

Maggie McCready
Vice President
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January 22, 2013

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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 and
In the Matter of Establishing Just and Reasonable Rates for Local Exchange Carriers
WC Docket No. 07-135**

Dear Ms. Dortch:

On January 18, 2013, Mark Montano and the undersigned of Verizon met with William Dever, Travis Litman, and Lisa Gelb of the Wireline Competition Bureau. The purpose of the meeting was to discuss the various issues involved in compiling and assessing metrics relating to call completion rates to non-rural and rural areas.

For instance, we explained how it would be inappropriate for metrics to treat as not completed calls that are delivered but not answered by the customer. We also discussed various approaches to defining the area where the call is delivered as rural or non-rural. Finally, we cautioned that a uniform approach to call completion data and metrics for providers that use various technologies to deliver calls may create complexity and impose undue burdens on some providers.

Sincerely,

A handwritten signature in black ink that reads "Maggie McCready".

cc: Bill Dever
Lisa Gelb
Travis Litman