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August 19, 2005

VIA ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street SW
Washington DC 20554

Re: NOTICE OF EX-PARTE COMMUNICATIONS

In the Matter of Federal-State Joint Board on Universal Service, et. al.,
CC Dockets No. 96-45, 98-171, 90-571, 92-237, 99-200, 96-116, 98-170, 02-33, 95-20, 98-10 and NSD File No. L-00-72.

Dear Ms. Dortch:

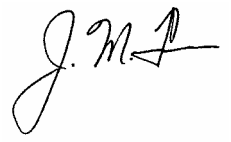
On August 17, 2005, members of the Intercarrier Compensation Forum (ICF) met with Rich Lerner, Rodger Woock, Narda Jones, Cathy Carpino, Carol Pomponio, and Greg Guice of the Wireline Competition Bureau. Representing the ICF were David Hostetter, Ellen Blackler and the undersigned of SBC, and Joel Lubin and Amy Alvarez of AT&T. Also in attendance via telephone were Jim Eisner of the Wireline Competition Bureau and Mark Lemler of AT&T.

The purpose of this meeting was to discuss the ICF proposal to reform the existing universal service contribution mechanism and, in particular, the methodology for determining and counting the assessable connections for interstate dedicated non-switched services sold to end users. In the attached materials, which were distributed and used during this meeting, it is important to note that the diagrams and accompanying tables are designed only to identify and quantify the assessable connections. They do not represent the magnitude of the universal service contribution assessment associated with each connection. Rather, consistent with the ICF proposal currently in the record, the magnitude of the universal service assessment on each connection will vary in accordance with the bandwidth of the connection.

In accordance with Section 1.1206 of the Commission's rules, this letter and the attached are being filed in each of the above referenced dockets via the Commission's ECFS system.

Should you have any questions regarding the attached, please do not hesitate to contact me by whatever means are most convenient for you.

Sincerely,



Attachment

Cc: Mr. Richard Lerner (via electronic mail)
Mr. Rodger Woock (via electronic mail)
Ms. Narda Jones (via electronic mail)
Ms. Cathy Carpino (via electronic mail)
Ms. Carol Pomponio (via electronic mail)
Mr. Greg Guice (via electronic mail)
Mr. James Eisner (via electronic mail)

ICF Plan
Connections-Based USF Contribution Methodology

Purpose:

The ICF Plan proposes a connections-based USF contribution methodology for interstate dedicated non-switched services sold to end users. The purpose of this paper is to develop the details that will be used to determine which connections to count and which service provider to assess.

Step 1 – Identify the network access connections to be counted

The connection-based component of the ICF Plan's USF contribution methodology applies to interstate network access connections. A network access connection is the transmission path (physical or logical), one end of which is connected to an end user's premises that is used to provide the following types of qualifying interstate services:

1. Non-circuit switched, interstate dedicated services with a speed at least equal to the Commission's definition of *high speed* provided for a fee to residential end user customers, i.e., on a retail basis.

2. Non-circuit switched, interstate dedicated services provided for a fee to business end user customers, i.e., on a retail basis.

Step 2 – Identify the service provider to be assessed

The service provider that sells a qualifying interstate service to the end user customer will be assessed. An end user for universal service contribution assessment purposes is any customer of a qualifying interstate service or that is not a carrier or information service provider. A carrier or information service provider shall be deemed an end user when it uses a qualifying interstate service for administrative purposes.

