

Tamar E. Finn
Direct Phone: 202.373.6117
Direct Fax: 202.373.6001
tamar.finn@bingham.com

October 25, 2011

VIA ELECTRONIC FILING

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

Re: Notice of Exempt Ex Parte Communication Pursuant to 47 C.F.R. §1.1204(a)(10)(iv), CC Docket No. 96-45; CC Docket No. 01-92; WC Docket No. 05-337; WC Docket No. 07-135; WC Docket No. 03-109; WC Docket No. 10-90; GN Docket No. 09-51

Dear Ms. Dortch:

Pursuant to Sections 1.1203(a)(1), 1.1204(a)(10)(iv) and 1.1206(b)(2)(v) of the Commission's Rules, 47 C.F.R. §§ 1.1203(a)(1), 1.1204(a)(10)(iv) and 1.1206(b)(2)(v), the undersigned, representing IDT Telecom ("IDT"), submits in the above-referenced dockets this summary of an oral *ex parte* presentation made via telephone at approximately 3 pm today, October 25, 2011.

Ms. McCarthy, Wireline Policy Advisor to Commissioner Michael Copps, requested that I clarify IDT's position on the Arizona Dialtone Petition for Reconsideration referenced in footnote 1101 of the Notice of Proposed Rulemaking. In response, I suggested that if the FCC wants to change the intercarrier compensation applicable to locally-dialed prepaid calling card calls, it would need to adopt a workable solution for segregating locally-dialed prepaid card calls from all other locally-dialed calls and consider the potential impact, if any, on similar offerings such as calls to foreign exchange numbers and virtual central office codes. The discussion was consistent with IDT's arguments on pages 2-3 of our Oct. 11, 2011 *ex parte* notice and pages 20-22 of our April 18, 2011 comments.

If you have any questions, please do not hesitate to contact me.

Sincerely yours,

/s/ electronically signed

Tamar E. Finn

cc (by e-mail):

Margaret McCarthy

Boston
Hartford
Hong Kong
London
Los Angeles
New York
Orange County
San Francisco
Santa Monica
Silicon Valley
Tokyo
Walnut Creek
Washington

Bingham McCutchen LLP
2020 K Street NW
Washington, DC
20006-1806

T 202.373.6000
F 202.373.6001
bingham.com