



March 29, 2011

(Filed electronically)

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: **Ex Parte Notice**
CC Docket No. 01-92
WC Docket 04-36
WC Docket 07-135

Dear Ms. Dortch:

On March 28, 2011, the Voice on the Net Coalition (VON) represented by Paula Boyd and Laura Carter of Microsoft, Staci Pies of Skype and Glenn Richards, Executive Director and Counsel for VON, met with the following staff from the Wireline Competition Bureau: Dan Ball, Lynne Engledow, Victoria Goldberg, Travis Litman, Al Lewis, John Hunter, Randy Clarke, Rohit Dixit, Kevin King and Rebekah Goodheart, to discuss the intercarrier compensation issues raised in the above-referenced dockets. In particular, VON explained that it is unnecessary to adopt an interim rate for the origination and/or termination of IP-enabled voice communications. Instead, to best facilitate and encourage the transition from circuit-switched to IP networks, the Commission should move immediately to adopt bill-and-keep as the appropriate intercarrier compensation regime for IP traffic. VON also discussed current commercial arrangements between VoIP providers and CLECs, and suggested that movement to bill and keep for intercarrier payments would reduce or eliminate charges that are currently based on the regulated intercarrier rates, resulting in lower prices and greater innovation in IP communications product offerings for end users. We also discussed whether it is possible, either through technical or administrative means, to designate IP traffic as it is passed to the terminating carrier. Such a designation would enable carriers to identify IP traffic during an interim transition period until all traffic is terminated under a bill and keep regime. VON also supported classification of VoIP and other IP-enabled communications services as interstate, information services, suggesting that would be consistent with the adoption of a bill and keep regime and eliminate disputes concerning intrastate access charges.



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Please contact me directly if you have any questions.

Sincerely,

/s/

Glenn S. Richards
Executive Director

cc: Dan Ball (via email)
Lynne Engledow (via email)
Victoria Goldberg (via email)
Travis Litman (via email)
Al Lewis (via email)
John Hunter (via email)
Randy Clarke (via email)
Rohit Dixit (via email)
Kevin King (via email)
Rebekah Goodheart (via email)