



January 28, 2014

**Via Electronic Submission**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., SW, Room TW-A325  
Washington, DC 20554

**Re: Ex Parte Communication  
WC Docket No. 13-5**

Dear Ms. Dortch:

On January 24, 2014, Charles McKee and the undersigned, on behalf of Sprint Corporation (“Sprint”) met with Julie Veach and Timothy Stelzig of the Wireline Competition Bureau; Jonathan Sallet, Acting General Counsel; Stephanie Weiner, Associate General Counsel; and Henning Schulzrinne, Office of Strategic Planning and Policy Analysis, regarding the above captioned docket. Sprint’s comments were consistent with its previous filings in this matter<sup>1</sup> and the attached presentation.

Sprint discussed the on-going transition to IP-based services and the impediments that it is facing in attempting to negotiate interconnection agreements for the exchange of IP voice traffic with the major incumbent local exchange carriers. Sprint requested that the Commission affirm the statements made in the Connect America Fund Order that Sections 251 and 252 are “technology neutral,” *In the Matter of Connect America Fund*, WC Docket No. 10-90 (Nov. 18, 2011) (“*CAF Order*”) ¶¶ 1342, 1352, 1381, and provide express guidance that state commissions can require IP interconnection under Section 251. Sprint emphasized that any trials conducted by the Commission should not undermine the ability of carriers to proceed with IP interconnection agreements and outlined the potential cost savings to consumers of an IP network.

Consistent with its previous filings, Sprint noted that the Commission has the jurisdictional authority to mandate voice IP interconnection under Sections 251/252 without classifying VoIP as a telecommunications service or information service.

Pursuant to Section 1.1206 of the Commission’s Rules, a copy of this letter is being filed electronically in the above-referenced docket. If you have any questions, please feel free to contact me at (703) 592-2560.

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<sup>1</sup> See Comments of Sprint Corporation, Docket No. 13-5 (filed July 8, 2013) and Reply Comments of Sprint Corporation, Docket No. 13-5 (filed August 7, 2013).

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Sincerely,

*/s/ Keith C. Buell*

Keith C. Buell  
Senior Counsel

Attachment

cc: Julie Veach  
Timothy Stelzig  
Jonathan Sallet  
Stephanie Weiner  
Henning Schulzrinne