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August 10, 2010

Electronic Submission

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

Re: **EXPARTE**
WC Docket No. 06-122 – Petition of Nebraska Public Service
Commission and Kansas Corporation Commission for Declaratory
Ruling

Dear Ms Dortch:

Yesterday, Robert Quinn, Jack Zinman and I, all of AT&T, met with Christine Kurth, Policy Director & Wireline Counsel of Commissioner McDowell's office for wireline and universal service. During the meeting we discussed the above-reference petition. The discussion was consistent with AT&T's comments in this proceeding.

We recommended that the Commission not retroactively narrow the scope of preemption of state regulation of interconnected voice-over-IP services (VoIP). We urged the Commission instead to authorize states to require interconnected VoIP providers to contribute to state universal service mechanisms on a prospective basis only, and pursuant to a uniform methodology to ensure that VoIP providers not be subjected to intrastate assessments in multiple states for the same customers. Inconsistent intrastate contribution mechanisms would not only entail double assessments, but could also force VoIP providers to incur significant costs in modifying their billing and accounting systems, which would ultimately be passed on to consumers.

Pursuant to section 1.1206 of the Commission's Rules, this letter is being filed electronically with your office for inclusion in the public record of the above referenced proceedings.

If you have any questions, please do not hesitate to contact me at (202) 457-3821.

Sincerely,

Henry Hultquist

cc: Christine Kurth