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**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW,  
Washington, DC 20554

**RE: GN Docket Nos. 12-353 and 13-5**

Dear Ms. Dortch:

On May 15, 2013, Robert DeBroux, Jason Hendricks (via telephone), Derrick Owens and Gerard Duffy representing the Western Telecommunications Alliance (“WTA”) met with Priscilla Delgado Argeris, Legal Adviser to Commissioner Jessica Rosenworcel, to discuss matters regarding the ongoing evolution of the network from Time Division Management (“TDM”) to Internet Protocol (“IP”) technology.

WTA indicated that many of its members have deployed hybrid TDM-IP soft switches, and are very interested in providing state-of-the-art services to their rural customers.

WTA understands that the Commission is presently focusing upon managed Voice over Internet Protocol (“VoIP”) services, but noted that Commission’s ultimate definition of the “IP network” or “all IP network” that constitutes the goal or end point of the referenced proceedings will have a significant impact upon the nature and extent of the issues (particularly bandwidth, interconnection and universal service issues) that will need to be resolved therein.

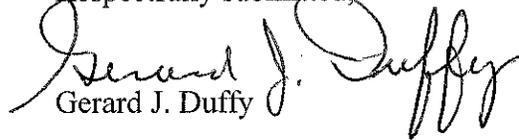
WTA reiterated its support for true technical trials that will help the Commission and the industry to identify potential technical and operational issues. It continues to oppose “regulatory” trials because they appear to constitute an end run around state Carrier of Last Resort requirements and other existing federal and state rules and procedures. WTA acknowledges that the transition from TDM circuit based services to IP services raises numerous policy and regulatory issues that will need to be studied, debated and resolved.

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WTA noted that the existing voice service interconnection arrangements of its members range from statewide centralized equal access networks through regional fiber rings to homing arrangements with Class 4 tandem switches owned and operated by unrelated entities. Such varied interconnection arrangements are not readily amenable to "one-size-fits-all" solutions, and will need to be carefully and flexibly transitioned in order to minimize service and financial disruptions.

Pursuant to Section 1.1206(b) of the Commission's Rules, this submission is being filed for inclusion in the public record of the referenced proceedings.

Respectfully submitted,

  
Gerard J. Duffy

cc: Priscilla Delgado Argeris