



CenturyLink™

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EX PARTE NOTICE

November 1, 2010

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

*Re: Developing a Unified Intercarrier Compensation Regime, CC Dkt. No. 01-92;
A National Broadband Plan for Our Future, GN Docket No. 09-51*

Dear Ms. Dortch:

On October 29, 2010, David Bartlett, Jeb Benedict and I met on behalf of CenturyLink with Zachary Katz in the office of Chairman Genachowski, and Rebekah Goodheart, Jennifer Prime, and Randy Clarke in the Wireline Competition Bureau. CenturyLink agreed that intercarrier compensation reform is critical to broadband deployment and expressed general agreement with the framework in the National Broadband Plan.

In particular, CenturyLink explained the importance to the Commission's broadband deployment goals of preserving and making explicit the high-cost support reflected in access charges. In addition, we explained the need for all carriers to compensate each other for the costs associated with using network facilities, which are particularly important with respect to higher-cost rural transport networks. CenturyLink explained that the Commission must take action promptly on the interim measures of phantom traffic, traffic pumping, and IP-PSTN access compensation to build confidence that the Commission and stakeholders can make progress on intercarrier compensation reform.

With respect to the treatment of IP-originated traffic, CenturyLink emphasized the need to ensure revenue stability during the transition to a new universal service and intercarrier compensation regime. We noted that the Commission must not retroactively upset the current and long-held industry practice of treating IP-originated traffic like all other traffic on the PSTN. CenturyLink explained that there is no way to distinguish IP-originated traffic, so it should not receive special treatment, which will create massive new arbitrage. Finally, we explained that the Commission should ensure compliance with established intercarrier compensation rules and practices rather than permit carriers to avoid tariffed rates and procedures unilaterally.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this notice is being filed in the above-referenced dockets. Please contact me if you have any questions.

Sincerely,

Jeffrey S Lanning

cc: Zac Katz, Rebekah Goodheart, Jenny Prime, Randy Clarke