



IDT Telecom, Inc.
550 Broad Street
Newark, New Jersey 07102

September 9, 2011

VIA ELECTRONIC FILING

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

Re: Notice of Ex Parte Communication, WC Docket No. 10-90; GN Docket No. 09-51; WC Docket No. 07-135; WC Docket No. 05-337; CC Docket No.01-92; CC Docket No. 96-45; WC Docket No. 03-109

Dear Secretary Dortch:

On September 8, 2011, Carl Billek, Senior Regulatory Counsel of IDT Telecom, Inc. ("IDT"), John Windhausen of Telepoly Consulting and Michael Glassner of C&M Transcontinental LLC, both acting on behalf of IDT, met with Christine Kurth, Policy Director and Wireline Counsel to Commissioner McDowell and Margaret McCarthy, Policy Advisor, Wireline to Commissioner Copps. Messrs. Billek, Windhausen and Glassner, along with James Courter, Vice Chairman of the Board of Directors for IDT Corporation, IDT's parent company, met with Angela Kronenberg, Wireline Legal Advisor to Commissioner Clyburn.

IDT urged the Commission to act on the issues raised in paragraph 684 and footnote 1101 of the Commission's intercarrier compensation and universal service NPRM.¹ In general, IDT's statements reflected the comments submitted by IDT (as a member of the "Prepaid Card Providers.")² Specifically, IDT stated that: (1) prior actions taken by the Commission did not require the application of access charges to prepaid calling card calls placed using a locally-dialed number; (2) access charges cannot apply to prepaid calling card providers for prepaid calling card calls placed using a locally-

¹ *Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing a Unified Intercarrier Compensation System, et al.*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109, GN Docket No. 09-51, CC Dockets No. 01-92, 96-45, FCC 11-13 Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking (rel. Feb. 8, 2011)(the "NPRM").

² "Prepaid Card Provider Comments," *Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing a Unified Intercarrier Compensation System, et al.*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109, GN Docket No. 09-51, CC Dockets No. 01-92, 96-45 (April 18, 2011).

dialed number; (3) AT&T does not have tariff provisions allowing for the application of access charges for the services it provides when a prepaid calling card's local access number is dialed from a AT&T local service customer and/or that if such provisions exist they must be deemed unlawful; (4) Commission policy toward a more streamlined access charge regime warrants a finding that access charges cannot apply to prepaid calling card providers for prepaid calling card calls are placed using a locally-dialed number; and (5) consumers would be harmed if the Commission were to reach a conclusion contrary to IDT's position.

The attached handout was distributed to the meeting attendees. If you have any questions, please do not hesitate to contact me.

Sincerely yours

A handwritten signature in cursive script that reads "Carl Billek".

Carl Billek

Attachment

cc (by email only):

Christine Kurth
Margaret McCarthy
Angela Kronenberg