ICF Plan
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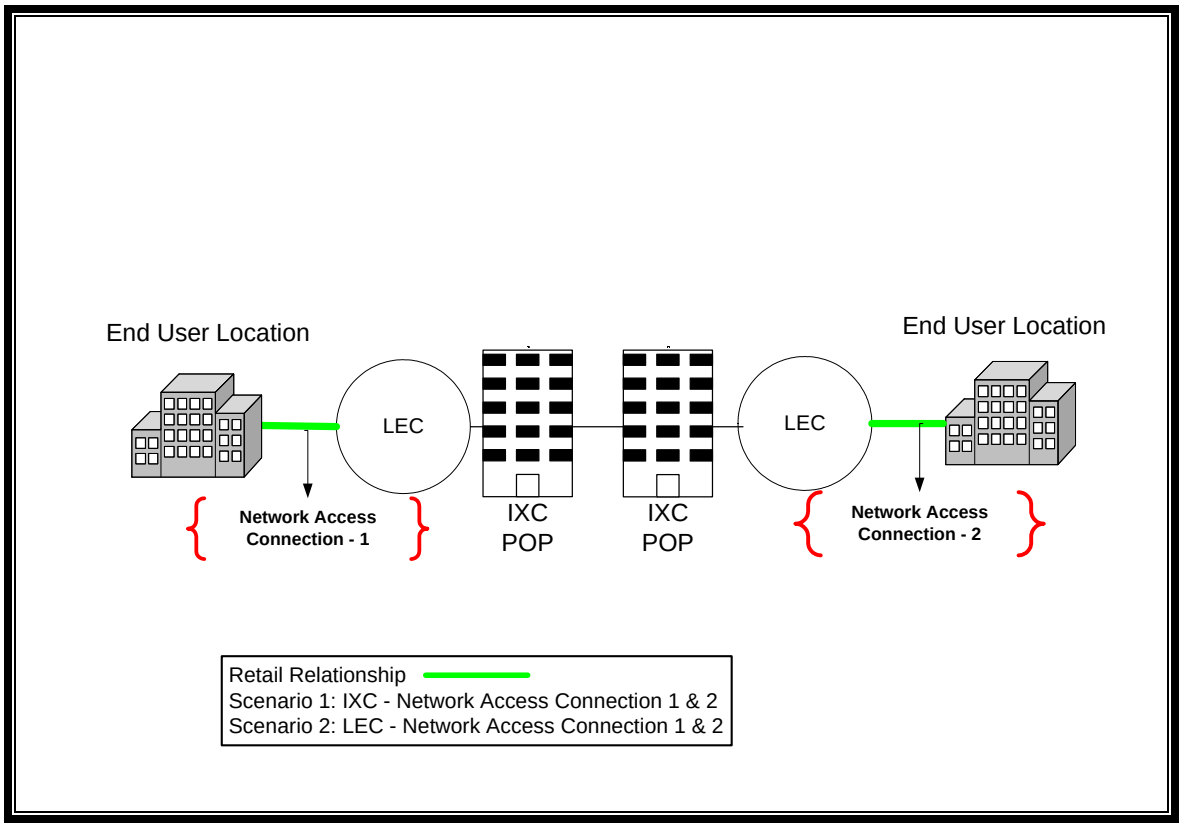
Diagram 1

This diagram illustrates a "point to point" interstate special access service.

Scenario 1: The IXC has the retail relationship for the "end-to-end" qualifying services that provide network access connections 1 and 2.
Scenario 2: The LEC has the retail relationship for the qualifying services that provide network access connections 1 and 2.



Network Access Connections	Number of Assessments	Service Provider Assessed
Network Access Connection 1	1	Scenario 1: IXC Scenario 2: LEC
Network Access Connection 2	1	Scenario 1: IXC Scenario 2: LEC
TOTAL	**2**	

