INDEPENDENT TELEPHONE & TELECOMMUNICATIONS ALLIANCE

September 28, 2010

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

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

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

Feature GroupIP 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

Framework for Broadband Internet Service
GN Docket No. 10-127

Dear Ms. Dortch:

On September 27, 2010, the undersigned met with Christine D. Kurth of Commissioner Robert M. McDowell's office to discuss the above-captioned proceedings.

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.

ITTA also discussed the strongly competitive broadband market, and noted that, where appropriate, the Commission's ancillary jurisdiction is sufficient. Therefore, ITTA urged the Commission to refrain from introducing regulations aimed at broadband Internet access services.

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

Sincerely,

Joshua Seidemann
Vice President, Regulatory Affairs

cc: Christine D. Kurth

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