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April 21, 2006

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

**Re: CC Docket No. 80-286
CC Docket No. 96-45
Notice of *Ex Parte* Presentation**

Dear Ms. Dortch:

On April 20, 2006, Douglas Meredith and John Kuykendall of John Staurulakis, Inc. ("JSI") met with Dana Shaffer in the office of Commissioner Deborah Taylor Tate on behalf of JSI's rural local exchange carrier clients. In the meeting, the JSI representatives discussed a written *ex parte* presentation filed with the Commission in Docket No. 80-286 which explains a proposal made by JSI that addresses a mechanical issue related to the current jurisdictional separations freeze period.¹ In the *Ex Parte* Presentation, JSI urges the Commission to extend the jurisdictional separations freeze and order that a change in Dial Equipment Minutes ("DEM") weight apply to both increases and decreases in access lines during any extension of the freeze when access lines cross a DEM weight threshold.

Also in the meeting, the JSI representatives discussed three Requests for Review of an Administrator Decision which were filed by Darien Telephone Company, Inc., Roanoke & Botetourt Telephone Company and Logan Telephone Cooperative, Inc. in CC Docket No. 96-45. The representatives explained that the appeals seek a reversal of a decision by the Universal Service Administrative Company ("USAC") in which USAC significantly reduced the Safety Net Additive Support for these companies.² The representatives urged the Commission to act upon the pending requests as expeditiously as possible.³

¹ See, Letter from Douglas Meredith, Director – Economics & Policy, JSI, to Marlene H. Dortch, Secretary, FCC, *Ex Parte* Presentation in CC Docket No. 80-286, dated Mar. 30, 2006 ("*Ex Parte Presentation*"). The representatives informed Ms. Shaffer that JSI would be supplementing the written presentation with data to support the need for prompt Commission action in this matter.

² A compilation of all of the filings in this proceeding was presented to Ms. Shaffer.

³ The representatives noted that the appeals have been pending for almost a year and cited an FCC rule which requires the Wireline Competition Bureau to act on such requests in 90 days. See 47 C.F.R. § 54.724. According to this rule, the Wireline Competition Bureau may extend the time to consider the requests for an additional 90 day period. Any further extensions of time require Commission action.

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Please contact the undersigned with any questions.

Respectfully submitted,

/s/ John Kuykendall

John Kuykendall

Director – Regulatory Affairs

cc: Dana Shaffer