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December 7, 2009

VIA ELECTRONIC FILING

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

Re: Notice of Ex Parte Communication, GN Dockets No. 09-47, 09-51,
and 09-137

Dear Ms. Dortch:

On December 4, 2009, Nancy Lubamersky, Vice President of Public Policy and Strategic Initiatives of TelePacific Communications (“TelePacific”), together with Tamar Finn and the undersigned, met with Jennifer McKee, Amy Bender, Albert Lewis, Marcus Maher, Donald Stockdale, and Jay Atkinson of the Wireline Competition Bureau and Carol Matthey and Rebekah Goodheart of the Omnibus Broadband Initiative Task Force. Vickie Robinson of the Wireline Competition Bureau also attended the meeting by telephone.

The participants discussed TelePacific’s interests in the development of the National Broadband Plan. TelePacific discussed its network deployment in California and Nevada its small and mid-sized business customer focus, the ways in which it serves those customers, the costs of terminating calls to such customers, and its interest in ensuring reasonable compensation of those costs. TelePacific explained the various types of disputes that it often encounters in attempting to collect intercarrier compensation under the existing regulatory regimes, and expressed support for a single cost-based intercarrier compensation rate that would minimize opportunities for arbitrage and eliminate the inefficiencies that arise out of disputes under the existing frameworks.

TelePacific further advocated that the Commission, as part of the National Broadband Plan, ensure that any universal service fund (“USF”) contributions on broadband Internet access services be competitively neutral. In particular, TelePacific pointed out that USF contribution rules should not favor those who own ubiquitous loop facilities and disadvantage those who make substantial investments in their network but do not control bottleneck last-mile access to specific customer premises.

The attached handout was distributed at the meeting. Thank you for your attention to this correspondence. If you have any questions, please do not hesitate to contact me.

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Sincerely yours,

/s/ electronically signed

Michael R. Romano

Enclosure

cc (by e-mail):

Carol Matthey
Rebekah Goodheart
Jennifer McKee
Amy Bender
Albert Lewis
Marcus Maher
Donald Stockdale
Jay Atkinson
Vickie Robinson