



May 4, 2012

(Filed electronically)

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

Re: **Ex Parte Notice**
CC Docket No. 96-45
CC Docket No. 99-200
CC Docket No. 01-92
WC Docket 04-36
WC Docket 05-196
WC Docket No. 05-337
WC Docket No. 06-122
PS Docket 07-114
WC Docket No. 10-90
PS Docket No. 10-255
GN Docket No. 09-51
WC Docket No. 03-109
WC Docket No. 07-135
CG Docket No. 10-213
WT Docket No. 96-198
CG Docket No. 10-145

Dear Ms. Dortch:

On May 2, 2012, members of the Voice on the Net Coalition (VON) held a series of meeting with Commission staff and a legal advisor to discuss a number of issues raised in the above referenced dockets, as described more fully below.

1) VON, represented by Brendan Kasper of Vonage, Paula Boyd and Staci Pies of Microsoft, Mark Swanson of the Cloud Communications Alliance and Glenn Richards, Executive Director and Counsel for VON, met with Michael Steffen, Legal Advisor for Chairman Genachowski. During the meeting, VON expressed its support for the FCC decision to transition to bill and keep for intercarrier compensation and urged the Commission not to backslide from that decision. VON suggested that the transition for originating access charges should mirror the schedule for terminating access charges. VON also recommended that the FCC classify VoIP and other IP enabled services as information services. VON noted that 24 states now prohibit state regulation of VoIP or other IP-enabled services but that uncertainty remains in other states; and that VON had



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joined AT&T and Verizon in an amicus brief filed last month with the Vermont Supreme Court opposing the regulation of VoIP by the Vermont Public Service Board. VON also expressed its support for a connections based contribution methodology and stated its interest in working with other industry groups to provide the Commission with a consensus position. VON also discussed its filing in support of Vonage's waiver seeking direct access to telephone numbers by VoIP providers.

2) VON, represented by Mr. Kasper, Ms. Boyd, Mr. Swanson and Mr. Richards met Karen Strauss, Gregory Hlibok, Rosaline Crawford, Eliot Greenwald, of the Consumer and Government Affairs Bureau, Michael Ha of the Office of Engineering and Technology. VON discussed its filings concerning implementation of the disabilities access rules, including the need for safe harbors.

3) VON, represented by Mr. Kasper, Ms. Boyd, Ms. Pies, Mr. Swanson and Mr. Richards met with Henning Schulzrinne, Office of Strategic Policy, Patrick Donovan, Tim May, Jerome Stanshine, David Siehl of the Public Safety and Homeland Security Bureau, Karen Peltz Strauss and Cheryl King of the Consumer and Government Affairs Bureau and William Dever and Richard Hovey of the Wireline Competition Bureau to discuss VON's filings related to 911 requirements for VoIP applications and services. VON expressed its interest in working with Commission staff in developing solutions for those services where the consumer has an expectation that he or she can dial a 911 call.

4) VON, represented by Mr. Kasper, Ms. Pies, Mr. Swanson and Mr. Richards met with Mr. Dever, Sanford Williams, Ann Stevens, Victoria Goldberg, Randy Clarke, Travis Litman, Deena Shettler and Rhonda Lien of the Wireline Competition Bureau. During the meeting, VON expressed its support for the FCC decision to transition to bill and keep for intercarrier compensation and urged the Commission not to backslide from that decision. VON suggested that the transition for originating access charges should mirror the schedule for terminating access charges. VON also discussed its filing in support of Vonage's waiver seeking direct access to telephone numbers by VoIP providers.

Please contact me directly if you have any questions.

Sincerely,

/s/

Glenn S. Richards
Executive Director



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cc: Michael Steffen (by email)
Karen Strauss (by email)
Rosaline Crawford (by email)
Eliot Greenwald (by email)
Gregory Hlibok (by email)
Michael Ha (by email)
Henning Schulzrinne (by email)
Patrick Donovan (by email)
Cheryl King (by email)
Timothy May (by email)
Jerome Stanshine (by email)
William Dever (by email)
David Siehl (by email)
Richard Hovey (by email)
Sanford Williams (by email)
Ann Stevens (by email)
Victoria Goldberg (by email)
Randy Clarke (be email)
Travis Litman (by email)
Deena Shettler (by email)
Rhonda Lien (by email)