



August 22, 2011

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
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. 01-92; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Lifeline and Link-Up, WC Docket No. 03-109*

Dear Ms. Dortch:

On August 18, 2011, Kathy Zachem and Mary McManus of Comcast Corporation (“Comcast”) and Richard Metzger, of Lawler, Metzger, Keeney & Logan, outside counsel to Comcast, spoke by conference call with Zachary Katz, Chief Counsel and Senior Legal Advisor to Chairman Julius Genachowski; Sharon Gillett, Chief, Wireline Competition Bureau; Rebekah Goodheart, Wireline Competition Bureau; and Michael Steffen, Office of the General Counsel. In the course of the discussion, Comcast’s representatives addressed issues relating to the framework proposal¹ filed by a group of incumbent local exchange carriers (“LECs”) on July 29, 2011.

Comcast’s representatives noted that aspects of the proposal warrant further clarification by the Commission, in particular, the implementation of the proposal for terminating VoIP traffic and the treatment of tandem transit service after the proposed transition. Comcast’s representatives also stated that the Commission’s intercarrier compensation reform plan should encourage the conversion of legacy networks to Internet Protocol (“IP”) technology, consistent with the recommendations of the National Broadband Plan.

¹ See Joint Letter from AT&T, CenturyLink, FairPoint Communications, Frontier Communications, Verizon, and Windstream, to Chairman Julius Genachowski and Commissioners, WC Docket No. 10-90 (July 29, 2011).

Comcast representatives further stated that the size of the high-cost fund should be capped at the 2010 level and intercarrier compensation rates for all providers should move as quickly as possible to a stable, more economically efficient uniform default rate for all terminating voice traffic covered by the proposal. Finally, Comcast's representatives emphasized that the company is committed to continuing a productive dialogue with the Commission in an effort to develop a workable comprehensive reform plan.

Pursuant to section 1.206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), this *ex parte* notification is being filed for inclusion in the public record of the above referenced proceedings.

Respectfully submitted,

/s/ Mary McManus
Mary McManus

cc: Zachary Katz
Sharon Gillett
Rebekah Goodheart
Michael Steffen