



November 19, 2003

Tina M. Pidgeon
(202) 457-8812
tpidgeon@gci.com

EX PARTE – VIA ELECTRONIC FILING

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

Re: CC Docket No. 96-45
Notice of Oral Parte Presentation

Dear Ms. Dortch:

During the NARUC Annual Convention in Atlanta, Georgia, I met with the following Federal-State USF Joint Board Commissioners and staff on the dates indicated: Commissioner Nan Thompson and Lori Kenyon (November 16), Greg Fogleman (November 16), Commissioner Tom Dunleavy and Carl Johnson (November 17), State Consumer Advocate Billy Jack Gregg (November 18), Peter Bluhm (November 18), and Joel Shifman (November 18). The substance of each of the conversations is reflected in the attached documents and is consistent with other filings previously made by GCI in this proceeding.

In addition to the attached summary, GCI also emphasized that the goals of basic universal service would be met, and sustainability of the fund would be served, through the implementation of a primary line restriction. To the extent that implementation issues have not been resolved, adoption of the principle now will provide the incentive and opportunity for such issues to be resolved prior to the end of the RTF. GCI also identified a series of unexamined questions regarding ILEC assertions of COLR costs, as set forth in the attached. These questions and their responses demonstrate that ILEC assertions about COLR costs do not provide any justification for the adoption of non-competitively neutral universal service policies, like unequal per-line support.

In accordance with the Commission's rules, a copy of this letter with attachments is being filed in the above-captioned proceeding.

Ms. Marlene H. Dortch
November 19, 2003
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Sincerely,

/s/
Tina M. Pidgeon
Vice President, Federal Regulatory Affairs

Attachments

cc: The Honorable Nan Thompson
The Honorable Tom Dunleavy
The Honorable Billy Jack Gregg
Lori Kenyon
Greg Fogleman
Carl Johnson
Peter Bluhm
Joel Shifman