



**INDEPENDENT TELEPHONE & TELECOMMUNICATIONS ALLIANCE**

June 24, 2008

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20054

**Re: NOTICE OF *EX PARTE* PRESENTATION**

***Assessment and Collection of Regulatory Fees for Fiscal Year 2008***  
MD Docket No. 08-65, RM-11312

***Declaration of Free Press, et al. for Declaratory Ruling Regarding Internet Management Policies; Petition of Vuze, Inc. for Rulemaking to Establish Rules Governing Network Management Practices by Broadband Network Operators***  
WC Docket No. 07-52

***Developing a Unified Intercarrier Compensation Regime***  
CC Docket No. 01-92

***Implementation of Section 224 of the Act: Amendment of the Commission's Rules and Policies Governing Pole Attachments***  
WC Docket No. 07-245, RM-11293, RM-11303

***Petition of AT&T Inc. for Forbearance Under 47 U.S.C. § 160(c) from Enforcement of Certain of the Commission's ARMIS Reporting Requirements***  
WC Docket No. 07-139

***Petition of AT&T, Inc. for Forbearance Under 47 USC § 160 from Enforcement of Certain of the Commission's Cost Assignment Rules***  
WC Docket No. 07-21

***Petition of Verizon for Forbearance Under 47 USC § 160(c) from Enforcement of Certain of the Commission's Recordkeeping and Reporting Requirements***  
WC Docket No. 07-273

***Petition of Qwest Corporation for Forbearance from Enforcement of the Commission's ARMIS and 492A Reporting Requirements Pursuant to 47 USC § 160***  
WC Docket No. 07-204

Dear Ms. Dortch:

Yesterday, Curt Stamp and Zachary Champ of the Independent Telephone & Telecommunications Alliance, Jeb Benedict of Embarq, Melissa Newman of Qwest, Jennie Chandra of Windstream, and the undersigned met with John Hunter of Commissioner Robert M. McDowell's office to discuss the above-referenced proceedings.

With regard to regulatory fees (MD Docket 08-65, RM-11312), ITTA reiterated its previously-filed position that entities sharing in the benefit from the Commission's adjudication of various proceedings should likewise share the cost of supporting the Commission's efforts in those regards.

ITTA also urged the Commission to ensure that carriers have sufficient latitude to manage their networks efficiently in a manner that enables rational and economic provision of broadband services on a shared-infrastructure basis (WC Docket No. 07-52). And, ITTA reiterated its position that those who use the network should pay for that use, and accordingly urged the Commission to rely upon the full record that has been developed in the phantom traffic proceeding (WC Docket 01-92), and implement a solution to instances of payment evasion; ITTA recommended specifically that the Commission adopt the proposal submitted in this docket by USTelecom.

Recognizing the interest in broadband deployment among regulators and Congress, ITTA again advocated pole attachment rules that ensure just and reasonable rates, terms, and conditions for incumbent telephone companies, consistent with the guarantees provided by Section 224 of the Communications Act of 1934, as amended (WC Docket 07-245, RM-11293, RM-11303).

Lastly, ITTA discussed forbearance relief granted to AT&T and related petitions filed by Verizon, Qwest, Embarq, and Frontier/Citizens (respectively, WC Docket Nos. 07-139, 07-21, 07-273, and 07-204). ). ITTA emphasized that administrative efficiency supports broad uniform grant of relief to all similarly-situated carriers, rather than the consumption of resources adjudicating substantively similar petitions for relief where competitive markets obviate the need for certain of the Commission's rules

Respectfully submitted,

*s/ Joshua Seidemann*  
Joshua Seidemann  
Vice President, Regulatory Affairs

cc: Commissioner Robert M. McDowell  
John Hunter