



April 18, 2013

Ex Parte

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

Re: USTelecom Petition for Forbearance From Certain Legacy
Telecommunications Regulations, WC Docket 12-61

Dear Ms. Dortch:

On Tuesday, April 16, 2013, Glenn Reynolds of USTelecom, Timothy Boucher and Jeb Benedict of CenturyLink, Brian Benison of AT&T, and Chris Miller and Ian Dillner of Verizon met with Christopher Killion and William Kehoe of the Enforcement Bureau. The parties discussed USTelecom's request for forbearance from the quarterly pre-paid calling card reporting requirements.¹

In particular, the parties discussed how these "interim" requirements were only adopted out of an abundance of caution "[t]o reduce further the incentive for carriers to report false or misleading information" amongst themselves.² Moreover, any need at that time has long since lapsed, and the Commission's recent decision to transition much of intercarrier compensation to bill-and-keep only reinforces that these regulations are no longer warranted.

The parties also discussed how the information provided to the FCC in quarterly reports under section 64.5001 of the Commission's rules is duplicative of information included on carrier Form 499-A submissions, including a particular break-out of the same calling card data required by the quarterly certifications.³ Because the USTelecom companies impacted by this rule also file Form 499-A, this requirement is unnecessary. If the Commission wishes to retain the obligations under rule 64.5001 for other purposes, it should nevertheless forbear from application of those requirements for those carriers that have filed both the rule 64.5001 quarterly certifications and Form 499-A in both 2011 and 2012. Because there is no evidence of

¹ *Petition of the United States Telecom Association for Forbearance From Certain Legacy Telecommunications Regulations*, WC Docket No. 12-61, (filed Feb. 16, 2012) at 72-73.

² *Regulation of Prepaid Calling Card Services*, Declaratory Ruling and Report and Order, 21 FCC Rcd 7290, 7304 ¶ 38 (2006).

³ See FCC 2013 Form 499-A Instructions, 18-19 (describing Line 411 separate reporting of calling card revenues).

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any concern with respect to ongoing compliance with any of these providers, the Commission should forbear from this unnecessary and burdensome reporting requirement.

Pursuant to Commission rules, this ex parte letter is being filed in the above-referenced docket.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn Reynolds". The signature is fluid and cursive, with a long horizontal stroke at the end.

Glenn Reynolds
Vice President, Policy

c: Christopher Killion
William Kehoe
Lisa Gelb
Deena Shetler
Jennifer Prime