

JENNER & BLOCK

April 1, 2011

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Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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Re: WC Docket Nos. 10-90, 07-135, 05-337; GN Docket No. 09-51; CC Docket No. 01-92

Dear Ms. Dortch:

On March 31, 2011, Catherine Bohigian of Cablevision Systems Corporation, Howard Symons of Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C., and the undersigned met with Rebekah Goodheart, Randy Clarke, John Hunter, Lynn Engledow, Victoria Goldberg, and Travis Litman of the Wireline Competition Bureau, and Rohit Dixit and Kevin King of the Office of Strategic Planning & Policy Analysis concerning the above-referenced proceedings.

In this meeting, we urged the Commission, for purposes of prospective rules on intercarrier compensation, to subject Voice of Internet Protocol (“VoIP”) traffic and circuit-switched traffic to identical rates. We explained that to do otherwise, even for a transitional period, would merely create an additional arbitrary distinction leading to the kind of arbitrage the Commission seeks to eliminate. We further explained that subjecting VoIP and circuit-switched traffic to identical rates creates appropriate incentives for carriers to upgrade their networks to Internet Protocol (“IP”) architecture, as under such a regime carriers can adopt more efficient IP architecture without risking losing revenue to which they would otherwise be entitled.

Additionally, we asked that the Commission make clear that ILECs are required to interconnect in IP if a requesting carrier seeks to do so. We explained that such a requirement is consistent with the Commission’s previous conclusions with respect to Section 251(c)(2) of the Communications Act, 47 U.S.C. § 251(c)(2), and furthers the Commission’s goal of encouraging the shift to IP interconnection.

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In accordance with §1.1206 of the Commission rules, one copy of this letter is being filed electronically via ECFS, and one delivered via email to the FCC participants.

Sincerely,

/s/ Samuel L. Feder

Samuel L. Feder

cc: Rebekah Goodheart
Randy Clarke
John Hunter
Lynn Engledow
Victoria Goldberg
Travis Litman
Rohit Dixit
Kevin King