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March 2, 2006

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MAR - 2 2006

Federal Communications Commission
Office of Secretary

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

Re: Ex Parte Notice
Docket Nos.: In the Matter of Special Access Rates for Price Cap Local Exchange Carriers WC Docket No. 05-25
In the Matter of Developing a Unified Intercarrier Compensation Regime CC Docket No. 01-92
In the Matter of Federal-State Joint Board on Universal Service CC Docket No. 96-45

Dear Ms. Dortch:

On March 1, 2006 the undersigned Counsel for Global Crossing Limited, Alfred E. Mottur, Counsel for Global Crossing Limited, and Paul Kouroupas, Vice President, Regulatory Affairs, Global Crossing Limited, met with Commissioner Deborah Taylor Tate and Dana Shaffer, Legal Advisor to Commissioner Tate, to discuss issues related to the aforementioned proceedings and certain substantive points reflected in the submissions already on file in this proceeding. In addition, Mr. Kouroupas provided Commissioner Tate and Ms. Shaffer with a copy of the attached document.

Any questions about these matters should be directed to the undersigned.

Respectfully submitted,

Steven W. Wall

Steven W. Wall
Counsel for Global Crossing Limited

cc: Commissioner Deborah Taylor Tate (w/o attachment)
Dana Shaffer, Esq. (w/o attachment)
Paul Kouroupas, Esq. (w/o attachment)

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Attachment

The New Global Village

Global Crossing Overview

Commissioner Deborah Taylor Tate

March 1, 2006

Global Crossing

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Global Crossing at a Glance

Global Crossing was founded seven years ago based on an idea ahead of its time ... IP.

Network:

- Core network connects over 300 cities in over 30 countries; delivers services to nearly 600 major cities in over 50 countries
- Industry-leading network reliability over "five nines" (99.999+%)
- Current IP traffic over 115 Gbps; Current VoIP traffic at 64%; 2004 total VoIP minutes: 29 billion minutes

Services:

- A fully integrated and interoperable suite of converged IP and legacy services including IP VPN Service, VoIP Services and IP Video.
- Full suite of Managed Solutions that includes Managed Network Services (MNS) and Managed Security Services (MSS).

Customers:

- Customer base includes more than 40% of Fortune 500 companies; 700 carriers, mobile operators, ISPs
- Satisfaction among industry's highest.

