

December 27, 2011

**VIA ECFS**

***EX PARTE***

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

**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 December 23, 2011, on behalf of Integra Telecom, Inc. (“Integra”) and tw telecom inc. (“tw telecom”), I had separate telephone conversations with Angie Kronenberg, legal advisor to Commission Mignon Clyburn, and Lisa Hone, legal advisor to Commissioner Michael Copps. During the conversations, I explained that Integra and tw telecom each exchanges intra-MTA traffic with CMRS providers pursuant to interconnection agreements and that a flash cut to bill and keep for such traffic would be harmful to both Integra and tw telecom. Accordingly, I argued that the Commission should delay implementation of bill and keep for intra-MTA CMRS traffic to give competitive LECs an opportunity to adjust their businesses to this regime.

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

Respectfully submitted,

Thomas Jones  
Nirali Patel

*Counsel for Integra Telecom, Inc. and tw telecom inc.*

cc: Angie Kronenberg  
Lisa Hone