



INDEPENDENT TELEPHONE & TELECOMMUNICATIONS ALLIANCE

August 24, 2010

Marlene Dortch
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Developing a Unified Intercarrier Compensation Regime*
CC Docket 01-92

Establishing Just and Reasonable Rates for Local Exchange Carriers
WC Docket No. 07-135

Feature GroupIP Petition for Forbearance Pursuant to 47 U.S.C. § 160(c)
from Enforcement of 47 U.S.C. § 251(g), Rule 51.701(b)(1), and Rule 69.5(b)
WC Docket No. 07-256

Dear Ms. Dortch:

Today, Jeffrey Lanning of CenturyLink and I met with Zachary Katz of Chairman Julius Genachowski's office.

ITTA urged the Commission to implement measures that address phantom traffic, access stimulation, and obligations of VoIP providers to pay access for calls terminated on the public switched telephone network (PSTN). Immediate action on these items will reduce incentives for arbitrage, strengthen provider stability by enabling proper cost recovery, and serve as a reasoned prelude to further comprehensive reform. ITTA also explained that comprehensive ICC reform should contemplate reasonable transition periods and an appropriate alternative recovery mechanism in order to avoid compelling carriers to meet unfunded mandates.

Please do not hesitate to contact me if you have any questions or require additional information.

Sincerely,

Joshua Seidemann
Vice President, Regulatory Affairs

cc: Zachary Katz