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April 11, 2012

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Ex Parte

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

Re: In the Matter of Connect America Fund A National Broadband Plan for Our Future High-Cost Universal Service Support, WC Docket No. 10-90

Dear Ms. Dortch:

Yesterday, Chris Miller and the undersigned of Verizon met with Michael Steffen, Legal Advisor to Chairman Genachowski, as well as Deena Shetler (by telephone), Randy Clarke, Victoria Goldberg, and Travis Litman of the Wireline Competition Bureau. We also met individually with Christine Kurth, Policy Director and Wireline Legal Advisor to Commissioner McDowell, and Angela Kronenberg, Wireline Legal Advisor to Commissioner Clyburn. The purpose of these meetings was to address originating access charges on PSTN-VoIP traffic under the *USF-ICC Transformation Order* and potential further Commission action on these issues in response to a pending reconsideration request filed by Windstream and Frontier.¹

We reaffirmed that the Commission correctly determined in the *USF-ICC Transformation Order* to subject PSTN-VoIP traffic only to, at most, interstate access rates (both originating and terminating rates) during a transition period to a bill-and-keep regime. We expressed particular concern if the Commission were to reconsider its original position and allow for intrastate originating access charges on this traffic for an indefinite or extended period of time. We also expressed concern over the implications such a reversal could have on the Commission's careful efforts in the *USF-ICC Transformation Order* to avoid extending the legacy intrastate access regulatory regime to VoIP and urged the Commission at a minimum to make clear that it would not undo that balance. In addition, we asked about the Commission's

¹ *Connect America Fund, et al.*, WC Docket No. 10-90 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (paras. 513-520) (rel. Nov. 18, 2011) (“*USF-ICC Transformation Order*”).

Ms. Marlene H. Dortch

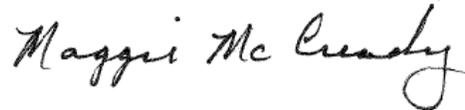
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view of its legal authority to address originating access charges on IP-originated calls in this way and discussed the difficulties with this approach if challenged on appeal.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's Rules. Should you have any questions, please contact the undersigned.

Sincerely,

A handwritten signature in cursive script that reads "Maggie McCreedy".

cc: (via e-mail)
Michael Steffen
Christine Kurth
Angela Kronenberg
Deena Shetler
Randy Clarke
Victoria Goldberg
Travis Litman