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A PROFESSIONAL LIMITED
LIABILITY COMPANY

March 27, 2008

VIA ECFS

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Exparte: WC Docket 07-135, CC Docket 01-92

Dear Ms. Dortch:

On March 26, 2008, David Erickson, CEO of FreeConferencing Corporation (“FreeConference”) along with counsel, Ross A Buntrock, Womble Carlyle Sandridge & Rice, PLLC met with the following Wireline Competition Bureau Staff: Dana Shaefer; Randy Clarke; Deena Shetler; Albert Lewis; Lynne Engledow; Victoria Goldberg; Doug Slotten; Jay Atkinson; and Marcus Maher to discuss the issues raised in the above-captioned dockets. The attached written presentation was used in the meeting.

FreeConference explained in the meeting that AT&T, Verizon, Qwest, Sprint and Metro PCS are in fact, the only real so-called “traffic pumpers” in that each of them have heavily promoted flat-rated, “all-you can talk” long distance plans and encourage their customers, as Verizon does, to “never worry about minutes again.” Indeed, consumers who pay per-minute long-distance charges don’t use any where near as many minutes per month as customers with flat-rated “talk all you want” plans. In fact, in a recent SEC filing, Metro PCS noted that: “As of December 31, 2004, our customers in all metropolitan areas averaged approximately 1,900 minutes of use per month, compared to approximately 700 minutes per month for customers of the national wireless carriers. We believe that average monthly usage by our customers also exceeds the average monthly usage for typical wire line customers.”¹ Presumably, the number of minutes being pumped onto the network by Metro PCS customers has grown, since Metro PCS has ramped up its market coverage and marketing efforts in the last two years.²

¹ See Metro PCS, Inc. 10-K SEC Filing, filed by METROPCS COMMUNICATIONS INC (May 12, 2006) Available at <http://sec.edgaronline.com/2006/05/12/0001193125-06-109756/Section3.asp>. (note that now the national wireless carriers have followed suit, and begun offering their own talk-all- want plans.)

² See “MetroPCS Hopes to Profit From More Competition, Recession,” Dallas Morning News (Mar. 20, 2008) (noting that “MetroPCS launched service in Los Angeles in September and is still expanding its service area and marketing efforts.”) (available at: http://www.dallasnews.com/sharedcontent/dws/bus/stories/DN-metropcs_20bus.ART0.State.Edition1.3a19d79.html).

By contrast, FreeConferencing noted that its average registered user of its free conferencing service uses, on the average, only 21 minutes of free conferencing service per month over the course of 12 months.

Accordingly, the FCC should not adopt the rules proposed in

Regards,

/s/

Ross A. Buntrock

cc: Dana Shaffer (via electronic mail)
Randy Clarke (via electronic mail)
Deena Shetler (via electronic mail)
Albert Lewis (via electronic mail)
Lynne Engledow (via electronic mail)
Victoria Goldberg (via electronic mail)
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Jay Atkinson (via electronic mail)
Marcus Maher (via electronic mail)