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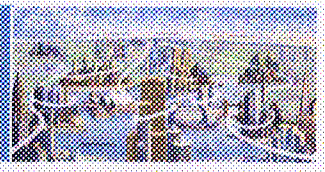
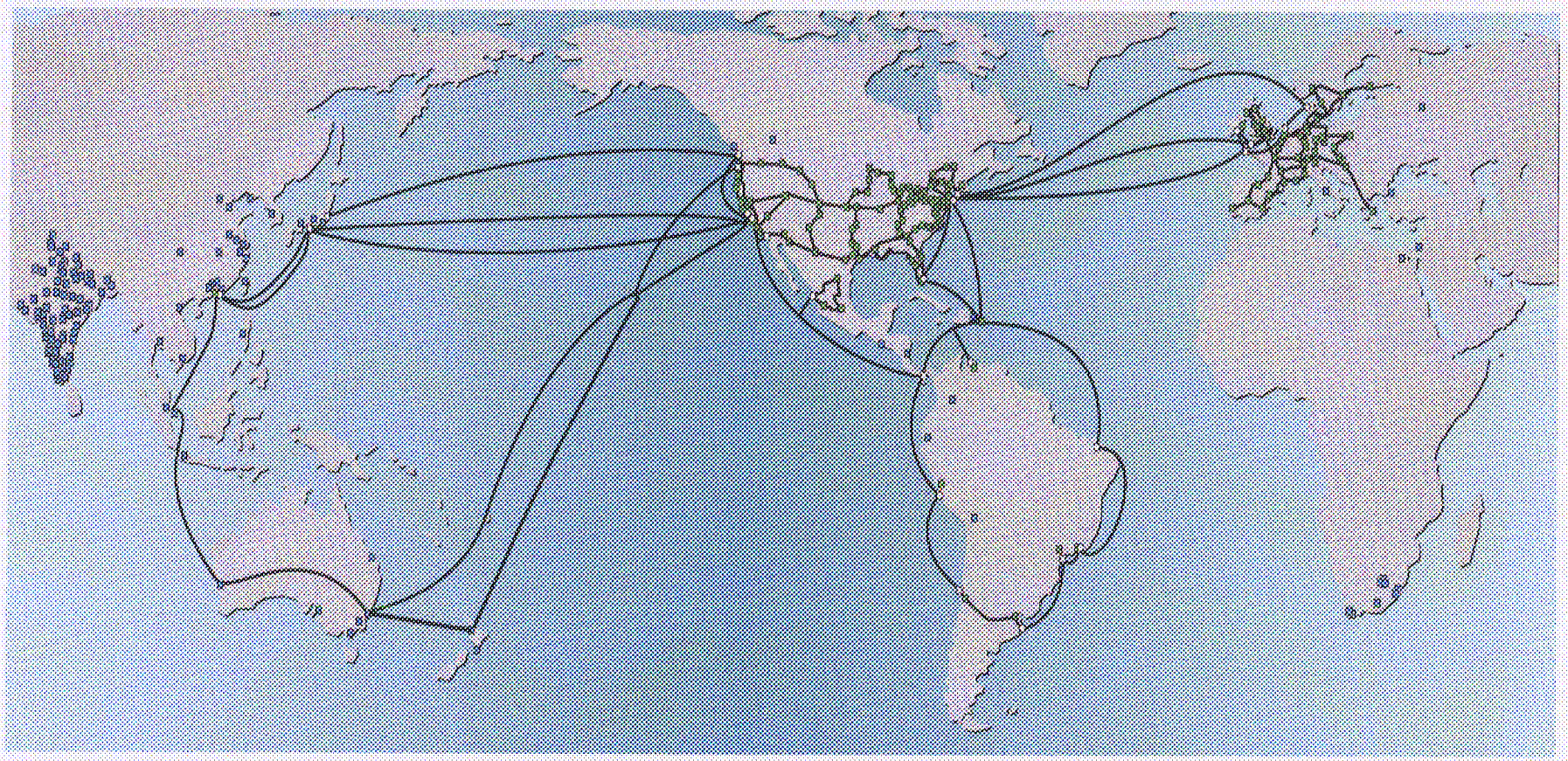
Global Crossing®

A Worldwide IP Network Designed to Optimize Today's Global Business





Global Crossing's highly secure, wholly owned IP network is managed and operated end-to-end. It is a network not to be replicated in the near future, if ever.

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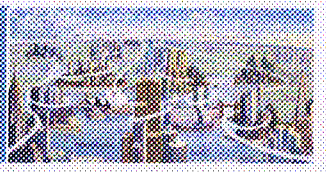
Global Crossing®

Some of our Global Partners and Customers



Financial

BARCLAYS

JPMorgan

Goldman Sachs

FIRST DATA

WELLS FARGO

Merrill Lynch

E*TRADE FINANCIAL

Research & Education

SURFnet

DANTE

HEAnet

FLORIDA INTERNATIONAL UNIVERSITY

Transportation

Virgin trains

Delta

Network Rail

TACA

Alitalia

Tech

Sun

Microsoft

ORACLE

Sonus NETWORKS

EarthLink
We revolve around you.

