

October 14, 2011

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

Re: Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92; High-Cost Universal Service Support, WC Docket No. 05-337; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; Connect America Fund, WC Docket No. 10-90; A National Broadband Plan for Our Future, GN Docket No. 09-51; 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 October 12, 2011, on behalf of Level 3 Communications, LLC, I spoke with spoke with Zac Katz, Chief Counsel and Senior Legal Adviser to Chairman Genachowski regarding intercarrier compensation reform. I stated that Level 3 supported Comcast's proposed rules with respect to end office compensation, and that Level 3 had filed an ex parte on October 12 with other proposed anti-arbitrage rules. I stated that it was important to close known arbitrage problems simultaneously with mandating reductions in access charges, because the mandated reductions will stimulate a search for new ways to extract enhanced access charges through arbitrage.

Please contact me if you have any questions.

Sincerely,



John T. Nakahata
Counsel to Level 3 Communications, LLC

cc: Zachary Katz