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October 21, 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 20, 2011 Jerry James, CEO, and the undersigned of COMPTTEL; Larissa Herda (by phone), CEO of tw telecom, Rolla Huff (by phone), CEO, and Christopher Murray of Earthlink, Laura Thomas, interim CEO, and Lisa Youngers (both by phone) of XO Communications, Thomas Jones of Willkie Farr & Gallagher LLP, and Kevin Joseph of The Joseph Group, LLC met with Chairman Genachowski, Edward Lazarus, Zachery Katz and Michael Steffen with regard to the above-referenced proceedings.

In the meeting the parties stressed the importance of the Commission taking action, at this time, to confirm facilities-based VoIP providers' rights to direct IP-to-IP interconnection pursuant to section 251(c) of the Communications Act, as amended. tw telecom explained that the network architecture used for the direct exchange of facilities-based interconnected VoIP service between IP networks would not support the exchange of non-VoIP traffic over the facilities in question unless the interconnecting parties agreed to do so. This is because the equipment used to connect the IP networks, the session border control ("SBC"), and the routers used by each network to route traffic to and from the SBC would all need to be programmed to handle non-VoIP traffic, something that would not be possible unless both parties agreed to exchange such traffic. In the absence of such programming, the non-VoIP traffic would not be properly routed.

We 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): Edward Lazarus
Zachery Katz
Michael Steffen