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August 27, 2010

VIA ECFS

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

RE: Nebraska Pub. Service Commission and Kansas Corp. Commission Petition for Declaratory Ruling or, in the Alternative, Adoption of Rule Declaring that State Universal Service Funds May Assess Nomadic VoIP Intrastate Revenues; WC Docket No. 06-122 (“Petition”)

Dear Ms. Dortch:

On August 26 and 27, 2010, representatives of the Nebraska Public Service Commission (“NPSC”), Commissioner Anne Boyle, Legal Counsel Shana Knutson, and the Kansas Corporation Commission (“KCC”), Advisory Counsel Patti Petersen-Klein and Managing Telecommunications Auditor Sandy Reams, accompanied by James Lister and Elisabeth Ross of this firm, had six FCC meetings. On the 26th, they met with representatives of the General Counsel’s office and Bureau staff: Austin Schlick, James Carr, Richard Welch, Julie Veach, Sonja Rifkin and Rebekah Goodheart; Angela Kronenberg, Wireline Legal Advisor to Commissioner Mignon Clyburn; Commissioner Meredith Baker and her Wireline Legal Advisor, Christi Shewman; and Christine Kurth, Wireline Legal Advisor to Commissioner Robert McDowell. On the 27th, they met with Zac Katz, Wireline Legal Advisor to Chairman Genachowski and Carol Matthey, Rebekah Goodheart, and Nick Degani of the Wireline Competition Bureau; and Jennifer Schneider, Wireline Legal Advisor to Commissioner Coppins.

The NPSC/KCC representatives re-iterated in the meeting the points made in their above-referenced Petition, their reply comments, and their prior *ex parte* presentations, and urged that the Commission grant their Petition so that nomadic VOIP providers contribute to federal and state universal service funds on 100% of their revenues as their circuit-switched, wireless, and fixed VOIP competitors already do. They responded to arguments raised in *ex parte* filings over the last two weeks by other parties on issues including double billing and retrospectivity. They reiterated points made in the *ex parte* that they had filed on August 25, 2010.

Respectfully submitted,

/s/ Elisabeth H. Ross
Elisabeth H. Ross
James H. Lister

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Rebekah Goodheart
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Jennifer Schneider
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