



1401 K Street, NW
Suite 800
Washington, D.C. 20005

Joe A. Douglas
Vice President
Government Relations
PH 202.682.0153
FX 202.682.0154
jdouglas@neca.org

October 24, 2008

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: Notice of Ex Parte Presentation; Developing a Unified Intercarrier Compensation Regime CC Docket 01-92; Universal Service Contribution Methodology, CC Docket 96-45; IP-Enabled Services; WC Docket 04-36.

Dear Ms. Dortch:

On October 24, 2008, NECA representatives Jim Frame, Regina McNeil and the undersigned met by conference call with Nick Alexander. Also on this date we met with Amy Bender, Dana Shaffer, Don Stockdale, and Randy Clarke.

NECA explained that proposals for reform, as reported by the trade press, are raising significant concerns among the small rate-of-return carriers participating in NECA's pools. For example:

- How rates will be set, and whether they will reflect network costs;
- how restructure mechanism funding will operate;
- whether proposals to freeze high-cost funding are consistent with rate of return regulatory mechanisms; and
- treatment of VoIP traffic.

We suggested that, given the complexity of current interrelated access charge and universal service funding mechanisms, the Commission allow time and opportunity for interested members of the public to examine specific implications of this proposal for rate of return carriers and rural customers.

NECA also reiterated its positions regarding intercarrier compensation and universal service reform as outlined in its September 11, 2008 ex parte meeting.

Questions regarding these meetings may be directed to my attention.

Sincerely,

A handwritten signature in black ink that reads "Joe A. Douglas". The signature is written in a cursive, flowing style.

CC:

Kevin J. Martin
Michael J. Copps
Jonathan S. Adelstein
Deborah Taylor Tate
Robert M. McDowell
Nicholas G. Alexander
Amy Bender
Scott Bergmann
Scott M. Deutchman
Greg Orlando
Dana R. Shaffer
Donald Stockdale
William Dever
Ann Stevens
Julie Veach
John Hunter
Albert Lewis
Pam Arluk
Deena Shetler
Lensworth Smith
Thomas Buckley
Cheryl Callahan
Jennifer McKee
Gina Spade
Ellen Burton
Alan Feldman
Jeremy Miller
Rodger Woock
Cathy Zima
Kirk S. Burgee
Marcus Maher
Jeremy Marcus
Julie Veach