



Grace E. Koh  
Policy Counsel  
Public Policy Office

September 27, 2010

**VIA ECFS**

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

**Re: Notice of *Ex Parte* Presentation; In the Matter of Developing a Unified Inter-carrier Compensation Regime, WC Docket No. 01-92; In the Matter of a National Broadband Plan for Our Future, GN Docket No. 09-51**

Dear Ms. Dortch:

On October 9, 2008, the undersigned met with Randy Clarke, Jay M. Atkinson, Lynne Engledow, Dan Ball, Rebekah Goodheart, John Hunter, Ted Burmeister, and Al Lewis, all of the Wireline Competition Bureau. Doug Garrett, Vice President, Western Region Regulatory Affairs, and Jose Jimenez, Executive Director, Regulatory Affairs, both from Cox Communications, Inc. ("Cox"), joined the meeting by telephone.

During the meeting, we discussed Cox's support for certain reforms to the inter-carrier compensation regime recommended in the National Broadband Plan. Specifically, we agreed that the right course of action was to step down intrastate rates to interstate rates over a period of time and then further down to bill-and-keep for traffic that was largely in balance. We also suggested that the FCC should restrict "make-whole" access revenue recovery to rural rate-of-return carriers under appropriate conditions, with an eye to phasing out such subsidies entirely. We emphasized that the FCC should not disrupt the current network interconnection regime, and in particular, we noted that the existing ILEC transit obligations must be maintained at cost-based rates, even as carriers begin transitioning to direct IP-to-IP interconnection.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed with your office via ECFS. Courtesy copies also are being distributed to the meeting attendees via email.

Respectfully submitted,

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Grace Koh  
Policy Counsel  
Cox Enterprises, Inc.

Ms. Marlene Dortch

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cc: Jay M. Atkinson  
Dan Ball  
Ted Burmeister  
Randy Clarke  
Lynne Engledow  
Rebekah Goodheart  
John Hunter  
Al Lewis