



1300 I Street N.W.  
Suite 500 East  
Washington DC 20005

Alan Buzacott  
Executive Director  
Federal Regulatory and Legal Affairs

September 9, 2020

**Ex Parte**

Marlene H. Dortch  
Secretary, Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: 8YY Access Charge Reform, WC Docket 18-156**

Dear Ms. Dortch:

On September 4, 2020, I met by telephone with Arielle Roth, Wireline Legal Advisor to Commissioner O’Rielly, regarding the above-captioned proceeding. On September 8, 2020, I met by telephone with Joseph Calascione, Legal Advisor to Commissioner Carr.

In both meetings, I urged the Commission to move forward with reform of the switched access regime for 8YY traffic. I emphasized that 8YY switched access reform is necessary because the existing rules continue to foster uneconomic arbitrage schemes. I also explained that 8YY switched access reform is overdue: It has been almost nine years since the Commission concluded that originating access charges are inconsistent with the legal framework underpinning the intercarrier compensation regime.<sup>1</sup>

This letter is being filed electronically in the above-referenced dockets pursuant to Section 1.1206 of the Commission’s rules. Please contact the undersigned with any questions.

Sincerely,

Alan Buzacott

---

<sup>1</sup> *Connect America Fund*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17,663, ¶ 817 (2011).