



October 13, 2009

VIA ELECTRONIC MAIL

Ms. Christi Shewman
Ms. Stephanie Weiner
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WC-Docket Nos. 08-33 and 08-185

Dear Ms. Shewman and Ms. Weiner:

On September 30, 2009, Intrado Communications of Virginia, Inc. filed a "request for expedited treatment" of the arbitration issues now before the Commission in these consolidated arbitrations, ostensibly with a handful of Virginia PSAPs interested in Intrado's service. Central Telephone Company of Virginia d/b/a Embarq and United Telephone Southeast LLC d/b/a Embarq believe Intrado's submission warrants a brief response.

Even if Intrado's filing were proper, it is inaccurate. Intrado's filing is replete with assertions irrelevant to the legal issue under Commission review. Intrado claims that Embarq and Verizon are thwarting competition by declining to grant Section 251(c) interconnection rights, rights to which Intrado is not entitled by law, as some other state commissions have already found. Additionally, Intrado's request wrongly suggests that an FCC decision on the pending arbitration is essential for Intrado to provide competitive services to public safety answering points. That is simply not true. Intrado has always remained free to negotiate a commercial agreement with Embarq, or Verizon, pursuant to Section 251(a) to provide its services to Virginia PSAPs. As the record shows, Embarq has entered into such a commercial agreement with Intrado in Florida, and Intrado is already working with public safety answering points there to provide competitive 911 service.

Very truly yours,

A handwritten signature in black ink that reads "Jeanne W. Stockman".

Jeanne W. Stockman

cc (by ECFS): Marlene H. Dortch
(by Email): Cherie Kiser
Rebecca Ballesteros
Maggie McCready
Katharine Saunders
John E. Benedict

Jeanne W. Stockman
Counsel
14111 Capital Boulevard
Wake Forest, NC 27587
(919) 554-7621 (phone)
(919) 554-7913 (fax)