

March 27, 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:

On March 25, 2014, the undersigned, on behalf of Cablevision Systems Corporation and Charter Communications, Inc., met with General Counsel Jon Sallet and Linda Oliver of the Office of General Counsel. In the meeting, I reiterated the views expressed in Cablevision and Charter's 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); Comments of Cablevision, GN Docket No. 12-353, at 6-7 (January 28, 2013). I 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); Comments of Cablevision, GN Docket No. 12-353, at 3-6 (January 28, 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.

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

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

Sincerely,

/s/ Samuel L. Feder

Samuel L. Feder

cc: Jon Sallet
Linda Oliver