

August 30, 2010

Jennifer L. Richter  
202-457-5666  
jrichter@pattonboggs.com

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

Re: **Notice of Ex Parte Communication - Docket Nos. 02-6 and 09-51**

Dear Ms. Dortch:

On Friday, August 27<sup>th</sup>, Phil Gieseler, Jon Abrams from Edline, Ed Fish from ePals, and Jennifer Richter, counsel to Edline and ePals, participated in a conference call with Gina Spade and Cara Voth, both of the Wireline Competition Bureau (the “Bureau”). The parties discussed two topics.

First, the parties discussed how web hosting technology works. Web-hosted or web-based communications services are enabled with the same technology that enables other Priority 1 services, such as email and voicemail. All three services employ computers, access to the Internet and enabling software, all designed to work together in a comprehensive system.

Second, the parties discussed two proposals made by Edline and ePals to reduce the complexity of administering web hosting eligibility and control costs: (1) a “bright line test” to determine basic eligibility for web-based communications services; and (2) a “standard discount” to eliminate cost allocations for web hosting. The bright line test and the standard discount are both discussed in prior filings made by Edline and ePals, including *ex parte* notices filed on August 5<sup>th</sup> and August 27<sup>th</sup>. Edline and ePals thank the Bureau for its time and consideration of these ideas.

Respectfully submitted,

/s/ Jennifer L. Richter

Jennifer L. Richter  
Counsel to Edline and ePals

cc: Gina Spade  
Cara Voth