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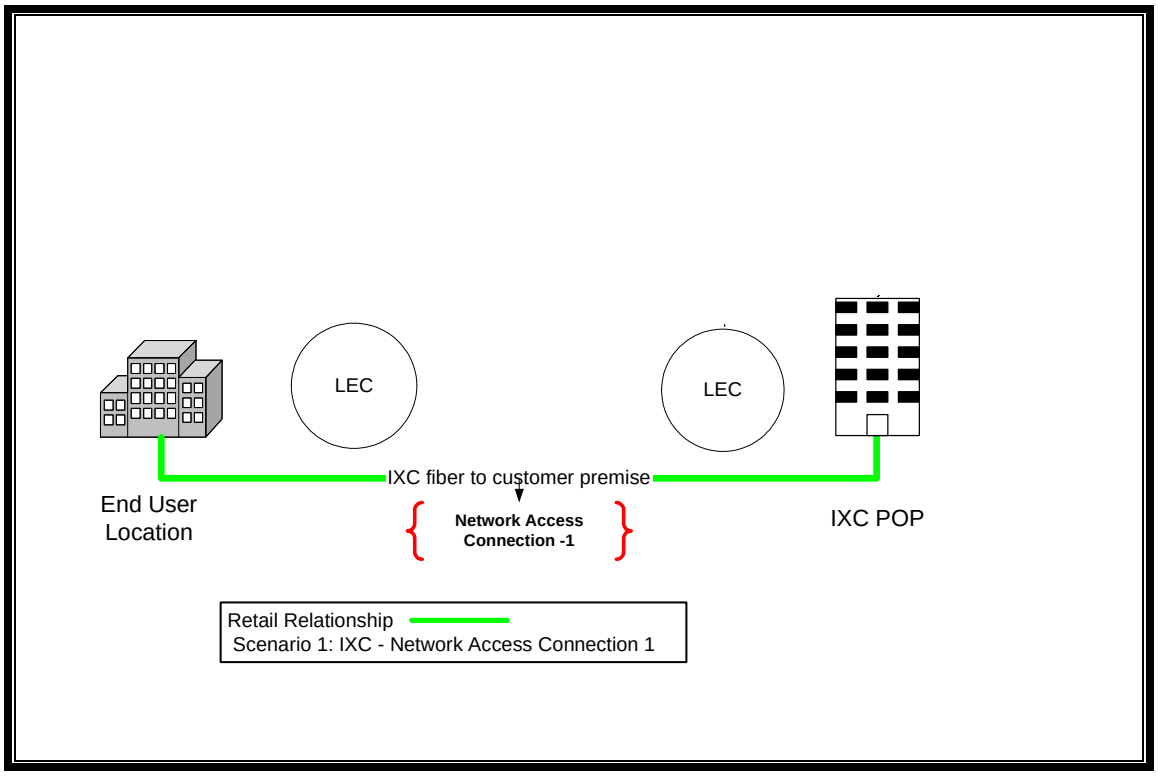
Diagram 2A

This diagram illustrates an IXC self-provisioned fiber system that bypasses the LEC network to provide an interstate special access service.

The IXC has the retail relationship for the qualifying interstate service that provides network access connection 1, which was established through self-provisioned facilities.



Network Access Connections	Number of Assessments	Service Provider Assessed
Network Access Connection 1	1	IXC
TOTAL	**1**	

ICF Plan
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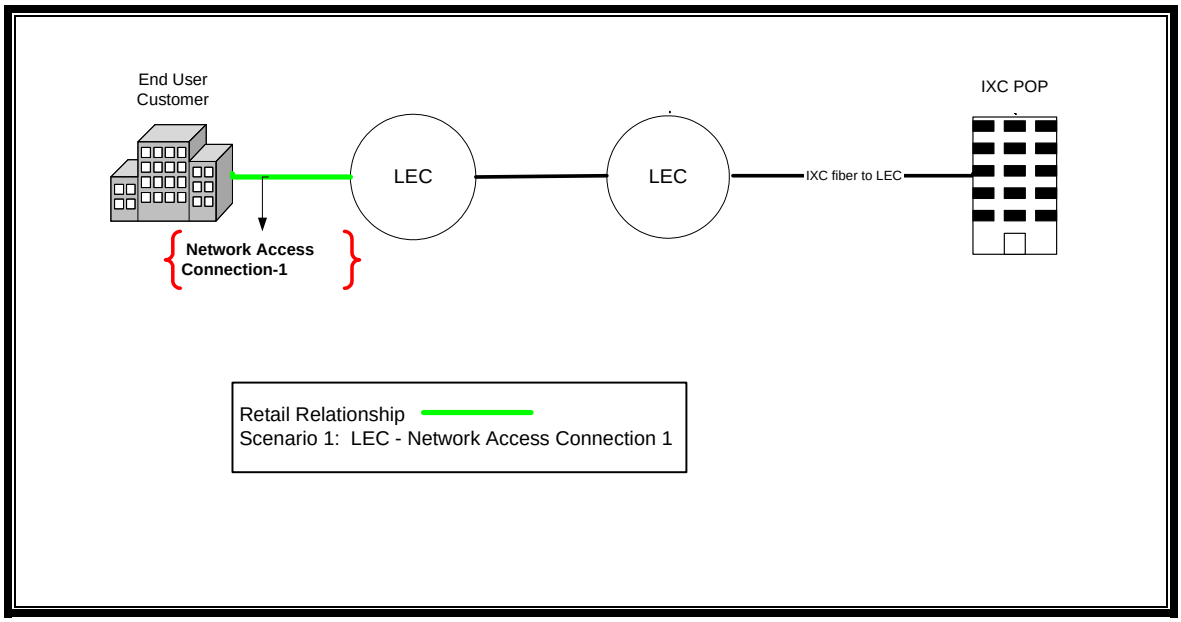
Diagram 2B

This diagram illustrates an IXC fiber system collocated at a LEC wire center, which is connected to a customer location via a LEC interstate special access service.

