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April 2, 2012

**VIA ELECTRONIC SUBMISSION**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

**Re: *Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund, WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208***

Dear Ms. Dortch:

On March 29th, the following people met with representatives of the Wireline Competition Bureau and the Pricing Policy Division: Michael Saperstein on behalf of Frontier Communications; Jeffrey Lanning, Tim Boucher, and Gary Kepley on behalf of CenturyLink; Alan Buzacott and David Haga on behalf of Verizon; and Christi Shewman, David Hostetter, and I on behalf of AT&T. Travis Litman of the Wireline Competition Bureau, and Dan Ball, Doug Slotten, Richard Kwiatkowski, Randy Clarke, and Pam Arluk of the Pricing Policy Division attended the meeting.

During this meeting we discussed questions related to the implementation of the reductions in intercarrier compensation set out in the recently adopted section 51.907 of the Commission's rules. Our discussion focused on the following question: Does Rule 51.907(c) require, effective July 1, 2013, a price cap carrier to adopt a rate structure and rates for Transitional Intrastate Access Service that are identical, on a rate-element-by-rate-element basis, to its rates for functionally equivalent interstate access service? If not, under what circumstances could the rate level or rate structure differ?

Marlene H. Dortch, Secretary  
April 2, 2012

If you have any questions or need additional information, please do not hesitate to contact me. Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically with the Commission.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Lee". The signature is fluid and cursive, with a long horizontal stroke at the end.

cc: Travis Litman  
Dan Ball  
Doug Slotten  
Richard Kwiatkowski  
Randy Clarke  
Pam Arluk