



May 19, 2005

Tina M. Pidgeon  
(202) 457-8812  
tpidgeon@gci.com

**EX PARTE – VIA ELECTRONIC FILING**

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

Re: WC Docket No. 03-133; *AT&T Petition for Declaratory Ruling regarding Prepaid Calling Card Services*  
WC Docket No. 05-68; *Regulation of Prepaid Calling Card Services*  
CC Docket No. 01-92; *Developing a Unified Inter-carrier Compensation Regime*  
CC Docket No. 96-45; *Universal Service Fund Contribution Methodology*  
Notice of Oral Ex Parte Presentation

Dear Ms. Dortch:

On May 18, 2005, Ron Duncan and I met with Chairman Martin and Dan Gonzalez, Chief of Staff to the Chairman, to discuss matters related to the captioned proceedings.

GCI highlighted the continuing problems associated with the misclassification of calling card traffic. Significant intrastate access charges continue to be shifted to GCI in amounts that are well out of proportion with its in-state interexchange market share. Consistent with the statements made by Affidavit in AT&T's Motion to Stay the Commission's Calling Card Order (WC Docket No. 03-133, rel. Feb. 23, 2005), increased volume of traffic terminating to GCI have been stripped of call record data, or include jurisdictionally altered call record data, that would otherwise be used to identify the originating point, and ultimately the jurisdiction of and assessment of charges to, the traffic.

In light of these increasing efforts to evade compliance and troubling potential impediments to determining monies owed, GCI agrees with AT&T that the Commission should confirm that all enhanced calling card services are subject to interstate and intrastate access charges, *and* that the stripping or jurisdictionally altering of information otherwise required to be passed with the call is prohibited, and penalties should apply for such actions.

Ms. Marlene H. Dortch

May 19, 2005

Page 2 of 2

We further discussed the importance of FCC action to reform the USF contribution methodology to broaden the contribution base and to adopt and implement as quickly as possible access charge reform. Both actions would help alleviate the incentives for service providers to mischaracterize traffic, both by service classification and jurisdiction.

In accordance with the Commission's rules, a copy of this letter with attachment is being filed in the captioned proceedings.

Sincerely,

/s/

Tina M. Pidgeon

Vice President, Federal Regulatory Affairs