May 29, 2015

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

Re: Petition for Declaratory Ruling Regarding Applicability of the IntraMTA Rule to LEC-IXC Traffic, WC Docket No. 14-228

Dear Ms. Dortch:

Chris Miller and I, both of Verizon, spoke by phone yesterday with Richard Welch of the Office of General Counsel about this proceeding. I also spoke by phone yesterday with Deena Shetler of the Wireline Competition Bureau about the same topic.

In both discussions we said—consistent with our comments\(^1\)—there is no exception to the intraMTA rule when intraMTA wireless traffic is carried by an intermediary carrier, including interexchange carriers. The Commission in 2011 adopted default intercarrier-compensation rates that do not depend on which types of carriers handle traffic or how they route it along the call path. The intraMTA rule says reciprocal compensation applies to wireless intraMTA traffic, and the Commission rejected the argument that access charges apply if intraMTA wireless traffic is routed through an intermediary interexchange carrier.\(^2\) We also said that it would have made no sense for the Commission to set a separate, higher, intercarrier compensation rate for some—but not all—intraMTA traffic at the same time the Commission put in a place a new intercarrier compensation system expressly designed to harmonize and reduce rates.

Please let me know if you need additional information.

Very truly yours,

Curtis L. Groves  
Assistant General Counsel

\[^1\] Verizon Comments (Feb. 9, 2015).