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August 13, 2010

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*

Dear Ms. Dortch:

On August 12, 2010, Robert Quinn and Jack Zinman, representing AT&T, met with Angela Kronenberg, Legal Advisor to Commissioner Clyburn. 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.

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: Angela Kronenberg