

Before The
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
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

**REPLY COMMENTS OF NEUTRAL TANDEM, INC., d/b/a INTELIGENT,
SUPPORTING THE OPPOSITIONS TO PETITION FOR RECONSIDERATION
FILED BY THE NATIONAL EXCHANGE CARRIER ASSOCIATION, ET AL**

Neutral Tandem, Inc., d/b/a Inteligent (“Neutral Tandem”) respectfully submits these reply comments supporting the oppositions filed by numerous parties to certain aspects of the petition for reconsideration filed by the National Exchange Carriers Association, et al. (“NECA”).¹ Specifically, Neutral Tandem supports the arguments made by numerous parties opposing NECA’s request that the Commission reconsider its

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□ Neutral Tandem is the leading competitive (*i.e.*, non-ILEC) provider of tandem services in the United States. Neutral Tandem provides competitive tandem services in 189 of the 192 LATAs in the continental United States, and in Puerto Rico. The only LATAs in which Neutral Tandem does not provide service are LATAs 921, 980, and 981. LATA 921 is comprised entirely of Fishers Island, New York, an island off of the coast of Long Island. LATAs 980 and 981 are comprised of parts of the Navajo Nation. Neutral Tandem recently adopted “Inteligent” as a d/b/a, but continues to refer to itself as “Neutral Tandem” in these comments, as it has done throughout this proceeding.

decision not to impose financial liability on intermediate carriers, when those carriers deliver traffic that has not been populated with complete or correct call signaling data.²

The parties opposing NECA's petition have persuasively explained why the Commission properly rejected requests to impose liability on intermediate providers in its order.³ Thus, rather than repeat arguments already made so persuasively by many others, Neutral Tandem hereby incorporates those arguments as if fully set forth herein.⁴

Respectfully submitted,
NEUTRAL TANDEM, INC.,
d/b/a INTELIGENT

/s/ John R.

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² See, e.g., Feb. 9, 2012 Comments of the Nat'l Cable & Telecomms. Ass'n, at 13-14; Feb. 9, 2012 Comments of Comcast Corp., at 6-7; Feb. 9, 2012 Opposition of Level 3 Communications, LLC, at 3-4; Feb. 9, 2012 Consolidated Opposition of Hypercube Telecom, LLC, at 21-23.

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³ See *Report and Order and Further Notice of Proposed Rulemaking*, WC Docket Nos. 10-90, 07-135, 05-337, 03-109; CC Docket Nos. 01-92, 96-45; GN Docket No. 09-51, ¶¶ 731-32 (rel. Nov. 18, 2011).

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⁴ See, e.g., Feb. 9, 2012 Comments of the Nat'l Cable & Telecomms. Ass'n, at 13-14; Feb. 9, 2012 Comments of Comcast Corp., at 6-7; Feb. 9, 2012 Opposition of Level 3 Communications, LLC, at 3-4; Feb. 9, 2012 Consolidated Opposition of Hypercube Telecom, LLC, at 21-23.