JENNER & BLOCK LLP

April 11, 2018

VIA ECFS

Rebekah P. Goodheart Tel +1 202 639 5355 RGoodheart@jenner.com

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

Re: Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92

Dear Ms. Dortch:

On April 9, 2018, Michael Romano, Senior Vice President—Industry Affairs & Business Development, NTCA—The Rural Broadband Association; Jeff Lanning, Vice President Federal Regulatory, CenturyLink; Jennifer K. McKee, Vice President and Associate General Counsel, NCTA – The Internet & Television Association; Matthew Nodine, Assistant Vice President, Federal Regulatory, AT&T Inc.; Curtis L. Groves, Associate General Counsel, Verizon; and the undersigned met with Joseph Price, Pamela Arluk, Lynne Engledow, Edward Krachmer, Lisa Hone, Arielle Roth, and Doug Slotten of the Wireline Competition Bureau to follow up on an industry letter proposing to require carriers that are engaged in access stimulation to bear financial responsibility for all terminating switched transport costs (including both flat-rated and usage-sensitive charges) between their end office (or remote or functional equivalent) and the tandem switch to which the terminating carrier requires inbound calls to be routed.¹ During the meeting, we discussed potential ways to implement the proposal.

Please contact the undersigned if you have any questions.

Sincerely,

/s/ Rebekah P. Goodheart

Rebekah P. Goodheart Counsel for NTCA—The Rural Broadband Association and Windstream Services, LLC

¹ See Letter from Hank Hultquist, Vice President-Federal Regulatory, AT&T Comm'ns, et al., to Marlene H. Dortch, Secretary, FCC, CC Docket No. 01-92, WC Docket No. 16-363 (Nov. 16, 2017).

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cc: Joseph Price Pamela Arluk Lynne Engledow Edward Krachmer Lisa Hone Arielle Roth Doug Slotten