



WILTSHIRE
& GRANNIS LLP

August 7, 2012

Ex Parte

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

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

Dear Ms. Dortch,

On August 3, 2012, on behalf of Level 3 Communications, LLC, I talked with Randy Clarke of the Competitive Pricing Division, WCB. We discussed AT&T's ex parte and the history of the provisions of the CAF-ICC Order regarding access charges by CLECs for functions performed by the CLEC or its VoIP partner. I presented the points set forth on p. 2 of the ex parte letter of Tamar Finn, counsel for Bandwidth.com, dated June 11, 2012, which are incorporated by reference herein.¹

Please contact me if you have any questions.

Sincerely,

John T. Nakahata
Counsel to Level 3 Communications, Inc.

cc: Randy Clarke

¹ Ex Parte Notice, Tamar Finn, counsel, Bandwidth.com, to Marlene Dortch, Secretary, Federal Communications Commission, at 2, WC Docket Nos. 10-90 et al (filed June 11, 2012).