

LAW OFFICES  
**BLOOSTON, MORDKOFKY, DICKENS, DUFFY & PRENDERGAST, LLP**  
2120 L STREET, NW, SUITE 300  
WASHINGTON, DC 20037

HAROLD MORDKOFKY  
BENJAMIN H. DICKENS, JR.  
JOHN A. PRENDERGAST  
GERARD J. DUFFY  
RICHARD D. RUBINO  
MARY J. SISAK  
D. CARY MITCHELL  
SALVATORE TAILLEFER, JR.

ARTHUR BLOOSTON  
1914 – 1999

(202) 659-0830  
FACSIMILE: (202) 828-5568

May 16, 2013

AFFILIATED SOUTH AMERICAN OFFICES

ESTUDIO JAUREGUI & ASSOCIATES  
BUENOS AIRES, ARGENTINA

ROBERT M. JACKSON  
OF COUNSEL

PERRY W. WOOFER  
LEGISLATIVE CONSULTANT

EUGENE MALISZEWSKYJ  
ENGINEERING CONSULTANT

**WRITER'S CONTACT**

(202) 828-5528  
[gjd@bloostonlaw.com](mailto:gjd@bloostonlaw.com)

**INFORMATION**

**VIA ECFS**

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

**RE: GN Docket Nos. 12-353 and 13-5**

Dear Ms. Dortch:

On May 15, 2013, Robert DeBroux, Jason Hendricks (via telephone), Derrick Owens and Gerard Duffy representing the Western Telecommunications Alliance (“WTA”) met with General Counsel Sean Lev, Chief Technology Officer Henning Schulzrinne, and Carol Matthey, Patrick Halley and Eric Ralph of the Wireline Competition Bureau to discuss matters regarding the ongoing evolution of the network from Time Division Management (“TDM”) to Internet Protocol (“IP”) technology.

WTA indicated that many of its members have deployed hybrid TDM-IP soft switches, and are very interested in providing state-of-the-art services to their rural customers.

WTA reiterated the question that it asked in its January 28, 2013 Comments in GN Docket No. 12-353, as to how the Commission intends to define the term “IP network” or “all IP network” that constitutes the goal or end point of the referenced proceedings. WTA noted that such definition will have a significant impact upon the nature and extent of the issues (particularly bandwidth, interconnection and universal service issues) that will need to be resolved therein.

WTA understands from the conversation that the Commission is presently focusing upon managed VoIP services, and that it does not currently contemplate specifying a hard and fast date for nationwide conversion from TDM to IP.

Marlene H. Dortch, Secretary  
May 16, 2013  
Page 2 of 2

WTA reiterated its support for true technical trials that will help the Commission and the industry to identify potential technical and operational issues. It continues to oppose “regulatory” trials because they appear to constitute an end run around state Carrier of Last Resort requirements and other existing federal and state rules and procedures. However, WTA acknowledges that the transition from TDM circuit based services to IP services raises numerous policy and regulatory issues that will need to be studied, debated and resolved.

Much of the conversation focused upon interconnection issues. WTA agreed to gather more data and anecdotal evidence regarding the VoIP-related experiences of its members, and share relevant information with the Commission in future comments and meetings. WTA noted that the existing voice service interconnection arrangements of its members range from statewide centralized equal access networks through regional fiber rings to homing arrangements with Class 4 tandem switches owned and operated by unrelated entities. Such varied interconnection arrangements are not readily amenable to “one-size-fits-all” solutions, and will need to be carefully and flexibly transitioned in order to minimize service and financial disruptions.

Pursuant to Section 1.1206(b) of the Commission's Rules, this submission is being filed for inclusion in the public record of the referenced proceedings.

Respectfully submitted,

Gerard J. Duffy

cc: Sean Lev  
Henning Schulzrinne  
Carol Matthey  
Patrick Halley  
Eric Ralph