

January 21, 2014

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: **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:

Today, Alexander Hoehn-Saric, Senior Vice President, Government Affairs, of Charter Communications, Inc., and the undersigned had telephone conversations about the above-referenced proceedings with Daniel Alvarez, Legal Advisor to Chairman Wheeler, Rebekah Goodheart, Legal Advisor to Commissioner Clyburn, Christianna Barnhart, Legal Advisor to Commissioner Rosenworcel, Nicholas Degani, Legal Advisor to Commissioner Pai, and Amy Bender, Legal Advisor to Commissioner O’Rielly. In the calls, 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 asked that the Commission move expeditiously in clarifying ILECs’ IP interconnection obligations, or, at the least, to adopt a firm schedule for doing so.

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

January 21, 2014

Page 2

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

Sincerely,

/s/ Samuel L. Feder

Samuel L. Feder

cc: Daniel Alvarez
Rebekah Goodheart
Christianna Barnhart
Nicholas Degani
Amy Bender