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September 8, 2011

Ex parte

VIA ECFS

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 an 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 Wednesday, September 7, Lisa Youngers and I, of XO Communications, LLC (“XO”) met separately with Angela Kronenberg, Wireline Legal Advisor to Commissioner Clyburn, and Christine Kurth, Policy Director & Wireline Counsel to Commissioner McDowell, to discuss intercarrier compensation reform. XO urged the Commission to include IP interconnection policies in conjunction with reduced TDM-based rates in order to provide a balanced industry approach to reform. At a minimum, the Commission should confirm that telecommunications carriers must negotiate arrangements for IP-based interconnection with other carriers. The discussion in the meetings was consistent with XO’s filings in the above-captioned proceedings and followed the attached presentation, which was distributed at the meetings.

Respectfully Submitted,

/s/
Teresa K. Gaugler
Federal Regulatory Counsel

Attachment

cc: Angela Kronenberg
Christine Kurth