

Donna Epps  
Vice President  
Federal Regulatory Affairs



1300 I Street, NW, Suite 400 West  
Washington, DC 20005

Phone 202 515-2527  
Fax 202 336-7922  
donna.m.epps@verizon.com

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**Ex Parte**

**VIA ECFS**

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**

Dear Ms. Dortch:

Yesterday, Kathleen Grillo of Verizon had a call with Zachary Katz, Legal Advisor for Wireline Communications, International and Internet Issues, Chairman Genachowski to discuss Verizon's position on intercarrier compensation reform. During the discussion, Ms. Grillo indicated support for the Commission's efforts to reform the legacy intercarrier compensation system. The current outdated system is broken, and the Commission needs to reform it precisely because the communications landscape has changed so dramatically with the advent of new technologies and services.

Ms. Grillo made clear that Verizon strongly opposes extending the legacy system to IP traffic and urged the Commission to reject arguments that the Commission should impose tariffed access charges on IP traffic. She indicated that the record is clear that the FCC has not decided the proper compensation regime for IP traffic and that it would be inappropriate and harmful for the Commission to reach such a conclusion in the pending Notice of Proposed Rulemaking. Instead, the Commission should make clear that until it adopts rules, carriers may enter into voluntary, commercial agreements to establish rates, terms, and conditions for IP traffic.

Sincerely,

A handwritten signature in black ink that reads "Donna Epps".

cc: Zachary Katz