November 16, 2017

VIA ECFS

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

Re: *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92; *Petition of AT&T Services, Inc. for Forbearance Under 47 U.S.C. § 160(c) from Enforcement of Certain Rules for Switched Access Services and Toll Free Database Dip Charges*, WC Docket No. 16-363

Dear Ms. Dortch:

The undersigned write in support of further Federal Communications Commission ("Commission") action to address access stimulation. Despite prior Commission efforts, a handful of carriers continue to take advantage of the intercarrier compensation system through the use of services, like free conference calling, that generate high volumes of inbound calling to ordinary telephone numbers associated with remote locations. Those practices result in substantial charges for transport of the stimulated traffic to reach those locations, which are ultimately paid for by interexchange customers.

There is no compelling reason that such services must be associated with remote locations. But, this choice should not be driven by the purpose of imposing higher charges on other operators. Since the access stimulating carriers have made this choice, it would be appropriate for them, not other carriers, to bear the financial responsibility for the costs of transporting these calls between the terminating tandem switch or other point of interconnection designated by the local exchange carrier and the applicable end office or functional equivalent.

Accordingly, the undersigned urge the Commission to adopt rules to require carriers that are engaged in access stimulation to bear financial responsibility for all terminating switched transport costs (including both flat-rated and usage-sensitive charges) between their end office (or remote or functional equivalent) and the tandem switch to which the terminating carrier requires inbound calls to be routed.[1] Under these rules, those carriers engaged in access

[1] The undersigned parties further agree that this proposal is limited to access stimulating carriers as defined currently in the Commission's rules and is not intended to change any existing exchange points or to prejudge any ultimate

stimulation would not render bills to interexchange carriers for terminating tandem switched transport with respect to stimulated traffic, and would be required to pay the terminating tandem switched transport charges in lieu of interexchange carriers for these calls to other access providers of such transport. Such rules would resolve a significant component of AT&T's forbearance petition.[2] We look forward to presenting a detailed proposal for how such rules would work to Commission staff in the near future.

Respectfully,

/s/ Michael R. Romano
Michael R. Romano
Senior Vice President – Industry Affairs & Business Development
NTCA–The Rural Broadband Administration

/s/ Hank Hultquist
Hank Hultquist
Vice President-Federal Regulatory
AT&T Communications

/s/ Jennifer K. McKee
Jennifer K. McKee
Vice President and Associate General Counsel
NCTA – The Internet & Television Association

/s/ Malena Barzilai
Malena Barzilai
Vice President – Government Affairs
Windstream Services, LLC

/s/ Curtis L. Groves
Curtis L. Groves
Associate General Counsel
Verizon

/s/ Michael Saperstein
Michael Saperstein
Vice President, Federal Regulatory
Frontier Communications

/s/ Jonathan Banks
Jonathan Banks
Senior Vice President Law & Policy
USTelecom Association

/s/ Derrick B. Owens
Derrick B. Owens
Vice President of Government Affairs
WTA – Advocates for Rural Broadband

Commission decision on further intercarrier compensation reform including the network edge. Any payments actually made by access stimulating carriers for transport under this framework would not constitute "revenue-sharing" under the Commission's rules.

[2] As a result, AT&T is contemporaneously requesting to withdraw its forbearance petition.