

**REDACTED –FOR PUBLIC INSPECTION**

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

---

In the matter of )  
 )  
 )  
Request for Review by ) WC Docket No. 06-122  
MeetingOne.com Corp. of Decision of )  
Universal Service Administrator )  
 )  
 )  
 )

---

**PETITION TO STAY DECISION PENDING COMMISSION REVIEW**

**REDACTED –FOR PUBLIC INSPECTION**

**TABLE OF CONTENTS**

|      |   |    |
|------|---|----|
| I.   | Summary .....   | 1  |
| II.  | Introduction and Background .....   | 2  |
| III. | Standard for Interim Injunctive Relief.....   | 5  |
| IV.  | MeetingOne Will Likely Succeed on the Merits .....  | 6  |
|      | A.    USAC Erred by Disregarding MeetingOne’s Unique Architecture .....   | 6  |
|      | B.    USAC Exceeded the Scope of Its Authority by Issuing a Decision<br>Despite the Lack of Clarity Surrounding IP-Only Services..... | 9  |
|      | C.    Prospective Application .....   | 10 |
| V.   | The Balance of Equities Favors a Stay of USAC’s Decision .....  | 12 |
|      | A.    Retroactive Application Will Cause Irreparable Harm.....  | 12 |
|      | B.    Grant of this Petition Will not Harm the USF or any other Entity<br>and Will Serve the Public Interest .....                    | 13 |
| VI.  | Conclusion .....  | 14 |

**REDACTED –FOR PUBLIC INSPECTION**

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

---

In the matter of )  
 )  
Request for Review by ) WC Docket No. 06-122  
MeetingOne.com Corp. of Decision of )  
Universal Service Administrator )  
 )  
 )  
 )

---

**PETITION TO STAY DECISION PENDING COMMISSION REVIEW**

MeetingOne.com Corp. (“MeetingOne”) submits, pursuant to Section 4(i) of the Communications Act of 1936, as amended, 47 U.S.C. §154(i), and Sections 1.41, 1.43, and 54.719 of the Commission’s rules, 47 C.F.R. §§1.41, 1.43, 54.719, this petition to stay the March 3, 2010 decision of the Universal Service Administrative Company (“USAC”) directing MeetingOne to submit Forms 499-A reporting revenue received in 2008 and 2009 and the Forms 499-Q due on May 1, 2009 and August 1, 2009.

**I. Summary**

Alone among many in the industry, MeetingOne raised the question whether USF requirements apply to its business. And yet, MeetingOne faces the end of its business if USAC’s decision to impose retroactive Universal Service Fund (“USF”) fees is not stayed. While MeetingOne has demonstrated a substantial case on the merits that USAC’s decision to impose any USF liability was an error and that any decision to the contrary should be imposed prospectively, it will not benefit from a decision in its favor if forced to make retroactive contributions. Specifically, MeetingOne has demonstrated

**REDACTED –FOR PUBLIC INSPECTION**

that USAC erred first in disregarding the unique aspects of MeetingOne’s IP-only architecture that qualify it as an information service and distinguish it from services previously subjected to USF by the Commission. Second, USAC exceeded the scope of its authority by issuing a decision despite evidence that the Commission’s orders did not clearly cover MeetingOne’s service and that experienced industry participants had treated IP-only services as exempt from USF. Granting the stay not only will avoid the irreparable harm that MeetingOne faces, but it will also serve the public interest by ensuring consumers have access to a viable competitor and the USF has access to another contributor should the Commission rule against MeetingOne. All of this can be accomplished without harming the USF or any other entities because MeetingOne will contribute to the USF from the date of USAC’s decision forward.

