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VIA ECFS

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

**Re: Reply Comments to Application for Review of Level 3 Communications, LLC, ICG Telecom Group, Inc., Looking Glass Networks, Inc., Looking Glass Networks of Virginia, Inc. Progress Telecom, LLC, and Witel Communications, LLC
WC Docket No. 06-122**

Dear Ms. Dortch:

Level 3 Communications, LLC, ICG Telecom Group, Inc., Looking Glass Networks, Inc., Looking Glass Networks of Virginia, Inc., Progress Telecom, LLC, and Witel Communications, LLC (collectively, "Level 3"), respectfully submit these reply comments to its Application for Review requesting reversal of a Wireline Competition Bureau ("Bureau") Order.

On March 2, 2010, Level 3 filed its Application for Review of the Bureau's Order upholding a Universal Service Administrative Company ("USAC") decision, and the Commission released a Public Notice seeking comment on the application. Ascent Media Group, LLC ("Ascent Media") was the only party to file comments and offered strong support for Level 3's application. Ascent Media urged the Commission to reconsider its approach to Universal Service Fund ("USF") revision deadlines and USAC's pay and dispute policy.¹ No objections were filed to the request for reversal.

Therefore, Level 3 respectfully requests that the Commission act expeditiously and grant its Application for Review. In addition, Level 3 urges the Commission to grant Ascent Media's Petition, which also seeks reconsideration of a decision by the Bureau denying Ascent Media's request for waiver of USF filing deadlines and refund of late payment charges. The reporting errors Level 3 and Ascent made resulted in significant increases in billed USF contributions that USAC later reversed. Both contributors would

¹ Comments from Ascent Media Group, LLC on Level 3 Application for Review, WC Docket No. 06-122 (filed April 12, 2010).

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have faced significant financial hardship if they had paid the billed amounts and effectively provided USAC an interest free loan pending invoice reversal. The Commission should grant both contributors equitable relief.

Sincerely,



Tamar E. Finn
Kimberly A. Lacey

*Counsel for Level 3 Communications, LLC, ICG
Telecom Group, Inc., Looking Glass Networks,
Inc., Looking Glass Networks of Virginia, Inc.,
Progress Telecom, LLC, and Witel
Communications, LLC*