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25 January 2007

**VIA ELECTRONIC FILING**

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 January 24, 2007, William P. Hunt, Michael Saunders (both of Level 3 Communications, LLC), and I met with FCC Managing Director Anthony Dale and Deputy Managing Director Mark Stone, to discuss the above-referenced petition. 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.

If you have any questions, please do not hesitate to contact me by telephone at (202) 730-1349 or by email at [cbreckinridge@harriswiltshire.com](mailto:cbreckinridge@harriswiltshire.com).

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Charles Breckinridge", is written over a light blue horizontal line.

Charles Breckinridge

*Counsel for Level 3 Communications, LLC*

cc: Anthony Dale  
Mark Stone