**II. Introduction and Background**

On March 3, 2010, USAC issued a decision in response to a request for guidance from MeetingOne<sup>1</sup> finding that MeetingOne is subject to USF contributions under the Commission’s *InterCall Order*, and that MeetingOne’s liability is retroactive to October 2008, when the Order went into effect.<sup>2</sup> In its decision, USAC requested that MeetingOne submit within 60 days of its decision 2008 and 2009 FCC Form 499-As, FCC Form 499-Qs for November 2008, February 2009, May 2009, August 2009 and November 2009, and subsequent quarterly forms.<sup>3</sup>

---

<sup>1</sup> Letter from Trent Martinet, Counsel to MeetingOne.com Corp., to USAC (Oct. 15, 2009).

<sup>2</sup> Letter from USAC to Trent Martinet, Counsel for MeetingOne.com Corp. (Mar. 3, 2010) (“USAC Decision”).

<sup>3</sup> *Id.* at 4.

**REDACTED –FOR PUBLIC INSPECTION**

On May 3, 2010, MeetingOne submitted a request for review of that decision to the Wireline Competition Bureau outlining why USAC's decision was erroneous and why any USF obligations that may be imposed on MeetingOne should be applied prospectively.<sup>4</sup>

Around that time, MeetingOne implemented procedures for contributing to USF prospectively to limit the potential liability it would face if the Commission denied its *Request*. MeetingOne, therefore, began collecting USF fees from its customers as of the date of USAC's decision. On April 30, 2010, MeetingOne submitted a Form 499-Q reporting projected revenue for the third quarter of 2010. USAC informed MeetingOne that it was required to file an initial Form 499-A in order to register before submitting any Forms 499-Q. Following a discussion with USAC and in accordance with USAC's specific instructions, MeetingOne submitted its initial Form 499-A. In response to such submission, MeetingOne received an email from USAC on July 21, 2010, stating that MeetingOne's Form 499-A had been received and approved by the Data Collection Agent (DCA) and forwarded to USAC's billing department.<sup>5</sup> On August 2, 2010, MeetingOne submitted its Forms 499-Q reporting historical revenue for the second quarter of 2010 and reporting projected revenue for the third and fourth quarters.<sup>6</sup>

---

<sup>4</sup> *In the Matter of Request for Review by MeetingOne.com Corp. of Decision of Universal Service Administrator, Request for Review of Universal Service Administrator Decision, WC Docket 06-122 (filed May 3, 2010) ("Request").*

<sup>5</sup> See Attachment 1.

<sup>6</sup> All of the forms submitted to USAC are attached as Attachment 2. These documents are being submitted under a request for confidentiality and have been redacted from the public filing. MeetingOne anticipates that any discrepancy in the amount of USF contributions it makes for the 2010 calendar year will be addressed when it files its Form 499-A in April 2011.

**REDACTED –FOR PUBLIC INSPECTION**

MeetingOne has been operating an IP-only audio conferencing service since February 2008. MeetingOne started operations in 2001 with only two employees in the US, and currently has grown to only 18 employees. In 2008 and 2009, MeetingOne's total income was [REDACTED] and [REDACTED] respectively, and it did not earn any profits.<sup>7</sup> The majority of this revenue is earned under long-term contracts with fixed prices.<sup>8</sup>

MeetingOne has reviewed its revenue for calendar years 2008 and 2009, and determined that, if USAC's decision to apply retroactive USF obligations is not stayed, MeetingOne may owe as much as [REDACTED] in contributions before interest and penalties.<sup>9</sup> According to USAC's Decision, MeetingOne may also be subject to late fees and interest.<sup>10</sup> Setting aside the potential interest that may be charged, the principal amount represents approximately [REDACTED] percent of the [REDACTED] in total revenue and over [REDACTED] percent of [REDACTED] in total audio revenue that MeetingOne has earned in 2010.<sup>11</sup> If MeetingOne were required to remit it to USAC, it would completely wipe out the company.

MeetingOne will remit USF contributions prospectively for revenues collected since the date of USAC's Decision and await refund if the Bureau agrees with

---

<sup>7</sup> A summary of MeetingOne's financial statements for 2007 through 2009 is provided as Attachment 3. These documents are being submitted under a request for confidentiality and have been redacted from the public filing.

