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September 12, 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, CC Docket No. 01-92; High-Cost Universal Service Support, WC Docket No. 05-337; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Intercarrier Compensation for ISP-Bound Traffic, WC Docket No. 99-68; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135

Dear Ms. Dortch:

On behalf of AT&T Services, Inc. Hank Hultquist, Gary Phillips, Joel Lubin, David Hostetter, Mary Henze, Christopher Heimann, Cathy Carpino and the undersigned met with Don Stockdale, Marcus Maher, Randy Clarke, Alex Minard, Al Lewis, Lynne Engledow, Doug Slotten, Victoria Goldberg, Jay Atkinson, Bill Sharkey, Rebekah Goodheart, Nick Degani and Chris Barnekov of the Wireline Competition Bureau on September 11, 2008. At the meeting, AT&T discussed interconnection and transport issues related to intercarrier compensation reform and achieving a unified terminating rate for all carriers.

The attached presentation served as a basis for the discussion.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically with the Commission. If you have any questions, please contact me at (202) 457-3065.

Sincerely,

/s/ Brian Benison

cc: Don Stockdale, Marcus Maher, Randy Clarke, Alex Minard, Al Lewis, Lynne Engledow, Doug Slotten, Victoria Goldberg, Jay Atkinson, Bill Sharkey, Rebekah Goodheart, Nick Degani, Chris Barnekov

Intercarrier Reform

Basic Interconnection Architecture
&
Compensation Framework

September 11, 2008

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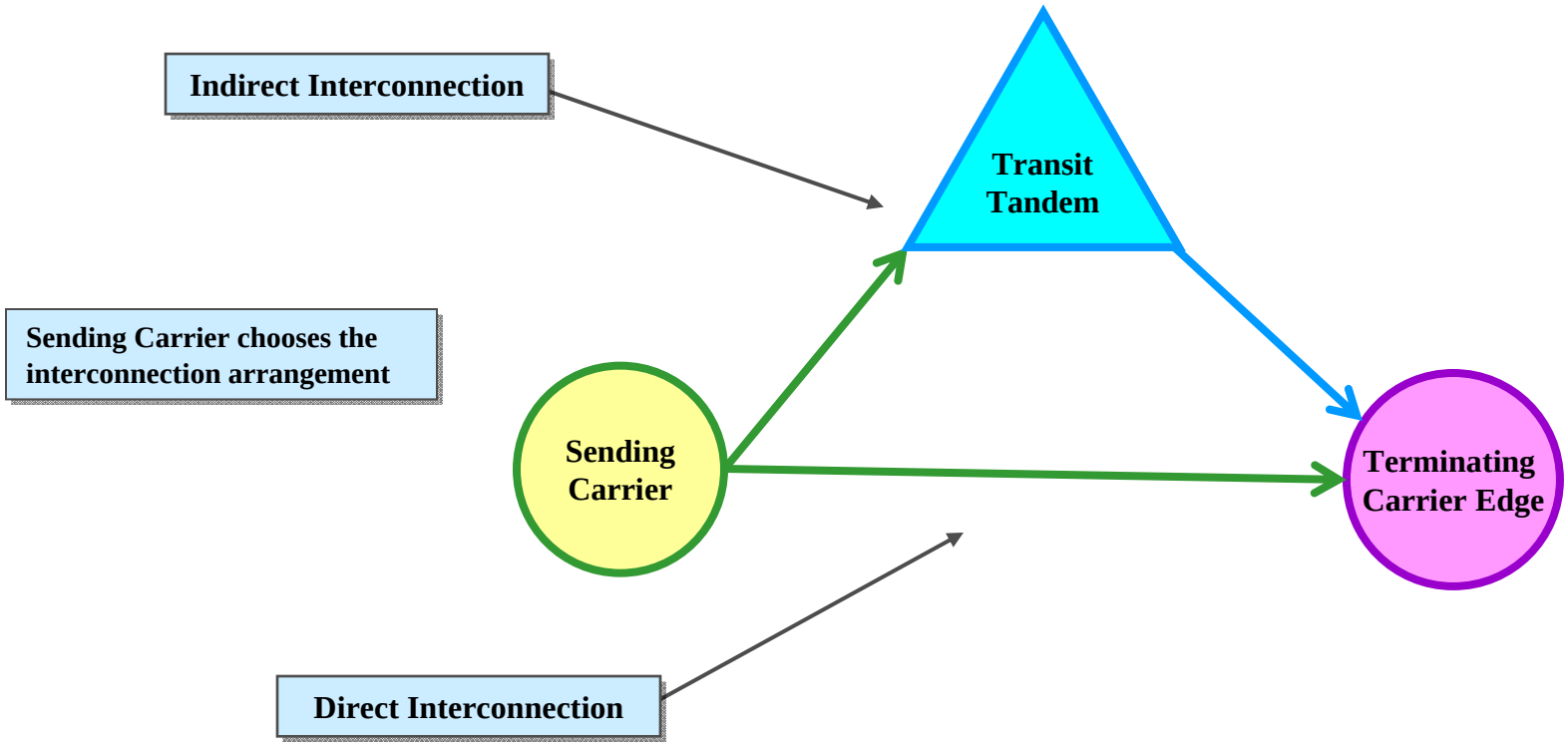
General Interconnection Transport Rule

