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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 16, the undersigned from COMPTTEL and Joe Gillan of Gillan Associates and Dave Malfara of ETC Group, LLC, both on behalf of COMPTTEL, had a meeting with Lisa Gelb, Bill Dever, Tim Stelzig, Jennifer Prime, Claude Aiken, Daniel Kirschner, Melissa Kinkel (by phone), Richard Hovey (by phone), Heather Hendrickson (by phone), of the Commission's Wireline Competition Bureau, John Visclosky of the Office of General Counsel, and Angela Kronenberg of Commissioner Clyburn's office. 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 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.

The attached presentation was the basis for our discussion. 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
Lisa Gelb
Bill Dever
Tim Stelzig
Jennifer Prime
Melissa Kinkel
Richard Hovey
Heather Hendrickson
Claude Aiken
John Visclosky