Ex Parte

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

Re: Cisco WebEx LLC Request for Review of a Decision of the Universal Service Administrator, WCB Docket No. 06-122

Dear Ms. Dortch:

On June 30, 2015, on behalf of Cisco WebEx LLC (“WebEx”), Jeffrey Campbell of Cisco, along with Scott Blake Harris and the undersigned of this firm, met with Jonathan Sallet, General Counsel, Stephanie Weiner, Associate General Counsel, Marcus Maher, Assistant General Counsel, and Rick Mallen, Office of the General Counsel, to discuss WebEx’s Petition for Review of a Decision of the Universal Service Administrator.

WebEx offers a suite of online collaboration services. WebEx services allow customers to engage in online video meetings, exchange documents, share desktop contents, share applications, and edit documents in real time. WebEx also includes audio capabilities, including the option to connect to a WebEx session using the PSTN. Customers are not required to purchase this additional capability, but may do so if it suits their needs. Notably, WebEx does not offer a stand-alone audio conferencing service.

WebEx explained that its service is a single, integrated information service, but that USAC nonetheless incorrectly viewed WebEx as offering two services: an information service and a separate audio conferencing service. WebEx noted that the uncertainty arising from USAC’s decision concerning WebEx’s 2009 revenues imposes ongoing costs on WebEx, and urged the Commission to address WebEx’s Petition.

WebEx noted that like all information services, WebEx’s service incorporates telecommunications.¹ As the end-user of the telecommunications it purchases, WebEx pays universal service pass-through fees to its carrier providers. Treating WebEx as a regulated reseller rather than as an information service provider would have little impact on the Universal Service Fund (“USF”), as WebEx’s underlying carriers would then be exempt from contributions on the basis of telecommunications sold to WebEx and on which WebEx itself contributes; these reduced contributions would largely offset any USF contributions made by WebEx. WebEx

would, however, be saddled with the heavy burden of telecommunications regulation simply because it has offered its customers the flexibility to purchase WebEx in different ways.

Please do not hesitate to contact me at (202) 730-1346 or bstrandberg@hwglaw.com if you have questions or would like additional information.

Sincerely,

/s/ Brita D. Strandberg

Brita D. Strandberg
Counsel to Cisco WebEx LLC

cc: Meeting attendees