



**INDEPENDENT TELEPHONE & TELECOMMUNICATIONS ALLIANCE**

August 24, 2010

Marlene Dortch  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re:    *Developing a Unified Inter-carrier Compensation Regime***  
***CC Docket 01-92***

***Establishing Just and Reasonable Rates for Local Exchange Carriers***  
***WC Docket No. 07-135***

***Feature Group IP Petition for Forbearance Pursuant to 47 U.S.C. § 160(c)***  
***from Enforcement of 47 U.S.C. § 251(g), Rule 51.701(b)(1), and Rule 69.5(b)***  
***WC Docket No. 07-256***

Dear Ms. Dortch:

On August 23, 2010, Jeffrey Lanning of CenturyLink, Michael Shultz of Consolidated Communications, and I spoke via telephone with Angela Kronenberg of Commissioner Mignon Clyburn's office.

ITTA urged the Commission to implement measures that address phantom traffic, access stimulation, and obligations of VoIP providers to pay access for calls terminated on the public switched telephone network (PSTN). Immediate action on these items will reduce incentives for arbitrage, strengthen provider stability by enabling proper cost recovery, and serve as a reasoned prelude to further comprehensive reform.

Please do not hesitate to contact me if you have any questions or require additional information.

Sincerely,

Joshua Seidemann  
Vice President, Regulatory Affairs

cc: Angela Kronenberg