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June 24, 2010

Electronic Submission

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

Re: Framework for Broadband Internet Service, GN Docket No. 10-127

Dear Ms. Dortch:

Yesterday, Robert W. Quinn and I, on behalf of AT&T Inc., met with Chairman Genachowski's Chief Counsel and Senior Legal Advisor, Bruce Gottlieb. During that meeting we discussed the above-referenced proceeding. The attached documents provided the basis for our discussion.

We first discussed whether there are differences between the transmission service offered under the NECA tariff for Digital Subscriber Line Access Service referenced in the NOI and the "Internet connectivity service" also described in the NOI. We noted that the NECA transmission service provides a "layer 2" transmission path between a home or business and an Internet Service Provider (ISP) location, and does not, by itself, "allow users to communicate with others who have Internet connections, send and receive content, and run applications online."[1] To engage in such activities also requires the ISP's "layer 3" services.

We next discussed the geographic scope of the "Internet connectivity service." In particular, we focused on whether the service includes Internet backbone capabilities, and if it does, whether it ends at the point where the ISP exchanges traffic with other ISPs, or extends all the way across the Internet to every possible endpoint.

Finally, we discussed the implications of the definition of "Internet connectivity service" for the classification of information services that use "Internet connectivity service" as an input. We inquired as to whether a definitional framework that treats such a service as severable from the information services with which it is bundled, may cause information service providers that purchase an "Internet connectivity service" and bundle it with an information service, to be classified as common carrier resellers of a telecommunications service.

[1] NOI at footnote 1.

Pursuant to section 1.1206 of the Commission's Rules, this letter is being filed electronically with your office for inclusion in the public record of the above referenced proceeding.

If you have any questions, please do not hesitate to contact me at (202) 457-3821.

Sincerely,

Henry Hultquist
Vice President – Federal Regulatory

cc: Bruce Gottlieb

The FCC's New "Internet Connectivity Service"

Where Does It Reside Physically & Logically?