SunRocket

allstream

Cisco Systems

Schlumberger

Government

U.S. Air Forces

OGC
Office of Government Commerce

BRITISH COUNCIL

Carrier

IDT

vodafone

VONAGE
THE BROADBAND PHONE COMPANY

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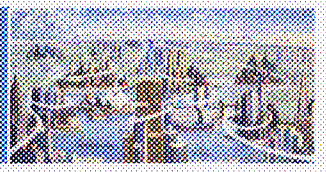
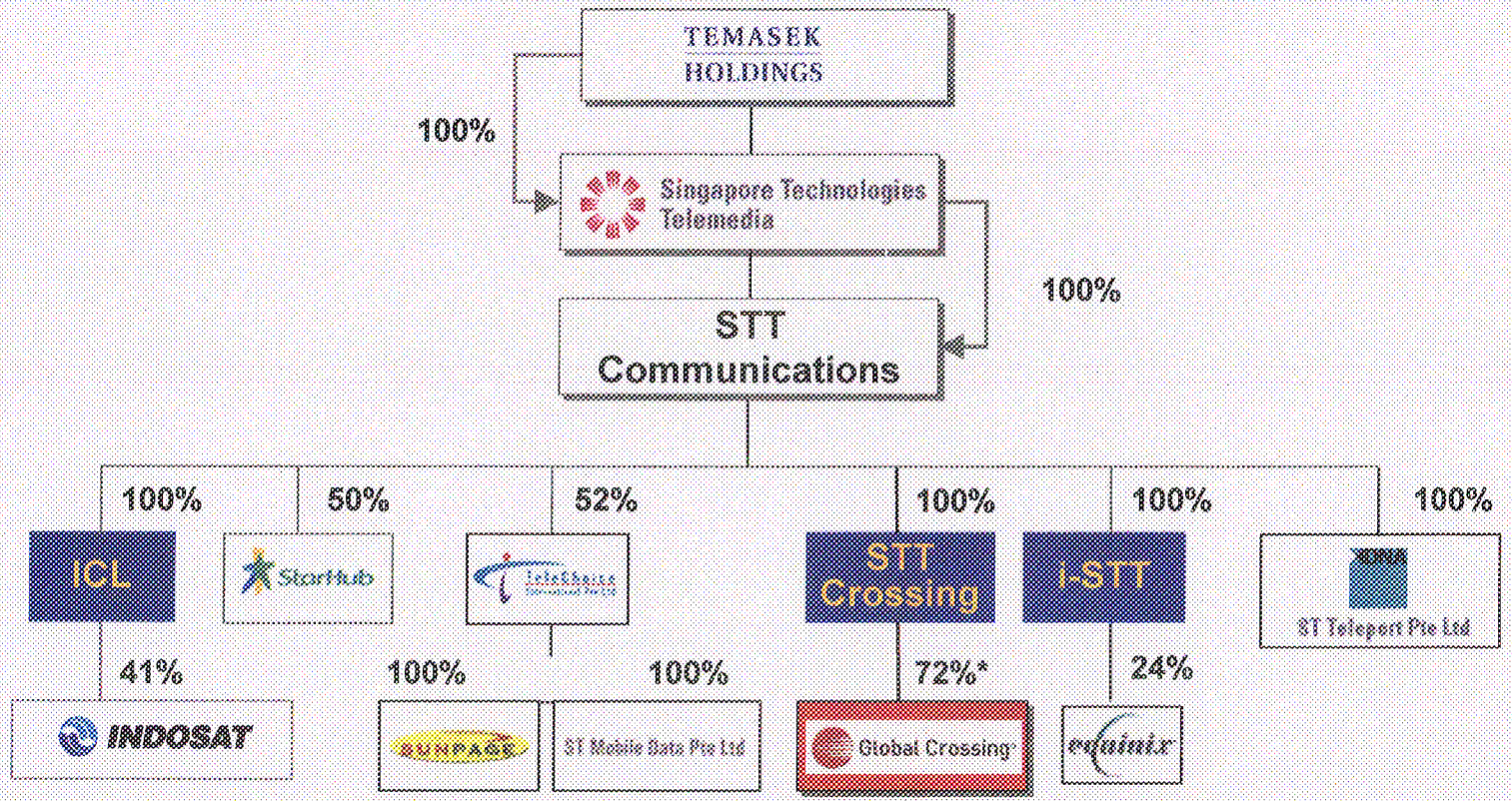
ST Telemedia Provides Strategic and Financial Strength



Focused on IP Services and Wireless Services



*Upon conversion of $250M 4.7% PIK convertible notes

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Global Crossing

Financially Secured for Long-Term Growth

- Global Crossing is fully funded
- Forecasted to begin generating positive EBITDA in 1H06 and positive Cash Flow from operations in 2H06
- 4 consecutive quarters delivering on performance commitments
- 46% improvement in Adjusted EBITDA (Ex-non-cash Stock Comp)
- Adj. Gross Margins absolute dollars improved by 3% in spite of 21% less revenue, year-over-year
- Improved cash burn from operations 41% year-over-year

Financial Profile (YTD ending 9/30/05)

Revenue:	$1,506 million
Adjusted EBITDA:	$(88) million
Cash Use:	$(105) million
Cash:	$260 million
Shares of common stock outstanding:	22.6 million

Largest shareholders:
- ST Telemedia 60.7%
- Carlos Slim and Affiliates 10.8%
- Richard Rainwater 8.0%

Strategy execution on target:

- Launching **new services aligned with our IP Strategy.**
- Primary focus on serving **global enterprise businesses.**
- Continue to strengthen **IP convergence leadership** position through our fully integrated and interoperable suite of IP and legacy services.

