



OPASTCO

21 Dupont Circle NW
Suite 700
Washington, DC 20036

February 19, 2007

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street SW
Washington, DC 20554

***Ex Parte* Notice**

Re: Federal-State Joint Board on Universal Service Seeks Comment on the Merits of Using Auctions to Determine High-Cost Universal Service Support WC Docket No. 05-337

**Federal-State Joint Board on Universal Service
CC Docket No. 96-45**

Dear Ms. Dortch,

On February 19, 2007, John Rose and Stuart Polikoff of the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO) met with Jacob Williams and David Dowds from the Florida Public Service Commission and staff to the Federal-State Joint Board on Universal Service. During the meeting, we discussed OPASTCO's views on reform of the system for determining high-cost universal service support in rural service areas and, in particular, the Universal Service Joint Board's consideration of reverse auctions. OPASTCO stated that reverse auctions should not be used to determine high-cost support in rural service areas; high-cost support for rural incumbent local exchange carriers should continue to be based on their embedded network costs; and the identical support rule should be eliminated in rural service areas and support for competitive eligible telecommunications carriers should be based on their own costs. The attached slide presentation was used during the meeting and contains the details of our discussion.

In accordance with FCC rules, this letter and the slide presentation are being filed electronically in the above-captioned docket.

Sincerely,

Stuart Polikoff
Director of Government Relations
OPASTCO