The LEC has the retail relationship for the qualifying interstate service that provides network access connection 1 between the IXC's POP and the customer's end user location.



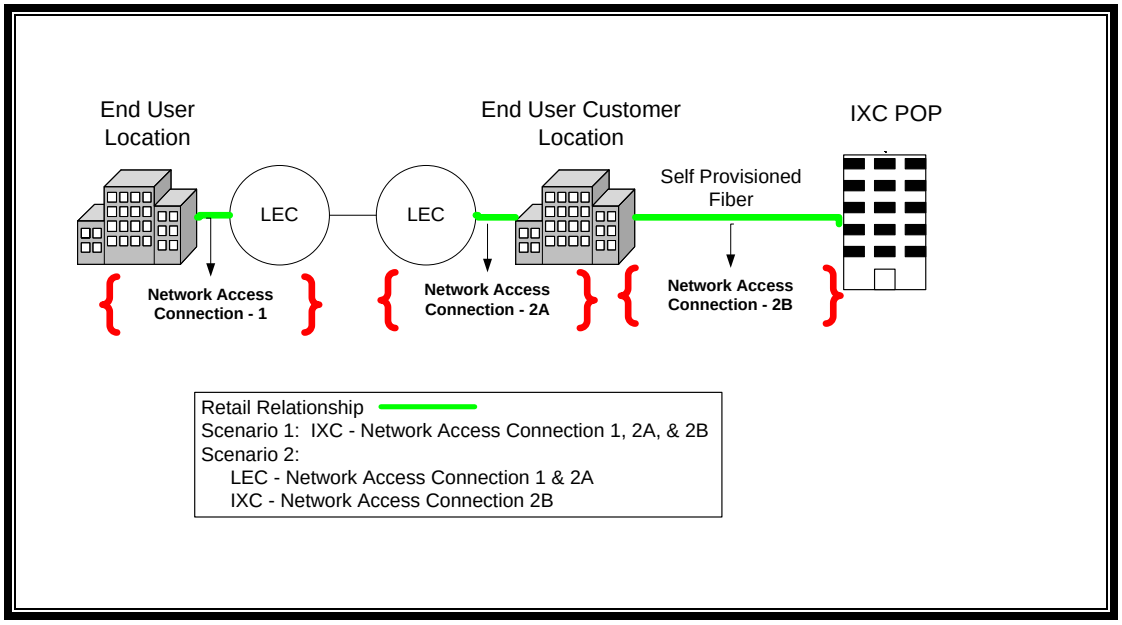
Network Access Connections	Number of Assessments	Service Provider Assessed
Network Access Connection 1	1	LEC
TOTAL	**1**	

ICF Plan
Connections-Based USF Contribution Methodology

Diagram 3

This diagram illustrates a multi-premises service configuration connected on a point-to-point basis using interstate special access services and an IXC's self-provisioned fiber facilities.

Scenario 1: The IXC has the retail relationship for the "end to end" qualifying interstate services that provide network access connections 1,2A, and 2B.
Scenario 2: The LEC has the retail relationship for the qualifying interstate services that provide network access connections 1 and 2A. The IXC has the retail relationship for the qualifying service that provides network access connection 2B.