<sup>8</sup> Declaration of Brigitte Grimm, Director of Accounting and Finance for MeetingOne, at ¶4 ("Grimm Declaration"), attached hereto as Attachment 4.

<sup>9</sup> *Id.* at ¶7.

<sup>10</sup> *USAC Decision* at 4.

<sup>11</sup> Grimm Declaration at ¶8.

**REDACTED –FOR PUBLIC INSPECTION**

MeetingOne’s *Request* to reverse USAC’s decision. MeetingOne, however, is unlikely to be able to recoup any retroactive amounts paid to USAC from its customers and it will not be able to continue operating while awaiting a refund. Because of the irreparable harm MeetingOne will face and the likelihood that it will prevail on the merits of its *Request*, MeetingOne requests that USAC’s decision to impose retroactive USF obligations from October 2009 to March 2010 be stayed pending a decision on MeetingOne’s *Request*.

**III. Standard for Interim Injunctive Relief**

In evaluating requests for injunctive and interim relief, the Commission applies the following four-part test established in *Virginia Petroleum Jobbers Association v. Federal Power Commission*:<sup>12</sup> “(1) likelihood of success on the merits; (2) the threat of irreparable harm absent the grant of preliminary relief; (3) the degree of injury to other parties if relief is granted; and (4) that the issuance of the order will further the public interest.”<sup>13</sup> When applying this standard, the Commission recognizes that no single factor is dispositive and has noted, for example, that “a compelling demonstration that the public interest would be irreparably harmed lessens the level of certainty required of a moving party to show that it will prevail on the merits.”<sup>14</sup>

---

<sup>12</sup> 259 F.2d 921 (D.C. Cir. 1958).

<sup>13</sup> *AT&T Corp. v. Ameritech Corp.*, 13 FCC Rcd. 14,508, ¶13 (1998) (citing *Comark Cable Fund III v. Nw. Indiana Tel. Co.*, 104 FCC 2d 451, 456 (1985); *Virginia Petroleum Jobbers Ass’n v. FPC*, 259 F.2d 921 (D.C. Cir. 1958) ) (“*Ameritech Order*”).

<sup>14</sup> *Ameritech Order* at ¶14. See also *Cuomo v. NRC*, 772 F.2d 972, 974 (D.C. Cir. 1985) (“Probability of success is inversely proportional to the degree of irreparable injury evidenced. A stay may be granted with either a high probability of success and some injury, or *vice versa*.”).

## REDACTED –FOR PUBLIC INSPECTION

The potential harm that would be inflicted both on MeetingOne and the public interest, in conjunction with MeetingOne’s showing of a “substantial case on the merits,” demonstrates that a stay is appropriate in this case.<sup>15</sup>

### IV. MeetingOne Will Likely Succeed on the Merits

MeetingOne is likely to succeed on the merits of its *Request* to reverse USAC’s decision finding MeetingOne subject to USF contributions because USAC erred in two critical ways when it (1) failed to consider the relevance of MeetingOne’s unique architecture, which does not directly touch the Public Switched Telephone Network (“PSTN”), in finding that MeetingOne is subject to the *InterCall Order*;<sup>16</sup> and (2) exceeded its scope of authority by issuing a decision despite the lack of clarity surrounding MeetingOne’s regulatory status. Even if the Commission ultimately determines that MeetingOne is subject to USF contributions, MeetingOne has amply demonstrated that the confusion surrounding MeetingOne’s status warrants prospective application of such a decision.

#### A. USAC Erred by Disregarding MeetingOne’s Unique Architecture

In its decision, USAC failed to consider the unique IP-only architecture that MeetingOne employs to provide its audio bridging conference service. This failure led to a series of analytical errors that resulted in USAC’s incorrect conclusion.

