

November 16, 2017

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VIA ECFS

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

Re: *In re Connect America Fund*, WC Docket No. 10-90; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135; *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92.

Dear Ms. Dortch:

On November 14, 2017, Michael Romano, Senior Vice President – Industry Affairs & Business Development, NTCA – The Rural Broadband Administration (“NTCA”); Malena Barzilai, Vice President – Government Affairs, Windstream Services, LLC (“Windstream”); Michael Saperstein, Vice President, Federal Regulatory, and AJ Burton, Director, Federal Regulatory Affairs, Frontier Communications Corporation (“Frontier”); and the undersigned on behalf of NTCA and Windstream met with Lisa Hone, Pamela Arluk, Gil Strobel, Edward Krachmer, Douglas Sloten, Rhonda Lien, Irina Asoskov, Al Lewis, Joseph Price, Lynne Engledow, and Victoria Goldberg (via phone), of the Wireline Competition Bureau.

During the meeting, NTCA, Windstream, and Frontier, (collectively, the “rural LECs”) reiterated that there are key differences between 8YY calls and traditional originating access traffic that make a bill-and-keep methodology inappropriate for 8YY originating access and database query charges.<sup>1</sup> We used the attached diagram to show that 8YY subscribers, typically businesses, have agreed to bear the cost of originating 8YY calls in order to provide and be able to market a “toll free” calling service to their customers.<sup>2</sup>

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<sup>1</sup>See generally Comments of Windstream Services, LLC, Frontier Communications Corporation and NTCA – The Rural Broadband Association, WC Docket No. 10-90 et al. (July 31, 2017) (“Comments”); Reply Comments of Windstream Services, LLC, Frontier Communications Corporation and NTCA – The Rural Broadband Association, WC Docket 10-90 et al. (Aug. 15, 2017).

<sup>2</sup> See Comments at 10-11.

Even so, to the extent 8YY arbitrage is occurring, the rural LECs expressed support for targeted solutions similar to the Commission's 2011 access stimulation rules. Finally, the rural LECs reiterated that the Commission must evaluate impacts of the 2011 intercarrier compensation reforms, including predictions about consumer benefits and impacts on rural consumers' rates and services, before evaluating more comprehensive reforms.<sup>3</sup>

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

Sincerely,

*/s/ Rebekah P. Goodheart*

Rebekah P. Goodheart  
*Counsel for NTCA – The Rural Broadband Administration  
and Windstream Services, LLC*

Attachment

cc: Gil Strobel  
Pamela Arluk  
Edward Krachmer  
Douglas Slotten  
Rhonda Lien  
Irina Asoskov  
Al Lewis  
Joseph Price  
Lynne Engledow  
Lisa Hone  
Victoria Goldberg

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<sup>3</sup> See Comments at 5-10.

# CURRENT 8YY CASH FLOWS: BUSINESSES PAY IXCS TO ALLOW THEIR CUSTOMERS TO CALL THEM FOR FREE

