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June 9, 2010

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Preserving the Open Internet*, GN Docket No. 09-191; *Broadband Industry Practices*, WC Docket No. 07-52; *A National Broadband Plan for Our Future*, GN Docket No. 09-51

Dear Ms. Dortch:

On behalf of AT&T, Robert Quinn, Gary Phillips, Hank Hultquist and I met today with Christine Kurth of Commissioner McDowell's office. In the meeting, we discussed the so-called "third way" Internet regulatory framework that is the subject of a forthcoming Notice of Inquiry (NOI).¹ In particular, we raised questions about the physical and logical dimensions of the "Internet connectivity service" that the Commission has reportedly identified in the NOI.² We inquired about the Commission's position regarding the network facilities over which this connectivity service is provided, as well as the logical "layers" of the Open System Interconnection (OSI) reference model that are included in the connectivity service. The attached materials formed the basis of our discussion.

If you have any questions or require further information, please do not hesitate to contact me directly.

Sincerely,

/s/
Jack S. Zinman

Enclosures

CC: Christine Kurth

¹ *FCC Announces Tentative Agenda for June 17th Open Meeting*, FCC News Release (May 27, 2010).

² *Id.*

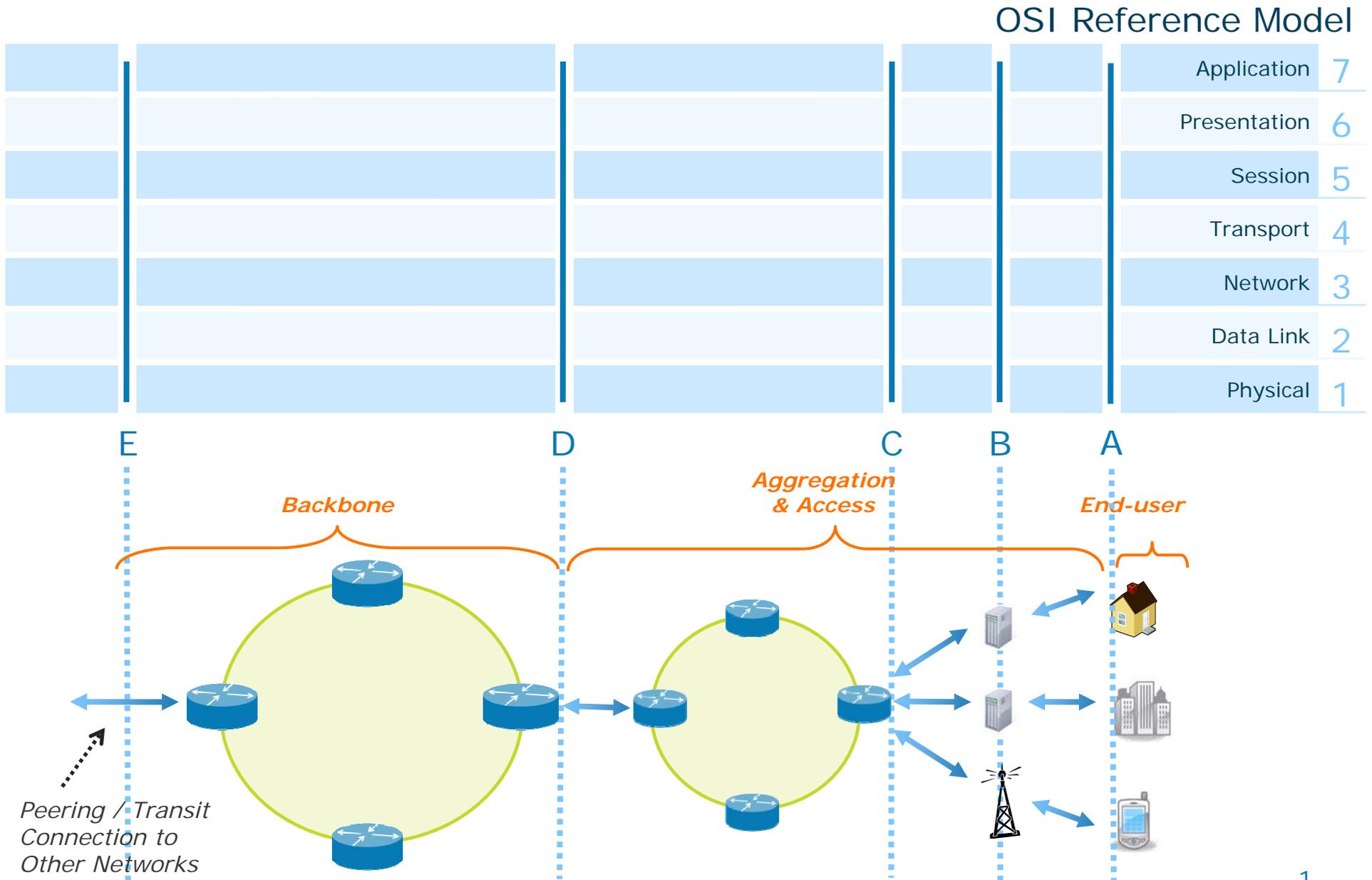


The FCC's New "Internet Connectivity Service"

Where Does It Reside Physically & Logically?