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Global Crossing

Full Suite of Solutions to Enable Convergence

A totally integrated and interoperable suite of IP and legacy services that support the migration path to a fully converged environment.

Converged IP Services	Collaboration Services	Data Transport Services	Traditional Voice Services
IP VPN	Video Conferencing IP Video and iVideo	Ethernet IP	Direct Dial
VoIP	Web Conferencing	Ethernet Private Line	Toll Free/Freephone
IP Video	Audio Conferencing	Co-location	Business Line Services
Remote VPN Access	Event Call	Frame Relay/ATM	
Internet Access		Wavelength	
		Private Line	

Global Managed Solutions

Managed Network Services | Managed Security Services

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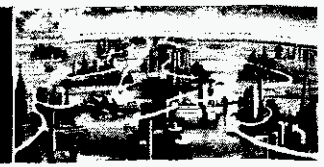
Public Policy Challenges



The regulatory process itself is increasingly becoming a barrier to entry in the telecommunications industry

- Only very large, well-funded entities have the resources to perpetually litigate an issue and thus shape the pace and direction of regulations
- The industry can no longer afford this form of rulemaking whereby final rules are established by the courts only after years of litigation and tremendous expense
- Such delays prevent carriers from efficiently executing their business plans and serving consumers
- The ever-quickening acceleration of technological change in the telecommunications industry demands a regulatory process that is swift, efficient, and final
- As the industry evolves towards an IP environment, Global Crossing recommends its REFORM agenda to begin adapting today's regulatory tools to tomorrow's regulatory challenges

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REFORM

Rationalize inter-carrier compensation

The multiple forms of inter-carrier compensation in existence today contribute to an unwieldy arrangement that invites abuse, confusion, litigation, and uneconomic bypass. The industry requires a uniform system of inter-carrier compensation that applies to all forms of traffic and all carriers. Proper reform must not only recognize that "a minute is a minute", it must also conclude that "a packet is a packet." Moreover, all packets must be exchanged without the distortion of past regulatory policies.

Establish a swift and efficient dispute resolution forum

Carriers must have available to them a swift and efficient dispute resolution forum to resolve inter-carrier compensation and interconnection disputes. All carriers (including IP-enabled service providers) should submit to "baseball-style" arbitration. Baseball-style arbitration requires each party puts forth its best and final offer and a neutral third party arbitrator is required to select only one offer, in its entirety. This style of arbitration will encourage carriers to narrow their differences and seek compromise, but in order to be effective, the arbitration must be the sole remedy available to carriers.

Formulate clear and simple rules and regulations

Clear and definitive rules regarding IP-enabled services is a critical prerequisite to bringing certainty and growth to the telecommunications industry. Vague or overly complex rules and regulations fail to establish viable solutions to the industry's challenges and simply create a climate of uncertainty. This uncertainty only gets resolved through time-consuming and extremely costly litigation. Congress and the FCC must simplify their laws and rules to eliminate vagaries.

Overhaul universal service

Any comprehensive reform effort must include an overhaul of the current universal service system that is just as dysfunctional as the inter-carrier compensation regime. Global Crossing believes the Commission should modify the existing universal service program, especially in light of the rapid development of IP-enabled services.

Redefine public interest obligations

Telecommunications service in the U.S. has historically been imbued with a public interest component, and IP-enabled services offer a broad range of new and innovative ways to support traditional public interest efforts.

Maintain authority over essential bottleneck facilities

While IP-enabled services present a multitude of new opportunities and present consumers many competitive options, it is imperative that regulators maintain authority over essential bottleneck facilities such as access services and facilities. Similarly, if a new bottleneck materializes in the IP universe, policy makers must be willing to exercise their authority to ameliorate the ill effects of such a bottleneck.

