



900 17th STREET, NW, SUITE 400 PH: 202.296.6650  
WASHINGTON, DC 20006 FX: 202.296.7585

August 17, 2012

**EX PARTE NOTICE**

VIA ECFS

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

**Re: Connect America Fund, WC Docket No. 10-90  
A National Broadband Plan for Our Future, GN Docket No. 09-51  
Establishing Just and Reasonable Rates for Local Exchange Carriers,  
WC Docket No. 07-135  
High-Cost Universal Service Support, WC Docket No. 05-337  
Developing a Unified Intercarrier Compensation Regime,  
CC Docket No. 01-92  
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 15, the undersigned and Joe Gillan of Gillan Associates had a meeting with Angela Kronenberg, Legal Advisor to Commissioner Clyburn, regarding the above-referenced proceeding. In the conversation, COMPTTEL expressed the urgent need for the Commission to address IP-to-IP Interconnection for facilities-based services (provided over “private”, “closed” or “managed” networks) in the context of Section 251 of the Act. We stressed that this service does not transverse the public Internet and provided quotes from Verizon and AT&T in which they highlight this fact to their customers with regard to their FiOS and U-Verse services, respectively.<sup>1</sup> We also discussed the fact that this service is a telecommunications service and that section 251(c)(2) applies to interconnection with an ILEC for the purposes of provisioning this service.

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<sup>1</sup> <http://newscenter.verizon.com/press-releases/verizon/2010/fios-digital-voice-heres.html> (emphasis added); <http://www.att.com/u-verse/explore/home-alarm.jsp> (emphasis added).

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

Respectfully submitted,

/s/ Karen Reidy

Karen Reidy

cc (via email): Angela Kronenberg