempt state regulation of such services.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



Glenn T. Reynolds

**Attachment**

Cc: Jeffrey Carlisle      Marcus Maher  
Michelle Carey      Darryl Cooper  
Thomas Navin      Christi Shewman  
Julie Veach      John Stanley  
Russell Hanser      Austin Schlick  
Terri Natoli