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October 13, 2011

**Written Ex Parte: Via Electronic Filing**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington D.C. 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 Board on Universal Service*, CC Docket No. 96-45

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 1.1206 of the Commission's rules, STi Prepaid, LLC ("STi") respectfully submits this written ex parte communication into the above-captioned proceedings. STi endorses the position taken in the October 11, 2011 letter of Tamar Finn on behalf of IDT Telecom ("IDT"). Like IDT, STi offers prepaid calling cards, and its customers dial local numbers. Like IDT, STi needs certainty as to the intercarrier compensation regime that applies to such calls. STi agrees with IDT that the FCC has never addressed the type of intercarrier compensation that applies to locally dialed prepaid card calls. Indeed, until it issued the NPRM in these Dockets on February 9, 2011, the FCC never exhibited any awareness that the prepaid card industry was offering customers cards that enabled them to dial local, rather than 8YY, numbers. STi strongly believes that the FCC, not the courts, should determine intercarrier compensation policy, and that the upcoming USF/ICC Reform Order is the best means for the FCC to assert its jurisdiction to do so.

Finally, STi agrees with IDT's comments about the workability of any approach pursuant to which access charges would be due on locally dialed calls. Although AT&T has engaged STi for more than three years in a dialog over AT&T's claims that access charges are due for such calls, AT&T has never proposed any mechanism by which such calls can be segregated from other locally dialed calls.

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In conclusion, STi respectfully suggests that the Commission provide clarity as to the intercarrier compensation regime that governs locally dialed prepaid card calls, establishing that the carrier serving the customer placing the call is not entitled to collect switched access charges.

Sincerely,

*/s/ electronically signed*

Eric J. Branfman