AT&T
June 2010

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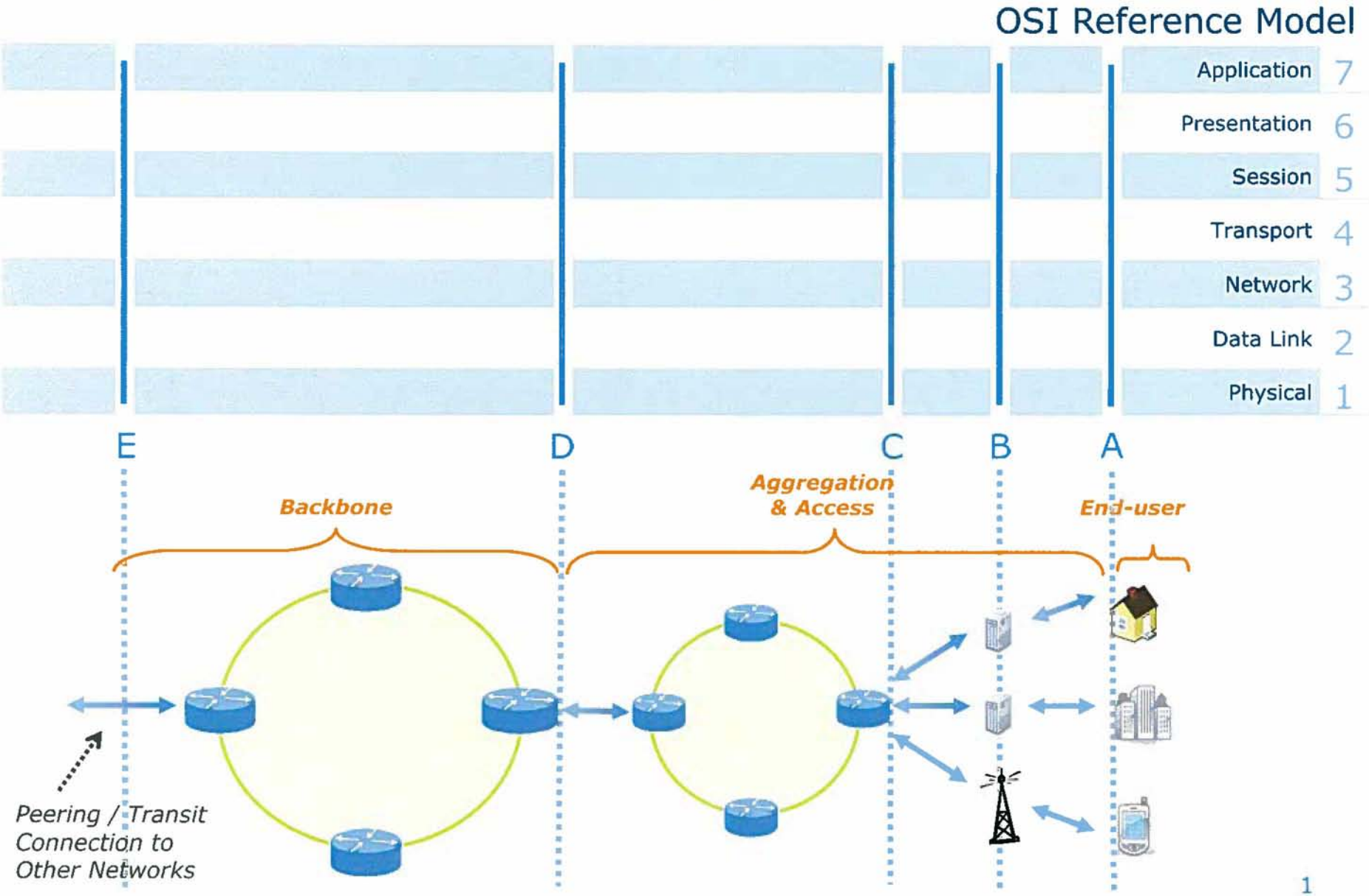
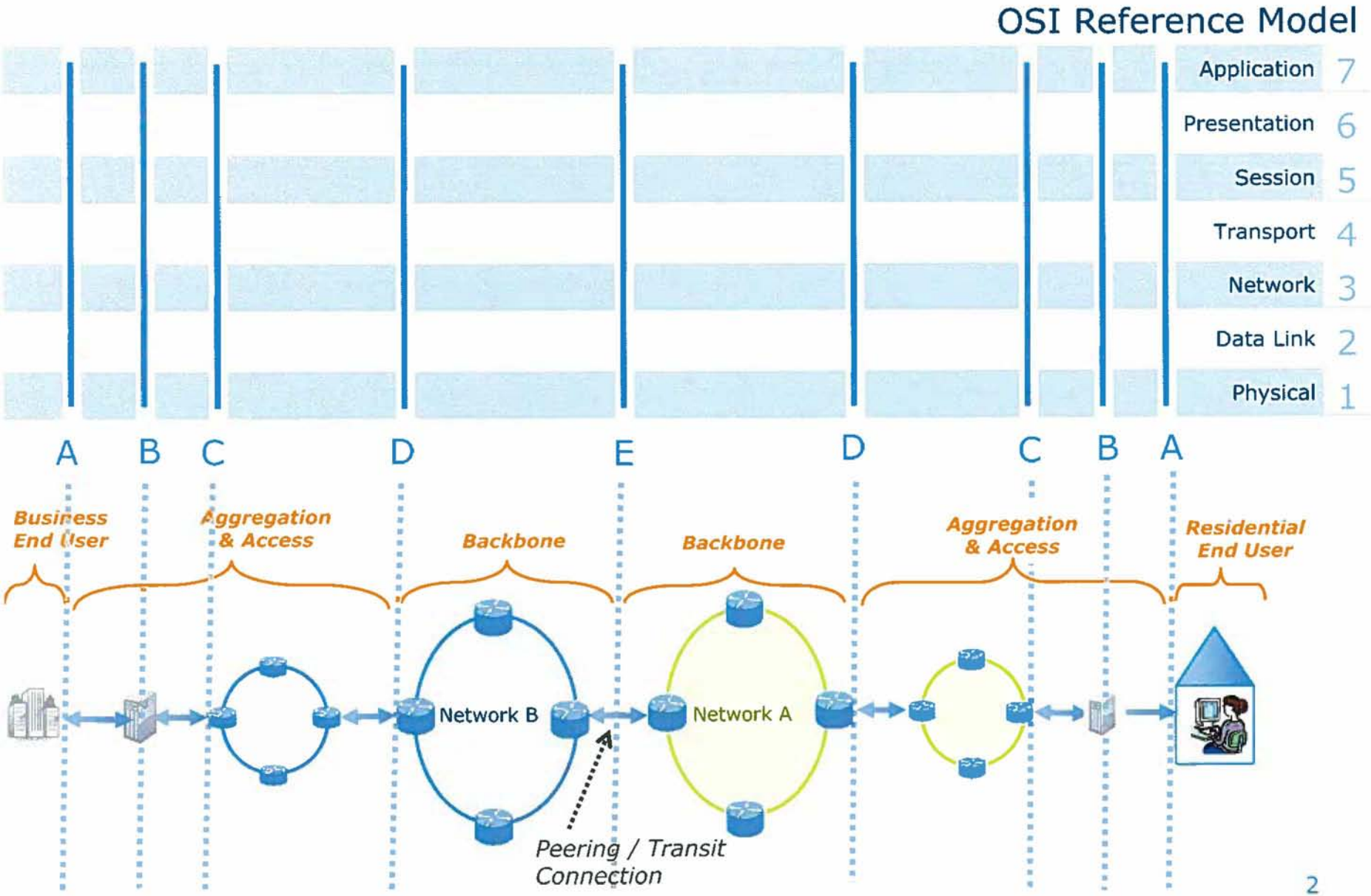
Where is the "Internet Connectivity Service?"



Where Is The "Internet Connectivity Service?"



Open Systems Interconnectin (OSI) Model

Layer 7: Application Layer (HTTP, FTP, etc.)

- Defines interface-to-user processes for communication and data transfer in network
- Provides standardized services such as virtual terminal, file and job transfer and operations

Layer 6: Presentation Layer (SSL, MME, etc.)

- Masks the differences of data formats between dissimilar systems
- Specifies architecture-independent data transfer format
- Encodes and decodes data; encrypts and decrypts data; compresses and decompresses data

Layer 5: Session Layer (SCP, NetBIOS, etc.)

- Manages user sessions and dialogues
- Controls establishment and termination of logic links between users
- Reports upper layer errors

Layer 4: Transport Layer (TCP, UDP, etc.)

- Manages end-to-end message delivery in network
- Provides reliable and sequential packet delivery through error recovery and flow control mechanisms
- Provides connectionless oriented packet delivery

Layer 3: Network Layer (IP, IGMP, etc.)

- Determines how data are transferred between network devices
- Routes packets according to unique network device addresses
- Provides flow and congestion control to prevent network resource depletion

Layer 2: Data Link Layer (Ethernet, ATM, Frame Relay, etc.)

- Defines procedures for operating the communication links
- Frames packets
- Detects and corrects packets transmit errors

Layer 1: Physical Layer (T1, DSL, SONET, etc.)

- Defines physical means of sending data over network devices
- Interfaces between network medium and devices
- Defines optical, electrical and mechanical characteristics