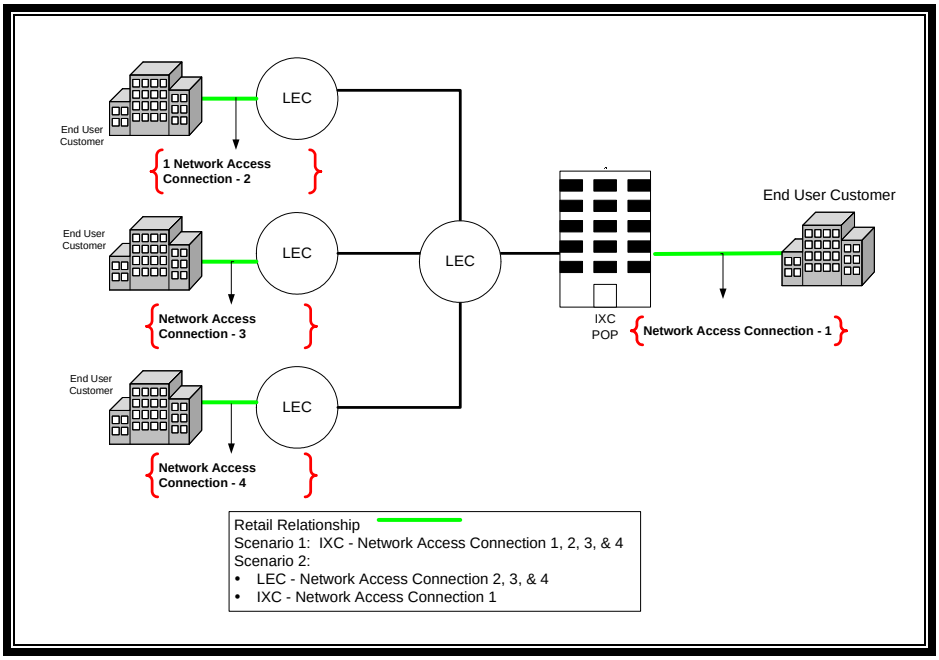
Network Access Connections	Number of Assessments	Service Provider Assessed
Network Access Connection 1	1	Scenario 1: IXC Scenario 2: LEC
Network Access Connection 2A	1	Scenario 1: IXC Scenario 2: LEC
Network Access Connection 2B	1	Scenario 1: IXC Scenario 2: IXC
TOTAL	**3**	

ICF Plan
Connections-Based USF Contribution Methodology

Diagram 4

This diagram illustrates a "multi-point" interstate special access service.

Scenario 1: The IXC has the retail relationship for the "end-to-end" qualifying services that provide network access connections 1, 2, 3, and 4.
Scenario 2: The LEC has the retail relationship for the qualifying services that provide network access connections 2, 3 and 4. The IXC has the retail relationship for the qualifying service that provides network access connection 1, which was established through self-provisioned facilities.



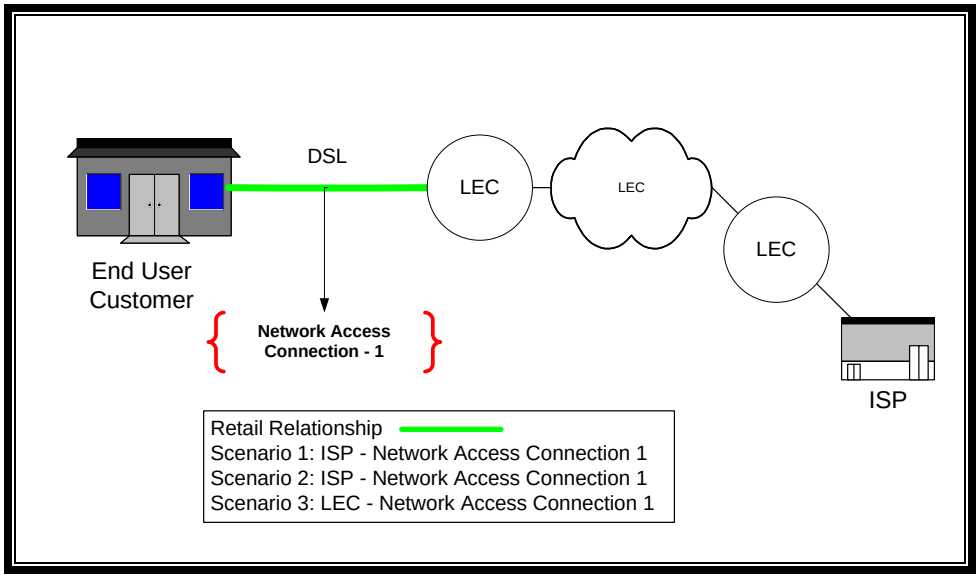
Network Access Connections	Number of Assessments	Service Provider Assessed
Network Access Connection 1	1	Scenario 1: IXC Scenario 2: IXC
Network Access Connection 2	1	Scenario 1: IXC Scenario 2: LEC
Network Access Connection 3	1	Scenario 1: IXC Scenario 2: LEC
Network Access Connection 4	1	Scenario 1: IXC Scenario 2: LEC
TOTAL	**4**	

ICF Plan
Connections-Based USF Contribution Methodology

Diagram 5

This diagram illustrates a high speed Internet access service provided using a DSL interstate special access service.

