



INDEPENDENT TELEPHONE & TELECOMMUNICATIONS ALLIANCE

July 17, 2008

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20054

**Re: NOTICE OF EX PARTE PRESENTATION**

***Declaration of Free Press, et al. for Declaratory Ruling Regarding Internet Management Policies; Petition of Vuze, Inc. for Rulemaking to Establish Rules Governing Network Management Practices by Broadband Network Operators WC Docket No. 07-52***

Dear Ms. Dortch:

Today, Curt Stamp and the undersigned, of the Independent Telephone & Telecommunications Alliance, spoke via telephone with Scott Bergmann of Commissioner Jonathan Adelstein's office about the above-referenced proceeding.

ITTA advocated the use of broad principles, rather than narrowly-drawn guidelines, to govern network management practices in case-by-case proceedings where necessary to address specific circumstances. This approach would better serve consumers, developers, and network operators by ensuring that operators have sufficient latitude to manage their networks efficiently in a manner that enables rational and economic provision of broadband services on a shared-infrastructure basis. General principles would also ensure relevance that could otherwise be lost if narrowly-drawn standards were rendered inapplicable to new technology; this is especially important where design and applications are evolving rapidly.

Respectfully submitted,

s/ Joshua Seidemann  
Joshua Seidemann  
Vice President, Regulatory Affairs

cc: Commissioner Jonathan Adelstein  
Scott Bergmann