



October 28, 2008

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

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

**High-Cost Universal Service Support  
WC Docket No. 05-337**

**Federal-State Joint Board on Universal Service  
CC Docket No. 96-45**

Dear Ms. Dortch,

As part of the Federal Communications Commission's ("Commission") plan to reform intercarrier compensation, the members of the Western Telecommunications Alliance ("WTA") and the Organization for the Promotion and Advancement of Small Telecommunications Companies ("OPASTCO") urge the Commission to confirm that access charges apply to interexchange traffic terminating on the public switched telephone network ("PSTN"), regardless of whether such traffic originates on Internet Protocol ("IP") format. WTA and OPASTCO believe that all providers should pay for the use of the PSTN and IP-providers are no exception. Accordingly, the Commission should find, as part of any intercarrier compensation reform proceeding, that IP-providers pay applicable access charges for terminating calls on the PSTN.

Sincerely,

Stuart Polikoff  
Director of Government Relations  
OPASTCO

Derrick Owens  
Director of Government Affairs  
WTA