

LUKAS, NACE, GUTIERREZ & SACHS, LLP

8300 GREENSBORO DRIVE, SUITE 1200
MCLEAN, VIRGINIA 22102
703 584 8678 • 703 584 8696 FAX

WWW.FCCLAW.COM

RUSSELL D. LUKAS
DAVID L. NACE
THOMAS GUTIERREZ*
ELIZABETH R. SACHS*
DAVID A. LAFURIA
PAMELA L. GIST
TODD SLAMOWITZ*
BROOKS E. HARLOW*
TODD B. LANTOR*
STEVEN M. CHERNOFF*
KATHERINE PATSAS NEVITT*

CONSULTING ENGINEERS
ALI KUZEHKANANI
LEILA REZANAVAZ
—
OF COUNSEL
GEORGE L. LYON, JR.
LEONARD S. KOLSKY*
JOHN CIMKO*
J. K. HAGE III*
JOHN J. MCAVOY*
HON. GERALD S. MCGOWAN*
TAMARA DAVIS BROWN*
JEFFREY A. MITCHELL*
ROBERT S. KOPPEL*
MARC A. PAUL*
—
*NOT ADMITTED IN VA

September 19, 2012

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, DC 20554

**Re: Notice of *Ex Parte* in WC Docket No. 06-122
InComm Solutions, Inc.**

Madam Secretary:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, we hereby provide notice of an oral *ex parte* presentation in connection with the above captioned proceeding. On September 19, 2012, David A. LaFuria and undersigned counsel met on behalf of InComm Solutions, Inc., ("InComm") with Nicholas Degani, Legal Advisor to Commissioner Pai to discuss the status of the request for review of a decision of the universal service administrator and petition for waiver ("Request") filed by InComm on February 6, 2012. We summarized arguments already set forth in the Request, a copy of which is enclosed. We also discussed the status of the pending further notice of proposed rulemaking addressing universal service contributions reform and how that may provide the Commission an opportunity to clarify for the future the steps resellers who face double-counting of revenues can take to obtain prompt relief from the universal service administrator.

Sincerely,



Jeffrey A. Mitchell
Counsel for InComm Solutions, Inc.

Enclosure

cc: Nicholas Degani, Esq.