

**CAHILL GORDON & REINDEL LLP**

SUITE 950

1990 K STREET, N.W.  
WASHINGTON, D.C. 20006-1181

EIGHTY PINE STREET  
NEW YORK, N.Y. 10005-1702  
(212) 701-3000  
FAX: (212) 269-5420

AUGUSTINE HOUSE  
6A AUSTIN FRIARS  
LONDON, ENGLAND EC2N 2HA  
(011) 44.20.7920.9800  
FAX: (011) 44.20.7920.9825

TELEPHONE (202) 862-8900  
FACSIMILE (202) 862-8958

CHÉRIE R. KISER | 202-862-8950 | ckiser@cgrdc.com

October 21, 2008

**VIA ELECTRONIC DELIVERY**

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

**Re: Notice of Ex Parte - WC Docket No. 08-171, Implementation of the NET 911 Improvement Act of 2008; CC Docket No. 01-92, Developing a Unified Intercarrier Compensation Regime; WT Docket No. 08-95, Applications of Atlantis Holdings LLC and Celco Partnership d/b/a Verizon Wireless for Transfer of Control**

Dear Secretary Dortch:

Yesterday, Carey Spence-Lenss, Vice President of Regulatory and Government Affairs, and Susan A. McGurkin, Director of Federal Government & Regulatory Policy for Intrado Inc. and its affiliate Intrado Communications Inc., and the undersigned met with Nicholas G. Alexander, Legal Advisor to Commissioner Robert M. McDowell. The participants discussed the points Intrado raised in its comments and reply comments in WC Docket No. 08-171, and how its perspective is unique from other participants in the NPRM as it is poised to offer a competitive 911/E911 service to public safety answering point ("PSAP") consumers utilizing its innovative national IP-enabled network dedicated to the provision of emergency service.

Intrado further emphasized that it is important that the Commission does not permit decisions in other proceedings to frustrate or undermine the primary purpose of the NET 911 Improvement Act.<sup>1</sup> Intrado is a competitive carrier in 40 states. In order to provide its competitive 911 service to PSAPs, it must interconnect with the PSTN to which all 911 callers are connected and to which the 911/E911 wireline networks are connected. Interconnection with the ILECs is the linchpin to Intrado's ability to offer a competitive 911 service to PSAPs utilizing its national IP-enabled network. Intrado urged the Commission to not address unrelated

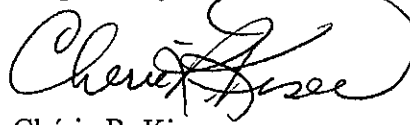
<sup>1</sup> New and Emerging Technologies 911 Improvement Act of 2008, Pub. L. No. 110-283 (July 23, 2008) ("NET 911 Act").

interconnection rules or issues in the context of its intercarrier compensation proceeding in CC Docket No. 01-92.

Similarly, the approval of mergers like the one contemplated between Alltel and Verizon (WT Docket No. 08-95) must be reviewed broadly to ensure carriers such as Verizon that already have a significant dominant presence in the telecommunications market are not further empowered to more easily undermine competition in other telecommunications segments such as competition for the provision of services to PSAP customers.

Please contact the undersigned if you have any questions regarding this matter.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Cherie R. Kiser", enclosed within a large, loopy circular flourish.

Chérie R. Kiser

cc: Nicholas G. Alexander