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Priority Issues Currently Before the FCC

→Reform of inter-carrier compensation

→Reform of special access pricing practices

→Reform of the universal service funding mechanism

→Clarification of the rules governing IP-enabled services

Swift and decisive action on these matters is needed to set the industry once again on a path of growth and investment

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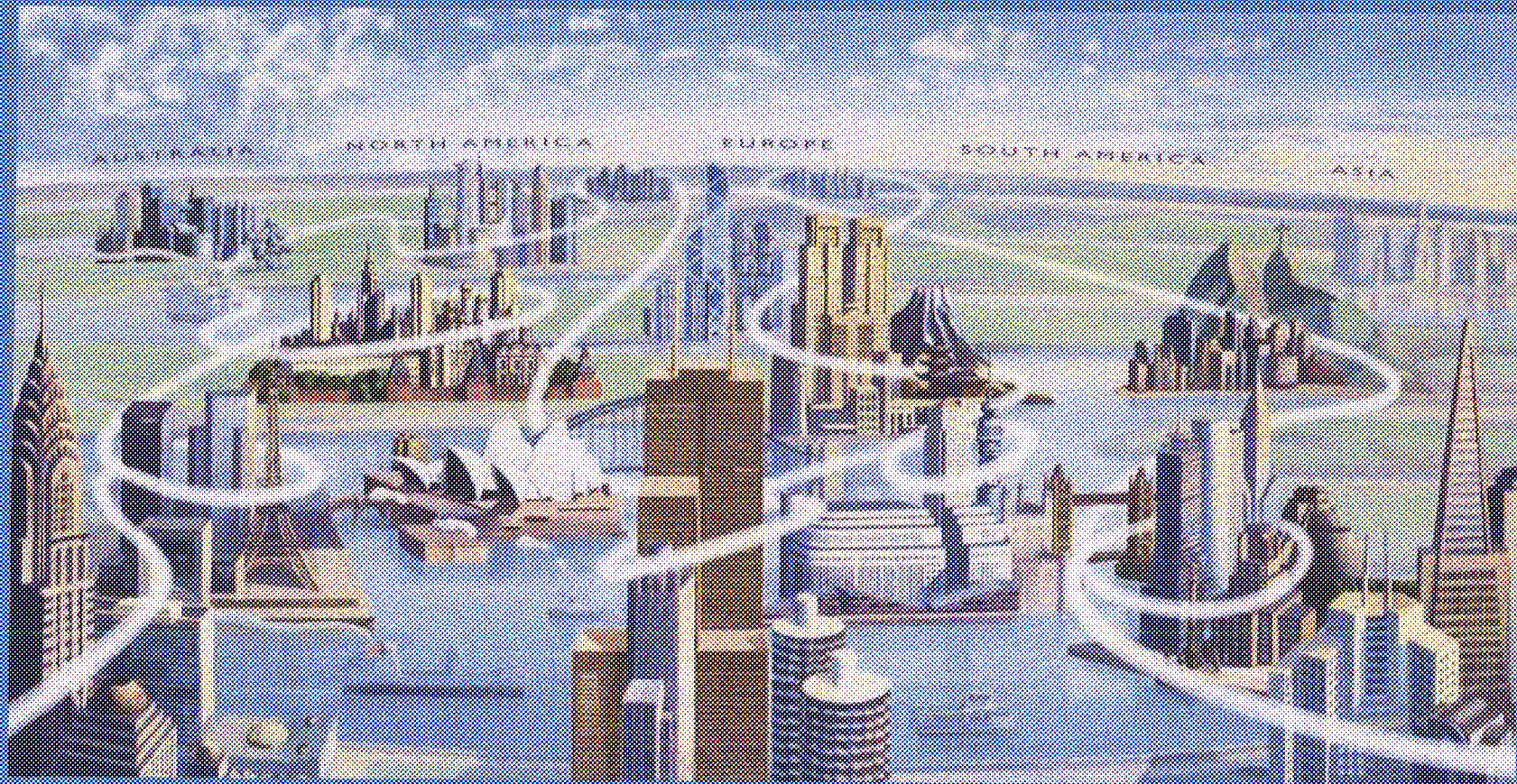
The New Global Village



Thank You

Global Crossing