

EX PARTE

November 18, 2005

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
TW-A325
Washington, DC 20554

Re: Federal-State Joint Board on Universal Service: CC Docket No. 96-45

Dear Ms. Dortch:

On November 17, 2005, Scott Turicchi, Norman Lent, and I, representing j2 Global Communications, Inc. (“j2 Global”), met with Commissioner Adelstein and Scott Bergman. We discussed the Commission’s proposal to modify the current universal service mechanism by using telephone numbers as the device triggering contribution obligations.

We noted that j2 Global provides outsourced, value-added messaging service, including service that converts facsimile transmissions to email and voice transmissions to voice mail. Its services utilize approximately 9.5 million telephone numbers to provide “free” service to customers. In the event that all telephone numbers, regardless of the uses which they facilitate, trigger universal service contribution obligations, j2 Global would discontinue its “free” services as uneconomic. This would result in loss of service to these millions of customers who value j2 Global “free” services without any corresponding benefit to the universal service fund.

We suggested that in the event telephone numbers were used in whole or in part as the contribution trigger, it would be appropriate to exempt uses of the type exemplified by j2 Global’s services. Among the possible bases for exemption are:

- Numbers used in the provision of information services that by virtue of systems architecture cannot be used for real time communication.
- Numbers employed in connection with services that are provided at nominal or no cost to subscribers.
- Numbers used exclusively to provide facsimile and non- real time services.

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Pursuant to section 1.1206(b)(2) of the Commission's rules, the letter is being filed electronically in the record of the above-referenced proceeding. Please do not hesitate to contact me if you have any questions.

Respectfully submitted,

/s/ David M. Don

David M. Don

cc: Commissioner Adelstein
Scott Bergman