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October 17, 2011

**EX PARTE NOTICE**

VIA ECFS

Ms. 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 a Unified Intercarrier Compensation Regime,  
CC Docket No. 01-92  
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 13, 2011 Jerry James, CEO of COMPTTEL, had a brief phone conversation with Christine Kurth of Commissioner McDowell's office. During the call Mr. James stressed the importance of the Commission taking action, *at this time*, to confirm VoIP providers rights to direct IP-to-IP interconnection pursuant to section 251(c) of the Communications Act, as amended, at least with regard to those services provided by facilities-based providers that are transported via managed or specialized IP networks (versus those provided over the public Internet). Mr. James also expressed the competitive industry's need for a longer time period to transition from intrastate rates to interstate rates than is provided for in the ABC Plan.

Please do not hesitate to contact me if you have any questions regarding this submission.

Respectfully submitted,

/s/ Karen Reidy

Karen Reidy

cc (via email): Christine Kurth