

COMSTOCK CONSULTING LLC

November 9, 2007

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street SW  
Washington, DC 20554

**Re: Federal-State Joint Board on Universal Service: CC Docket No. 96-45  
High Cost Universal Service Support; and WC Docket No. 05-337**

Dear Ms. Dortch:

On behalf of Alltel I met with Commissioner McDowell to discuss the proceedings listed above. I reviewed the arguments Alltel has previously presented on the record of these proceedings and urged Commissioner McDowell not to vote in favor of a proposed order to implement a cap on Universal Service payments. As Alltel has previously advocated, the Commission should focus on long-term reform of the Universal Service system as a means to control costs and ensure service to rural consumers, rather than implement a short sighted, discriminatory, and anti-competitive cap on payments to competitive eligible telecommunications carriers.

Respectfully,

Earl Comstock

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