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August 25, 2011

Ex Parte via Electronic Filing

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

Re: *Connect America Fund*, WC Dkt. 10-90; *A National Broadband Plan for Our Future*, GN Dkt. 09-51; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Dkt. 07-135; *High-Cost Universal Service Support*, WC Dkt. 05-337; *Developing a Unified Intercarrier Compensation Regime*, CC Dkt. 01-92; *Federal-State Joint Board on Universal Service*, CC Dkt. 96-45; *Lifeline and Link-Up*, WC Dkt. 03-109; *Universal Service Contribution Methodology*, WC Dkt. 06-122.

Dear Ms. Dortch:

On Tuesday, August 23, 2011, Adrienne Biddings and Aparna Sridhar of Google Inc., Brendan Kasper of Vonage Holdings Corp., Charles McKee of Sprint Nextel Corporation, Staci Pies of Skype Communications S.A.R.L., and the undersigned of Lampert, O'Connor & Johnston, P.C., met with Margaret McCarthy, Wireline Policy Advisor to Commissioner Capps. The parties also met briefly with Christine Kurth, Policy Director and Wireline Counsel to Commissioner McDowell, during which some of the points below were discussed.

During the meetings, we discussed the Tech/Users Framework filed on August 18, 2011 in the above-referenced proceedings by Ad Hoc Telecommunications Users Committee, Google Inc., Skype Communications S.A.R.L., Sprint Nextel Corporation, and Vonage Holdings Corp. We explained that the goals of the Tech/Users Framework were to improve upon the recent wireline carrier reform proposals in order to better meet the FCC's goals of greater broadband deployment and the swift transition to all-IP networks.

Specifically, we explained that in order to meet the goal of transitioning to all-IP networks, the FCC should expedite the reduction of existing per-minute access charges. We stressed that imposing legacy per-minute access charges for the first time on voice-over-IP (VoIP) services would raise the costs of IP services, dampen usage, and deter innovation. We noted that such charges would effectively create an implicit subsidy for TDM networks and undermine the goal of moving to all-IP networks. We also described how per-minute carrier access charges remain over-compensatory for terminating IP

traffic, and noted that today's economy does not support entitlements by any carrier to set revenue streams. The parties also expressed their position that the Commission has the authority to support an obligation of good faith negotiation for IP-to-IP interconnection by local carriers.

To meet the Commission's broadband deployment goals, we urged the Commission to shift current universal service funding to support both broadband deployment and ongoing operations through technology-neutral, targeted subsidies. The parties also expressed the need for the FCC to ensure that USF subsidies are wisely distributed and efficiently used to maximize broadband deployment.

Finally, we discussed the need for reform of the current revenues-based contribution mechanism along with reform of USF distributions, and how a connections-based methodology would be an improvement over the current system.

Pursuant to the Commission's rules, this notice is being filed in the above-referenced dockets for inclusion in the public record. Please contact me directly should you have any questions.

Sincerely,



Mark J. O'Connor
Counsel for Google Inc.

CC: Margaret McCarthy
Christine Kurth