

May 10, 2013

Samuel L. Feder  
Tel 202 639-6092  
Fax 202 661-4999  
sfeder@jenner.com

FILED ELECTRONICALLY

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th St., S.W.  
Washington, DC 20554

Re: **Connect America Fund, WC Docket No. 10-90; A National Broadband Plan for Our Future, GN Docket No. 09-51; 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.**

Dear Ms. Dortch:

On May 8, 2013, representatives of Inteliquent (formerly known as Neutral Tandem) met with Commission staff concerning the above-referenced proceedings. Attending the meeting for Inteliquent were John Harrington, Senior Vice President, Litigation, Regulatory & Human Resources for Inteliquent, Ian Neale, Senior Vice President, Global Voice Services for Inteliquent, and the undersigned. The Commission staff present were Randy Clarke, Victoria Goldberg, Kalpak Gude, Rhonda Lien, Deena Shetler, Jamie Susskind, Don Sussman, and John Visclosky, all of the Wireline Competition Bureau.

In the meeting, Inteliquent explained that the Commission's rules, 47 C.F.R. §§ 51.913 & 61.26, allow competitive local exchange carriers (CLECs) working in conjunction with over-the-top Voice over Internet Protocol (VoIP) providers to tariff and collect end-office switching charges, despite AT&T's arguments to the contrary. Inteliquent explained that it agreed with the arguments made by Level 3 and Bandwidth.com in these proceedings.<sup>1</sup> Inteliquent also urged the Commission to make a decision on this issue as soon as possible, as the lack of certainty on this issue hinders the ability of legitimate carriers like Inteliquent to compete, creates opportunities for other carriers to engage in arbitrage, and will lead to further litigation over access charges for VoIP traffic – exactly what the FCC sought to end. During the course of the meeting, Inteliquent provided and discussed the attached presentation.

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<sup>1</sup> See Letter of John T. Nakahata, Counsel, Level 3 Communications, LLC, and Tamar Finn, Counsel, Bandwidth.com, *et al.*, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 10- 90, 05-337, GN Docket No. 09-51, CC Dockets No. 01-92, 96-45 (filed Sept. 10, 2012); Letter of John T. Nakahata, Counsel, Level 3 Communications, LLC, to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 10- 90, 05-337, GN Docket No. 09-51, CC Dockets No. 01-92, 96-45 (filed Dec. 17, 2012).

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Please contact me if you have any questions regarding these meetings.

Sincerely,

*/s/ Samuel L. Feder*

Samuel L. Feder

cc: Randy Clarke  
Victoria Goldberg  
Kalpak Gude  
Rhonda Lien  
Deena Shetler  
Jamie Susskind  
Don Sussman,  
John Visclosky