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27 October 2006

**BY ELECTRONIC FILING
AND HAND DELIVERY**

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20054

*Re: Notice of Ex Parte Presentation: Petition for Rulemaking of VSNL
Telecommunications (US) Inc., RM-11312*

Dear Ms. Dortch:

On October 27, 2006, Bill Hunt (Vice President for Public Policy, Level 3 Communications, LLC (“Level 3”)), Michael Donahue (Corporate Counsel for Level 3), Randall Sifers (Kelley, Drye & Warren, as counsel for VSNL Telecommunications (US) Inc. (“VSNL”)), and I (as counsel for Level 3), met with Angela Giancarlo, Legal Advisor to Commissioner Robert McDowell, to discuss the above-referenced proceeding. Specifically, we reviewed the positions of Level 3, VSNL, and other parties (as filed on the record) regarding proposals for reform of the annual regulatory fees assessed against undersea cable operators; the legal, economic, and administrative bases for reform; and the status of ongoing discussions among cable operators regarding reform options. We also requested that the Commission proceed expeditiously to issue a notice of proposed rulemaking addressing these proposals for reform.

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If you have any questions, please do not hesitate to contact me by telephone at +1 202 730 1337 or by email at kbressie@harriswiltshire.com.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kent D. Bressie", is written over a horizontal line. The signature is fluid and cursive.

Kent D. Bressie

Counsel for Level Communications, LLC

cc: Angela Giancarlo