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February 11, 2005

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
455 12th SW
Portals II, Room TW-A325
Washington, DC 20544

Re: In the Matter of Level 3 Communications LLC's Petition for Forbearance Under 47 U.S.C. § 160(c) and Section 1.53 of the Commission's Rules from Enforcement of Section 251 (g), Rule 51.701(b) (1) and Rule 69.5(b).

Dear Ms. Dortch:

One Feb. 10, 2005, I spoke telephonically on behalf of Level 3 Communications with Jennifer McKee, Assistant Division Chief of the Telecom Access Policy Division. The call was in response to questions directed from Ms. McKee to Level 3's counsel John T. Nakahata.

In that conversation, Level 3 explained that in those instances where the Company uses an off-net provider to terminate VoIP originated traffic, Level 3 must pass through to its customers the termination rate it is charged by the terminating carrier. Level 3 reiterated that by granting its Petition, the FCC will provide clear guidance to VoIP providers on the economic treatment of IP to PSTN and PSTN to IP calls. Reaffirming the "rules of the road" is necessary to prevent special interests from engaging in piecemeal intercarrier compensation reform by imposing access charges on traffic that has been historically not been subject to access charges.

In addition, Level 3 explained that a number of commentators have mischaracterized the rate structure that would apply to PSTN to IP traffic that terminates on an IP network such as Level 3. For traffic that meets the criteria of the petition, the proper termination rate for traffic to the Level 3 network is the appropriate reciprocal compensation rate which in this case is currently .0007 per mou.

In accordance with Section 1.1206(b) (2) of the Commission's rules, this letter is being filed electronically with your office.

Please feel free to contact me if you have questions.

Sincerely

William P. Hunt III