



January 28, 2005

**VIA ELECTRONIC FILING**

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

Re: In the Matter of Developing a Unified Intercarrier Compensation Regime,  
CC Docket No. 01-92; In the Matter of Federal-State Joint Board on Universal Service,  
CC Docket No. 96-45; In the Matter of IP-Enabled Services, WC Docket No. 04-36

Dear Ms. Dortch:

This letter is filed in accordance with Commission rules. On January 27, 2005, Charlie Cooper of Telec Consulting Resources, Wendy Fast of Consolidated Companies, Michael Urdahl and S. Michael Jensen of Great Plains Communications and I met with Commissioner Michael Capps and his Competition and Universal Service Legal Advisor, Jessica Rosenworcel, to discuss issues in the above docket. We referred to the attached presentation.

We presented the Alliance for Rational Intercarrier Compensation's ("ARIC") views and recommendations on how it believes that regulators should manage the transition from circuit switching to the packet-switched world utilizing the layers model for regulation. Those recommendations are included in the attachment. Specifically, the ARIC representatives recommended that the FCC should:

- Stabilize and re-target high-cost support to broadband infrastructure outside city limits, while considering a separate fund for rural wireless services.
- Address barriers to entry and concentration of market power by maintaining open network access to the IP backbone and local distribution.
- Forebear on regulation of retail services (content and applications).

Sincerely,

Ken Pfister  
Vice President-Strategic Policy  
Great Plains Communications

Enclosure