



1200 EIGHTEENTH STREET, NW
WASHINGTON, DC 20036

TEL 202.730.1300

FAX 202.730.1301

WWW.HARRISWILTSHIRE.COM

2 August 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; Assessment and Collection of
Regulatory Fees for Fiscal Year 2007, MD Docket No. 07-81*

Dear Ms. Dortch:

On August 2, 2007, I, as counsel for Level 3 Communications, LLC (“Level 3”), left a voicemail message with Rick Chessen, Senior Legal Advisor to Commissioner Michael J. Copps, concerning the above-referenced proceedings. Specifically, I clarified that Level 3 and other undersea cable operators—including Apollo Submarine Cable System Ltd., Hibernia Atlantic, Pacific Crossing Limited, and VSNL Telecommunications (US) Inc. (“VSNL”) (collectively, “Submarine Cable Operators”)—continue to support the most expedient action on VSNL’s petition for rulemaking in RM-11312 (“VSNL Petition”), including the option of adopting a further notice of proposed rulemaking as part of the item containing the Commission’s forthcoming report and order in MD Docket No. 07-81. The Submarine Cable Operators believe that at this time, such a further notice of proposed rulemaking is preferable to a stand-alone notice of proposed rulemaking, the initiation of which could delay further action on the VSNL Petition.

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If you have any questions, please 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 3 Communications, LLC

cc: Rick Chessen (OMD)
Robert Aamoth (counsel for VSNL)
Fiona McKenna (Hibernia Atlantic)
Rogena Harris (VSNL)
Ulises Pin (counsel for Hibernia Atlantic)
James Stenger (counsel for Apollo)
Martin Stern (counsel for Pacific Crossing)