

1 Their knowledge and operational experience go beyond CenturyTel's and will assist the
2 Commission in reaching its decision in this matter.

3 In the Order the Arbitrator decides that the FCC's *ISP Order on Remand*¹ requires
4 all Internet Service Provider (ISP)-bound traffic to be subject to bill and keep, including
5 ISP-bound calls that are *interexchange*, such as those using virtual NXX ("V-NXX")
6 arrangements. This is incorrect. Moreover, if the Commission were to ratify the mistake
7 it would set a precedent that would significantly depart from and disrupt the switched
8 access charge system created by the Commission, causing great financial damage to the
9 state's public switched network. WITA's and Verizon's amicus brief explains and
10 discusses these facts.

11 WHEREFORE, WITA and Verizon request that the Commission accept and
12 consider their attached amicus brief.

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14 Respectfully submitted,

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THE WASHINGTON INDEPENDENT
TELEPHONE ASSOCIATION and
VERIZON NORTHWEST INC.

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¹ In the Matter of Intercarrier Compensation for ISP-Bound Traffic, CC Docket Nos. 96-98 and 99-68, Order on Remand and Report and Order (Rel. Apr. 27, 2001) [hereinafter *ISP Order on Remand*].