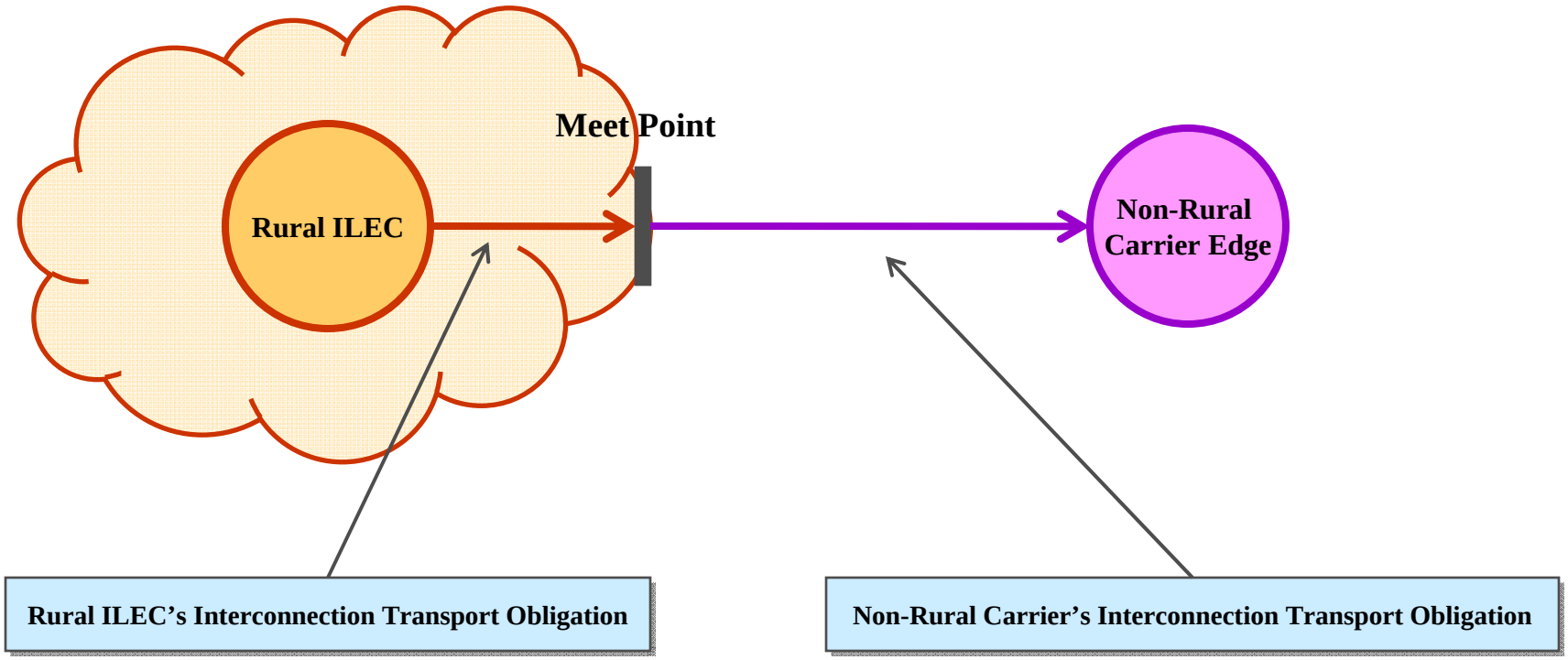
Each sending carrier has the duty to deliver its traffic to the terminating carrier's Edge



