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**Ex parte - VIA ECFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
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.***

On January 28, 2011, on behalf of XO Communications, LLC (“XO”), I spoke separately via telephone with Zac Katz, Legal Advisor to Chairman Genachowski for Wireline Communications, International and Internet Issues; Brad Gillen, Wireline Legal Advisor to Commissioner Baker; Angela Kronenberg, Wireline Legal Advisor to Commissioner Clyburn; and Margaret McCarthy, Policy Advisor, Wireline, to Commissioner Copps, and via voicemail to Christine Kurth, Policy Director & Wireline Counsel to Commissioner McDowell, to discuss intercarrier compensation issues regarding the treatment of voice-over-Internet protocol (“VoIP”) traffic.

In particular, we discussed recent ex partes filed in the above-referenced dockets regarding requests for the Commission to adopt a rule that may lead to the retroactive application of switched access charges to IP-PSTN traffic. While XO strongly supports Commission action to resolve the long-standing confusion by many carriers surrounding the proper regulatory treatment of IP-PSTN traffic, to the extent the Commission ultimately rules that switched access charges apply to IP-PSTN traffic, it should limit any such ruling to prospective application only.

Respectfully Submitted,

/s/

Lisa Youngers  
Vice President, Federal Regulatory

cc: Zac Katz  
Brad Gillen  
Angela Kronenberg  
Margaret McCarthy  
Christine Kurth