---

<sup>15</sup> *Washington Metro. Area Transit Comm’n v. Holiday Tours, Inc.*, 559 F.2d 841, 843 (D.C. Cir. 1977) (“a court, when confronted with a case in which the other three factors strongly favor interim relief may exercise its discretion to grant a stay if the movant has made a substantial case on the merits”). See also *Perpetual Bldg. Ltd. P’ship v. District of Columbia*, 618 F. Supp. 603, 610 (D.D.C. 1985).

<sup>16</sup> *In the Matter of Request for Review by InterCall, Inc. of Decision of Universal Service Administrator*, CC Docket 96-45, Order, FCC 08-160, 23 FCC Red. 10731 (2008) (“*InterCall Order*”).

## REDACTED –FOR PUBLIC INSPECTION

On the most basic level, by ignoring the processing MeetingOne’s system applies to the IP packets it receives from its third-party carrier, USAC erred in concluding that MeetingOne provides a telecommunications service.<sup>17</sup> In no case does MeetingOne engage in the transmission of communications without change in its form and content. Rather, as MeetingOne demonstrated in its *Request*, it relies on third-party carriers to receive a user’s call at the carrier’s IP gateway where it is converted to an IP packet.<sup>18</sup> The third-party carrier then sends the IP packet to MeetingOne over the Internet, where MeetingOne accepts the packet on its network, reconfigures it, processes it and combines it with other packets associated with that conference.<sup>19</sup> USAC failed to consider these activities, which fall within the definition of “information services” and are exempt from USF obligations.<sup>20</sup>

This failure led to a further error when USAC found MeetingOne’s service to be subject to the Commission’s *InterCall Order*.<sup>21</sup> In that Order, the Commission found InterCall’s service to be telecommunications subject to USF because “InterCall’s service allows end users to transmit a call (using telephone lines), to a point specified by the user (the conference bridge), without change in the form or content of the information as sent

---

<sup>17</sup> *USAC Decision 4*.

<sup>18</sup> *Request* at 10.

<sup>19</sup> *Id.*

<sup>20</sup> An “information service” is defined as “the offering of a capability for generating, acquiring, storing, transforming, processing, retrieving, utilizing, or making available information via telecommunications, and includes electronic publishing, but does not include any use of any such capability for the management, control, or operation of a telecommunications system or the management of a telecommunications service.” 47 U.S.C. §153(20).

<sup>21</sup> *USAC Decision* at 2-3.

**REDACTED –FOR PUBLIC INSPECTION**

and received (voice transmission).”<sup>22</sup> In reviewing MeetingOne’s request, USAC stated: “USAC cannot make a determination as to whether the technology used by MeetingOne is different from that used by InterCall. However, the technology used does not affect MeetingOne’s USF reporting and contribution obligations.”<sup>23</sup> This last statement ignores the fact that the Commission specifically identified the technology that InterCall used to provide its service and limited its decision to “similarly-situated providers, i.e., stand-alone teleconferencing providers as well as integrated teleconferencing providers . . . .”<sup>24</sup> By ignoring this important element of the Commission’s Order, USAC failed to consider that MeetingOne’s IP audio conferencing technology is distinct because it receives inbound calls on its network from its third-party carrier in IP packet form and does not use, depend on or directly touch the PSTN.<sup>25</sup>

USAC’s initial error also led to the incorrect conclusion that MeetingOne’s service is equivalent to that described in the Commission’s *AT&T IP-in-the-Middle Order*.<sup>26</sup> In that Order, the Commission emphasized that its decision applied only to the types of services described in the proceeding, namely “an interexchange service that: (1) uses ordinary customer premises equipment (CPE) with no enhanced functionality; (2) originates and terminates on the public switched telephone network (PSTN); and (3) undergoes no net protocol conversion and provides no enhanced functionality to end

---

<sup>22</sup> *InterCall Order* at ¶11.

<sup>23</sup> *USAC Decision* at 3.

<sup>24</sup> *InterCall Order* at ¶26.

<sup>25</sup> *See Request* at 11.

<sup>26</sup> *In the Matter of Petition for Declaratory Ruling that AT&T’s Phone-to-Phone IP Telephony Services are Exempt from Access Charges*, WC Docket 02-361, Order, FCC 04-97, 19 FCC Rcd. 7457 (2004) (“*AT&T IP-in-the-Middle Order*”)

**REDACTED –FOR PUBLIC INSPECTION**

users due to the provider's use of IP technology."<sup>27</sup> Without considering the fact that MeetingOne's technology did not meet elements two or three of the standard, USAC found that MeetingOne's service is similar to AT&T's service.

B. USAC Exceeded the Scope of Its Authority by Issuing a Decision Despite the Lack of Clarity Surrounding IP-Only Services

USAC exceeded the scope of its authority established in Section 54.702(c) of the Commission's rules because it interpreted Commission orders that did not clearly apply to MeetingOne without seeking guidance from the Commission. 47 C.F.R. §54.702(c). Section 54.702(c) provides that:

[t]he Administrator may not make policy, interpret unclear provisions of the statute or rules, or interpret the intent of Congress. Where the Act or the Commission's rules are unclear, or do not address a particular situation, the Administrator shall seek guidance from the Commission.

As demonstrated above, MeetingOne's technology does not clearly fall within either the *InterCall Order* or the *AT&T IP-in-the-Middle Order* creating uncertainty as to MeetingOne's regulatory obligations. By holding that MeetingOne's service is in fact similar to the services described in the two orders, and thereby subjecting MeetingOne to USF obligations, USAC expanded the scope of the orders contrary to its limited authority.

USAC's error was compounded by its decision to disregard evidence that other experienced telecommunications providers considered the IP services provided by MeetingOne to be information services. As MeetingOne described in its *Request*, upon learning of the *InterCall Order*, MeetingOne contacted Qwest, a third-party

---

<sup>27</sup> *Id.* at ¶1.

**REDACTED –FOR PUBLIC INSPECTION**

telecommunications carrier that sells Internet Protocol (IP) Long Distance (IPLD) and IP Toll Free (IPTF) capacity to MeetingOne, to obtain guidance on how the services are characterized for USF reporting purposes.<sup>28</sup> Based on those conversations, MeetingOne learned that Qwest treated the services it sold to MeetingOne as information services exempt from USF contribution requirements.<sup>29</sup> USAC summarily dismissed this evidence that confusion existed as to whether such IP services were covered by past Commission orders, and proceeded to find MeetingOne subject to USF contributions. These errors demonstrate that MeetingOne has established a substantial case on the merits.

C. Prospective Application

Even if the Commission finds that MeetingOne is subject to USF contributions, it may apply its decision prospectively, as MeetingOne has requested. The *InterCall Order* provides persuasive precedent for such a decision. In that Order, the Commission concluded: “[i]n part because of the lack of clarity regarding the direct contribution obligations of stand-alone audio bridging service providers that these actions may have created, we find that prospective application of our decision is warranted.”<sup>30</sup> As demonstrated above, the Commission’s *InterCall Order* and *AT&T IP-in-the-Middle Order* do not clearly apply to MeetingOne’s IP-only audio bridging service.

This lack of certainty has also been recognized by other industry participants. Qwest explicitly noted in its comments on MeetingOne’s *Request* that “the *InterCall*

---

<sup>28</sup> *Request* at 6.

<sup>29</sup> *Id.* at 6-7.

<sup>30</sup> *InterCall Order* at ¶24.