Arrowheads indicate call direction and network components of the same color mean the same network

Rural ILEC Interconnection Transport Rule

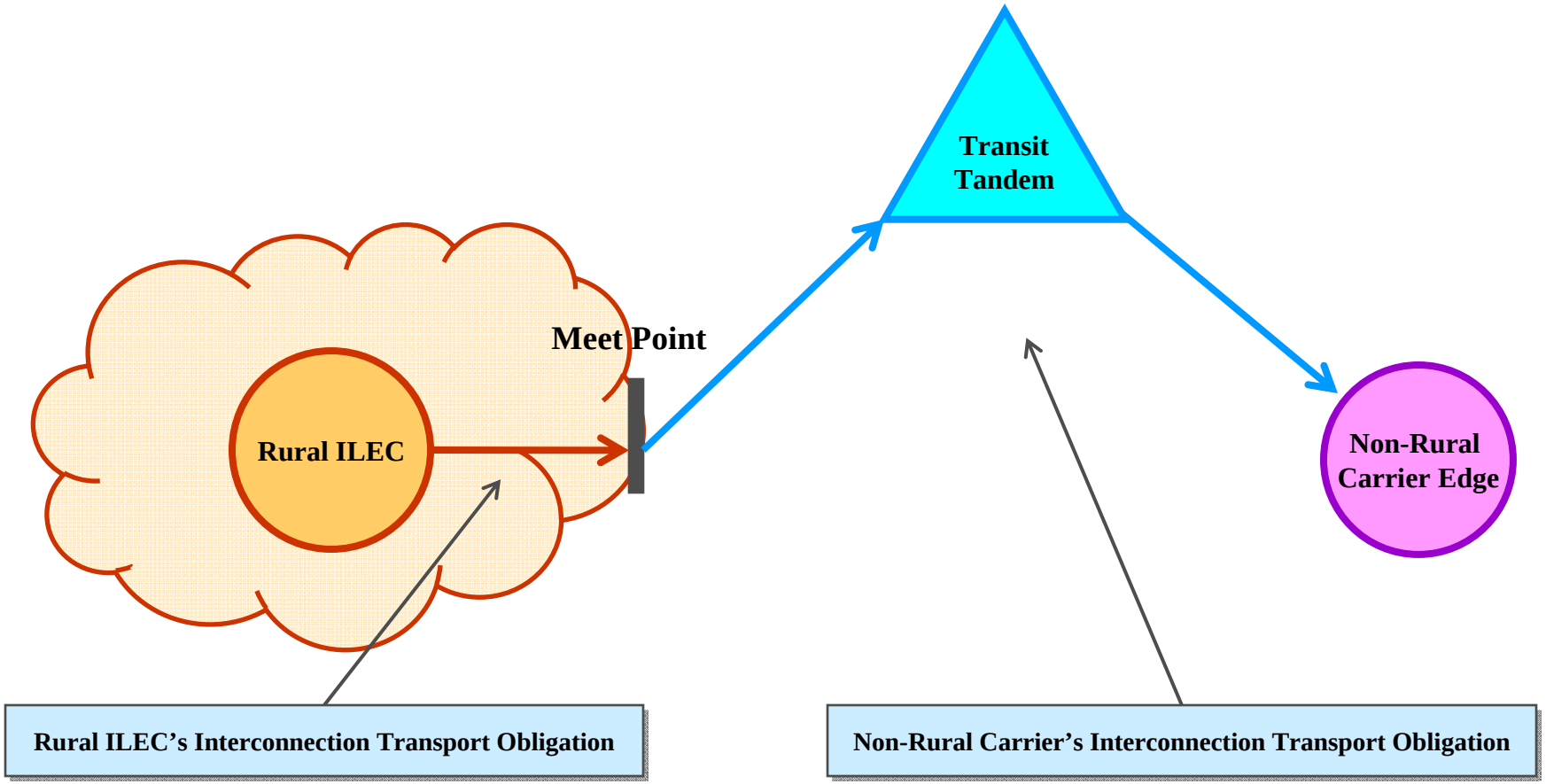
Non-Rural carrier chooses direct interconnection arrangement



