

January 18, 2011

The Honorable Julius Genachowski
Chairman, Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *A National Broadband Plan for Our Future*, GN Docket No. 09-51; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135; *High-Cost Universal Support*, WC Docket No. 05-337, *IP-Enabled Services*, WC Docket No. 04-36, *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92; *Intercarrier Compensation for ISP-Bound Traffic*, CC Docket No. 99-68.

Dear Chairman Genachowski:

As the CEOs of CenturyLink, Frontier, Qwest and Windstream, we fully appreciate the complexities of the current intercarrier compensation (ICC) system. We have been in favor of rational, comprehensive reform of ICC for some time and are encouraged by the National Broadband Plan's path forward in this regard. We write to renew our pledge to support the Commission through this important process. With this commitment, we urge you to address immediately an ICC-related issue of immediate and grave concern to us: the treatment of IP-based voice traffic.

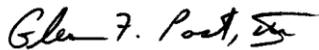
As we begin the New Year, we note that 2011 marks a decade since the Commission first opened its proceeding on ICC reform – a docket that remains open today. No doubt, the monumental changes proposed in the National Broadband Plan will take some time to accomplish. The first step is to adopt an order confirming the appropriate treatment of IP-based voice traffic – an issue that can easily be separated from the broader proceeding.

In particular, we ask the Commission to ensure that carriers are appropriately compensated for the use of their networks under the existing system. This is a growing concern as an increasing number of voice-over-IP (VoIP) service providers have unilaterally decided to decrease or eliminate the long-standing industry practice of honoring the appropriate and lawful intercarrier compensation charges (access or reciprocal compensation) for IP-originated traffic terminating on the public switched telephone network (PSTN). The lack of FCC action on this issue only exacerbates the problem and encourages carriers to bypass the FCC's compensation framework. We urge the Commission to take immediate interim action by confirming that VoIP traffic terminating to the PSTN has been and will continue to be subject to the appropriate intercarrier compensation according to the same rules as other voice providers with whom they compete until the Commission reforms the existing mechanisms.

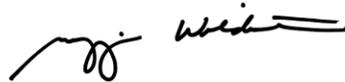
We believe that the time to act is now. By taking decisive action, you will end the self-help arbitrage opportunity that is running rampant in the unchecked ICC system, and will provide the Commission with a clear framework for moving forward with real reform. We have full confidence that the comprehensive reform process will not be deterred or delayed should the Commission move forward with this immediately remediable matter. We are investing hundreds

of millions of dollars annually to deploy the next generation of networks and services in order to achieve the goals of the National Broadband Plan, and we want to continue to do so. By moving forward on this discrete ICC issue, the FCC will create incentives and certainty for all carriers to continue to invest in their networks and meet the National Broadband Plan's goals. Finally, we want to assure you that we remain committed to working with you on the longer term efforts to restructure both the universal service and ICC systems.

We look forward to working with you,



Glen F. Post, III
Chief Executive Officer and President
CenturyLink, Inc.



Maggie Wilderotter
Chairman and Chief Executive Officer
Frontier Communications



Ed Mueller
Chairman and Chief Executive Officer
Qwest Communications



Jeff Gardner
President and Chief Executive Officer
Windstream

cc: Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker