



Brian Benison
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May 2, 2008

VIA ELECTRONIC SUBMISSION

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

**RE: Developing a Unified Intercarrier Compensation Regime,
WC Docket No. 01-92
Intercarrier Compensation for ISP-Bound Traffic,
WC Docket No. 99-68**

Dear Ms. Dortch:

On behalf of AT&T Services, Inc. Hank Hultquist, Gary Phillips and the undersigned met with Dana Shaffer, Marcus Maher, Randolph Clarke, Albert Lewis, Deena Shetler Victoria Goldberg and Jay Atkinson of the Wireline Competition Bureau on May 1, 2008. We explained that the Commission retains authority under Sections 201, 251(i) and 252(d)(2) of the Telecommunications Act of 1996 to establish rates for ISP bound traffic including a zero or “bill and keep” rate. In particular, we explained that section 251(i) clearly preserves the Commission’s authority over compensation for interstate traffic exchanged between carriers as a consequence of the Commission’s “ESP exemption.” Moreover, section 252(d)(2) plainly contemplates bill and keep in circumstances where a carrier incurs no additional uncompensated costs because it is, or has the opportunity to be, fully compensated by its end user customer for the use of its network.

Consistent with Section 1.1206 of the Commission’s rules, I am filing one electronic copy of this notice and request that you place it in the record of the above-captioned proceedings.

Please contact me if you have any questions.

Sincerely,

/s/ Brian Benison

cc: Dana Shaffer
Marcus Maher
Randolph Clarke
Albert Lewis
Deena Shetler
Victoria Goldberg
Jay Atkinson