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April 3, 2008

Via Electronic Delivery

Ms. Marlene H. Dortch
Federal Communications Commission
The Portals, TW-A325
445 12th Street SW
Washington, DC 20554

Re: Notice of *Ex Parte* Presentation – CC Dkt. 01-92, *Developing a Unified Intercarrier Compensation Regime*; WC Dkt. 04-36, *IP-Enabled Services*; CC Dkt. 96-45, *Federal-State Joint Board on Universal Service*

Dear Ms. Dortch:

On Wednesday, April 2, 2008, Richard S. Whitt, Washington Telecom and Media Counsel, Sunil Daluvoy, and Craig Walker, all of Google Inc., and Mark O'Connor and the undersigned, both of Lampert, O'Connor & Johnston, P.C., met with the following: Dana Shaffer (Bureau Chief); Don Stockdale (Deputy Bureau Chief); Julie Veach (Deputy Bureau Chief) and Marcus Maher (Associate Bureau Chief), all of the Wireline Competition Bureau.

During the meeting, Google demonstrated its GrandCentral software platform, a Web-driven set of applications that allows consumers to integrate their existing phone numbers and voice mailboxes. We then discussed the phantom traffic matter and related proposals made in the above-referenced dockets that seek to expand common carrier regulation to non-carriers offering IP-enabled software applications that may have a voice component. Google urged the FCC to take a forward-looking approach, rather than graft PSTN regulations to IP-enabled applications. We also discussed the negative impact of expanding regulation to information services, explaining the reasons why the FCC should not regulate non-carriers as proposed by USTelecom and others. Google urged that the FCC instead proceed with its broad intercarrier compensation reform efforts and address vital issues regarding IP-enabled applications squarely, including IP interconnection, rather than take a "shoot then aim" approach. The latter approach would extend PSTN regulations by imposing call signaling and other legacy requirements before addressing comprehensive intercarrier compensation reform. Finally, we noted that a pure numbers-based contribution methodology for universal service could greatly hamper innovative IP-enabled and information services such as the GrandCentral platform.

Lampert, O'Connor & Johnston, P.C.

Google Inc. Ex Parte

CC Dkt. 01-92, WC Dkt. 04-36 and CC Dkt. 01-92

April 3, 2008

Page 2

Pursuant to the Commission's rules, this notice is being filed in the above-referenced dockets for inclusion in the public record. Please contact me directly should you have any questions.

Respectfully submitted,



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Counsel for Google Inc.

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