

Ian Dillner
Vice President
Federal Regulatory Affairs



1300 I Street, NW, Suite 400 West
Washington, DC 20005

Phone 202 515-2458
Fax 202 336-7922
ian.dillner@verizon.com

October 4, 2011

Ex Parte

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

Re: Contributions to the Telecommunications Relay Services Fund, CG Docket No. 11-47

Dear Ms. Dortch:

On October 4, 2011, Curtis L. Groves and I met with Julie Veach, Diane Griffin Holland, and Raelynn Remy of the Office of General Counsel, Karen Peltz Strauss and Rosaline Crawford of the Consumer and Governmental Affairs Bureau, Vicki Robinson of the Wireline Competition Bureau, and Kathy Berthot of the Enforcement Bureau. The purpose of the meeting was to discuss the Commission's implementation of section 715 of the Communications Act of 1934, as amended.¹ In particular, we emphasized that the statute dictates that "*each* interconnected VoIP service provider and *each* provider of non-interconnected VoIP service *shall participate in and contribute to the Telecommunications Relay Services Fund.*"² Consistent with the comments Verizon filed in this proceeding,³ we also discussed the statutory requirement that contributions from VoIP providers be "consistent with and comparable to the obligations of other contributors to such Fund."⁴ Finally, we discussed the ongoing need for the Commission to remain focused on ensuring that its contributions methodology is equitable and addresses ongoing marketplace changes, including requiring contributions from VoIP services that, while "free" to end-users, generate revenues as they compete with other services obligated to contribute to the Fund.

Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Ian Dillner".

cc: Julie Veach
Diane Griffin Holland
Raelynn Remy
Karen Peltz Strauss

Rosaline Crawford
Vicki Robinson
Kathy Berthot

¹ 47 U.S.C. § 615.

² *Id.* (emphasis added).

³ Comments of Verizon, CG Docket No. 11-47 (filed May 4, 2011).

⁴ 47 U.S.C. § 615.