

October 14, 2011

VIA ECFS

EX PARTE

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: *GN Docket No. 09-51; WC Docket Nos. 10-90, 07-135, 05-337, 03-109, 06-122, 04-36; CC Docket Nos. 01-92, 96-45, 99-200, 96-98, 99-68*

Dear Ms. Dortch:

The undersigned, on behalf of Cbeyond, Inc., Integra Telecom, Inc. (“Integra”), and tw telecom inc. (“Joint CLECs”) discussed intercarrier compensation reform on October 13, 2011 with Angie Kronenberg, legal advisor to Commissioner Mignon Clyburn. During the discussion, I reiterated the points described in the October 12, 2011 Joint CLEC ex parte in the above-reference proceeding.¹

In addition, the undersigned and Roger Fleming of Integra discussed intercarrier compensation reform on October 14, 2011 with Christine Kurth, legal advisor to Commissioner Robert McDowell. During the discussion, we argued that the Commission should extend the transition for intrastate access rates to the level of interstate access rates for competitive LECs by the amount of time necessary to ensure that competitive LECs reach the target rate on the date when the access replacement mechanism is eliminated (e.g., by three years under the timeline proposed in the ABC Plan). In this manner, the Commission would place incumbent LECs and competitive LECs on an equal footing and would avoid disproportionately harming competition in the provision of services to small businesses (the market many competitive LECs serve). Moreover, preserving competition in the provision of services to small businesses would yield efficiencies for smaller businesses, thereby helping those businesses to grow and create jobs.

¹ See Letter from Thomas Jones, Counsel for Cbeyond, Inc., Integra Telecom, Inc., and tw telecom inc. to Ms. Marlene H. Dortch, Secretary, Federal Communication Commission, GN Docket No. 09-51; WC Docket Nos. 10-90, 07-135, 05-337, 03-109, 06-122, 04-36; CC Docket Nos. 01-92, 96-45, 99-200, 96-98, 99-68 (Oct. 12, 2011).

Ms. Marlene H. Dortch
October 12, 2011
Page 2

Please do not hesitate to contact me at (202) 303-1111 if you have any questions or concerns regarding this submission.

Respectfully submitted,

/s/ Thomas Jones

Thomas Jones

*Counsel for Cbeyond, Inc., Integra Telecom, Inc.,
and tw telecom inc.*

cc (via email): Angie Kronenberg
Christine Kurth