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June 21, 2012

**EX PARTE NOTICE**

VIA ECFS

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: WC Docket Nos. 10-90, 07-135, 05-337, 03-109, 05-25, and 11-118  
GN Docket No. 09-51, RM-10593, CC Docket No. 01-92 and 96-45**

Dear Ms. Dortch:

On June 19, 2012 Jerry James, Alan Hill and the undersigned of COMPTTEL met with Commissioner Pai and, his legal advisor, Nicholas Degani, in which issues related to the above-reference proceedings were discussed.

In the meeting the parties provided information on the line of business of the members of COMPTTEL and stressed the issues of importance to ensuring a robust and competitive communications market, providing greater choice and innovation for the business sector of the market. In particular, we stressed the importance of the Commission to move expeditiously to confirm facilities-based VoIP providers' rights to direct IP-to-IP interconnection pursuant to section 251(c) of the Communications Act, as amended, which will foster the transition to the more efficient IP technology; to reform the pricing for ILEC special access services and suspend any new grants of pricing flexibility until the Commission adopts a more effective framework for evaluating competition,<sup>1</sup> which will provide businesses much needed substantial savings to enable them grow and invest; and to clarify or forbear from regulations that hinder mergers and acquisitions between cable operators and competitive LECs.

Please do not hesitate to contact me if you have any questions regarding this submission.

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<sup>1</sup> In previous ex partes COMPTTEL has provided an analysis that demonstrates the current rules for price flexibility are flawed and guidance on the collection of data. See Letters from Karen Reidy, COMPTTEL, Marlene Dortch, WC Docket No. 05-25 and RM-10593, dated June 1 and August 31, 2010.

Respectfully submitted,

/s/ Karen Reidy

Karen Reidy

cc (via email): Nicholas Degani