

April 12, 2012

Marlene H. Dortch
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: *Petitions for Reconsideration and Clarification of the InterCall Order*, Order on Reconsideration, WC Docket No. 06-122 & CC Docket No. 96-45

Dear Ms. Dortch:

On Tuesday, April 10, 2012, on behalf of Cisco Systems, Inc. (“Cisco”), Jeff Campbell of Cisco and the undersigned of this firm met with Vickie Robinson and Ernesto Beckford of the Wireline Competition Bureau to discuss the *InterCall Reconsideration Order*.¹

During that meeting Cisco sought clarification of the scope of the *InterCall Reconsideration Order*. Cisco explained that its subsidiary, Cisco WebEx LLC, offers an integrated information service—WebEx—that allows users to convene online collaboration sessions during which users may share documents and desktops, make notes, edit and redline, make multi-media presentations, use whiteboarding, and stream integrated audio and video. Participants may use VoIP or traditional telephony to access collaboration sessions, and a single session may include participants using both VoIP and traditional telephony. In either case, WebEx seamlessly integrates participants into the collaboration session by visually displaying the name of the participant, displaying an icon indicating whether the participant is speaking or silent, and providing the meeting host with the ability to control access by muting or ejecting participants.

Cisco asked whether the final sentence of paragraph 13 of the *InterCall Reconsideration Order* holds that all information services are “bundled” services that include a separate, regulated telecommunications component. Ms. Robinson and Mr. Beckford first noted that service classification is a fact-specific exercise; the Commission had addressed only the facts presented by the Petitions for Reconsideration of the *InterCall Order*, and the *InterCall Reconsideration Order* did not resolve the classification of any services not presented in those Petitions. Ms. Robinson and Mr. Beckford next explained that the language in question addressed only bundled services that include distinct telecommunications and information services, and did not address single, integrated information services. Finally, Ms. Robinson and Mr. Beckford stated that the *InterCall Reconsideration Order* does not depart from the Commission’s existing precedents distinguishing between telecommunications and integrated information services.

¹ *Petitions for Reconsideration and Clarification of the InterCall Order*, Order on Reconsideration, WC Docket No. 06-122 & CC Docket No. 96-45 (rel. Jan. 27, 2012).

If you have questions or require any additional information, please do not hesitate to contact me at (202) 730-1346 or by email at bstrandberg@wiltshiregrannis.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'BDS' followed by a stylized flourish.

Brita D. Strandberg
Counsel to Cisco Systems, Inc.

Cc: Vickie Jones, Ernesto Beckford