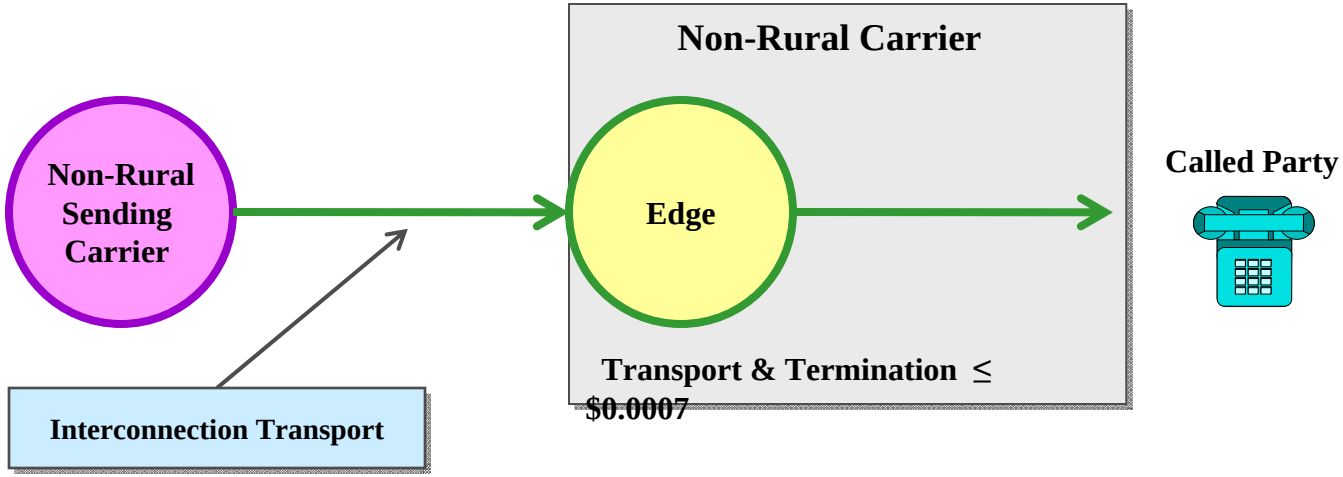
Non-rural carrier means all carriers other than rural ILECs

