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August 12, 2010

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

Re: GN Docket No. 09-51

Dear Ms. Dortch:

On August 11, 2010, Joe Gillan of Gillan Associates and the undersigned met with Bill Dever, Marcus Maher, Randy Clark, Rebekah Goodheart, Melissa Kirkel and Lynne Engledow of the Wireline Competition Bureau. Consistent with Recommendation 4.10 of the National Broadband Plan, we urged the Commission to clarify that Sections 251 and 252 of the Communications Act, 47 U.S.C. §§ 251 and 252, continue to govern the interconnection and traffic exchange obligations of incumbent local exchange carriers even as these carriers transition from a TDM-based network architecture to IP. The Act's interconnection provisions are technology-neutral and in order to "encourage the shift to IP-to-IP interconnection where efficient,"<sup>1</sup> the Commission should reiterate that requesting carriers are entitled to interconnect and exchange traffic in IP format with incumbent LECs where technically feasible and that such interconnection and traffic exchange arrangements should be memorialized in interconnection agreements filed and approved in accordance with the requirements of Section 252.

During the meeting we made reference to the attached documents, which have previously been filed in this docket. We also referenced the attached resolution adopted by the Board of Directors of the National Association of Regulatory Utility Commissioners in July 2008.

<sup>1</sup> National Broadband Plan at 49, Recommendation 4.10.

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Should you have any questions relating to this submission, kindly contact me.

Respectfully submitted,

/s/

Mary C. Albert

Attachments

cc: Bill Dever  
Marcus Maher  
Randy Clark  
Lynn Engledow  
Rebekah Goodheart  
Melissa Kirkel