**REDACTED –FOR PUBLIC INSPECTION**

*Order* did not address whether audio conferencing services or other conferencing services provided from an IP platform constitute telecommunications services” and “the plain language of the *InterCall Order* is at most silent regarding USF contribution obligations for IP-based audio conferencing services.”<sup>31</sup> While InterCall, Inc. disagreed with MeetingOne’s arguments on the merits, it recognized in its comments that “it is critical that the Bureau provide clear guidance on what services are – and are not – subject to USF contributions” and “urges the Bureau swiftly to clarify providers’ contribution obligations.”<sup>32</sup>

In addition to the uncertainty created by the Commission’s precedents, Qwest’s policy of characterizing the underlying IPLD and IPTF services it sold to MeetingOne as information services demonstrates that experienced telecommunications companies had concluded that the Commission’s prior orders did not apply to IP-only services. Therefore, under the Commission’s own precedent, any USF obligations imposed on MeetingOne should be applied prospectively.

The likelihood that MeetingOne will succeed on the merits of its case,<sup>33</sup> when considered in light of the significant harm described below that retroactive USF obligations would impose, argues strongly in favor of a stay.

---

<sup>31</sup> Comments of Qwest Communications International Inc., *filed in* WC Docket No. 06-122, at 2-3 (Jun. 7, 2010).

<sup>32</sup> Comments of InterCall, Inc., *filed in* WC Docket No. 06-122, at 1-2 (Jun. 7, 2010).

<sup>33</sup> *Washington Metro.*, 559 F.2d at 843. *See also Perpetual Building*, 618 F. Supp. at 610.

**REDACTED –FOR PUBLIC INSPECTION**

**V. The Balance of Equities Favors a Stay of USAC’s Decision**

**A. Retroactive Application Will Cause Irreparable Harm**

MeetingOne is a small company that has not been profitable for several years. In turn, the amount that MeetingOne may be subject to pay on revenue earned between October 2008 and March 2010 is approximately [REDACTED] without penalties and interest.<sup>34</sup> Considering that MeetingOne has been operating at a loss of several hundred thousand dollars over the last two years, requiring MeetingOne to pay retroactive contributions before the Commission has an opportunity to decide MeetingOne’s *Request* will force MeetingOne to close and prohibit MeetingOne from benefiting from any decision in its favor. This result represents a harm that MeetingOne cannot remedy by increasing its prices or by awaiting a refund from USAC, and therefore, supports grant of the requested stay.

MeetingOne likely has no viable option for avoiding closure. It cannot recoup any retroactive payments from its customers for two reasons. First, the majority of its revenue is earned under long-term contracts with fixed prices. MeetingOne is contractually prohibited from increasing the prices charged to these customers until the contracts expire, which may be up to a year.<sup>35</sup> Second, any attempt to increase prices to MeetingOne’s remaining customers would quickly drive them to other operators further reducing MeetingOne’s viability.

Furthermore, USAC’s refund process will not mitigate the harm MeetingOne faces because it could take months, or even years, for the Bureau to decide MeetingOne’s

---

<sup>34</sup> Grimm Declaration at ¶7.

<sup>35</sup> *Id.* at ¶5.

**REDACTED –FOR PUBLIC INSPECTION**

*Request*.<sup>36</sup> Any refund that may be granted after a decision in MeetingOne’s favor will come too late.

The Court of Appeals for the District of Columbia Circuit has found that “destruction of a business constitutes irreparable harm sufficient to warrant the granting of a preliminary injunction provided the other three elements discussed in [*Virginia Petroleum Jobbers*] are met.”<sup>37</sup> Therefore, the potential destruction of MeetingOne’s business strongly supports staying retroactive application of USAC’s decision.

B. Grant of this Petition Will not Harm the USF or any other Entity and Will Serve the Public Interest

As indicated above, MeetingOne has already begun collecting USF fees from its customers and submitted the forms necessary to remit those fees to USAC; therefore the fund will not be harmed by grant of this stay. This approach also will mitigate any perceived competitive harm because MeetingOne will be charging the same USF fees other audio bridging service providers charge to current customers.

