Wiley Rein & Fielding LLP

1776 K STREET NW
WASHINGTON, DC 20006
PHONE 202.719.7000
FAX 202.719.7049

Virginia Office
7925 JONES BRANCH DRIVE
SUITE 6200
McLEAN, VA 22102
PHONE 703.905.2800
FAX 703.905.2820

www.wrf.com

September 18, 2006

Helgi C. Walker
202.719.7349
hwalker@wrf.com

VIA ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th St., SW
Washington D.C. 20554

Re: *In the Matter of Petition for Interconnection of Neutral Tandem, Inc. Pursuant to 47 U.S.C. § 201(a) and 332(c)(1)(B)*, WC Docket No. 06-159; *In the Matter of Petition of Time Warner Cable for Declaratory Ruling That Competitive Local Exchange Carriers May Obtain Interconnection Under Section 251 of the Communications Act of 1934, as Amended, To Provide Wholesale Telecommunications Services to VoIP Providers,* WC Docket No. 06-55; *Petition of Time Warner Cable for Preemption Pursuant to Section 253 of the Communications Act,* WC Docket No. 06-54; *In the Matter of Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92.

Dear Ms. Dortch:

On September 15, 2006, John Scott and Charon Phillips of Verizon Wireless and Susanne Guyer, Kathleen Grillo, and Leslie Owsley of Verizon met with Tom Navin, Chief of the Wireline Competition Bureau, Julie Veach, Deputy Chief of the Wireline Competition Bureau, Don Stockdale, Deputy Chief of the Wireline Competition Bureau, and Amy Bender, Legal Counsel to the Bureau Chief, to discuss the above-referenced proceedings.

The primary purpose of the meeting was to discuss Neutral Tandem's Motion for Interim Relief and Petition for Interconnection in WC Docket No. 06-159. Verizon Wireless suggested that the Commission should deny Neutral Tandem's petition. Verizon Wireless addressed the legal problems associated with Neutral Tandem's Motion for Interim Relief and further demonstrated that there is no basis on the merits for imposing an obligation to connect directly with Neutral Tandem because such action would not serve the public interest. The arguments were consistent with Verizon Wireless' submissions in these proceedings.

Further, Verizon and Verizon Wireless explained that the public interest with respect to Neutral Tandem's requested relief is different from the calculus in the context of Time Warner Cable's petitions for relief in WC Docket Nos. 06-54 and 06-55.[1] Granting Time Warner Cable's petitions will ensure that consumers in

[1] With respect to Section 251(a)(1), which has been raised in the Time Warner proceeding, Verizon Wireless notes that Neutral Tandem has not predicated its

South Carolina are no longer denied the benefits of a competitive VoIP service simply because they happen to live in an area served by an independent LEC. In South Carolina, interconnection agreements between Verizon and the independent LECs are already in place, but the independent LECs are seeking to prevent one particular type of traffic from reaching customers – a different case from the one presented in Neutral Tandem's petition. Granting Time Warner's petition would promote both local competition and broadband deployment. In contrast, granting Neutral Tandem's petition will not result in consumers having more choices for local telephone service. Nor will it promote the deployment of broadband or further the federal policy.

Because many of the questions that were discussed relate to matters at issue in the pending intercarrier compensation proceeding, we are submitting this filing in that docket as well.

Respectfully submitted,

Helgi Walker/JRS

Helgi C. Walker

(Continued . . .)
request on this statutory provision; rather, its request for connection with Verizon Wireless is by its term based exclusively on Sections 201(a) and 332(c)(1))(B). Section 251(a) in any event permits carriers to interconnect directly or indirectly, and because Verizon Wireless already maintains indirect interconnection to Neutral Tandem's carrier customers through the ILEC, Neutral Tandem would have no recourse to compel Verizon Wireless to connect directly to it pursuant to Section 251(a).