

**ORIGINAL**

**REDACTED - FOR PUBLIC INSPECTION**

**EX PARTE OR LATE FILED**

October 26, 2011

**VIA COURIER AND ECFS**

**EX PARTE PRESENTATION**

**FILED/ACCEPTED**

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

OCT 26 2011

Federal Communications Commission  
Office of the Secretary

**Re: *Developing a Unified Intercarrier Compensation Regime; Establishing Just and Reasonable Rates for Local Exchange Carriers; Connect America Fund; High-Cost Universal Service Support; A National Broadband Plan for Our Future, CC Dkt. No. 01-92, WC Dkt. Nos. 07-135, 10-90, & 05-337, GN Dkt. No. 09-51***

Dear Ms. Dortch:

On behalf of Broadview Networks, Inc., please find enclosed two copies of the redacted version of an *ex parte* letter ("Broadview's *Ex Parte* Filing") for filing in the above-referenced dockets. One machine-readable copy of the redacted version of Broadview's *Ex Parte* Filing will also be filed electronically via ECFS.

Pursuant to the *Protective Order* in this proceeding,<sup>1</sup> one original of the confidential version of Broadview's *Ex Parte* Filing is being filed with the Secretary's Office under separate cover. In addition, pursuant to the *Protective Order*, two copies of the confidential version of Broadview's *Ex Parte* Filing will be delivered to Lynne Hewitt Engledow of the Pricing Policy Division of the Wireline Competition Bureau.

<sup>1</sup> *Developing a Unified Intercarrier Compensation Regime; Establishing Just and Reasonable Rates for Local Exchange Carriers; Connect America Fund; High-Cost Universal Service Support; A National Broadband Plan for Our Future*, CC Dkt. No. 01-92, WC Dkt. Nos. 07-135, 10-90, & 05-337, GN Dkt. No. 09-51, Protective Order, DA 10-1749 (rel. Sept. 16, 2010) ("*Protective Order*").

**REDACTED - FOR PUBLIC INSPECTION**

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

Respectfully submitted,

Handwritten signature of Thomas Jones in black ink, appearing as 'Thomas Jones/N.P.' with a stylized flourish.

Thomas Jones

*Counsel for Broadview Networks, Inc.*

Enclosures

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October 26, 2011

**VIA COURIER**

Ms. Marlene H. Dortch  
Secretary  
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**Re: *Developing a Unified Intercarrier Compensation Regime; Establishing Just and Reasonable Rates for Local Exchange Carriers; Connect America Fund; High-Cost Universal Service Support; A National Broadband Plan for Our Future, CC Dkt. No. 01-92, WC Dkt. Nos. 07-135, 10-90, & 05-337, GN Dkt. 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 hereby submits this written *ex parte* presentation in the above-referenced dockets in response to a request made via telephone by Zac Katz, Chief Counsel and Senior Legal Advisor to Chairman Julius Genachowski, on October 24, 2011.

Mr. Katz requested information regarding the financial impact on competitive LECs of a reduction of intrastate terminating access rates to interstate terminating access levels by July 1, 2013, as proposed in the America's Broadband Connectivity Plan.<sup>1</sup> Broadview Networks, Inc. ("Broadview") has estimated that, if the Commission were to reduce intrastate terminating and originating access rates to interstate access levels by July 1, 2013, Broadview would lose approximately [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL]

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<sup>1</sup> See Letter from Robert W. Quinn, Jr., AT&T, Steve Davis, CenturyLink, Michael T. Skrivan, FairPoint, Kathleen Q. Abernathy, Frontier, Kathleen Grillo, Verizon, and Michael D. Rhoda, Windstream, to Marlene H. Dortch, Secretary, FCC, WC Dkt. Nos. 10-90 et al., Att. 1, at 11 (filed July 29, 2011).

**REDACTED - FOR PUBLIC INSPECTION**

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 Broadview Networks, Inc.*

cc (via email): Zac Katz  
Tamar E. Finn  
Charles C. Hunter