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Ex parte

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92

Today, Heather Gold, Lisa Youngers, and I, of XO Communications, LLC met with Jay Atkinson, Ted Burmeister, Randy Clarke, Lynne Engledow, John Hunter, Katie King, Betsy McIntyre, and Don Stockdale, all of the Wireline Competition Bureau, to discuss intercarrier compensation reform. The discussion in the meeting followed the attached presentation, which was distributed to the meeting attendees.

XO urged the Commission to propose new rules for intercarrier compensation that would be consistent with its goals in the National Broadband Plan. By setting up a regime similar to the existing IP peering scheme and requiring IP interconnection for traffic exchanged between carriers, the Commission's forward-looking policies would encourage investment in broadband infrastructure and expedite deployment. XO recommended a 5-year transition that includes proper financial incentives to invest in IP-based networks by immediately reducing rates for using IP, rather than TDM, technology. XO stressed that IP-based carrier-to-carrier interconnection should be available regardless of the technology used to serve end users and that these new rules would not impact unbundling requirements for last mile facilities.

Respectfully Submitted,

/s/

Tiki Gaugler
Senior Manager & Counsel, Regulatory

Attachment