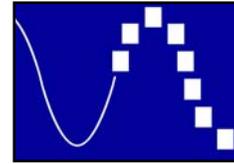


November 6, 2009



The VON Coalition

(Filed electronically)

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

Re: **Ex Parte Notice**

Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92; IP Enabled Services, WC Docket No. 04-36; Petition of Nebraska Public Service Commission and Kansas Corporation Commission for Declaratory Ruling, WC Docket No. 06-122; Consumer Information and Disclosure, CG Docket No. 09-158

Dear Ms. Dortch:

On November 5, 2009, Paula Boyd of Microsoft, Caitlin Clark-Zigmond of New Global Telecom, Staci Pies of Skype, Glenn Richards, Executive Director and Counsel for the VON Coalition, Ellen Schmidt of iBasis, and Amy Wolverton of T-Mobile, met with Christine D. Kurth, Policy Director and Wireline Counsel for Commissioner Robert McDowell, Jennifer Schneider, Broadband, Wireline and Universal Service Legal Advisor for Commissioner Michael Copps, and Sharon Gillett, John Branscome, Alex Minard, Jenny Prime and Cathy Seidel, all from the Wireline Competition Bureau. Ms. Boyd, Ms. Clark-Zigmond, Ms. Pies, Mr. Richards and Ms. Wolverton also met with Carole Simpson, Acting Legal Advisor, Wireline and Broadband, for Commissioner Mignon Clyburn, and Priya Aiyar, Legal Advisor for Wireline Competition and International Issues, for Chairman Julius Genachowski. And, Ms. Boyd, Ms. Clark-Zigmond, Ms. Pies, and Mr. Richards met with Christi Shewman, Legal Advisor for Wireline and Universal Service, for Commissioner Meredith Atwell Baker.

During the meetings, the members of VON discussed investment and innovation in IP-enabled communications market and the important role of the VON member companies in driving broadband adoption. In support of the national transition to broadband networks and IP-enabled applications, the members discussed the Coalition's positions in each of the proceedings listed above, consistent with VON's comments. In particular, the VON Coalition explained its opposition to the Kansas-Nebraska Petition seeking authority to require state Universal Service Fund payments from nomadic interconnected VoIP providers. The Coalition asked that the Commission confirm that such payments were preempted in the *Vonage Preemption Order* and establish a federal policy framework for interconnected VoIP on issues not already regulated by the states. The Coalition discussed its opposition to the application of the truth-in-billing rules to interconnected VoIP, stating that the available data regarding consumer complaints does not support such regulation. Finally, the Coalition reiterated its support for reform of the inter-carrier compensation system and the universal service fund, suggesting that changes need to recognize

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the transition to next generation networks. Specific recommendations include reforming the USF contribution methodology to a numbers- or connections-based approach, transitioning away from support for the PSTN towards support for broadband networks, and adopting bill and keep or a low, unified access rate of \$.0007 or less for carrier to carrier payments for the origination and termination of voice traffic.

Please contact me directly if you have any questions.

Sincerely,

/s/

Glenn S. Richards
Executive Director

cc: Priya Aiyar (by email)
John Branscome (by email)
Sharon Gillett (by email)
Christine Kurth (by email)
Alex Minard (by email)
Jenny Prime (by email)
Jennifer Schneider (by email)
Christi Shewman (by email)
Cathy Seidel (by email)
Carol Simpson (by email)