

February 22, 2011

VIA ECFS

EX PARTE

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: *WC Docket Nos. 10-90, 07-135, 05-337, 03-109, 04-36; CC Docket Nos. 96-45, 01-92; GN Docket No. 09-51*

Dear Ms. Dortch:

On February 18, 2011, Don Shephard of tw telecom inc., Joe Gillan of Gillan Associates, and the undersigned met with Zac Katz, legal advisor to Chairman Julius Genachowski and with Al Lewis, Randy Clarke, Lisa Gelb, Jenny Prime, Rebekah Goodheart, and Bill Dever of the Wireline Competition Bureau. During the meeting, we asserted that the FCC should classify managed VoIP service (i.e., VoIP provided via managed network facilities and not via the public Internet) as a telecommunications service, a telephone exchange service and an exchange access service. We further asserted that the FCC should rule that incumbent LECs are required, pursuant to Section 251(c)(2) of the Communications Act, to establish direct IP-to-IP interconnection at any technically feasible point with providers of managed VoIP service.

Please do not hesitate to contact me at (202) 303-1111 if you have any questions or concerns about this submission.

Respectfully submitted,

/s/ Thomas Jones
Thomas Jones
Counsel for tw telecom inc.

cc (via email): Zac Katz
Al Lewis
Randy Clarke
Lisa Gelb
Jenny Prime
Rebekah Goodheart
Bill Dever