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November 2, 2010

Ex Parte

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

RE: Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135

Dear Ms. Dortch:

Yesterday, Elaine Critides of Verizon Wireless; Karen Zacharia, Chris Miller, and Tamara Preiss of Verizon; and Scott Angstreich of Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C., met with Julie Veach, Peter Karanjia, Richard Welch, and Diane Griffin Holland of the Office of General Counsel; Jane Jackson of the Wireless Telecommunications Bureau; and Rebekah Goodheart, John Hunter, Randy Clarke, and Travis Litman of the Wireline Competition Bureau to discuss the impact of the Commission's decision in *North County Communications*¹ on compensation arrangements between wireless providers and competitive local exchange carriers (CLECs) for intraMTA traffic. Consistent with Verizon's previous filings on this issue,² we explained that the *North County* decision has created a new traffic pumping target for CLECs and that prompt action from the Commission is necessary to close the potentially large new arbitrage opportunity for intraMTA CMRS-originated traffic terminated by CLECs. We also demonstrated that the Commission has provided ample notice to interested parties to adopt rules addressing traffic pumping by CLECs with respect to intraMTA wireless traffic. In particular, we discussed and provided copies of numerous filings and other materials in WC Docket No. 07-135 that raise this issue. A list of the relevant record citations is attached to this letter.

¹ *North County Communications Corp., v. MetroPCS, LLC*, File No. EB-06-MD-007, Order on Review, 24 FCC Rcd 14036 (2009) ("North County").

² See, e.g., Letter from Tamara Preiss, Verizon, to Marlene H. Dortch, Secretary, FCC, CC Docket No. 01-92, WC Docket No. 07-135 (filed June 28, 2010).

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This letter is being filed electronically pursuant to Section 1.1206 of the Commission's rules. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "James Griffin". The signature is written in a cursive style with a large initial "J" and a long, sweeping underline.

cc: Julie Veach
Peter Karanjia
Richard Welch
Diane Griffin Holland
Jane Jackson
Rebekah Goodheart
John Hunter
Randy Clarke
Travis Litman

RECORD CITATIONS
IntraMTA Wireless Traffic

- Letter from Carl Northrop, MetroPCS, to Kevin J. Martin, FCC, WC Docket No. 07-135 (September 7, 2007).
- *Establishing Just and Reasonable Rates for Local Exchange Carriers*, Notice of Proposed Rulemaking, WC Docket No. 07-135 (October, 2, 2007).
- Comments of MetroPCS Communications, Inc., *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135, (December 17, 2007).
- Comments of Leap Wireless International, Inc., *Matter of Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135 (December 17, 2007).
- Reply Comments of CTIA, *Establishing Just and Reasonable Rates for Local Exchange Carriers*, CC Docket No. 07-135 (January 16, 2008).
- Motion of Freeconferencecall.com to consolidate Dockets CC Docket No. 01-92 and WC Docket No. 07-135 (March 10, 2008).
- *North County Communications Corp. v. MetroPCS California*, Memorandum Opinion and Order, EB-06-MD-007 (March 30, 2009).
- Letter from Ross A. Buntrock, Northern Valley Communications and Sancom, Inc., to Marlene Dortch, FCC, WC Docket No. 07-135 (July 17, 2009).
- *North County Communications Corp. v. MetroPCS California*, Order on Review, EB-06-MD-007 (November 19, 2009).
- Letter from Brian Benison, AT&T, to Marlene Dortch, FCC, WC Docket No. 07-135 and GN Docket No. 09-51 (December 23, 2009).
- Letter from Donna Epps, Verizon, to Marlene Dortch, FCC, WC Docket No. 07-135 (March 26, 2010).
- Letter from Tamara Preiss, Verizon, to Marlene Dortch, FCC, CC Docket No. 01-92 and WC Docket No. 07-135 (April 27, 2010).
- Letter from Stephen L. Goodman, North County Communications Corp., to Marlene Dortch, FCC, WC Docket No. 07-135 (June 15, 2010).
- Letter from Carl W. Northrop, MetroPCS, to Marlene Dortch, FCC, WC Docket No 07-135 and CC Docket No. 01-92 (June 24, 2010).

- Letter from Tamara Preiss, Verizon, to Marlene Dortch, FCC, CC Docket No 01-92 and WC Docket No. 07-135 (June 28, 2010).
- Letter from Michael B. Hazzard, Pac-West Telecomm, Inc., to Marlene Dortch, FCC, CC Docket No. 01-92 (July 19, 2010).
- Letter from Tamara Preiss, Verizon, to Marlene Dortch, FCC, CC Docket No. 01-92 and WC Docket No. 07-135 (July 28, 2010).
- Letter from Nancy E. Lubamersky, Telepacific Communications, to Marlene Dortch, FCC, CC Docket No. 01-92 (August, 20, 2010).
- Letter from L. Charles Keller, CTIA, to Marlene Dortch, FCC, CC Docket No. 01-92 and WC Docket No. 07-135 (August 26, 2010).
- Letter from Glenn T. Reynolds, USTelecom, to Marlene Dortch, FCC, WC Docket No. 07-135 (August 31, 2010).
- Letter from L. Charles Keller, CTIA, to Marlene Dortch, FCC CC Docket No. 01-92 and WC Docket No. 07-135 (September 9, 2010).
- Letter from Michael B. Hazzard, Pac-West Telecomm, Inc., to Marlene Dortch, FCC, WC Docket No. 01-92 and WC Docket 07-135 (September 10, 2010).
- Letter from Ross A. Buntrock, Bluegrass Telephone Company, Inc. d/b/a Kentucky Telephone, to Marlene Dortch, FCC, WC Docket No. 07-135 (September 16, 2010).
- Letter from Donna Epps, Verizon, to Marlene Dortch, FCC, WC Docket No. 07-135 (October 11, 2010).
- Letter from Scott K. Bergmann, CTIA, to Marlene Dortch, FCC, WC Docket No. 07-135 (October 13, 2010).
- Letter from Michael B. Hazzard, Pac-West Telecomm, Inc., to Marlene Dortch, FCC, WC Docket No. 01-92 and WC Docket 07-135 (October 22, 2010).