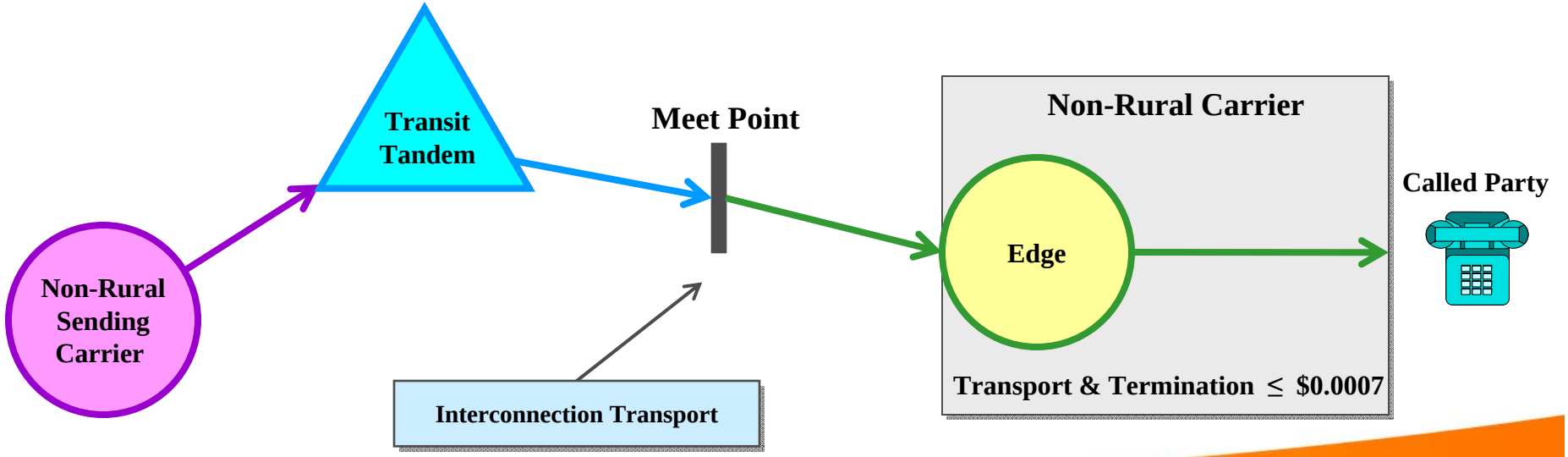
Rural ILEC Interconnection Transport Rule (cont'd)