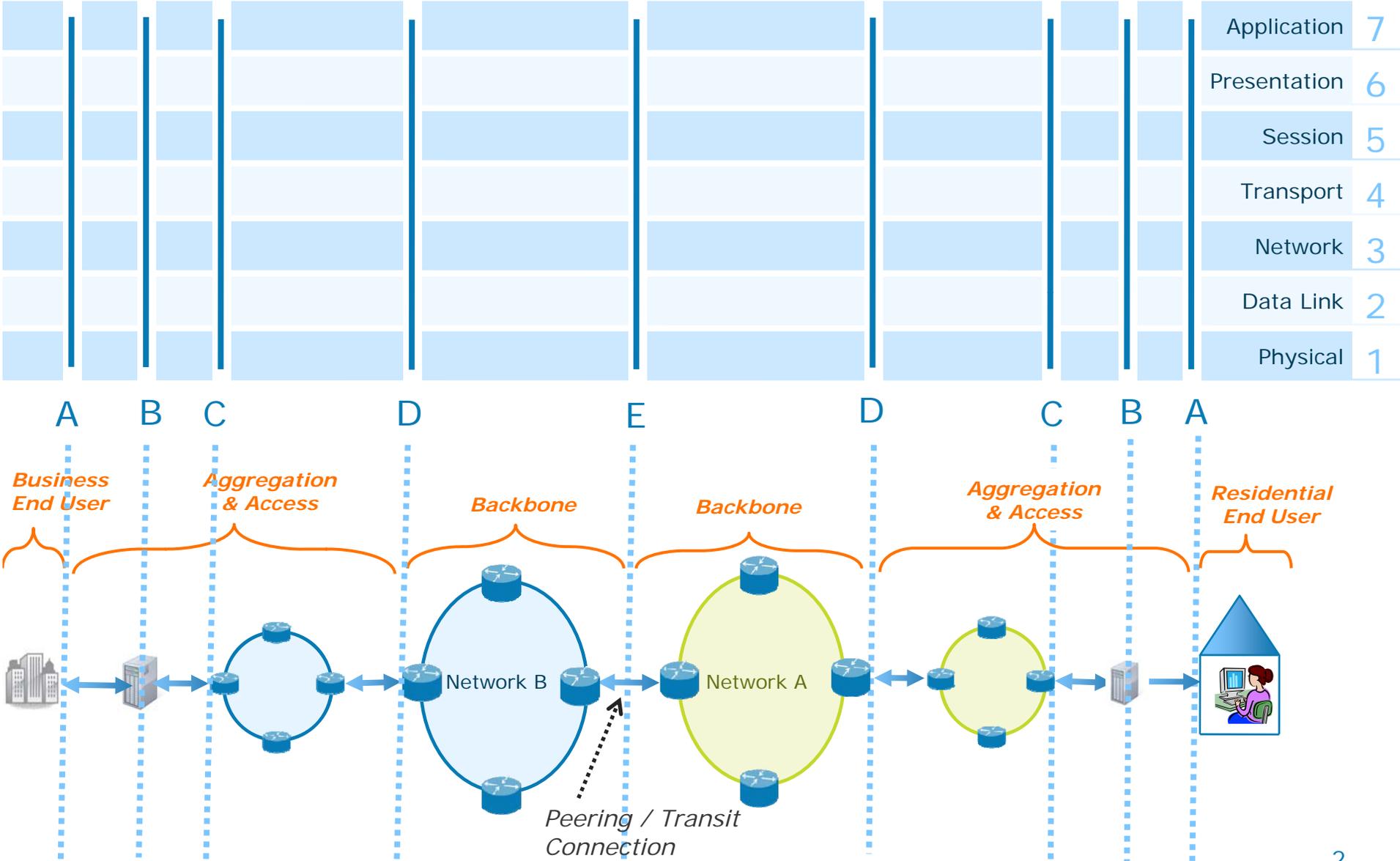
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Where is the "Internet Connectivity Service?"



Where Is The "Internet Connectivity Service?"

OSI Reference Model



Open Systems Interconnectin (OSI) Model

Layer 7: Application Layer (HTTP, FTP, etc.)

- Defines interface-to-user processes for communication and data transfer in network
- Provides standardized services such as virtual terminal, file and job transfer and operations

Layer 6: Presentation Layer (SSL, MME, etc.)

- Masks the differences of data formats between dissimilar systems
- Specifies architecture-independent data transfer format
- Encodes and decodes data; encrypts and decrypts data; compresses and decompresses data

Layer 5: Session Layer (SCP, NetBIOS, etc.)

- Manages user sessions and dialogues
- Controls establishment and termination of logic links between users
- Reports upper layer errors

Layer 4: Transport Layer (TCP, UDP, etc.)

- Manages end-to-end message delivery in network
- Provides reliable and sequential packet delivery through error recovery and flow control mechanisms
- Provides connectionless oriented packet delivery

Layer 3: Network Layer (IP, IGMP, etc.)

- Determines how data are transferred between network devices
- Routes packets according to unique network device addresses
- Provides flow and congestion control to prevent network resource depletion

Layer 2: Data Link Layer (Ethernet, ATM, Frame Relay, etc.)

- Defines procedures for operating the communication links
- Frames packets
- Detects and corrects packets transmit errors

Layer 1: Physical Layer (T1, DSL, SONET, etc.)

- Defines physical means of sending data over network devices
- Interfaces between network medium and devices
- Defines optical, electrical and mechanical characteristics