

March 17, 2011

**VIA ECFS**

***EX PARTE***

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

**Re: *Connect America Fund, WC Docket No. 10-90; 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 Service Support, WC Docket No. 05-337; Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-91; Federal-State Joint Board on Universal Service, CC Docket No. 96-4***

Dear Ms. Dortch:

Today, Joe Gillan and the undersigned, on behalf of tw telecom inc., held a telephone conversation with Sharon Gillett, Chief of the Wireline Competition Bureau and Marcus Maher, Associate Chief of the Wireline Competition Bureau. During the conversation, Mr. Gillan and I argued that the Commission should clarify that providers of managed VoIP services have a right, under Section 251(c)(2) of the Communications Act, to direct IP-to-IP interconnection for the purpose of exchanging managed VoIP traffic with incumbent LECs.

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): Sharon Gillett  
Marcus Maher