

July 1, 2011

VIA ECFS

EX PARTE

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

Re: *Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92; IP Enabled Services, WC Docket No. 04-36*

Dear Ms. Dortch:

On June 29, 2011, Joe Gillan, outside consultant to tw telecom inc. (“tw telecom”), and the undersigned of Willkie Farr and Gallagher LLP, outside counsel to tw telecom, had a telephone conversation with Sharon Gillett, Chief of the Wireline Competition Bureau, and Jennifer Prime of the Wireline Competition Bureau. During the conversation, we explained that tw telecom would be filing a petition for declaratory ruling seeking clarification that providers of facilities-based VoIP service have a right under Section 251(c)(2) of the Communications Act to establish direct IP-to-IP interconnection at any technically feasible point with incumbent LECs. We explained that the petition would focus on the specific facilities-based VoIP services that tw telecom provides. We also discussed the fact that the FCC has the discretion either to maintain a separate docket for consideration of the petition or to consider the petition with one or more of the above-referenced rulemaking proceedings.

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

Respectfully submitted,

/s/ Thomas Jones

Thomas Jones

Counsel for tw telecom inc.

cc (via email): Sharon Gillett
Jennifer Prime