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March 11, 2005

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street NW
Washington, D.C. 20664

RE: FCC Dockets WC No. 03-266 & 04-36 – March 3, 2005 Ex Parte Letter from
Rodney L. Joyce for ad hoc manufacturers' coalition.

Dear Ms. Dortch:

Please consider this letter to be QSI Consulting, Inc.'s ("QSI's") response to the above listed Ex Parte filing.

On March 3, 2005, Mr. Rodney Joyce filed, on behalf of the ad hoc manufacturers coalition, an Ex Parte¹ with the FCC in the above mentioned docket. In his Ex Parte, Mr. Joyce asserted that the Telecommunications Industry Association ("TIA") forecast for Voice over Internet Protocol ("VoIP") lines on which QSI relied in its report entitled *IP-Enabled Voice Services: Impact of Applying Switched Access Charges to IP-PSTN Voice Services*² included only business VoIP lines, rather than both business and residential VoIP lines.

The purpose of this letter is to inform the Commission that on December 15, 2004 QSI contacted the TIA on this same matter. Specifically, QSI asked whether TIA's VoIP access line data³ were based on both residential and business lines. On December 20, 2004, QSI received a response from Ms. Mary Lou Coffman, TIA Publications Department, confirming that TIA's VoIP access line data included both residential and business VoIP lines.

In addition, QSI notes that even if the TIA figures *were* a measure of IP PBX line shipments, as suggested by Mr. Joyce, such measure would have over-estimated IP PBX

¹ Mr. Joyce's Ex Parte addressed QSI's Ex Parte dated February 23, 2005, in which QSI explained why the criticisms set forth in the Manufacturers Coalition's February 17, 2005 Ex Parte regarding QSI's report were unwarranted.

² QSI's Report was filed in this docket on January 27, 2005.

³ See QSI's Report, Attachment 3 (Bibliography) citing Telecommunications Industry Association (TIA) "VoIP Market Begins To Take Off." Tech Trends Vol. 1, No. 1 (May 2004).

based VoIP lines because IP PBX line shipments represent a maximum capacity, rather than traffic-generating working VoIP lines.

Accordingly, Mr. Joyce's assertion that QSI has under-estimated VoIP lines should be rejected.

Respectfully submitted,

Michael Starkey, President
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