



October 14, 2011

(Filed electronically)

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: **Ex Parte Notice**  
PS Docket No. 11-82

Dear Ms. Dortch:

On October 13, 2011, Adrienne Biddings of Google and Glenn Richards, Executive Director of the Voice on the Net Coalition, met with Jennifer Manner and Vernon Mosley of the Public Safety and Homeland Security Bureau to discuss VON's comments in the above-referenced docket. During the meeting, VON reiterated its opposition to imposing outage reporting requirements on interconnected VoIP providers; suggesting that new regulatory burdens are unnecessary and could hinder the development of VoIP. VON also opposed using service level metrics, including jitter or latency, instead of standard network availability criteria, to determine whether there has been a reportable outage.

Please contact me directly if you have any questions.

Sincerely,

/s/

Glenn S. Richards  
Executive Director

cc: Jennifer Manner (by email)  
Vernon Mosley (by email)