Non-Rural carrier chooses indirect interconnection arrangement

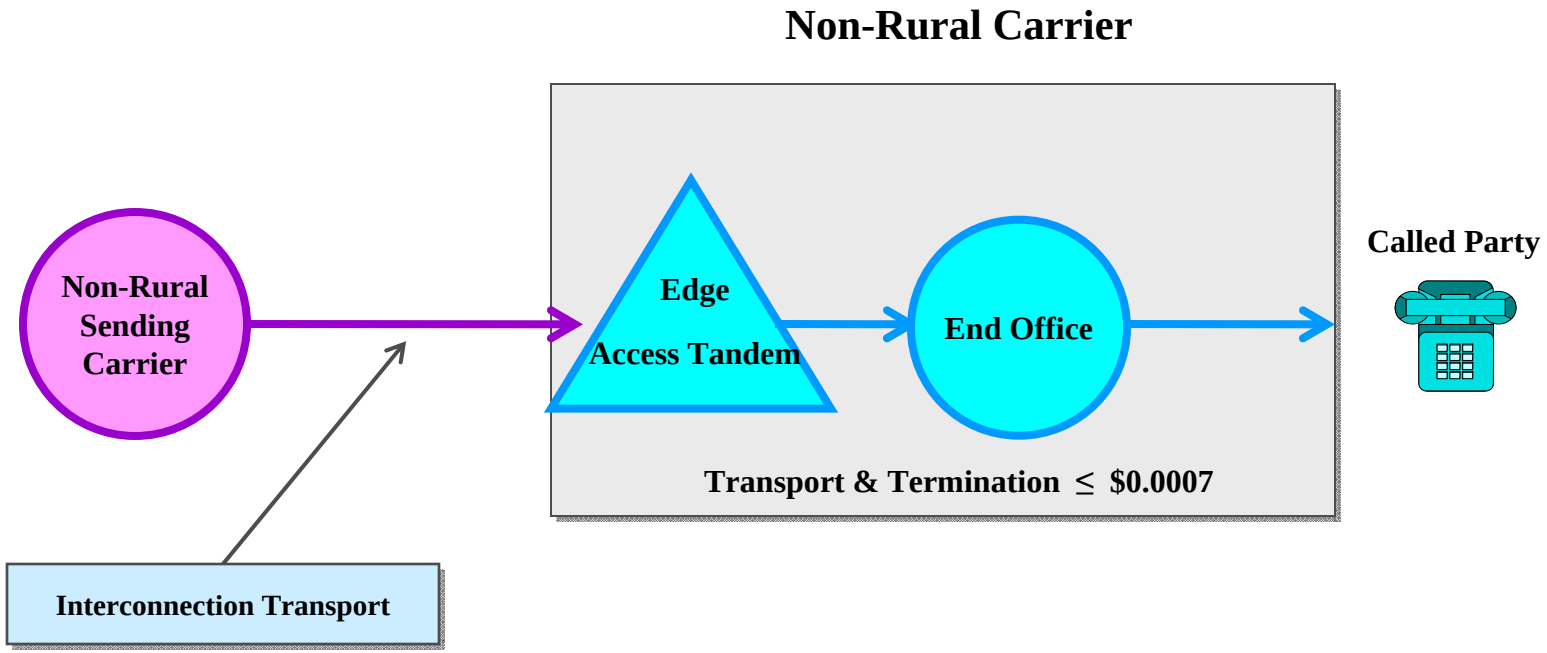


General 251(b)(5) Transport & Termination Framework

