



Sprint Nextel
2001 Edmund Halley Drive
Reston, VA 20191
Office: (703) 433-3786
Fax: (913) 523-9831

Charles W. McKee
Director
Government Affairs-Federal Regulatory
Charles.W.McKee@sprint.com

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Via Electronic Submission

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

Re: Ex Parte Communication

Developing a Unified Intercarrier Compensation Regime, CC Docket 01-92; In the Matter of Universal Service Contribution Methodology, WC Docket 06-122; In the Matter of Federal-State Joint Board on Universal Service, CC Docket 96-45; High Cost Universal Service Support, WC Docket 05-337.

Dear Ms. Dortch:

This letter is to inform you that on November 21, 2008, Anna Gomez and Charles McKee of Sprint Nextel Corporation (“Sprint”), in individual meetings, met with Nicholas Alexander, Legal Advisor to Commissioner McDowell, Scott Bergmann, Senior Legal Advisor to Commissioner Adelstein, Scott Deutchman, Legal Advisor to Commissioner Copps, and Greg Orlando, Legal Advisor to Commissioner Tate. In addition, Anna Gomez met with Amy Bender, Legal Advisor to Chairman Martin. The parties discussed reform of the intercarrier compensation (ICC) regime and the Universal Service Fund (USF) as discussed in the Further Notice of Proposed Rulemaking issued in the above referenced dockets.

Sprint’s comments were consistent with its prior filings in this docket and emphasized that the time for action is now. The Commission has more than a sufficient record to act and reform of the broken intercarrier compensation regime can wait no longer. Sprint argued that the proposed ten year transition period is far too long and should be shortened to five years.

Sprint also noted that the ICC proposals are unnecessarily biased in favor of incumbent local exchange carriers (ILECs) by: (1) including additional USF funding (while simultaneously eliminating funding for competitive carriers), (2) maintaining the current prohibition on wireless carrier’s ability to collect access charges but continuing the imposition of above-cost access charges by ILECs, and (3) by shifting costs away from ILECs to competitive entrants through modification of interconnection obligations. Given the lengthy transition periods being contemplated by the FCC, Sprint also encouraged the Commission to address the issue of traffic pumping as outlined in its previous filings on this subject.

With respect to the USF system, Sprint emphasized that if the Commission were to eliminate the equal support rule, it must establish a uniform transition period for all carriers, including Sprint. More broadly, however, Sprint argued that the Commission should review the costs and revenues of all carriers receiving USF funding and not focus merely on competitive carriers. Sprint urged the Commission to issue a further notice of proposed rulemaking addressing true reform of the universal system as a whole and not focus on narrow ways to prevent competitive carriers from participating in the USF system.

Finally, Sprint suggested the Commission confirm that, under current law, access charges are not applicable to IP traffic. The savings provision of 251(g) is inapplicable to IP traffic which did not exist at the time this provision was adopted. Rather, this traffic should be governed by the provisions of 251(b)(5) applicable to all telecommunications.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being electronically filed with your office. Please let me know if you have any questions regarding this filing.

Respectfully submitted,

/s/ Charles W. McKee
Charles W. McKee
Director, Government Affairs
Sprint Nextel Corporation

cc: Nicholas Alexander
Amy Bender
Scott Bergmann
Scott Deutchman
Gregory Orlando