



INDEPENDENT TELEPHONE & TELECOMMUNICATIONS ALLIANCE

December 12, 2008

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20054

**Re: *Developing a Unified Intercarrier Compensation Regime
Proper Routing and Compensation for Termination of
Telecommunications Traffic
CC Docket 01-92***

***Petition of the Embarq Local Operating Companies for Limited
Forbearance Under 47 U.S.C. § 160(c) from Enforcement of Rule
69.4(a), 47 U.S.C. § 251(b), and Commission Orders on the ESP
Exemption
WC Docket No. 08-8***

NOTICE OF EX PARTE

Dear Ms. Dortch:

Yesterday, Curt Stamp of ITTA, David Bartlett of Embarq, Ken Mason of Frontier, and the undersigned met with Commissioner Robert M. McDowell and Nicholas Alexander to discuss the above-captioned dockets. John Jones of CenturyTel and Tom Gerke and David Bartlett of Embarq participated via telephone.

The parties expressed their continued commitment to comprehensive Intercarrier Compensation (ICC) and Universal Service Fund (USF) reform. In addition to addressing the ITTA proposals for ICC and USF reform, the parties also advocated action on phantom traffic and rules intended to ensure regulatory parity for voice traffic; the parties also urged the Commission to affirm that entities choosing to use the PSTN must pay for that use in the same way without realizing regulatory-created advantages. As a threshold issue, ITTA supports the proposition that terminating access charges apply to IP-originated traffic that terminates to the PSTN. Action on both issues would ensure that carriers are compensated appropriately for use of their networks, and would arrest deceptive and "self-help" measures undertaken by providers seeking avoidance of payment obligations.

Respectfully submitted,

s/ Joshua Seidemann

Joshua Seidemann

Vice President, Regulatory Affairs

cc: Commissioner Robert M. McDowell
Nicholas Alexander