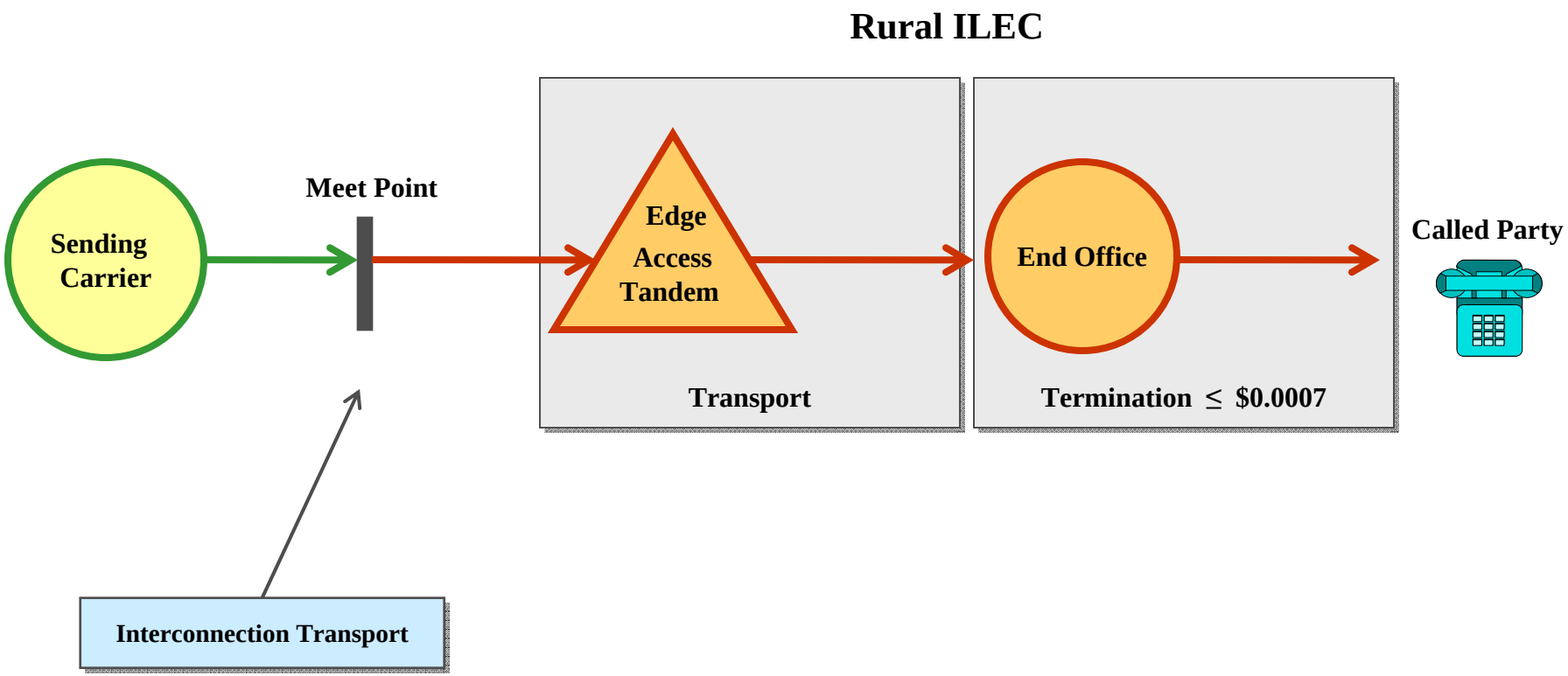




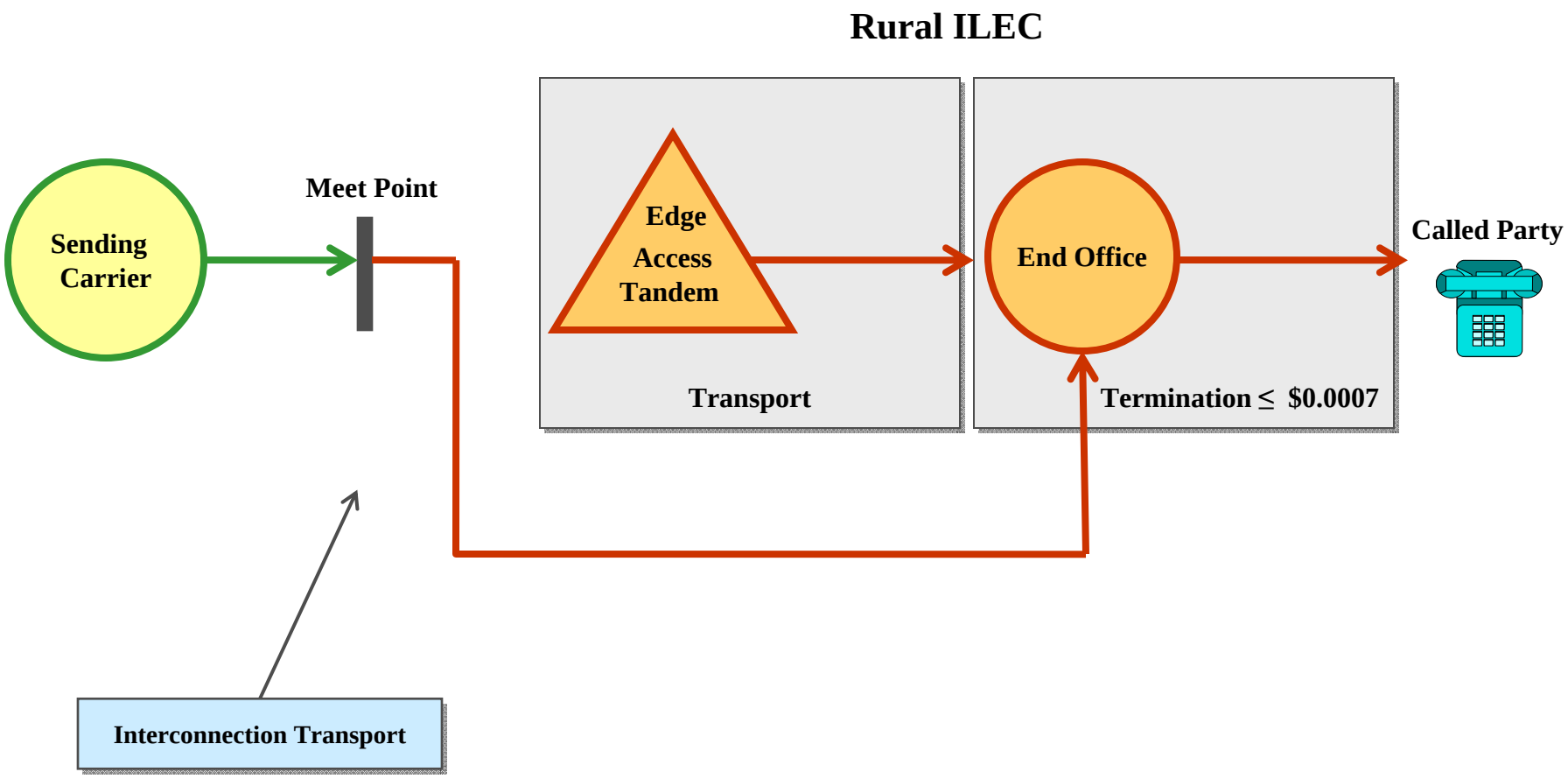
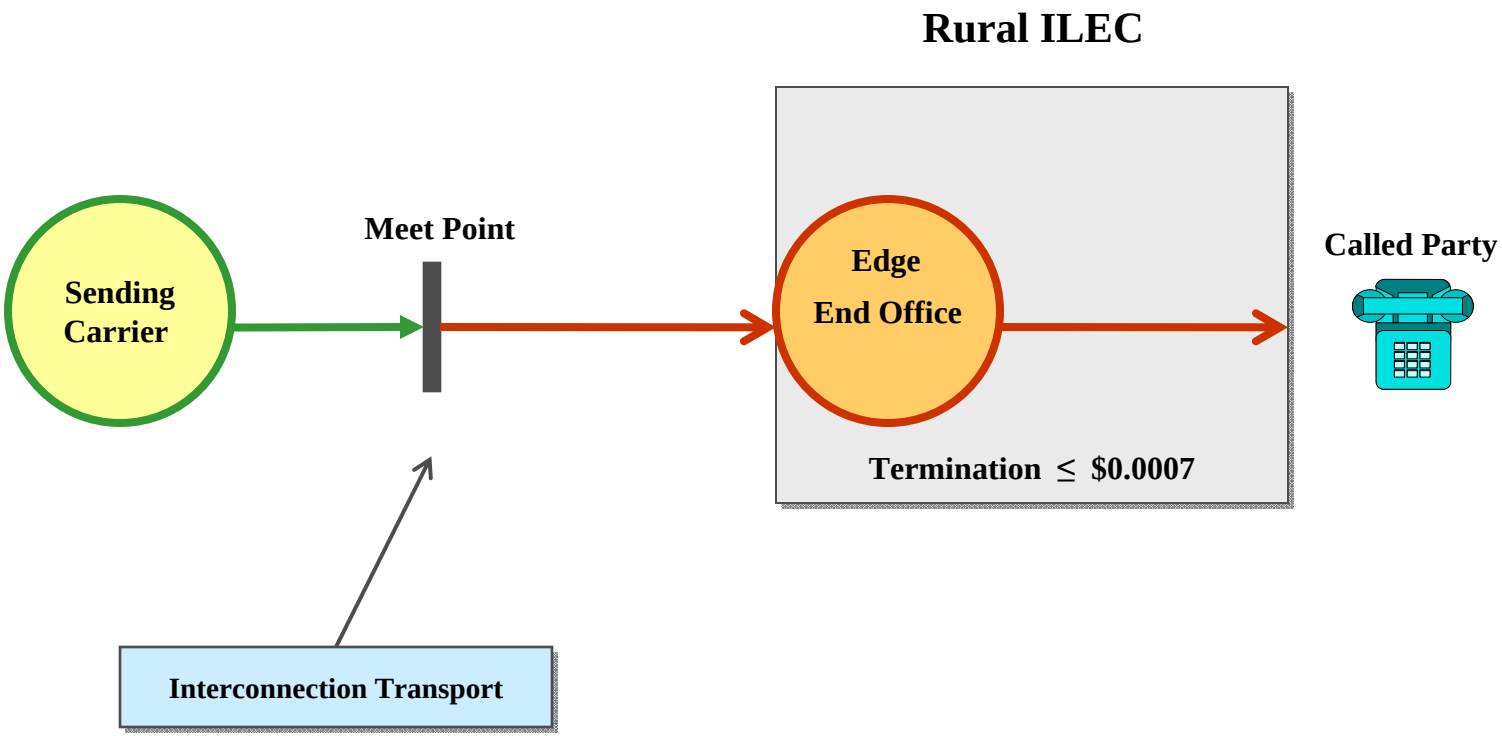
General 251(b)(5) Transport & Termination Framework (cont'd)



Rural ILEC 251(b)(5) Transport & Termination Framework



Rural ILEC 251(b)(5) Transport & Termination Framework (cont'd)



Rural ILEC 251(b)(5) Transport & Termination Framework (cont'd)