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Ex Parte

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

Re: Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98; and Intercarrier Compensation for ISP-Bound Traffic, CC Docket No. 99-68

Dear Ms. Dortch:

Today, Mike Glover and Susanne Guyer of Verizon met with Commissioner Adelstein and Scott Bergmann of the FCC to discuss Verizon's position on the ISP Reciprocal Compensation proceeding.

In particular, Verizon reviewed the legal bases for the federal ISP-bound traffic compensation regime that is currently in effect. In addition, Verizon reviewed the reasons that this traffic is subject to the FCC's jurisdiction and that it is not subject to Section 251(b)(5) which would subject this traffic to state jurisdiction. In addition, Verizon noted that the resolution of the ISP-bound traffic issue could affect the Commission's authority over this and other forms of IP traffic, and that the issue should be resolved in a way to preserve the Commission's authority over this interstate traffic. The arguments are further set out in prior submissions, and in particular in our May 17, 2004 White Paper.

Sincerely,

A handwritten signature in black ink that reads "Donna Epps".