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VIA ELECTRONIC SUBMISSION

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW – Lobby Level
Washington, D.C. 20554

Re: *Petition of Nebraska Public Service Commission and Kansas Corporation
Commission for Declaratory Ruling, WC Docket No. 06-122; Framework for
Broadband Internet Service, GN Docket No. 10-127*

Dear Ms. Dortch:

On August 11, 2010, Robert Quinn and Jack Zinman, representing AT&T, met with Jennifer Schneider, Legal Advisor to Commissioner Copps. During the meeting we discussed the above-reference petition filed by the Nebraska and Kansas Commissions. Consistent with AT&T's comments on that petition, we recommended that this Commission not retroactively narrow the scope of preemption of state regulation of interconnected Voice over IP (VoIP) services. 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.

In addition, consistent with AT&T's comments in the *Framework for Broadband Internet Service* proceeding, we reiterated AT&T's support for an open Internet and we encouraged the Commission to explore alternative approaches to Title II reclassification that would enable the Commission to pursue the goals of the National Broadband Plan.

If you have any questions or need additional information, please do not hesitate to contact me. Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically with the Commission.

Sincerely,

/s/
Jack Zinman

cc: Jennifer Schneider