Scenario 1: A non-facilities based ISP has the retail relationship for the "end-to-end" qualifying interstate information service that provides network access connection 1.
Scenario 2: A facilities based ISP has the retail relationship for the "end-to-end" qualifying information service that provides network access connection 1.
Scenario 3: The LEC has the retail relationship for the qualifying interstate telecommunications service that provides network access connection 1. The ISP has the retail relationship for high speed Internet access (LEC sells DSL and ISP provides high speed Internet access).



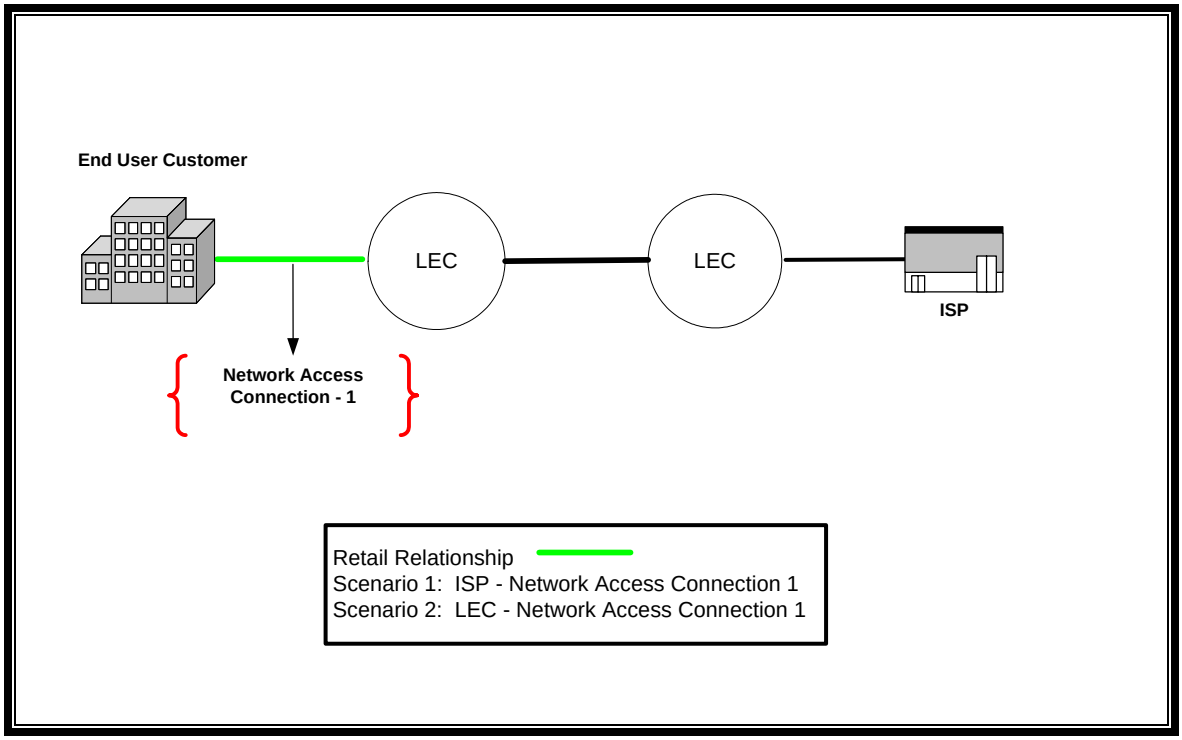
Network Access Connections	Number of Assessments	Service Provider Assessed
Network Access Connection 1	1	Scenario 1: ISP Scenario 2: ISP Scenario 3: LEC
TOTAL	**1**	

ICF Plan
Connections-Based USF Contribution Methodology

Diagram 6

This diagram illustrates a dedicated high speed Internet access service provided to a business end user by using an interstate special access service to connect the business end user to its ISP.

Scenario 1: A facilities based ISP has the retail relationship for the "end-to-end" qualifying interstate information service that provides network access connection 1.
Scenario 2: The LEC has the retail relationship for the qualifying interstate telecommunications service that provides network access connection 1. The ISP has the retail relationship for high speed Internet access.



Network Access Connections	Number of Assessments	Service Provider Assessed
Network Access Connection 1	1	Scenario 1: ISP Scenario 2: LEC
TOTAL	**1**	