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October 4, 2012

*Ex parte*

**VIA ECFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 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 an 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; Universal Service Reform – Mobility Fund, WT Docket No. 10-208; IP-Enabled Services, WC Docket No. 04-36, Appropriate Framework for Broadband Access to the Internet over Wireline Facilities, CC Docket No. 02-23; Framework for Broadband Internet Service, GN Docket No. 10-127; Petition for Declaratory Ruling That tw telecom inc. Has the Right to Direct IP-to-IP Interconnection Pursuant to Section 251(c)(2) of the Communications Act, as Amended, for the Transmission and Routing of tw telecom’s Facilities-Based VoIP Services and IP-in-the-Middle Voice Services, WC Docket No. 11-119; Petition of USTelecom for Forbearance Under 47 U.S.C. § 160(c) From Enforcement of Certain Legacy Telecommunications Requirements, WC Docket No. 12-61; Cbeyond, Inc. Petition for Expedited Rulemaking to Require Unbundling of Hybrid, FTTH, and FTTC Loops Pursuant to 47 U.S.C. § 251(c)(3) of the Act, WC Docket No. 09-223; Petition for Expedited Rulemaking to Adopt Rules Pertaining to the Provision by Regional Bell Operating Companies of Certain Network Elements Pursuant to 47 U.S.C. § 271(c)(2)(B) of the Act, WC Docket No. 09-222; Policies and Rules Governing Retirement Of Copper Loops by Incumbent Local Exchange Carriers, BridgeCom International, et al., Petition for Rulemaking and Clarification (filed Jan. 18, 2007) (“BridgeCom Petition”); Petition of XO Communications, LLC, et al., For a Rulemaking to Amend Certain Part 51 Rules Applicable to Incumbent LEC Retirement of Copper Loops and Copper Subloops, RM-11358, Special Access Rates For Price Cap Local Exchange Carriers, WC Docket No. 05-25.*

Dear Ms. Dortch:

On Wednesday, October 3, 2012, Laura Thompson, Interim Chief Executive Officer, & Chief Financial Officer of XO Communications, LLC (“XO”), Kevin Joseph of the Joseph Group, and I met with Commissioner Ajit Pai, Matthew Berry, Chief of Staff, and Nicholas Degani, Wireline Legal Advisor. During the meeting, XO described the upcoming launch of its native 100G coast-to-coast broadband service and highlighted the importance of special access reform. In addition, XO challenged the proposal submitted by AT&T in its ex parte letter filed on August 30, 2012, by stressing that the transition from TDM-based to IP-based services does not

justify deregulation of interconnection arrangements. Continued regulation and oversight is critical to ensure competition and innovation in the telecommunications marketplace. The discussion was consistent with XO's filings in the above-captioned proceedings.

Pursuant to Section 1.1206 of the Commission's Rules, a copy of this letter is being filed electronically in the above-referenced dockets. If you have any questions, please feel free to contact me at (703) 547-2258.

Respectfully Submitted,

/s/

Lisa R. Youngers  
Vice President and Assistant General Counsel,  
Federal Affairs

cc: Commissioner Ajit Pai  
Matthew Berry  
Nicholas Degani