Grant of the requested stay will serve the public interest because it will allow MeetingOne to continue operating while the Bureau reviews its *Request* giving consumers more options for audio conference bridging services. Moreover, in the event the Bureau rules against MeetingOne, the fund will benefit from the continued existence

---

<sup>36</sup> InterCall filed its initial request for review of USAC’s decision on February 1, 2008, and the Bureau issued its decision almost five months later on June 30, 2008. *InterCall Order* at nt. 1. Other decisions, however, have taken years. For example, Level 3 Communications, LLC, filed an emergency request for review of a USAC decision on August 15, 2008, but the Bureau did not issue a decision on that request until January 29, 2010. *In the Matter of Universal Service Contribution Methodology Emergency Request for Review of Universal Service Administrator Decision by Level 3 Communications, LLC, et al.*, WC Docket No. 06-122, Order, DA 10-187, 25 FCC Rcd. 1115 (Wireline Comp. Bur. 2010).

<sup>37</sup> *Perpetual Building*, 618 F. Supp. at 616. *See also Washington Metro.*, 559 F.2d at 843 (finding that failure to stay the District Court’s decision would destroy Holiday Tours business, which, along with the last two factors of analysis “clearly favored” grant of a stay)



**REDACTED –FOR PUBLIC INSPECTION**

**ATTACHMENT 1**

**Vorwig, Petra**

---

**From:** Grimm, Brigitte [bgrimm@meetingone.com]  
**Sent:** Wednesday, August 18, 2010 5:05 PM  
**To:** Martinet, Trent  
**Subject:** FW: 499 Form approval confirmation

---

**From:** form499@universalservice.org [mailto:form499@universalservice.org]  
**Sent:** Wednesday, July 21, 2010 7:17 AM  
**To:** Grimm, Brigitte  
**Subject:** 499 Form approval confirmation

A Form 499-A for Filer ID 828318 was recently approved by the Form 499 Data Collection Agent (DCA). The approved form has been forwarded to the USAC billing department.

To view this form, please click here to access the USAC [Online Form 499](#).

If you have questions, please contact:

Universal Service Administrative Company (USAC)  
Billing, Collections and Disbursement Department  
Phone: 888-641-8722  
Email: [customerservice@bcd.universalservice.org](mailto:customerservice@bcd.universalservice.org)

Use of your USAC Online account is optional. If you don't want to use your account, and don't want to receive further e-mails about your account, please click here to [Unsubscribe](#)

**REDACTED –FOR PUBLIC INSPECTION**

**ATTACHMENT 2**

**REDACTED**

**REDACTED –FOR PUBLIC INSPECTION**

**ATTACHMENT 3**

**REDACTED**

**REDACTED –FOR PUBLIC INSPECTION**

**ATTACHMENT 4**

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

|                                     |   |                               |
|-------------------------------------|---|-------------------------------|
| _____                               | ) |                               |
| In the matter of                    | ) |                               |
|                                     | ) |                               |
| Request for Review by               | ) | WC Docket No. 06-122          |
| MeetingOne.com Corp. of Decision of | ) |                               |
| Universal Service Administrator     | ) | Declaration of Brigitte Grimm |
|                                     | ) |                               |
| _____                               | ) |                               |

I, Brigitte Grimm, state as follows:

1. I am Director of Accounting and Finance for MeetingOne.com Corp (“MeetingOne”).
2. This Declaration is made in support of MeetingOne’s Petition to Stay the decision of the Universal Service Administrative Company (“USAC”) that is the subject of the above referenced request.
3. MeetingOne is a full service IP audio conferencing, training and event solutions provider.
4. The majority of its revenue is earned under long-term contracts with fixed prices.
5. MeetingOne is contractually prohibited from increasing the prices charged under these long-term contracts until the contracts expire, which may be up to a year.
6. I have reviewed MeetingOne’s revenue for calendar years 2008 and 2009 and applied the relevant USF contribution factors to that revenue.
7. Based on my review, I have determined that, if MeetingOne is subject to retroactive USF obligations for 2008 and 2009, it may owe as much as \_\_\_\_\_ in contributions before interest and penalties.



