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Roger C. Sherman
Director
Government Affairs – Wireless Regulatory

June 14, 2006

Via Electronic Submission

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

**RE: *Ex Parte* Communication
In the Matter of Federal-State Joint Board on Universal Service, CC Docket
No. 96-45; In the Matter of IP-Enabled Services, WC Docket No. 04-36**

Dear Ms. Dortch:

On June 14, 2006, Vonya B. McCann, Vice President, Government Affairs for Sprint Nextel Corporation (“Sprint Nextel”), Kevin M. Joseph of the Joseph Group and I met with Wireline Competition Bureau Chief Tom Navin, Deputy Bureau Chief Julie Veach, Bureau Legal Advisor Thomas Buckley, Amy Bender and Jeremy Marcus, Acting Chief, Telecommunications Access Policy Division to discuss universal service fund (“USF”) contribution methodologies, including the safe harbor for wireless carrier contributions and a proposed safe harbor for voice-over-the-Internet (“VoIP”) providers.

Sprint Nextel reiterated its support for immediate Commission adoption of a numbers-based USF contribution mechanism. Continued reliance on revenues will not stabilize the system; instead, a numbers-based mechanism would be sustainable, competitively and technologically neutral and would eliminate the network and operational inefficiencies, not to mention litigation, inherent in the current revenues-based system. Sprint Nextel noted its support for Chairman Martin’s efforts to facilitate this reform.

If the Commission decides to continue with the revenues-based system for an "interim" period, however, Sprint Nextel emphasized that the interim period should be as short as possible. While an interim fix may expand the base of contributors, it does not address the fundamental problems faced by the current system.

In addition, Sprint Nextel urged the Commission to permit wireless carriers and VoIP providers to utilize traffic studies in good faith. More specifically, the Commission should allow wireless carriers and VoIP providers the flexibility to develop and utilize studies that measure

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interstate traffic on their networks. Sprint Nextel supports reasonable standards, best practices, or guidelines to ensure that traffic studies accurately reflect interstate usage. The Commission should refrain, however, from imposing a “one-size fits all” methodology on all firms. Any Commission standards in this area must recognize that carriers employ a variety of billing systems and maintain unique operational capabilities. If the Commission mandates a specific methodology for traffic studies, some carriers might be forced to adopt the safe harbor because of operational constraints, despite interstate traffic levels well below the safe harbor.

Finally, to the extent the Commission adopts rules that require wireless carriers and VoIP providers to implement changes to their particular billing systems or other aspects of network operations, it should provide a reasonable transition period to accommodate such modifications.

Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter is being filed electronically in each of the above-referenced dockets.

Sincerely,

/s/ Roger C. Sherman

Roger C. Sherman

cc: Tom Navin
Julie Veach
Thomas Buckley
Amy Bender
Jeremy Marcus