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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:

Today, 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., met with Scott Bergmann, Senior Legal Advisor and Advisor for Wireline Issues to Commissioner Jonathan S. Adelstein. 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

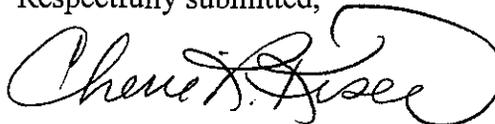
<sup>1</sup> New and Emerging Technologies 911 Improvement Act of 2008, Pub. L. No. 110-283 (July 23, 2008) ("NET 911 Act").

utilizing its national IP-enabled network. Intrado urged the Commission to not address unrelated 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 black ink, appearing to read "Cherie R. Kiser". The signature is fluid and cursive, with a large loop at the end.

Chérie R. Kiser

cc: Scott Bergmann