

November 25, 2008

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

Re: In the Matter of Universal Service Contribution Methodology, WC Docket No. 06-122; In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Developing a Unified Intercarrier Compensation Regime, CC Docket 01-92

Dear Ms. Dortch,

By this letter, BT Americas and its US affiliates (“BTA”) reiterate support for a pure numbers-based contribution mechanism. However, in the alternative, BT would support the Commission’s draft order contained in Appendix B as modified by the suggestions AT&T offers in its ex parte filed in this docket on November 21, 2008. AT&T suggestions are well thought out and address many of the concerns previously raised. The Commission should act expeditiously, modify its draft order in Appendix B per AT&T’s suggestions and adopt the resulting draft order. By doing so it will remove a complicated, confusing, burdensome reporting regime and replace it with one that is much simpler and fairer.

Please contact the undersigned with any questions.

Sincerely

A. Sheba Chacko
Head, Americas Regulation and
Global Operational Regulation