



November 20, 2012

(Filed electronically)

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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

Dear Ms. Dortch:

On November 16, 2012, members of the Voice on the Net Coalition (VON) held a series of meeting with Commission legal advisors and staff to discuss a number of issues raised in the above referenced dockets, as described below.

1) VON, represented by Paula Boyd of Microsoft, John Murphy of Nextiva, Jaclyn Tyndorf, VON intern, and Glenn Richards, Executive Director, met with Michael Steffen, Legal Advisor for Chairman Genachowski. During the meeting, VON recommended that the FCC classify VoIP and other IP enabled services as interstate, information services. VON noted that 26 states now prohibit state regulation of VoIP or other IP-enabled services but that uncertainty remains in other states. VON also expressed its support for a connections based contribution methodology for the Universal Service Fund (USF) and stated its interest in working with other industry groups to provide the Commission with a consensus position. VON also discussed its continued support of Vonage's waiver seeking direct access to telephone numbers by VoIP providers.

2) VON, represented by Ms. Boyd, Staci Pies of Microsoft, Mr. Murphy. Ms. Tyndorf, and Mr. Richards met Christine Kurth, Policy Director & Wireline Counsel, for



Commission McDowell. During the meeting VON expressed its support for a connections based contribution methodology for USF and for FCC classification of VoIP and other IP-enabled services as interstate, information services.

3) VON, represented by Ms. Boyd, Ms. Pies, Mr. Murphy, Ms. Tyndorf and Mr. Richards, met with Nicholas Degani, Wireline Legal Advisor for Commissioner Pai. During the meeting, VON recommended that the FCC classify VoIP and other IP enabled services as interstate, information services. VON noted that 26 states now prohibit state regulation of VoIP or other IP-enabled services but that uncertainty remains in other states. VON expressed its appreciation for Commissioner Pai's statement praising the VoIP legislation passed this year in California. VON also expressed its support for a connections based contribution methodology for the Universal Service Fund (USF) and stated its interest in working with other industry groups to provide the Commission with a consensus position. VON also discussed its continued support of Vonage's waiver seeking direct access to telephone numbers by VoIP providers. VON also discussed its concerns expressed in other filings about a requirement that over-the-top IP-based SMS services connect with 911 public safety answering points.

4) VON, represented by Ms. Boyd, Ms. Pies, Mr. Murphy, Ms. Tyndorf and Mr. Richards, met with David Goldman, Senior Legal Advisor, and Priscilla Delgado Argeris, Legal Advisor, for Commissioner Rosenworcel. During the meeting, VON discussed its concerns expressed in other filings about a requirement that over-the-top IP-based SMS services connect with 911 public safety answering points. VON also recommended that the FCC classify VoIP and other IP enabled services as interstate, information services. VON noted that 26 states now prohibit state regulation of VoIP or other IP-enabled services but that uncertainty remains in other states. VON also expressed its support for a connections based contribution methodology for the Universal Service Fund (USF) and stated its interest in working with other industry groups to provide the Commission with a consensus position. VON also discussed its continued support of Vonage's waiver seeking direct access to telephone numbers by VoIP providers.

5) VON, represented by Ms. Boyd, Mr. Murphy, Ms. Tyndorf, Laura Carter of Microsoft (by phone), and Mr. Richards met with Charles Mathias, Special Counsel to Chairman Genachowski, Henning Schulzrinne (by phone), Office of Strategic Policy, and Patrick Donovan, of the Public Safety and Homeland Security Bureau, to discuss VON's filings related to 911 requirements for VoIP applications and services, including SMS-911. 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 reach 911 and accurate location technology is available to support the service.



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Please contact me directly if you have any questions.

Sincerely,

/s/

Glenn S. Richards  
Executive Director

cc: Charles Mathias (by email)  
Michael Steffen (by email)  
Nicholas Degani (by email)  
Christine Kurth (by email)  
David Goldman (by email)  
Priscilla Delgado Argeris (by email)  
Henning Schulzrinne (by email)  
Patrick Donovan (by email)