



January 13, 2016

Ex Parte Notice

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

Re: WC Docket No. 14-228

Dear Ms. Dortch:

On January 11, 2016, Gerard Duffy, Counsel to WTA-Advocates for Rural Broadband, Colin Sandy, representing the National Exchange Carrier Association (NECA) and the undersigned met with Pamela Arluk, Victoria Goldberg, Joseph Price, Douglas Slotten and Peter Trachtenberg of the Wireline Competition Bureau to discuss the above-captioned docket.

The parties met with Staff to discuss potential implications (including Sections 206-208 impacts) of the MDL decision (*see, In re: intraMTA Switched Access Charge Litigation*, Civ. No. 3:14-MD-2587-D (MDL No. 2587) (N.D. Tex. Nov. 17, 2015) and the pending *Petition for Declaratory Ruling of the ILEC Petitioners* filed in this docket. The parties referred to their previously filed comments and emphasized both that there were substantial questions whether interexchange carriers (IXCs) were eligible to invoke the intraMTA rule and, even if they were so eligible, whether IXCs such as Sprint and Verizon had satisfied the requirements for cooperation (including but not be limited to the preparation of traffic studies and other analyses) that constitute an essential element in determining the status of traffic exchanged over IXC trunks and in properly effectuating the intraMTA rule.

Pursuant to Section 1.1206(b) of the Commission's Rules, this letter is filed for inclusion in the public record of the above-captioned proceeding.

Respectfully submitted,

/s/ Joshua Seidemann
Joshua Seidemann
Vice President of Policy

cc: Pamela Arluk
Victoria Goldberg
Joseph Price
Douglas Slotten
Peter Trachtenberg