



October 14, 2008

VIA ELECTRONIC FILING

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

**Re: Notice of *Ex Parte* Meeting: CC Docket No. 99-68; WC Docket No. 01-92;
and WC Docket No. 08-152**

Dear Ms. Dortch:

I submit this notice of an *ex parte* meeting held on October 10, 2008 between Core Communications, Inc. ("Core") and the Wireline Competition Bureau. Claude Aikon, Joy Atkinson, Chris Barnekov, Randy Clarke, Lynne Engledow, Al Lewis, Doug Slotten, and Matt Warner attended the meeting on behalf of the Wireline Competition Bureau. Chris Killion of the Office of General Counsel also participated by telephone. Bret Mingo, Chris Van de Verg, James Falvey, and I attended the meeting on behalf of Core.

During the meeting, Core emphasized its support for global intercarrier compensation unification, consistent with Chairman Martin's May 5, 2008 representation to the United States Court of Appeals for the District of Columbia Circuit.

Core further noted that the Commission should take all possible steps to ensure that any order unifying the existing, disparate intercarrier compensation systems is judicially sustainable. Towards that end, Core noted its support for the unification proposal set forth by tw telecom and One Communications in their October 2, 2008 *ex parte* filing, which advocated unification of intercarrier compensation regimes for all telecommunications under section 251(b)(5), with state commissions setting rates pursuant to their responsibilities under section 252(d). Indeed, unifying intercarrier compensation rates for all telecommunications under 251(b)(5) and 252(d)(2) is exactly what Congress legislated in the 1996 amendments to the Communications Act. Any other statutory construction fails.

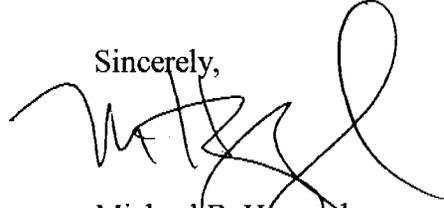
Core further discussed the D.C. Circuit's opinion in *In re: Core Communications, Inc.*, 531 F.3d 849 (D.C. Cir. 2008) and Core's May 14, 2008 *ex parte*, filed in CC Docket No. 99-68 and WC Docket No. 01-92.

Core also noted that the Commission could adopt a transition period to a new regime.

Finally, Core noted that a shift in the Universal Service Fund ("USF") contribution mechanism from a revenue basis to a telephone number basis would do nothing to constrain the growth of the USF fund. Rather, it would simply enable AT&T and Verizon to pay less than their fair share into the USF.

If you have any questions, please contact me.

Sincerely,



Michael B. Hazzard
Counsel for Core Communications, Inc.

cc: **Via electronic mail**

Claude Aikon
Joy Atkinson
Chris Barnekov
Randy Clarke
Lynne Engledow
Chris Killion
Al Lewis
Doug Slotten
Matt Warner