

December 9, 2013

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FILED ELECTRONICALLY

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

Re: **AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition, GN Docket No. 12-353; Petition for Declaratory Ruling that tw telecom inc. Has the Right to Direct IP-to-IP Interconnection, WC Docket No. 11-119; 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 a 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**

Dear Ms. Dortch:

On December 5, 2013, Alexander Hoehn-Saric, Senior Vice President, Government Affairs, of Charter Communications, Inc., and the undersigned met with Daniel Alvarez, Legal Advisor to Chairman Wheeler concerning the above-referenced proceedings. In the meeting, we reiterated the views expressed in our comments that the Commission should clarify that Internet Protocol (IP) interconnection with incumbent local exchange carriers (ILECs) for managed¹ Voice over Internet Protocol (VoIP) service is governed by 47 U.S.C. § 251(c)(2). See Comments of Cablevision and Charter, WC Docket No. 11-119, at 4-13 (Aug. 15, 2011); Reply Comments of Charter, GN Docket No. 12-353, at 4-6 (February 25, 2013). We further explained that ILECs are currently unwilling to provide IP interconnection on commercially reasonable terms (if at all), that ILECs remain the dominant providers of fixed voice services in all or virtually all markets in the country, and that regardless of an ILEC's market share in a particular area, we have been required to bear all costs of converting IP traffic to and from Time Division Multiplexing (TDM) format. See Reply Comments of Charter, GN Docket No. 12-353, at 4-5 (February 25, 2013). Because the inability to obtain IP interconnection harms competition and is a significant barrier to the industry-wide transition to IP facilities, we ask the Commission to move expeditiously in clarifying ILECs' IP interconnection obligations.

We also discussed Charter's opposition to certain ILEC requests for Connect America Fund ("CAF") Phase I, Round 2 support. See Charter Communications' Opposition to Price Cap Carrier Elections Seeking Incremental Support in Connect America Fund Phase 1 (Round 2), WC Docket No. 10-

¹ By "managed" VoIP service, we mean a service provided by facilities-based providers that does not traverse the public Internet.

Ms. Marlene H. Dortch

December 9, 2013

Page 2

90 (filed Sept. 27, 2013); Letter from K.C. Halm on behalf of Charter Communications to Marlene Dortch, WC Docket No. 10-90 (filed Dec. 2, 2013). We explained that Charter supports the Commission's universal service efforts but that it is crucial that CAF funds not be used to subsidize areas served by Charter and other ILEC competitors.

Please contact me if you have any questions regarding this meeting.

Sincerely,

/s/ Samuel L. Feder

Samuel L. Feder

cc: Daniel Alvarez