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December 14, 2016

**Via Email**

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

Re: Ex Parte -- WC Docket Nos. 10-90, 07-135, 05-337, 03-109, GN Docket No. 09-51, CC Docket Nos. 01-92 and 96-45, WT Docket No. 10-208

Dear Ms. Dortch:

On December 12, 2016, representatives from the Alliance for Telecommunications Industry Solutions (ATIS) and the SIP Forum met, via telephone, with representatives from the Commission's Wireline Competition Bureau (WCB) and Office of Strategic Planning (OSP). The purpose of the meeting was to discuss the work of ATIS and the SIP Forum to facilitate IP interconnection and to answer Commission questions about this work that have arisen in relation to the pending waivers of the Commission's call signaling rules.

One issue that was raised during the meeting concerned the implementation of the *IP Interconnection Routing Report* that was published by ATIS and the SIP Forum in May 2015. It was noted that when the ATIS-SIP Forum IP-NNI Joint Task Force published this report, there was no industry consensus on a single approach that could be applied across the industry. The report identified several approaches that could be used, falling into two broad categories: (1) bi-lateral agreements with interconnection based on groups of numbers going to a given interconnection point, and (2) industry wide interconnection, based on some form of registry with entries for every telephone number. In the absence of an agreement on a single approach, the industry is continuing to focus on bi-lateral agreements.

The term of bilateral agreements was discussed. It was noted that it is not uncommon for these agreements to be relatively long-term. It was noted that such bi-lateral agreements are generally working well, particularly as IP interconnection becomes more widespread and less challenging.

A question was asked about the costs and status of implementation of SIP-T. ATIS and the SIP Forum noted that neither organization had data pertaining to the implementation and specific cost information of SIP-T. It was noted that SIP-T is not the same as SIP IMS, which is being widely deployed by the industry.

A question was asked about the transmission of improper or unverifiable SIP signaling information. It was noted that this remains an issue but there is no information regarding the prevalence of improper/unverifiable data or its impact on routing/interconnection.

A question was also asked about phantom traffic and whether this is an issue for VoIP SIP traffic. It was noted that unfortunately phantom traffic is a challenge for SIP traffic.

ATIS and the SIP Forum were also asked whether there were plans to update the *IP Interconnection Routing Report*. It was noted that this report will likely be updated but that no specific timeframe has been established.

In attendance representing the Commission were: Henning Shulzrinne, Chief Technology Officer, OSP; David Zesiger, Deputy Division Chief, Pricing Policy Division, WCB; Pamela Arluk, Assistant Division Chief, Pricing and Policy Division, WCB; Chris Koves, Attorney Advisor, Pricing Policy Division, WCB; Justin Faulb, Attorney Advisor, Pricing Policy Division, WCB; Belinda Nixon, Attorney Advisor, Pricing Policy Division, WCB; and Alec MacDonell, Telecommunications Systems Specialist, WCB.

In attendance representing ATIS were Thomas Goode, General Counsel; and Jim McEachern, Senior Technology Consultant. In attendance representing the SIP Forum was Chairman Richard Shockey.

A copy of this letter is being filed in the above-referenced dockets.

If there are any questions, please contact the undersigned.

Sincerely,



Thomas Goode  
ATIS General Counsel

cc: Henning Shulzrinne, Chief Technology Officer, OSP  
David Zesiger, Deputy Division Chief, Pricing Policy Division, WCB  
Pamela Arluk, Assistant Division Chief, Pricing and Policy Division, WCB  
Chris Koves, Attorney Advisor, Pricing Policy Division, WCB  
Justin Faulb, Attorney Advisor, Pricing Policy Division, WCB  
Belinda Nixon, Attorney Advisor, Pricing Policy Division, WCB  
Alec MacDonell, Telecommunications Systems Specialist, WCB