

Donna Epps
Vice President
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December 9, 2008

Ex Parte

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

Re: Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92; In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45; IP-Enabled Services, WC Docket No. 04-36; In the Matter of Federal-State Joint Board on Universal Service, High Cost Universal Service Support, WC Docket No. 05-337.

Dear Ms. Dortch:

On December 8, 2008, Kathleen Grillo, Leslie Owsley and Donna Epps of Verizon and Tamara Preiss of Verizon Wireless met separately with Scott Bergmann, Legal Advisor to Commissioner Jonathan Adelstein, Greg Orlando, Legal Advisor to Commissioner Tate, and Amy Bender, Legal Advisor to Chairman Martin.

The purpose of the meetings were to urge the Commission to move forward with tackling long-term intercarrier compensation and universal service reform and remove the obstacles these systems present to progress and innovation. Verizon stressed that, first and foremost, the Commission should reaffirm that all VoIP and IP-enabled services are interstate services subject to the Commission's exclusive jurisdiction. Verizon also urged the Commission to phase down high cost Universal Service Fund support to wireless competitive eligible telecommunications carriers, freeing up funding for other important priorities such as expanding broadband and wireless infrastructure and any new access replacement funding that results from intercarrier compensation reform. Verizon also emphasized the importance of the Commission resolving the traffic pumping problem. The attached hand-out summarizes the presentation.

Pursuant to Section 1.1206(b) of the Commission's rules, one electronic copy of this notice is being filed in the above-referenced proceeding. Please contact me with any questions.

Sincerely,

A handwritten signature in black ink that reads "Donna Epps".

Attachment

cc: Amy Bender

Greg Orlando

Scott Bergmann

INTERCARRIER COMPENSATION AND UNIVERSAL SERVICE REFORM

Verizon/Verizon Wireless

December 8, 2008

- **VoIP Jurisdiction/Classification** – The FCC should clarify that all VoIP and IP-enabled services are subject to exclusive federal jurisdiction.
- **Identical Support Rule** - The FCC should eliminate the “identical support rule” for competitive eligible telecommunications carriers (CETCs) and, in its place, adopt a five-year phase-down of high cost USF support for CETCs.
 - This action would supersede the USF conditions imposed in the Sprint/Clearwire and Verizon Wireless/Alltel orders and restore a level playing field among wireless competitors, while the Commission considers further action on high cost reform.
 - Initiate rulemaking on whether and how part of the savings from CETC support phase-down can be used for one-time infrastructure grants to build broadband for wireless facilities in unserved areas.
- **Comprehensive Intercarrier Compensation Reform**
 - Single rate for all carriers within a state
 - Provide guidance on “interim rate” and schedule of rate reductions to close “loophole”
 - Shorten transition to 3-5 years
 - Reasonable restructure mechanisms
- **Traffic Pumping**
- **Phantom Traffic**