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

**Re: WC Docket No. 10-90; GN Docket No. 09-51; WC Docket No. 07-135; WC Docket No. 05-337; CC Docket No. 01-92; CC Docket No. 96-45; WC Docket No. 03-109; WC Docket No. 04-36**

Dear Ms. Dortch:

Today, Scott Angstreich of Kellogg Huber, representing Verizon, and I spoke with Austin Schlick, General Counsel of the FCC, by telephone. Separately, I had a brief follow-up conversation with Mr. Schlick. The purpose of the calls was to discuss the legal theories supporting intercarrier compensation reforms being considered by the Commission. In particular, we discussed potential application of various provisions of sections 251 and 252 of the Act under the intercarrier compensation system contemplated by the draft order now circulating. We discussed the potential role of both the FCC and state commissions, the jurisdiction of traffic (including VoIP traffic) that the Commission is considering addressing through section 251(b)(5) of the Act, and interconnection issues. We also discussed the need for default intercarrier compensation rates that apply on a uniform basis across states. Finally, we discussed the regulatory treatment of broadband networks at the national and state levels.

Should you have questions, please call.

Sincerely,

/s/ Chris Miller

Chris Miller

cc: Austin Schlick